



# VCU

## Safety and Risk Management

### Lead Based Paint Hazardous Waste Disposal

(Last revised April 15, 2020)

**I. Reference.** Virginia Commonwealth University (VCU) Hazardous Waste Program and Environmental Protection Agency (EPA), Virginia Department of Environmental Quality (DEQ), RCRA (Resource Conservation and Recovery Act) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund).

**II. General.** This standard operating procedure (SOP) applies to VCU Physical Plant and private contractors conducting construction, demolition, or renovation activities at any VCU owned or leased building. This includes general contractors and/or their subcontractors performing either lead-based paint (LBP) abatement or other renovation work resulting in the generation of LBP waste. Contractors performing this work are responsible for ensuring all generated LBP waste is properly containerized, labeled, and secured until transported for disposal.

**III. Applicability.** This SOP applies to all VCU-owned or leased properties. Contract and/or project managers are responsible for informing private contractors of this SOP and the requirement for proper management of LBP waste prior to their initiating any task resulting in the generation of such waste. Under current federal and state regulations and university policy, an outside entity (contractor, waste disposal company, etc.) may not under any circumstances sign hazardous waste manifest(s) for VCU, nor may they take possession of any LBP waste for shipment. Under the current CERCLA (Superfund) regulations, a contractor cannot indemnify the university from legal responsibility as the generator of the hazardous waste should the hazardous waste be improperly shipped or disposed of. The university thus retains “cradle to grave” responsibility for all hazardous waste it generates.

#### IV. Procedures.

A. To ensure appropriate disposal of these materials, the Safety and Risk Management (SRM), Waste Management Unit hazardous waste disposal system will be utilized. The VCU project manager/inspector should contact SRM seven to fourteen days prior to needing LBP waste drum(s) delivered and removed. Prior to pick up, the VCU contact will also need to provide a budget code to cover the costs of disposal. SRM will utilize one of the approved contractors on the Virginia Department of General Services hazardous waste disposal contract for disposal at an approved hazardous waste disposal site.

B. Should contractual reasons necessitate the use of a hazardous waste disposal firm or waste broker other than those noted above; the VCU project manager/inspector will be responsible for obtaining and forwarding to SRM an audit package from the contractor. Audit packages must contain complete EPA identification number(s), permit, insurance, and financial information for the hazardous waste disposal contractor, hazardous waste disposal transporter, and the treatment, storage, and disposal (TSD) site the waste will be sent to for ultimate disposal (stabilization and land fill).

**V. Recordkeeping.** Hazardous waste manifests from LBP waste disposal will be electronically archived and physically stored (hard copy) within SRM office located at, the Grant House.

**VI. Questions** concerning disposal of LBP waste contact [Waste Management Unit](#) or call 828-1392.