

# Integrated Pest Management

Cornell Cooperative Extension  
Suffolk County

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## Anti-fouling Paints and Boat Bottom Maintenance

### 5.3 What Kind of Hazardous Waste Generator is Your Boat Associated Business?

All hazardous waste generators are responsible for managing and disposing of their waste. There are 3 categories of hazardous waste generators:

#### **CATEGORY 1: Conditionally exempt small quantity generator (CESQG)**

- CESQG: generates no more than 220 lbs (27 gallons) of hazardous waste per month (there may be other hazardous marina waste other than boat bottom waste).
- Generates no more than 2.2 lbs of acute hazardous waste per month and
- Stores no more than 2,200 lbs of hazardous waste ON SITE at any time.
- If you meet the above qualifications, the only requirements you must comply with are:
  - Properly identify hazardous waste.
  - Comply with storage limits.
  - Ensure proper treatment and or disposal of your waste.
- If you are a CESQG make sure that, when it is time to dispose of your hazardous waste, it is delivered to an offsite treatment or disposal facility that has the following criteria:
  - State or federally regulated hazardous waste management treatment, storage or disposal facility.
  - Landfill permitted by NYSDEC to manage municipal or industrial solid waste.
  - Facility that uses or re-uses or legitimately recycles waste.
  - Hazardous waste collection program operated by a county or municipal government.
  - Universal waste handler (used to dispose of unused hazardous pesticides).
  - Licensed hazardous waste hauler.

#### **CATEGORY 2: Small quantity generator**

- Small quantity generator: must meet following guidelines:
  - Generate between 200-2,200 lbs of hazardous waste per month.
  - Generate no more than 2.2 lbs acute hazardous waste per month and
  - Store no more than 13,200 pounds of hazardous waste on site at any time.

- Small quantity generators must follow some, but not all, of the regulations related to storing and transporting hazardous waste.
- The following list is what you SHOULD do:
  - Determine type and amount of hazardous wastes you generate.
  - Store your hazardous wastes in properly labeled, closed containers.
  - Inspect containers weekly prior to disposal to check for damage or leaks.
  - Select a regulated (registered) treatment, storage and disposal facility or recycler.
  - Properly package, label, mark all hazardous wastes intended to be shipped for disposal.
  - Most small quantity generators use a commercial transporter to ship hazardous waste.
  - Transporters provide guidance on how to prepare waste for shipment.
- Can you transport the waste yourself?
  - You will have to comply with all US and NYSDOT regulations and rules for:
    - Labeling
    - Placarding
    - Licensing
    - Permit requirements
  - CONTACT NYSDEC for hazardous waste MANIFEST (Check with them on HOW MUCH LEAD TIME this entails) PRIOR to shipping hazardous material to a registered hazardous waste facility.
    - Purpose of the manifest: document that tracks hazardous waste from your facility to the waste disposal site.
    - Contact local DEC office for more details.

#### **CATEGORY 3: Large quantity generator**

- Large quantity generators: must comply with ALL regulations related to hazardous waste disposal, contact NYSDEC.
- Suspect wastes: what stands a good chance of being hazardous? Clue is in the potential to ignite:
  - Paints
  - Solvents
  - Thinners
  - Strippers
  - Other chemicals in hull prep and painting process.

- Paint scrapings, sanding dust, items contaminated with paint e.g., rollers, towels, might be hazardous based on toxicity especially if contaminated with other chemical solvents.

NOTE: Always verify that you can dispose of paint chips, sanding dust and other dry wastes without handling as hazardous waste BEFORE you dispose of them.

- Follow these three steps:
  - Confirm and certify that your marina is a CESQG as described earlier.
  - Obtain prior approval for disposal of the paint chips and other dry waste by contacting the landfill that receives the marina’s solid waste (dumpster).
    - SDS of paint will provide info needed.

- Landfill will also want CESQG certification and may also require testing of waste in order for you to obtain an approval for disposal.
- If the marina generates MORE than CESQG quantities of waste, the paint chips may require a “toxicity characteristic leaching procedure” or TCLP test prior to disposal.

NOTE: MSDS or SDS sheets may not provide adequate info on the waste toxicity, so the TCLP test (see TCLP factsheet) will determine ACCEPTABLE disposal options.

- if the waste is found hazardous you will need:
  - Permitted waste hauler.
  - Hazardous waste manifest.
  - Permitted hazardous waste disposal facility.

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