

<u>SUBJECT</u>		<u>DATE</u>
1253. Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE	NOV 16, 2017
1254. PCB Radioactive Wastes and Exception Reporting	ENCORE	NOV 21, 2017
1255. Satellite Accumulation Requirements and Container Inspections	ENCORE	NOV 30, 2017
1256. Disposing of PCB Ballasts with PCB Potting Material	ENCORE	DEC 7, 2017
1257. Fluorescent Light Ballasts and PCB Annual Reporting		DEC 14, 2017
1258. 'Twas the Night Before Christmas – The Twenty-Fifth Annual Edition		DEC 21, 2017
1259. The Purpose of Keeping Containers Closed Except When Adding or Removing Wastes	ENCORE	DEC 28, 2017
1260. Satellite Accumulation and Product Vessel Cleanouts	ENCORE	JAN 4, 2018
1261. Conservative Declaration that Material is a Hazardous Waste	ENCORE	JAN 11, 2018
1262. Defining Criteria for Household Waste Exclusion	ENCORE	JAN 18, 2018
1263. The Household Waste Exclusion and Renovation Debris	ENCORE	JAN 25, 2018

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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: THE HOUSEHOLD WASTE EXCLUSION AND RENOVATION DEBRIS

DATE: JANUARY 25, 2018

<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>
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TWO MINUTE TRAINING

SUBJECT: The Household Waste Exclusion and Renovation Debris

Q: A customer from the Two Minute Training (2MT) Nation noted that last week's 2MT stated that EPA does not consider debris produced from renovation as household waste and therefore is not eligible for the household waste exclusion. The customer resides in a house from the 1940's and is removing all the lead painted doors from the interior and exterior. The customer is now concerned that the lead painted doors are not eligible for the household waste exclusion based on EPA's position documented in the [November 13, 1984, Federal Register](#). Since the lead painted doors would most likely exhibit the hazardous waste characteristic of lead, are the customer's home doors subject to management as RCRA hazardous waste?

A: As originally documented in the November 13, 1984, Federal Register EPA stated:

"EPA has determined that there is no basis for extending the household waste exclusion to wastes such as debris produced during building construction, renovation, or demolition in house, 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"

However, an EPA guidance letter entitled, "Regulatory Status of Waste Generated by Contractors and Residents from Lead-Based Paint (LBP) Activities Conducted in Households" ([RO 14459](#)), dated July 31, 2000 stated:

"EPA is clarifying that waste generated as part of LBP activities conducted at residences (which include single family homes, apartment buildings, public housing, and military barracks) is also household waste, that such wastes are no longer hazardous wastes and that such wastes thus are excluded from RCRA's hazardous waste management and disposal regulations. Generators of residential LBP waste do not have to make a RCRA hazardous waste determination. This interpretation holds regardless of whether the waste exhibits the toxicity characteristic or whether the LBP activities were performed by the residents themselves or by a contractor."

Therefore, even if the customer hires a professional contractor to remove the lead painted doors, per the EPA clarification above, the doors would be eligible for the household waste exclusion and not subject to management as RCRA hazardous waste.

SUMMARY:

- In general, household hazardous waste is eligible for the RCRA household waste exclusion.
- In the November 13, 1984, Federal Register, EPA stated that debris wastes produced from building construction, renovation or demolition were not eligible for the household waste exclusion.
- However, in a July 31, 2000, guidance letter EPA clarified that even if contractors were renovating a house by removing lead-based painted debris, the waste would be eligible for the household waste exclusion and therefore excluded from RCRA Subtitle C hazardous waste regulation.

Nothing is attached. If you have any questions, contact me at [Paul W. Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 1/25/18

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