

## Disposal Requirements for Asbestos-Containing Material and Lead

### Asbestos

Federal: NESHAP, 40 CFR 61 Subpart M (61.150) Standard for Waste Disposal for Manufacturing, Fabricating, Demolition, Renovation and Spraying Operations.

State: DTSC, 22 CCR Part 66261.24, Characteristic of Toxicity.

Local: BAAQMD, Regulation 11, Rule 2.

### Summary:

- Friable asbestos waste containing more than 1% Asbestos, must be double-wrapped and labeled in compliance with DOT Class 9 HAZMAT (40 CFR 173.140) to include the Generator Name, Address, EPA ID Number label and be manifested/disposed of as Hazardous Asbestos Waste at an EPA-approved/registered landfill.
- Non-friable waste containing more than 1% asbestos, must be double-wrapped with an approved OSHA Asbestos labels (29 CFR 1926.1101) and be manifested/disposed of as asbestos -containing waste. The waste must still be disposed of at an EPA-approved landfill.
- Waste containing less than 1% asbestos (should be documented by Point Counting Analysis), must be burrito-wrapped and disposed of as asbestos-contaminated waste at an EPA-approved landfill.

### Lead

Federal: EPA, 40 CFR part 261, Hazardous Waste Constituent.

State: DTSC, 22 CCR, Div. 4.5, Chap. 10, Hazardous Waste Management System.

Local: San Francisco Department of Environmental and Health Services.

### Summary

The State requires two tests on lead materials, the SW846 Test and the WET (Waste Extraction Test). The former test results are compared against the Total Threshold Limit Concentration (TTLC) of 1,000 mg/kg. Test results above 1,000 mg/kg constitute failing this test. If the waste passes the TTLC test but is above 50 mg/kg, it still must undergo the WET test and pass the Soluble Threshold Limit Concentration (STLC) of 5 mg/liter. If the waste stream passes both these tests, it can be disposed of as non-hazardous lead waste. Failure of either State test requires the waste stream to undergo the Federal leachability test known as the Toxicity Characteristic Leaching Procedure (TCLP). Analytical results below 5 mg/liter passes this test, and the waste can be disposed of as low lead hazardous waste. If the waste stream fails the TCLP test, the waste must be disposed of at a RCRA waste site, where it must undergo stabilization at an increased cost.