

# Lead-Based Paint Disposal

## Guidance Document

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Alaska Department of Environmental Conservation  
Division of Environmental Health  
Solid Waste Program



Lead-based paint (LBP) was commonly used in residential, commercial, and institutional buildings until 1978, when the federal government banned its use in residences and public buildings where children are regularly present. This is a concern because lead presents a health risk, particularly in young children.

In 2003, the Environmental Protection Agency (EPA) changed the federal regulations to increase disposal options for residential LBP waste. The goal was to promote the removal of LBP from residential structures to minimize exposure, especially of children, to lead. The result is LBP waste from residential abatement, rehabilitation, renovation, and remodeling projects is regulated differently than residential demolition projects and non-residential sources.

### Residential LBP

Residential LBP waste is generated as a result of abatement, rehabilitation, renovation, and remodeling in homes and other residences. The term LBP waste includes paint debris, chips, dust, and sludges. While the management of LBP during a residential project must follow strict federal requirements, residential LBP waste is considered household hazardous waste and may be disposed at any permitted Class I or Class II Municipal Solid Waste Landfill (MSWLF) without testing. Residential demolition activities in which the entire structure is removed does not meet the definition of residential LBP waste and must be disposed as non-residential LBP waste.

### Non-Residential LBP

Sources of non-residential LBP are: renovation or demolition of non-residential structures OR demolition of a residence. LBP debris, dust, chips, or sludge wastes are subject to the toxicity criteria in 40 CFR 261.24, which is demonstrated using the Toxicity Characteristic Leaching Procedure (TCLP) test. The waste generator or responsible party should coordinate with EPA Region 10 with questions related to hazardous waste characterization, as EPA is the regulatory program for hazardous waste in Alaska.

- Wastes with a TCLP concentration for lead of less than 5 mg/L may be disposed at a permitted Class I or II MSWLF or Inert Waste Landfill.
- Wastes with a TCLP concentration for lead of greater than 5 mg/L must be managed as a hazardous waste under the Resource Conservation and Recovery Act (RCRA).

### LBP Polluted Soil

Soils or other materials may become contaminated from sandblasting or natural weathering of surfaces painted with LBP and may be subject to environmental cleanup and special disposal requirements.

Please contact ADEC if your project includes or will generate any of these types of wastes.