

<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
1264. The Household Waste Exclusion and Renovation Debris – Part II	ENCORE	FEB 1, 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 – PART II

DATE: FEBRUARY 1, 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>
Richard Austin Tania Bates Rene Catlow Richard Clinton Larry Cole John Dent Lorna Dittmer Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Melvin Lakes Richard Lipinski Jim McGrogan Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Bob Bullock Bill Cox Laura Cusack Sasa Kosjerina Jim Leary Anthony Nagel Robert Nielson Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg 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 Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: The Household Waste Exclusion and Renovation Debris – Part II

Q: The 1/25/18, “Two Minute Training” (2MT) stated EPA’s clarification that household renovation debris with lead-based paints (LBP) is eligible for the household waste (HHW) exclusion, but what about all the other types of renovation debris generated in households, are they also eligible for the HHW exclusion?

A: Per the [December 18, 1998, Federal Register](#) on page 70241, top of third column, EPA stated:

"Although the Agency stated in 1984 that waste from renovation should not be covered by the household waste exclusion (because the waste was not composed primarily of materials routinely generated by consumers in a home), it has become evident that more and more residents are engaging in renovation or remodeling of their homes. This is strongly suggested by the greatly increased number of building permits that have been issued throughout the country for renovation of residences. EPA believes that, although many renovation and remodeling efforts are conducted by professional contractors, more and more are done by residents on their own. This may be shown, in part, by the widespread openings of home improvement stores throughout the United States which cater to do-it-yourselfers. It is also evident from: (a) The doubling of retail sales of lumber and other materials to consumers over the last 10 years from \$45 to \$89 billion; (b) steady increases of approximately 25% in hardware sales every 5 years; (c) the increase in consumers' purchase of home improvement products from \$38 to \$90 billion between 1980 and 1995; and (d) the projected increase in sales of home improvement products to consumers to almost \$115 billion by the year 2000 (Ref. 9). Thus, EPA now believes that LBP waste resulting from renovation or remodeling efforts conducted by residents of households does meet the two criteria for the household exclusion outlined above (i.e., the waste is generated by individuals in a household and it is of the type that consumers generate routinely in their homes)."

Since more and more homeowners are doing renovation work, renovation wastes have become a routinely generated household waste. Therefore, if renovation waste meets the two criteria for the household hazardous waste exclusion, i.e., is generated by individuals in a household (homeowners or contractors) and is routinely generated consumer type waste, then any type of renovation waste can be eligible for the HHW exclusion – if it meets the two criteria.

SUMMARY:

- In 1984, EPA stated that renovation wastes were not covered by the household waste exclusion.
- Since then, more and more households have routinely generating renovation wastes and routine generation of consumer type waste is one of two criteria for meeting the HHW exclusion.
- If renovation waste meets the two criteria (household generated and consumer type waste), then renovation waste can be eligible for the household waste exclusion.

Nothing is attached to the e-mail. 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: 2/1/18

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