



HOME IMPROVEMENT RETAIL STORE WASTE MANAGEMENT

Delaware Department of Natural Resources and Environmental Control,
Solid & Hazardous Waste Management Section

Does my store generate Hazardous Waste?

Home improvement retail stores have the potential to generate hazardous waste. Once generated, these wastes must be managed properly, not only to ensure regulatory compliance but also to protect human health and avoid environmental harm.

Many of the products found in home improvement retail stores are identified as hazardous materials; they can cause health hazards, for example, acids that are corrosive to skin; or physical hazards, for example, products that are flammable or water reactive. When requiring disposal these hazardous material products can become a hazardous waste.

A typical home improvement retail store generates waste through normal store activities such as in-store product demonstrations, store sponsored events (e.g. children workshop events, Do-It-Yourself how-to events), store maintenance (e.g. cleaning supplies), store remodeling (painting supplies), or nonsalable incorrectly mixed paints. Wastes may also be generated through expired products, damaged and/or destroyed products, customer returns, and spills. It must be immediately determined if the product is unusable or unwanted, that is, is it now a waste. Some wastes must be managed as hazardous waste, while other wastes will be non-hazardous waste capable of being recycled.

Any site that generates hazardous waste is subject to the federal and state requirements covering the generation, transportation, and management of hazardous waste. It is the responsibility of the generator (the home improvement retail store) to make proper hazardous waste determinations at the time the waste is generated.

Hazardous Material Products to Hazardous Waste

Typical products that are identified as hazardous materials can be found in Plumbing Departments (e.g. pipe preparation materials, pipe adhesives), Paint Departments (e.g. solvents, stains, oil-based paints), Lawn and Garden Departments (e.g. pool chemicals, fertilizers, pesticides), Industrial and Household Cleaner Departments (e.g. bleach, drain cleaners), and Equipment Rental and/or Service Departments (e.g. waste gasoline, used oil). Most likely, when these products become wastes (i.e. nonsalable or unusable), they will need to be managed as hazardous waste.

Other typical hazardous material products that can result in hazardous wastes include waste fluorescent lamps, waste batteries, waste aerosol cans, waste scrap metal, and waste electronic components (i.e. circuit boards). This factsheet will cover each of the departments and the typical hazardous material products previously listed that often must be managed as hazardous waste when sent for disposal.

What is your generator category status?

The amount of hazardous waste you generate each calendar month will determine your generator category status. Each generator category status has different regulatory requirements. Typically, you will be either a Conditionally Exempt Small Quantity Generator (CESQG) or a Small Quantity Generator (SQG). Additional Departmental guidance is available for generator category statuses and regulatory requirements.

Human Health and Environmental Concerns

Products may have one or more hazardous characteristics. For example, solvents are ignitable, drain cleaners are corrosive and reactive, and pesticides can contain chemicals deemed toxic. Proper identification and management of products, and of these same products once they become unusable or unwanted and therefore waste, is important to protect human health and the environment.

Spills Waste

Spill prevention is always better than a subsequent cleanup. Prevent spills by having up-to-date work practices, providing adequate training to your employee team, and by having a clean and well-maintained working environment. An emergency response procedure with how to manage spills needs to be developed and implemented. Additionally, spill cleanup kits should be kept in easily accessible places with clear labels so they are ready for use in the event of a spill.

When products are spilled, you must determine if the resulting spill and cleanup waste is a hazardous waste. Products that are themselves hazardous materials, often result in the generation of hazardous waste when spilled and cleaned up. You must keep this in mind when determining how to properly dispose of spill waste.

Any spill, especially one involving a hazardous material needs to be promptly and properly cleaned up. The spill needs to be contained to prevent spreading and spill absorbents from a spill kit should be used to soak up as much of the spill as possible. The spilled product waste and contaminated spill cleanup supplies (e.g. spill absorbent) will likely need to be managed as hazardous waste. The required management practices will vary based on the product that spilled or leaked resulting in the creation of waste. The product's manufacturer or information found on the Material Data Sheet can often guide you in proper disposal of spill waste.

Paint Department

Typical products in a paint department will include solvents, stains, strippers, thinners, varnishes, wood preservatives, and oil-based paint. Most likely, when these products become waste they will need to be managed as hazardous waste due to their ignitability characteristic and/or chemical composition. Non-usable latex paint is not considered a hazardous waste.

Combining latex and oil-based paint together for disposal purposes is strongly discouraged. The resulting mixture may be subject to hazardous waste regulatory requirements, and due to its greater volume, more costly to manage.

Plumbing Department

Typical products in a plumbing department include cleaners used for pipe (e.g. copper or PVC) preparation prior to installation, pipe adhesives, and rust removers. Most likely, when these products become waste they will need to be managed as hazardous waste due to their corrosivity, ignitability, reactivity, toxicity, and/or chemical composition.

