

## HAZARDOUS WASTES GENERATED BY CONTRACTOR ACTIVITIES

1. The construction of buildings and renovation of building components generates waste materials that might be considered hazardous by the U.S. Environmental Protection Agency (EPA) 40 CFR Subtitle C, Section 261, Resource Conservation and Recovery Act (RCRA). These materials include, but are not limited to, spent fluorescent lamps, PCB containing ballasts, mercury containing thermostats, switches and relays, oil and lead based paint, paint thinners, strippers, contaminated rags, dropcloths and brushes and waste materials containing heavy metals such as lead, mercury and chromium. Under RCRA, generators of hazardous wastes are responsible for the proper handling, personnel training, storage, labeling, transportation and disposal of these wastes. The definition of generator in 40 CFR 260.10 is “any person, **by site**, whose act or process produces regulated hazardous waste”. This implies that construction projects create a co-generator status, because the contractor produces wastes on a site that belongs to the owner. Therefore to protect both the University and the contractor, the following procedures shall be implemented:
2. Contractors must develop a waste management plan and provide to the owner during contract submittals. This plan must identify the wastes that will be generated during the project, how their amounts will be minimized, recycled or reused and how the remainder will be properly managed. Those wastes that cannot be reused or recycled and still meet the definition of hazardous shall be properly packaged, labeled and prepared for disposal by a licensed vendor.
3. The contractor shall arrange for the disposal of the wastes and notify the owner when they are to be removed from the construction site so that the owner can sign and obtain copies of the disposal documents.
4. Contractors with employees who handle hazardous substances and generate hazardous wastes must provide training for these employees in compliance with RCRA. Certificates of training shall be provided during contract submittals.