

RENOVATION & ABATEMENT

- Small-scale debris that is generated during renovation, maintenance, or abatement activities such as paint chips, vacuum debris and dust, waste wash water and sludge from chemical paint stripping is more likely to exceed the TCLP.
- Sampling may be appropriate for intermediate-volume renovation wastes such as window moldings, doors, etc.
- Core or sectional samples can be taken of representative waste items to determine whether each waste is hazardous.
 - Fewer samples could be taken by taking one or more core samples, compiling ratios of waste material surface area to mass for each type, and then comparing these to the surface area/mass ratio of the sample.
 - Sampling protocol should be used for each site.
- Individual waste materials should either:
 - Be sampled and analyzed by TCLP and then handled/disposed of accordingly; or
 - Be segregated from other large-scale debris and then managed as hazardous waste.
- Records of sampling procedures and analytical results must be kept for at least 3 years.

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The logo for the Montana Department of Environmental Quality (DEQ) features the letters 'DEQ' in a large, blue, serif font. To the left of the letters, the full name 'Montana Department of Environmental Quality' is written in a smaller, blue, sans-serif font, oriented vertically.

Solid Waste Program

Lead-Based Paint



Solid Waste Section

<https://deq.mt.gov/twr/programs/solidwaste>

406-444-5300

Solid Waste Program (SWP)

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LEAD-BASED PAINT (LBP)

Where do we find it?

- Prior to the 1950s, paints used for residential use contained up to 50% lead.
- Lead-based paint was used on buildings until 1978, when it was banned on residential structures by the consumer Products Safety Commission.
- Renovation, remodeling, demolition, and surface preparation for painting have the potential to produce hazardous wastes if LBP was involved.



How do we know it is there?

- Test the paint for lead to be certain of the presence of lead.
- Hazardous waste criterion for lead waste is established under the federal Resource Conservation and Recovery Act (RCRA), Subtitle C, as 5.0 mg/L measured with the Toxicity Characteristic Leaching Procedure (TCLP).



STRUCTURE DEMOLITION

Residential Structures

Household Hazardous Waste Exemption

- On June 18, 2003, the Environmental Protection Agency (EPA) published a rule under solid waste regulations to streamline LBP debris disposal.
- LBP debris from households generated by homeowners or contractors may be disposed of at a municipal solid waste landfill or and construction and demolition waste landfill.



Non-residential Structures

Waste Determination and Management

- LBP debris that comes from commercial or industrial sources, **not households**, may be subject to state and federal hazardous waste rules.
- The generator of the waste must determine whether the debris fails the TCLP for lead.
- Two scenarios outlined for making the waste determination and then managing the LBP debris are:
 - Whole-Building Demolition
 - Renovation and Abatement

WHOLE-BUILDING DEMOLITION

- Whole-building demolitions debris is considered a non-hazardous waste with regard to lead.
 - EPA stated that solid architectural components coated with LBP are less likely to be hazardous because of the small ratio of lead paint to total waste mass.
 - The US Army conducted a study that concluded that whole-building demolition debris is not likely to exceed the toxicity characteristic standard for lead if it is handled as a single, whole waste stream and disposed of all together.
- No sampling or analysis of painted components for lead is required for disposal as a non-hazardous waste.

NOTE: Constituents other than LBP, including PCBs from light ballasts or asbestos containing materials, may require special handling and should be removed before demolition.

