

Construction Waste Management & Disposal Safety Program

Guy's Construction
123 Main Street, Anytown, CA 90210

29 CFR 1926.857 / 29 CFR 1926.65 / 40 CFR 260-270

Effective Date: June 08, 2026

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SAMPLE DOCUMENT - NOT FOR COMPLIANCE USE

JURISDICTION AND REGULATORY FRAMEWORK

Construction waste management involves overlapping OSHA, EPA, and state environmental regulations:

- OSHA 29 CFR 1926.857: storage of waste material during demolition
- OSHA 29 CFR 1926.65: HAZWOPER (when hazardous waste is encountered)
- EPA 40 CFR 260-270: RCRA hazardous waste identification, handling, storage, transport, disposal
- EPA 40 CFR 61 Subpart M: asbestos NESHAP (demolition and renovation)
- State environmental agencies: additional waste handling and disposal requirements

STATE-SPECIFIC NOTICE: California has the following requirements:

- wetting with water or water-surfactant mixture before packaging
- water or a mixture of water and surfactant prior to packaging in disposable containers
- water or a mixture of water and surfactant
- disposable containers
- airborne fiber release if not wetted
- abandoned
- 6 feet with 4x6 uprights
- 8X10
- the unitization is approved
- API 53
- lead hazards during construction activities
- occupational lead exposure
- occupational lead exposure
- airtight containers for disposal
- T8 CCR 1735(f)(2): max 25% of total floor area unless lateral supports remain in place
- PLHCP indicates that the employee is no longer at risk of material impairment
- indirect vent chemical splash goggles ANSI Z87.1 D3 rated (splash protection)
- 12X12 with vertical spacing of 5 feet
- project not more than 3 feet 6 inches from the outside wall line
- an application for renewal to the Enforcement Section
- T8 CCR 1513: construction sites kept clean and orderly, waste removed at regular intervals
- the operational readiness of pumps, valves, and dynamic restraints within the scope of the Regulatory Treatment of Non-Safety Systems for ap
- all Restricted Data and classified National Security Information are separated from the unclassified information
- a licensee safeguards contingency plan in accordance with the criteria set forth in section II of appendix C to part 73
- the original safety factor of the equipment
- posted signs
- physical hazards
- <100 kg/month
- >1,000 kg/month

- California Health and Safety Code Division 20 Chapter 6.5: federal RCRA with broader definitions: Total Threshold Limit Concentration (TTLC) and Soluble Threshold Limit Concentration (STLC) tests, lo
- 90 days
- third physician to conduct examinations, consultations, laboratory tests and discussions with prior physicians as necessary to resolve disag
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- a diagrammatic sketch of the mechanical installation along with a detailed explanation of the flow, procedures and frequency of well tests,
- a list of interested parties (those with interests in the leases and/or units from which production is to be commingled for which the applic

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1.0 PURPOSE AND SCOPE

This Construction Waste Management & Disposal Safety Program establishes procedures for identifying, handling, storing, transporting, and disposing of waste generated on Guy's Construction construction projects. It covers non-hazardous construction debris, hazardous waste, special waste streams (lead, asbestos, silica), universal waste, and concrete washout operations.

29 CFR 1926.857(a)

2.0 WASTE CLASSIFICATION

All waste generated on the project must be classified before disposal:

Category	Examples	Disposal Method
Non-hazardous C&D	Concrete, wood, metal, drywall, roofing, soil	Landfill, recycling facility, or beneficial reuse
Hazardous (RCRA)	Solvents, paints, adhesives, contaminated soil, lead debris	Licensed hazardous waste facility via manifest
Special (regulated)	Asbestos ACM, lead paint debris, silica dust waste	Regulated disposal per specific standard
Universal	Batteries, fluorescent lamps, mercury thermostats	Universal waste handler rules (40 CFR 273)
Liquid waste	Concrete washout water, dewatering effluent	Per NPDES/SWPPP or licensed disposal

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3.0 NON-HAZARDOUS CONSTRUCTION WASTE

- wetted with water or a mixture of water and surfactant prior to packaging in disposable containers

29 CFR 1926.1101

- floor load limit compliance for debris/waste storage

29 CFR 1926.857(a)

- local fire regulations

29 CFR 1926.252(d)

- radioactive waste disposal options: release to sanitary sewer (within limits per 20.2003), incineration (with NRC approval per 20.2004), decay-in-storage for short-lived isotopes, transfer to licensed

10 CFR 20.2001-2008

- Storage

3.1 Segregation and Recycling

- Separate recyclable materials: metal, clean wood, concrete/masonry, cardboard, drywall
- Clearly label dumpsters/bins by waste type
- Track recycling/diversion rates if required by project specs or local ordinance
- Many jurisdictions require minimum construction waste diversion rates (50-75%)

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4.0 HAZARDOUS WASTE IDENTIFICATION AND HANDLING

RCRA hazardous waste determination is required for any waste that may be hazardous. When in doubt, test it. Improper disposal of hazardous waste carries criminal penalties.

