

<u>SUBJECT</u>		<u>DATE</u>
1188. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II	ENCORE	AUG 11, 2016
1189. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario III	ENCORE	AUG 18, 2016
1190. Product Spills and Waste Determinations	ENCORE	AUG 25, 2016
1191. Product Spills, Waste Determinations, and LDR	ENCORE	SEP 1, 2016
1192. Regulatory Status of Caustic Rinse Waters Contaminated with Trace Solvents	ENCORE	SEP 8, 2016
1193. Regulatory Status of Sand Blast Grit Contaminated with Trace Listed Solvents	ENCORE	SEP 15, 2016
1194. Hazardous Waste "F" Listings and Trace Contamination	ENCORE	SEP 22, 2016
1195. Hazardous Waste "F" Listings and Trace Contamination – Again!	ENCORE	SEP 29, 2016
1196. Hazardous Waste Determinations and Phase Separation		OCT 6, 2016
1197. Asbestos and DOT Relief	ENCORE	OCT 13, 2016
1198. PCB Containers and Concentration of PCBs	ENCORE	OCT 20, 2016
1199. PCB Analytical Waste Disposal Requirements	ENCORE	OCT 27, 2016
1200. PCB Analytical Waste Disposal Requirements – Water vs. Organic Liquids and Non-aqueous Inorganic Liquids		NOV 3, 2016
1201. Listed Waste Codes and Pre-RCRA Wastes	ENCORE	NOV 10, 2016
1202. Purpose of the <90-day Hazardous Waste Accumulation Exemption		NOV 17, 2016
1203. Used Oil Eligibility for Turkey and Ham Oils	ENCORE	NOV 23, 2016
1204. PCB Reporting and Recordkeeping Relief	ENCORE	DEC 1, 2016
1205. Defining Criteria for Household Waste Exclusion	ENCORE	DEC 8, 2016

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## TWO MINUTE TRAINING

**TO:** CH2M HILL PLATEAU REMEDIATION COMPANY

**FROM:** PAUL W. MARTIN, RCRA Subject Matter Expert  
CHPRC Environmental Protection, Hanford, WA

**SUBJECT:** DEFINING CRITERIA FOR HOUSEHOLD WASTE EXCLUSION

**DATE:** DECEMBER 8, 2016

<u>CHPRC Projects</u>	<u>CH PRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Roni Ashley Tania Bates Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Marty Martin Jim McGrogan Stuart Mortensen Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Michael Waters Jeff Westcott Jeff Widney	Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Rick Engelmann Ted Hopkins Sasa Kosjerina Jim Leary Rick Oldham Anthony Nagel Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson Joel Williams	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Jon McKibben Saul Martinez Jon Perry Christina Robison Lana Strickling Lou Upton	(TBD)  <u>DOE RL, ORP, WIPP</u>  Mary Beth Burandt Duane Carter Cliff Clark Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Lori Fritz Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Dan Kimball Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Marty Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Mandy Pascual Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Kyle Webster Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** Defining Criteria for Household Waste Exclusion

**Q:** With the holidays approaching and lots of waste to be generated in homes, what criteria must be applied to household waste to ensure that it meets the dangerous waste exclusion found at [WAC 173-303-071\(3\)\(c\)](#) [[40 CFR 261.4\(b\)\(1\)](#)]?

**A:** The Household Waste Exclusion basically states that waste generated by consumers is not subject to regulation as a dangerous or hazardous waste. In the [November 13, 1984, Federal Register](#) on page 44978, EPA stated that two criteria must be applied to ensure that a waste meets the requirements of the exclusion. First, the waste must be generated by permanent individuals (home owners) or temporary (renters) of a household. Second, the waste stream must be composed primarily of materials found in the wastes generated by consumers in their homes. In EPA's view, a waste stream meeting both criteria is a household waste subject to the exclusion. Therefore homes, apartments, bunkhouses, ranger stations, campgrounds, and picnic grounds that generate wastes similar to wastes generated by consumers in their household are considered household waste and eligible for the exclusion.

In contrast, wastes from retail stores, office buildings, restaurants, and shopping centers do not meet the two criteria: They do not serve as permanent or temporary residences for individuals and the wastes generated at these establishments are not necessarily similar to wastes generated by consumers in their homes. EPA also stated on page 44978 of the November 13, 1984 Federal Register:

*“... there is no basis for extending the household waste exclusion to wastes such as debris produced during building construction, renovation, or demolition in houses or other residences, as EPA does not consider wastes from these sources to be similar to those generated by a consumer in the home in the course of daily living.”*

Therefore, these wastes must be evaluated as any other solid waste to determine if hazardous waste regulations apply.

### SUMMARY:

- Household waste must be:
  - Generated by the residents of the household and,
  - Composed primarily of household-type wastes generated by consumers in their homes.
- Establishments such as retail stores, office buildings, restaurants, and shopping centers do not meet the two criteria.
- Debris from building construction, renovation, or demolition in houses, or other residences, is not similar to wastes generated by a consumer in the home in the course of daily living and is therefore not eligible for the household waste exclusion.

WAC 173-303-071(3)(c) and 40 CFR 261.4(b)(1) are attached to the e-mail. If you have any questions, please contact me at [Paul\\_W\\_Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

**FROM:** Paul W. Martin

**DATE:** 12/8/16

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** Defining Criteria for Household Waste Exclusion

### **WAC 173-303-071 Excluded categories of waste.**

(3) Exclusions. The following categories of waste are excluded from the requirements of chapter 173-303 WAC, except for WAC 173-303-050\*, 173-303-145\*, and 173-303-960\*, and as otherwise specified:

(c) Household wastes, including household waste that has been collected, transported, stored, or disposed. Wastes that are residues from or are generated by the management of household wastes (e.g., leachate, ash from burning of refuse-derived fuel) are not excluded by this provision. "Household wastes" means any waste material (including, but not limited to, garbage, trash, and sanitary wastes in septic tanks) derived from households (including single and multiple residences, hotels and motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds, and day-use recreation areas).

\*WAC 173-303-050 Department of ecology cleanup authority.  
\*WAC 173-303-145 Spills and discharges into the environment.  
\*WAC 173-303-960 Special powers and authorities of the department.

### **40 CFR 261.4 Exclusions**

(b) *Solid wastes which are not hazardous wastes.* The following solid wastes are not hazardous wastes:

(1) Household waste, including household waste that has been collected, transported, stored, treated, disposed, recovered (e.g., refuse-derived fuel) or reused. "Household waste" means any material (including garbage, trash and sanitary wastes in septic tanks) derived from households (including single and multiple residences, hotels and motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds and day-use recreation areas).