

May 2002

# Management of Lead-bearing Paint Waste from Households

This guidance document supercedes Ohio EPA's previous guidance document entitled, "Management of Lead-bearing Paint Waste from Lead Paint Abatement" Ohio EPA, 1994.

## What is Ohio EPA's position regarding the disposal of lead-based paint waste?

Regardless of who generates lead-based paint (LBP) waste from abatement, renovation and remodeling activities at homes and other residences, lead-based paint waste is exempt from the hazardous waste requirements under the household hazardous waste exemption [Ohio Administrative Code (OAC) rule [3745-51-04 \(B\)\(1\)](#)]. This rule defines households as "...single and multiple residences, hotels and motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds, and day-use recreation areas." In addition, Ohio Revised Code (ORC) section [3734.02 \(D\)](#) exempts single-family residential premises from regulation under ORC chapter [3734](#) and all OAC rules adopted under it.

Household hazardous waste (HHW) includes lead-based paint waste which homeowners or contractors generate in households. Common wastes generated include architectural components coated with lead-based paint (i.e., doors, window, wooden trim, etc.) and other debris (contami-

nated carpet, paint chips; plastic sheeting; rags; sandpaper and paint stripping wastes).

## Why has Ohio EPA's interpretation changed?

Ohio EPA changed its interpretation to be consistent with U.S. EPA's interpretation that they expressed in a July 31, 2000 memorandum from Elizabeth A. Cotsworth, Director, Office of Solid Waste to the RCRA Senior Policy Advisors, EPA Regions 1-10. U.S. EPA intended its interpretation to simplify lead abatement projects (LAP) and reduce costs associated with regulatory compliance for management and disposal of lead contaminated lead abatement, renovation and remodeling wastes. The reduced cost and simplified management of wastes should result in reduced lead exposure to children.

## Where can exempt household lead-based paint wastes be disposed of in Ohio?

Contractors (including lead abatement contractors) may dispose of this waste with household waste. Some types of residential LBP waste may be disposed of at a construction and demolition debris landfill if it meets Ohio's definition of construction and demolition debris. These materials include window and door frames,

doors, wall board, and other structural components. However, liquid LBP waste is prohibited from landfill disposal. Although household hazardous waste is exempt from all hazardous waste requirements, all waste generated must be disposed of in accordance with all applicable Ohio solid waste disposal requirements. Materials not "...identified or listed as solid wastes must comply with Ohio EPA Division of Solid & Infectious Waste construction and demolition debris requirements found in OAC chapter [3745-400](#)."

## Who must comply with hazardous waste requirements when removing lead-based paint?

Businesses that remove LBP from structures that are not households must evaluate the wastes they generate from abatement, renovation and remodeling projects to determine if they are hazardous wastes. These structures include; bridges, office buildings, churches, and schools, etc.

## Who do I talk to about becoming a lead abatement contractor?

ODH, Division of Quality Assurance licenses professionals who conduct LAPs. The Division also establishes work practices with which lead abatement contractors must comply. OAC chapter [3701-32](#) details these standards.

## How do I obtain additional information?

You may contact the following agencies:

**Ohio EPA Central Office**  
Division of Hazardous Waste Management  
Technical Support Unit  
(614) 644-2917

Division of Solid & Infectious Waste Management  
(614) 644-2621

Office of Pollution Prevention  
(614) 644-3469

OSHA  
(800) 582-1708

Columbus  
(614) 469-5582  
(worker safety concerns)

Ohio Department of Health  
Division of Environmental Health & Toxicology  
(614) 466-1450  
(Lead abatement contractor training)

U.S. EPA  
RCRA/Superfund Hotline  
(800) 424-9346  
(General hazardous waste information)

Lead Information Clearinghouse  
(800) 424-LEAD

National Lead Information Center  
(800) 526-5456