

PAINT DEBRIS DISPOSAL GUIDANCE

Applicable to large structures: water towers, bridges and electrical towers

If you are anticipating a project involving the removal of paint from a bridge or tower structure, the following guidance offers assistance to ensure the debris is managed properly at the site and disposal is conducted in accordance with state regulations.

Overview

In the past, many commercial grade paints and primers used on large structures such as water towers and bridges contained lead, and sometimes cadmium, chromium, mercury and even polychlorinated biphenyls (PCBs). When this paint coating is removed the resulting debris can have high concentrations of one or more of these metals, often requiring the waste to be managed and disposed of as a hazardous waste. To determine if the waste is a hazardous waste an analysis needs to be performed on the removed material. Because a variety of methods may be used to remove paint coatings, the waste stream generated from structural renovations will vary. The debris may consist of the paint and heavy metal binding agents such as Blastox, paint coatings and sand or glass, or even just the paint chip/coating alone. It is the responsibility of the owner of the structure to make sure any debris generated from the removal of the surface coating is managed and disposed of properly. If you find the debris is a hazardous waste or if you are unsure, please contact the DANR Waste Management Program at 605-773-3153 for assistance.

Below are some items to consider when preparing for a structural surface renovation project:

- Be knowledgeable about the waste you will be generating. In some cases you may know the surface coating contains a high level of lead or other heavy metal(s). With that knowledge, be aware that depending upon the method being used to remove the coating (for example, sand or other abrasive blast media, Blastox or scraping and sanding), the resulting waste may or may not contain both the paint residue and the abrasive media used to remove the paint. No matter which removal method is used, waste generated from the removal process needs to be analyzed in order to determine whether it is a hazardous or solid waste. For assistance regarding testing methods and parameters that will determine whether the debris is a hazardous waste, contact the Waste Management Program at 605-773-3153.
- Be aware that all paint-containing debris from the removal process needs to be collected. Special precautions need to be taken when working on structures that lie over bodies of water. For information regarding projects that may impact water bodies please contact DANR's Office of Water at 605-773-3351. For bridge structure work, contact the Department of Transportation at 605-773-3285.

Debris generated from structures over land also needs to be collected as much as practicable. Debris that is considered a hazardous waste needs to be placed in secure, closed containers that have been labeled with the words "Hazardous Waste." Debris that is not a hazardous waste is considered a solid waste. This material should also be placed in secure containers or on plastic sheeting and securely covered. Nonhazardous waste debris should be disposed of at a permitted municipal solid waste facility.