

<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
1207. 'Twas the Night before Christmas – The Twenty-Fourth Annual Edition		DEC 24, 2016
1208. The Household Waste Exclusion and Renovation Debris – Part II	ENCORE	DEC 29, 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 – PART II

DATE: DECEMBER 29, 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 – Part II

Q: The 12/15/2016, “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 are 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, please contact me at Paul_W_Martin@rl.gov or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 12/29/16

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