

# Scrap Lead Disposal



## Overview

Lead is found and/or utilized throughout Weill Cornell Medicine (WCM). The two main sources of scrap lead are from construction projects (e.g., old piping) and radiation shielding materials (e.g., bricks). Lead is a toxic heavy metal and in most cases regulated as a hazardous waste. However, through a federal exemption for scrap metal recycling, the New York State Department of Environmental Conservation (NYSDEC) allows the recycling of lead via approved scrap metal recyclers. This exempts WCM from certain hazardous waste regulations regarding lead wastes, so long as they are recycled appropriately. As such, **all scrap lead must be managed in accordance with this Update and recycled via Environmental Health and Safety's (EHS's) approved scrap metal recycler.**

## Applicability

This Update applies to all WCM employees and contractors working on behalf of WCM who require the disposal of scrap lead. Other types of lead wastes not addressed in this Update must be managed as a hazardous waste in accordance with WCM's waste disposal procedures.

## Responsibilities

**Environmental Health and Safety (EHS)** maintains appropriate permits and recycling/disposal records; surveys all scrap lead utilized as a radiation shielding to ensure the items do not contain radioactive contamination; provides training and information to the WCM community, and coordinates collections with the external recycler and Project Managers, as necessary.

**Project Managers** ensure that all scrap lead generated from renovation and/or other projects within WCM facilities (e.g. demolition phase) are collected, stored, and managed in accordance with this Update. Contact EHS prior to all projects generating scrap lead to further discuss management procedures.

**Generators** ensure that all scrap lead is disposed in accordance with this Update. Generators must refrain from using lead articles for purposes other than their intended use (e.g., lead bricks as door stops).

**Contractors** ensure that the scrap lead is disposed in accordance with this Update and coordinate its disposal with their Project Manager and EHS. Under no circumstances shall a contractor remove scrap lead from a work site without first receiving approval from EHS.

## Procedure

### SCRAP LEAD FROM RADIATION SHIELDING MATERIALS

Lead utilized for radiation shielding materials may be in the forms of bricks, foils, radioactive material shipper packaging, and patient vests during x-raying. Any lead not utilized for its intended purpose must be disposed in accordance with this Update. The disposal of these scrap lead materials must be managed as follows:

1. Generator labels / identifies scrap lead items with the words: "Scrap Lead for Recycle (DEC C7 Scrap Metal Exemption)".
2. Generator contacts EHS (646-962-7233) to have the scrap lead surveyed to ensure no radioactive contamination exists. Any scrap lead found to contain radioactive contamination must be decontaminated in accordance with WCM's Radiation Safety protocols.
3. EHS labels each of the items which certify that the lead materials do not contain any radioactive contamination. EHS will only collect scrap lead materials which contains this label.
4. Once the scrap lead has been certified by Radiation Safety as having no radioactive contamination, the generator completes an on-line Chemical Collection Request Form available at EHS' website with the following statement added to the Comments field: "Scrap lead was surveyed by Radiation Safety and no radioactive contamination was observed."
5. EHS collects the scrap lead from the generator and recycles the lead with an approved scrap metal recycler.



**Weill Cornell  
Medicine**

**Environmental Health and Safety**

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## SCRAP LEAD FROM CONSTRUCTION PROJECTS

Scrap lead associated with construction projects may include old piping and other related wastes/debris. Project Managers must contact EHS to coordinate scrap lead management, collection, storage, and recycling. *Under no circumstances can scrap lead be removed from WCM without EHS' approval.*

At a minimum, scrap lead from construction projects must be managed as follows:

1. Project Manager notifies EHS during the project's pre-bid phase that scrap lead will be generated.
2. EHS will provide the Project Manager with the EHS-approved scrap metal recycler information to establish an account for the project.
3. Scrap lead must be collected and stored in a secure manner to prevent unauthorized access and migration of lead contamination. Scrap lead is labeled / identified with the words: "Scrap Lead for Recycle (DEC C7 Scrap Metal Exemption)".
4. Scrap lead generated at WCM must be recycled by the EHS-approved scrap metal recycler.
5. Project Manager provides EHS with copies of shipping documents.

## References

[6 NYCRR Parts 370 through 374 and 376 – Hazardous Waste Disposal](#)

[6 NYCRR 371.1\(c\)\(7\) – Prior Notification for Scrap Metal Exemption](#)