

Wyoming Department of Environmental Quality
Solid and Hazardous Waste Division
Lead-Based Paint Waste Management Guide

Introduction

The purpose of this guidance is to provide information concerning the proper management of lead-based paint (LBP) waste generated during housing demolition projects. Inhalation of dust and fumes, ingestion of lead contaminated items, and potential ground and surface water contamination from the improper storage and disposal of lead contaminated materials, can cause harm to humans.

Waste Types

There are basically two main types of LBP waste. **Household LBP waste** is generated by individuals on the premises of the household. The waste can be generated by a homeowner or contractor. LBP waste resulting from a residential homeowner is exempt from the state hazardous waste requirements, regardless of whether it is generated by the homeowner or a contractor. LBP waste generated from the renovation or demolition of multi-family, rental or lease housing units, would **not** meet the household LBP waste exclusion.

All other, non-household LBP waste is subject to the State Hazardous Waste Rules and Regulations (HWRR) and must be properly characterized to determine whether it is classified as hazardous. Samples of the waste must be taken and analyzed using the Toxicity Characteristic Leach Procedure (TCLP) to determine if the waste leachate extract contains 5.0 mg/l or greater lead. If so, the waste would be classified as hazardous. The TCLP is designed to mimic the leaching of chemicals from landfills and the concentration limits in the extract are based on drinking water standards. Since the TCLP is a waste dilution test, a total waste analysis can also be performed and if the total amount of lead in the sample is greater than 100 mg/kg lead, it would more than likely fail the TCLP and the waste would be classified as hazardous. Total waste tests are usually much cheaper to perform than the TCLP.

Waste Management Requirements

Household LBP waste can be disposed as municipal solid waste at state permitted municipal landfills.

Non-household or business/commercial wastes - If the total amount of hazardous waste generated including the **LBP hazardous waste**, is less than 100 kg/month (220 lbs/month), the **LBP hazardous waste** is defined as conditionally exempt small quantity generator (CESQG) hazardous waste. CESQG waste can be disposed at state permitted landfills provided prior disposal authorization is obtained from the landfill owner/operator.

If the total amount of hazardous waste generated including the **LBP hazardous waste** is greater than 100 kg/month, the **LBP hazardous waste** is regulated hazardous waste and must be properly packaged, shipped and disposed at a commercial hazardous waste management facility.

The State HWRR allow hazardous waste generators to treat LBP hazardous waste in the original container to render the waste no longer hazardous. This can be accomplished by mixing the LBP with a pozziolanic agent such as concrete or fly ash, and if a sample of the treated and solidified waste does not fail the TCLP for lead, the treated wastes can be disposed at a state permitted landfill with prior disposal authorization. If the hazardous wastes are treated in their original container to render the wastes nonhazardous, the following requirements must be followed:

- 1) The container must be in good condition and must be compatible with the wastes being stored;
- 2) The container holding the LBP hazardous waste must always be closed during storage, except when it is necessary to add or remove waste;
- 3) The container holding the waste must not be opened, handled, or stored in a manner that may cause the container to rupture or leak;
- 4) The owner/operator must inspect areas where containers are stored, at least weekly, looking for leaks or deterioration;
- 5) LBP hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material (see appendix V, Chapter 11, HWRR for examples). An example here would be a container previously holding a corrosive material.

If water is used as part of the activity it must be collected and tested to confirm it is not hazardous before it can be disposed of through storm or sanitary sewers.

If LBP hazardous waste is generated above the approximately 220 lb per month threshold previously discussed for CESQGs, you must comply with the following requirements:

- 1) Use required hazardous waste containers and labels;
- 2) Mark the waste accumulation start date (date wastes are first placed in container) on each waste container;
- 3) Inspect the waste containers at least weekly for leaks/corrosion and keep a record of the inspections;
- 4) The maximum amount of waste that can be stored onsite is 6000 kilograms of LBP hazardous waste;

- 5) The maximum on-site storage time is:
- a) Large quantity LBP hazardous waste generators (LQG) (generate 1,000 kilograms or more LBP hazardous waste/month) - 90 days;
 - b) Small quantity LBP hazardous waste generators (SQG) (generate > 100 kilograms but < 1,000 kilograms/month) - 180 days when transportation to waste management facility is < 200 miles;
 - c) SQG - 270 days allowed when transportation to waste management facility is >200 miles.

Although this section refers to LQGs and SQG, please keep in mind, CESQGs also have a storage threshold of 2,200 lbs at any time.

- 6) Copies of hazardous waste manifests, exception reports, test results, waste analyses, and Biennial Reports for LQGs, must be maintained for 3 years. LQGs must keep LDR records for 5 years. SQGs are required to keep manifests and waste test results for 3 years and LDR records for 5 years.
- 7) SQGs must have in their possession basic safety information that can be used during an emergency. LQGs must have a written emergency plan. **For a complete listing of all State HW requirements, please go to the following web site to obtain a copy of the State HW generator checklist:**<http://deq.state.wy.us/shwd/I&C/Downloads/compliance.asp>
- 8) SQGs must ensure their employees are familiar with emergency spill and accident procedures. LQGs must have an established training program that includes the identification or availability of the following:
- a) waste handling procedures;
 - b) emergency response actions/contingency plans;
 - c) emergency contacts and equipment;
 - d) medical treatment and supplies;
 - e) a designated emergency coordinator.

If shipping LBP hazardous waste offsite for management, generators should investigate the answers to the following questions about facilities under consideration:

- #1 Do they have any EPA ID number?

- #2 Have they successfully completed similar jobs?
- #3 Can they supply references? How do the references describe their service?
- #4 How long have they been in business?
- #5 Has the firm been cited by EPA or State agencies for any environmental violations?
- #6 How much waste are they capable of handling over a given period of time?
- #7 Can they handle both solid and hazardous waste?
- #8 Are they willing and able to perform special management actions (such as covering vehicles during transport)?
- #9 Do they have experience dealing with RCRA land disposal restrictions?
- #10 Do they have insurance?

Recommendations For Handling Household LBP Waste

The following best management practices are recommended for the proper handling and disposal of **Household LBP Waste**:

- 1) Collect paint chips and dust, and dirt and rubble in plastic trash bags for disposal (the main goal is to minimize emissions of dust or debris from the work area or waste containers).
- 2) Store larger **Household LBP** architectural debris pieces in containers until ready for disposal.
- 3) Consider using a covered mobile dumpster (such as a roll-off container) for storage of **Household LBP** debris until the job is done.
- 4) Contact local municipalities or county solid waste offices to determine where and how **Household LBP** can be disposed.

Further Information

Further information can be obtained from the following Solid and Hazardous Waste Division offices. Comments and suggestions for improvements are always appreciated.

Casper : (307) 473-3450
Cheyenne : (307) 777-7752
Lander : (307) 332-6924
Sheridan: (307) 673-9337