Equipment Rental and/or Service Department

Unusable or unwanted fuel (e.g. gasoline) removed from equipment is hazardous waste due to its ignitability and toxicity characteristics, for example benzene. Unusable or unwanted oil removed from equipment can be managed under the less stringent Used Oil Regulations. If the oil has **NOT** been “used” (e.g. spilled virgin oil) **OR** if it is unwanted virgin oil, a hazardous waste determination must be completed prior to disposal. A factsheet for “Used Oil Management” is available.

Industrial and Household Cleaner Department

Many cleaners in your store carry warning labels indicating the product is corrosive, ignitable, reactive, toxic, or any combination of the four. Examples of the more common products include bleach, drain cleaners, disinfectants, oven cleaners, floor cleaners, carpet cleaners, and bathroom cleaners. Most likely, when these products become waste they will need to be managed as hazardous waste carrying those same identifiers. Your store must always make a hazardous waste determination prior to disposal.

Lawn and Garden Department

Typical lawn and garden department products include fertilizers, herbicides, fungicides, rodenticides, pesticides, and pool chemicals. When pesticides become waste, typically by expiring, spilling, or non-usable returns, they may be managed under the less stringent Universal Waste Regulations. A pesticide is defined as, “any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant, other than any article that: (a) Is a new animal drug under FFDCa section 201(w), or (b) Is an animal drug that has been determined by regulation of the Secretary of Health and Human Services not to be a new animal drug, or (c) Is an animal feed under FFDCa section 201(x) that bears or contains any substances described by paragraph (a) or (b) of this section.”

Fluorescent Lamps and Batteries

Fluorescent lamps and batteries typically become waste through damage, breakage, or non-resalable returns. They often contain concentrations of heavy metals, such as, mercury, lead, cadmium, and nickel that may classify them as hazardous waste. However, both can be managed under the less stringent Universal Waste Regulations. A factsheet for “Waste Lamp Management” is available.

If your store uses and/or sells lead-acid batteries and/or accepts returns for exchange, spent lead-acid batteries can be managed under the Universal Waste Regulations or returned to the supplier.

Typically, a store will be a small quantity handler of universal waste because it will accumulate less than 5,000 kg (11,023 lbs) site wide. A store accumulating 5,000 kg or more of universal waste is a large quantity handler of universal waste. This classification is completely separate from the hazardous waste generator category status for hazardous waste. A factsheet for “Universal Waste Management” is available.

Many stores offer its customers the opportunity to safely dispose of their household waste fluorescent lamps and/or batteries by having recycling containers in the store. While household hazardous wastes are exempt from regulation, once combined with the store-generated hazardous waste, all of the waste becomes subject to regulation. This is not a problem provided your store manages all these wastes properly.

Remember, the fluorescent lamps lighting the store, when replaced, also have the potential to require hazardous waste or universal waste management.

Aerosol Cans

Many common products such as paint, insecticide, and cleaners are sold in aerosol cans. These cans contain both product and a pressurized propellant. The product and the propellant may have hazardous characteristics, such as ignitability and toxicity, and can be a safety hazard under heat and/or pressure. Waste aerosol cans must be managed as hazardous waste unless the generator can demonstrate that the product in the can, the can itself, and the gaseous propellant are **ALL** non-hazardous. A factsheet on Aerosol Can Management options is available.

What other wastes may you generate?

Your store may also generate scrap metal. Scrap metal must have a hazardous waste determination if sent for disposal. Scrap metal is **ONLY** excluded from being a hazardous waste if it is recycled, thus making the recycling of scrap metal an attractive option.

Electronic components (i.e., devices with printed circuit boards) often contain heavy metals, batteries, and mercury switches and can be difficult to categorize as either hazardous or non-hazardous waste. DNREC recommends all electronic equipment be recycled. The DSWA has an Electronic Goods Recycling Program (EGRP). A flyer describing the EGRP is available. Visit www.dswa.com or call 1-800-404-7080 for full details or questions.

More Information

Additional factsheets for the management of Waste Aerosol Cans, Waste Fluorescent Lamps, Universal Waste, Used Oil, and Electronic Equipment are available.

State hazardous waste regulations are in 7 DE Admin Code 1302 of Delaware’s *Regulations Governing Hazardous Waste*, Parts 260-266, 268, 273, and 279. <http://regulations.delaware.gov/AdminCode/title7/1000/1300/1302/index.shtml>

For more assistance, contact DNREC, Solid and Hazardous Waste Management Section at 302-739-9403 or Karen J’Anthony, Program Manager, at karen.janthony@state.de.us