

## **RCRA**

- Resource Conservation and Recovery Act    Passed 1976, Amended 1984
- Enforced by US EPA and WDNR
- Wisconsin is an Authorized State
- Applicable Regulations                      Administrative Code NR 600-690  
Wisconsin Statute Chapter 291

## **What Is A Hazardous Waste?**

- Does It Meet The Definition Of a Solid Waste?
- Is It Excluded Under NR 605.05?
- Is It Listed as a HW in NR 605.05?
- Does It Meet Any Characteristics Of a HW    Described in NR 605.08?

## **Household Hazardous Waste Exemption Household Waste**

- Defined in NR 600.03(107)
- 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

## **Household Hazardous Waste Exemption**

- If Waste is Generated by Member of Household and is Disposed of as Part of Household Waste Stream, then it is Exempt
- If Waste is Generated by Contractor at a Residence and Safely Managed by the Homeowner as Household Waste, then it is Exempt

- If Contractor Removes Paint Waste From Residence and Manages Waste, Then It Is Not Exempt

## **Examples of Listed Hazardous Waste**

### **Characteristics of a Hazardous Waste**

- Ignitability - D001
- Corrosivity - D002
- Reactivity - D003
- Toxicity - D004 to D043 (Arsenic to Vinyl Chloride)

### **Toxicity - D004 to D043**

- TCLP (Toxicity Characteristic Leaching Procedure) Vs. Total Constituent Concentration
- Metals
- Pesticides
- Organics

### **Examples of Toxicity Characteristic Hazardous Waste**

- D006 Cadmium
  - TCLP 1.0 mg/l
- D007 Chromium
  - TCLP 5.0 mg/l
- D008 Lead
  - TCLP 5.0 mg/l

### **How To Determine If The Solid Waste Is A Hazardous Waste**

### **Very Small Quantity Generator (VSQG)**

## **Small Quantity Generator (SQG)**

## **Large Quantity Generator (LQG)**

### **Contractor Managed Waste**

- If Less Than 220 lbs of Waste is Generated At a Project Site:
  - Waste Can Be Taken Directly to a Household/Very Small Quantity Generator (VSQG) Collection Site
  - Waste Can Be Picked Up by Licensed Transporter at Project Site
  - No Approved Solid Waste Landfills in WI

### **Contractor Managed Waste**

- If More Than 220 lbs of Waste is Generated At a Project Site, Then the Waste Must be Transported by a Licensed HW Transporter To an Approved Hazardous Waste Management Site
- Do Not Transport the Waste to the Contractor's Business Location Unless It Is Licensed and Approved to Store Hazardous Waste

### **Method of Paint Removal**

- Sanding Or Physical Scraping
  - Paint Chips
- Chemical Stripping
  - Paint Chips + Chemical Waste = Listed Waste?
- Water Blasting
  - How to Manage Water?

### **Contractor Managed Waste**

- Use a Containment System to Prevent Contamination of Soils and Surface Waters or Dispersing Into the Air

- Properly Containerize the Waste
- Keep Containers Closed and Labeled
- Collect and Properly Dispose of Containerized Waste

### **Other Considerations**

- Treatment to Render Waste Nonhazardous Is Subject to Licensing
- Must Use Licensed HW Transporter Unless You Are Transporting Household or VSQG Waste
- During Demolition, Lead Painted Structural Materials Are Not Considered Hazardous Waste
- Loose Paint Chips are Hazardous Waste