When hazardous waste is encountered on a construction site, HAZWOPER requirements may apply:

- at least 8 hours of hands-on training
- review of confined-space hazards and procedures
- review of hazard communication programs meeting 29 CFR 1910.1200
- review of applicable appendices to 29 CFR 1926.65
- HAZWOPER Trained Personnel

1926.65(e)

- fiberboard box (4G) or fiber drum (1G) with plastic inner packaging not exceeding 5 kg (11 lbs) and maximum net mass not more than 25 kg (55 lbs)

4.1 RCRA Hazardous Waste Characteristics

Waste is hazardous under RCRA if it exhibits any of these characteristics:

Characteristic	Test	Common Construction Sources
Ignitability	Flash point < 140F (D001)	Solvents, waste fuels, oil-based paints, adhesives
Corrosivity	pH <= 2 or >= 12.5 (D002)	Battery acid, concrete washout (high pH), rust removers
Reactivity	Unstable, explosive, reacts with water (D003)	Cyanide wastes, some demolition chemicals
Toxicity	TCLP test exceeds limits (D004-D043)	Lead paint debris, chromated copper arsenate (CCA) wood, contaminated soil

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5.0 SPECIAL WASTE STREAMS

5.1 Lead-Containing Waste

- blood lead level sampling at least monthly during removal period
- blood lead level (BLL) determination every two months
- new blood lead level measured monthly
- Lead paint debris: TCLP test determines if RCRA hazardous (D008, limit 5.0 mg/L)
- Intact lead paint on demolition debris: if debris passes TCLP, may dispose as non-hazardous C&D
- Worker protection during handling: per 29 CFR 1926.62 Lead in Construction

1926.62(d)

5.2 Asbestos-Containing Waste

- more than one percent asbestos

29 CFR 1926.1101(b)

- Written Asbestos Abatement Plan

1926.1101

- certified asbestos abatement contractor or supervisor; class-specific training for all workers

29 CFR 1926.1101

- Regulated asbestos-containing material (RACM): wetted, sealed in leak-tight containers, labeled
- Transport: licensed asbestos hauler, manifest required
- Disposal: approved asbestos landfill only
- EPA NESHAP notification required 10 working days before demolition/renovation

40 CFR 61 Subpart M; 29 CFR 1926.1101

5.3 Silica-Containing Waste

- Dust from concrete cutting, grinding, drilling contains respirable crystalline silica
- Collected dust/slurry: typically non-hazardous but check local requirements
- Wet methods preferred for dust suppression (slurry can be dewatered and disposed as solid waste)
- Worker protection during handling: per 29 CFR 1926.1153 Respirable Crystalline Silica

29 CFR 1926.1153 Appendix B

6.0 CONCRETE WASHOUT

Concrete washout water has a pH of 11-13 (corrosive). It cannot be discharged to storm drains, waterways, or bare ground:

- Designated washout area: lined pit, portable washout container, or self-contained unit
- Located at least 50 feet from storm drains, open ditches, and water bodies
- Signage: 'Concrete Washout - No Discharge to Storm Drain'
- Maintain at minimum 12 inches of freeboard in washout pit
- Solidified concrete: dispose as non-hazardous C&D waste
- Liquid: pH-neutralize or dispose at approved facility

7.0 UNIVERSAL WASTE

Universal waste rules (40 CFR 273) provide simplified handling for common hazardous wastes:

- Batteries (lead-acid, lithium, NiCd): collect in designated container, recycle
- Fluorescent lamps and HID bulbs: do not break, store in original boxes or fiber drums
- Mercury-containing equipment (thermostats, switches): sealed container, label 'Universal Waste - Mercury'
- Pesticides: if recalled, manage as universal waste

Small quantity handlers (<5,000 kg): accumulate up to 1 year, no EPA ID needed but must comply with 40 CFR 273.

40 CFR 273

8.0 STORAGE, LABELING, AND CONTAINMENT

- Hazardous waste: store in compatible, labeled containers. Containers closed except when adding/removing waste.
- Label: 'Hazardous Waste,' contents, accumulation start date, generator info
- 90-day limit: large quantity generators must ship hazardous waste within 90 days of accumulation start date
- Secondary containment: required for liquid hazardous waste storage (110% of largest container or 10% of total)
- Incompatible wastes: segregate. Acids away from bases. Oxidizers away from organics.
- Weekly inspections of hazardous waste storage area: document in log

40 CFR 262.17 (90-day accumulation); 40 CFR 265 Subpart I (containers)

9.0 TRANSPORTATION AND MANIFESTING

- Hazardous waste: shipped by licensed transporter on a Uniform Hazardous Waste Manifest (EPA Form 8700-22)
- Generator signs manifest, retains copy, receives signed copy from TSDf within 35 days
- Exception report if signed manifest not returned in 45 days
- DOT requirements: proper shipping name, UN number, placards, packaging per 49 CFR
- Non-hazardous C&D waste: weigh tickets from landfill/recycler, retain for project records

40 CFR 262 Subpart B (manifesting); 49 CFR 171-180 (DOT)

10.0 SPILL RESPONSE

For spills of hazardous materials or waste on the construction site:

