



## **MANAGEMENT OF HAZARDOUS WASTE AT CONSTRUCTION AND DEMOLITION SITES**

The construction, remodeling, renovation, and demolition of buildings generates waste materials that may be classified as hazardous wastes under federal and state law and regulations. Hazardous waste is a waste with properties that make it potentially dangerous or harmful to human health or the environment. Hazardous wastes can be liquids, solids, or contained gases. In regulatory terms, a hazardous waste is a waste that appears on one of the four RCRA hazardous wastes lists (the F-list, K-list, P-list, or U-list) or that exhibits one of the four characteristics of a hazardous waste (ignitability, corrosivity, reactivity, or toxicity). However, materials can be hazardous wastes even if they are not specifically listed or don't exhibit any characteristic of a hazardous waste.

A generator of hazardous waste is defined as any person, by site, whose act or process produces hazardous waste identified, or listed or whose act first causes a hazardous waste to become subject to regulation. This implies that construction projects create a co-generator status, because the contractor produces wastes on a site that belongs to the owner.

Potential hazardous waste streams generated at a construction project or site may include, but are not limited to:

- Asbestos waste
- Universal waste such as, spent fluorescent lamps, electronic waste, mercury containing waste (i.e. thermostats, switches and relays)
- PCB containing ballasts
- Paint (water based, oil, latex, paint thinners, strippers, contaminated rags)
- Waste materials containing heavy metal residues such as lead, mercury and chromium
- Used oil, such as vehicle crankcase oils, hydraulic oils from elevators, transformer oils, engine lubricating oils, compressor oils, refrigeration oils, and fluids
- Treated wood waste
- Contaminated soil and groundwater
- Spill cleanup waste

Contact your local building/planning department for guidance and additional requirements for the recycling and disposal of non-hazardous waste. Non-hazardous waste streams found at construction sites include, but are not limited to:

- Uncontaminated solids, such as asphalt, brick, concrete, and uncontaminated dirt, fines, rock, sand, and stone
- Steel scrap, such as reinforcement bars, buckets and barrels, steel strips from packaging, and steel pipes
- Metal scrap, such as binding wire, HVAC duct sections, cable trays, aluminum sheets
- Wood scrap, such as timber, plywood, formwork, crates, plates;
- Cardboard, paper products
- Plastic, such as piping, polyethylene, buckets, and tarps
- Empty paint cans (only dry paint with no free-flowing paint residues)



The generator of the waste is required to make a hazardous waste determination prior to disposal using knowledge, or by testing the waste. A waste management plan should be put into place to standardize procedures for how waste generated will be managed. Eliminating waste generation as best as possible, minimalizing existing streams, recycling materials, and reusing materials can help reduce the amount of waste generated. Illegal disposal of hazardous waste can cost up to \$70,000 per violation per day.

## TEMPORARY VS ROUTINE HAZARDOUS WASTE GENERATION

Hazardous waste must be managed in accordance with federal and state laws and regulations, and/or local ordinances. Sites that routinely generate hazardous waste are required to obtain a Certified Unified Program Agency (CUPA) Permit from San Mateo County Environmental Health Services and a permanent hazardous waste ID number. Temporary ID numbers are issued to generators who do not typically generate hazardous waste. These ID numbers are valid for 90 days.

Hazardous waste ID numbers are issued by the Department of Toxic Substances Control (DTSC). To apply for an ID number, go to DTSC's website: [dtsc.ca.gov/IDManifest/index.cfm](http://dtsc.ca.gov/IDManifest/index.cfm)

Construction or demolition projects are usually temporary generators of hazardous waste but based on the duration of the project they may become routine generators.

## OPTIONS FOR HAZARDOUS WASTE DISPOSAL

Depending on frequency and amount of hazardous waste generation, disposal options will vary:

**Recyclable Hazardous Waste:** Used oil, paint waste and universal waste are examples of recyclable hazardous wastes and there are alternative options for disposal for businesses that generate small quantities of these wastes. Businesses must check the quantity limits of each recycling center before dropping off their waste.

- Review the information found in the links below for disposal site options:
- Used oil collection centers: <https://www2.calrecycle.ca.gov/UsedOil/CertifiedCenters> or [smchealth.org/usedoil](http://smchealth.org/usedoil)
- Paint care collection centers: [paintcare.org](http://paintcare.org)
- Universal waste drop-off locations: [smchealth.org/fluorescentlights](http://smchealth.org/fluorescentlights)

**San Mateo County Very Small Quantity Generator (VSQG) Program:** Businesses that generate less than 27 gallons (100 kg.) of hazardous waste per month can dispose of their hazardous waste at the San Mateo County Very Small Quantity Generator (VSQG) Program. A permanent or temporary hazardous waste ID number must be obtained prior to scheduling a disposal appointment.

To schedule an appointment to dispose of hazardous waste at the VSQG Collection Center, go to [smchealth.org/vsqq](http://smchealth.org/vsqq).

**Hazardous Waste Haulers:** If the business generates more than 27 gallons of hazardous waste per month, the VSQG program cannot be used, and a pickup must be scheduled with a registered hazardous waste hauler. For a list of haulers visit [smchealth.org/hazwaste](http://smchealth.org/hazwaste)



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[smchealth.org/cupa](http://smchealth.org/cupa)

Businesses that routinely generate hazardous waste are permitted and inspected by San Mateo County CUPA. If your business routinely generates hazardous waste contact the San Mateo County CUPA at (650) 372-6200 or [envhealth@smcgov.org](mailto:envhealth@smcgov.org).

The new facility registration form can be found at [smchealth.org/cupaforms](http://smchealth.org/cupaforms).

**For additional guidance, contact the CUPA Inspector for your jurisdiction.  
A complete list of inspectors can be found at [smchealth.org/cupainspectors](http://smchealth.org/cupainspectors).**