

Water Tower/Bridge Paint Removal Guidance

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

Overview: Up until about the last ten years many commercial grade paints and primers used on water towers and bridges contained lead and other heavy metals such as cadmium and chromium. 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 material removed. Because a variety of methods may be used to remove paint coatings, the waste stream generated from structural renovations may vary from a removal/lead binding agent such as Blastox, to sand mixed with paint and primer, to exclusively paint and primer chips and scrapings. It is the responsibility of the owner of the structure to make sure any debris generated from the removal of paint is managed and disposed of in the proper manner. If you find the debris is a hazardous waste or if you are unsure, please contact the DENR 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 being removed may have a high level of lead or other heavy metal. With that knowledge, be aware that depending upon the method being used to remove the surface coating (for example, sand or other abrasive blasting, Blastox or scraping and sanding), the resulting waste may or may not contain both 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 to determine whether the debris would be considered a hazardous waste, please 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 DENR's Surface Water Quality Program at 605-773-3351 and the Department of Transportation at 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 and disposed of at a state permitted solid waste facility.