

<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
1206. The Household Waste Exclusion and Renovation Debris	ENCORE	DEC 15, 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: THE HOUSEHOLD WASTE EXCLUSION AND RENOVATION DEBRIS

DATE: DECEMBER 15, 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>
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TWO MINUTE TRAINING

SUBJECT: The Household Waste Exclusion and Renovation Debris

Q: A customer noted that last week's "Two Minute Training" (2MT) stated that EPA does not consider debris produced from renovation as household waste and therefore is not subject to 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 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](#) 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 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 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: 12/15/16

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