- Stop the source if safe to do so
- Contain the spill: use absorbent, berms, or other containment. Prevent entry to storm drains or waterways.
- Notify: superintendent, safety director, and environmental coordinator immediately
- Reportable quantity (RQ): if the spill exceeds the RQ for the substance, report to National Response Center (800-424-8802)
- Cleanup: use appropriate PPE. Containerize spill residue as waste (characterize before disposal).
- Document: spill report with date, time, material, quantity, cause, response, and corrective action

40 CFR 302 (reportable quantities); CERCLA Section 103

11.0 TRAINING REQUIREMENTS

All employees must receive training on:

- This Waste Management & Disposal Safety Program
- Waste classification: how to identify hazardous vs. non-hazardous waste
- Proper segregation and container use
- Spill response procedures
- PPE requirements for handling waste materials

Additional training for employees handling hazardous waste:

- HAZWOPER 40-hour (uncontrolled sites) or 24-hour (controlled/cleanup) per 29 CFR 1926.65
- Annual 8-hour HAZWOPER refresher
- DOT hazmat employee training (if signing manifests or loading for transport)

1926.65(e)

12.0 RECORDKEEPING

Record	Retention	Authority
Hazardous waste manifests	3 years from ship date	40 CFR 262.40
Waste characterization/TCLP results	3 years	40 CFR 262.40
Land disposal restriction notifications	3 years from ship date	40 CFR 268.7
Hazardous waste storage inspection logs	3 years from inspection	40 CFR 265.174
Spill reports	3 years	Company policy
C&D waste weigh tickets/disposal receipts	Project duration + 3 years	Contract/spec requirement
Recycling/diversion reports	Project duration + 3 years	LEED/spec requirement
HAZWOPER training records	Duration of employment	29 CFR 1926.65
Asbestos NESHAP notifications	Permanent	40 CFR 61.145
EPA generator ID records	Permanent	40 CFR 262.18

California STATE-SPECIFIC REQUIREMENTS

The following requirements apply under California regulations:

- wetting with water or water-surfactant mixture before packaging
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- disposable containers
- airborne fiber release if not wetted
- abandoned
- 6 feet with 4x6 uprights
- 8X10
- the unitization is approved
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- lead hazards during construction activities
- occupational lead exposure
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- airtight containers for disposal
- max 25% of total floor area unless lateral supports remain in place

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- 12X12 with vertical spacing of 5 feet
- project not more than 3 feet 6 inches from the outside wall line
- an application for renewal to the Enforcement Section
- construction sites kept clean and orderly, waste removed at regular intervals

T8 CCR 1513

- the operational readiness of pumps, valves, and dynamic restraints within the scope of the Regulatory Treatment of Non-Safety Systems for applicable reactor designs
- all Restricted Data and classified National Security Information are separated from the unclassified information
- a licensee safeguards contingency plan in accordance with the criteria set forth in section II of appendix C to part 73
- the original safety factor of the equipment
- posted signs
- physical hazards
- <100 kg/month
- >1,000 kg/month
- federal RCRA with broader definitions: Total Threshold Limit Concentration (TTLC) and Soluble Threshold Limit Concentration (STLC) tests, lower thresholds, annual fees required

California Health and Safety Code Division 20 Chapter 6.5

- 90 days

- third physician to conduct examinations, consultations, laboratory tests and discussions with prior physicians as necessary to resolve disagreement
- fiberboard box (4G) or fiber drum (1G) with plastic inner packaging not exceeding 5 kg (11 lbs) and maximum net mass not more than 25 kg (55 lbs)
- the overall status of implementation of the provisions of this Part relating to the identification, inventory, and removal of underwater obstructions
- a diagrammatic sketch of the mechanical installation along with a detailed explanation of the flow, procedures and frequency of well tests, calibration/proving of metering devices and allocation formu
- a list of interested parties (those with interests in the leases and/or units from which production is to be commingled for which the applicant has no existing commingling authority)

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APPENDIX A: WASTE CHARACTERIZATION CHECKLIST

Date: _____

Project: _____

Waste Source: _____

Assessed By: _____

Question	Reference	Y/N	Notes
Is the waste a listed hazardous waste (F, K, P, or U list)?	40 CFR 261.31-33		
Does the waste exhibit ignitability (flash point < 140F)?	40 CFR 261.21		
Does the waste exhibit corrosivity (pH <= 2 or >= 12.5)?	40 CFR 261.22		
Does the waste exhibit reactivity?	40 CFR 261.23		
Does the waste contain TCLP metals above limits?	40 CFR 261.24		
Does the waste contain lead paint (test: TCLP for lead)?	D008, limit 5.0 mg/L		
Does the waste contain asbestos (>1% ACM)?	40 CFR 61 Subpart M		
Is the waste contaminated soil (what contaminants)?	Site assessment data		
Is the waste a universal waste (batteries, lamps, mercury)?	40 CFR 273		
Is the waste a liquid (requires special handling)?	No free liquids in landfill		

Classification Result: Non-hazardous C&D Hazardous (RCRA) Special Universal Requires testing

Assessed By: _____

Date: _____

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