

NORTH CENTRAL TEXAS COUNCIL OF GOVERNMENTS

Household Hazardous Waste Management and Risks

Solid Waste Administration and Solicitation Support PROJECT NO. 172934 MAY 1, 2025



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1.0 Introduction

Household Hazardous Waste (HHW) encompasses a wide range of products used in homes that contain potentially dangerous chemicals and substances. Examples include paints, solvents, pesticides, batteries, and fluorescent lamps. These materials require special handling and disposal to prevent their potential to harm the environment and human health.

Over the past few years, the costs have significantly increased, posing challenges for communities, especially smaller ones, in managing these wastes effectively. Improper management of HHW can lead to soil and water pollution, harm to wildlife, and health risks to residents. It can also result in legal liabilities and financial penalties for municipalities.

This white paper aims to guide city managers and personnel within the North Central Texas Council of Governments (NCTCOG) communities on strategies to manage HHW cost-effectively. It will also outline how to incorporate HHW services into residential solid waste contracts and offer considerations for Requests for Proposals (RFPs) related to HHW management.

2.0 Current Landscape of HHW Management

Managing HHW poses several challenges. Many residents are unaware of the risks associated with improper disposal, resulting in HHW being discarded in regular trash or poured down drains. Additionally, the region faces infrastructure gaps, with limited collection facilities and infrequent events making proper disposal inconvenient for many households. Funding limitations further complicate efforts to expand HHW programs, as these initiatives often require significant financial resources. Ensuring compliance with state and federal regulations adds complexity to implementing effective programs.

2.1 Regulatory Framework

Federal, state, and local laws govern the regulatory framework for HHW management in Texas. Here is an overview of key elements of the framework:

- Federal Regulations
 - Resource Conservation and Recovery Act (RCRA)
 - Under RCRA, the U.S. Environmental Protection Agency (EPA) regulates the management and disposal of hazardous waste but specifically exempts HHW.
 - While HHW is exempt from RCRA hazardous waste regulations when generated by households, its management and disposal must comply with state and local rules.
- Texas State Regulations
 - Texas Commission on Environmental Quality (TCEQ):
 - TCEQ oversees HHW management in Texas and establishes policies to ensure safe collection, transportation, and disposal.
 - TCEQ permits HHW collection events and facilities, ensuring they comply with environmental and public safety standards.
 - The agency provides technical guidance to local governments and organizations hosting HHW programs.
 - Texas Administrative Code (TAC):

- Chapter 335 of the TAC governs municipal solid waste, including the operation of HHW collection and disposal facilities.
- Rules for HHW collection events and facilities, including record-keeping, public notification, and waste-handling protocols, are outlined.
- Local Government Programs
 - Many local governments in Texas operate HHW collection programs and events through:
 - Interlocal Agreements: Municipalities collaborate to share resources and establish regional HHW facilities.
 - Local Ordinances: Cities and counties may have additional rules or programs for HHW management.

Key components of HHW regulations in Texas include collection events, permitted facilities, and transportation protocols. Temporary HHW collection events, authorized by the TCEQ, provide residents with designated locations for safe waste disposal. Event organizers are required to follow strict safety protocols, including waste segregation and proper disposal methods. Permanent HHW facilities must operate under TCEQ permits, ensuring compliance with environmental standards, and are responsible for appropriate labeling, storing, and transferring hazardous materials to authorized treatment or disposal sites. Additionally, HHW transportation is regulated to ensure waste is managed by licensed haulers and delivered to approved disposal or recycling facilities, with detailed manifests and records maintained for all shipments.

2.2 HHW Program Types

HHW programs are designed to provide residents with safe, convenient, and environmentally responsible options for disposing of hazardous materials to human health, wildlife, and the environment. The NCTCOG region offers a variety of HHW program types to accommodate the diverse needs of its 16-county area. These programs generally fall into the following categories.

2.2.1 Permanent Facilities

Several cities in the NCTCOG area operate permanent HHW collection facilities where residents can drop off their hazardous materials. These facilities typically serve residents within their respective cities or participating communities through interlocal agreements. Commonly accepted items include paints, pesticides, household cleaners, batteries, and electronics. Examples include:

- City of Fort Worth Environmental Collection Center (more than 40 cities and counties participating in this program)
- City of Dallas County Home Chemical Collection Center (17 cities participating in this program)
- City of Denton ReUse Store and Home Chemical Collection (City of Denton only)

2.2.2 Mobile Collection Events

Mobile collection events are temporary, scheduled events organized by local governments or other agencies. These events provide an opportunity for residents to dispose of HHW in areas that lack permanent facilities. Events are advertised through city websites, community newsletters, and local media. Examples include:

- The Town of Trophy Club offers biannual HHW clean-up events
- The Town of Highland Park offers annual HHW drop-off events

2.2.3 Curbside Collection Services

Some municipalities provide curbside HHW pickup services, where residents can schedule a collection appointment or have weekly pickup for items like used motor oil, paint, or other hazardous materials. These services are often included in the local waste management contracts. Examples of curbside collection services include:

- The Town of Highland Park offers on-call curbside collection for residents for \$160 per collection, billed on the following month's water bill.
- The City of Heath partnered with a company to provide weekly "front porch pickup" of HHW items for a monthly fee of \$1.13.
- The City of Plano homeowners can schedule a collection of HHW for free through the City's trash and recycling team.

2.2.4 Retail Take-back Programs

Many retailers in the region accept specific types of HHW, such as batteries, electronics, and fluorescent light bulbs, for recycling or proper disposal. Examples include:

- Home Depot and Lowe's: Compact fluorescent light bulbs (CFLs)
- Best Buy: Electronics
- AutoZone: Used motor oil and car batteries

2.3 Rising Costs of HHW Programs

In recent years, communities have faced a noticeable increase in the costs associated with HHW disposal. This rise is primarily driven by inflation, increased consumer use of hazardous products, and challenges within the waste management infrastructure.

One major contributor to rising costs is households' growing volume of HHW. As consumer products containing hazardous components, such as lithium batteries, become more prevalent, municipalities face additional pressure to manage these materials responsibly.

Inflation has further compounded the rising costs of HHW disposal. Higher fuel prices directly affect the transportation of hazardous materials, while increased equipment and supply costs strain disposal program budgets. Labor costs have also risen as facilities compete for skilled workers capable of managing hazardous materials safely. These inflationary pressures often translate into higher service fees, ultimately borne by municipalities and consumers.

For example, the City of Fort Worth Environmental Collection Center (ECC) raised its HHW disposal rates from \$50 to \$95 per household, reflecting rising operational and material costs. Similarly, the City of Crowley, which partners with Fort Worth to allow its residents access to the ECC, increased its HHW disposal voucher fee from \$50 to \$95 as of October 1, 2023. Even smaller-scale programs have experienced cost increases; the City of Heath, for instance, raised its base service fee for weekly front porch HHW pickups in 2024 from \$1.08 to \$1.13 per month. These changes highlight how inflationary pressures, including higher fuel, labor, and operational expenses, drive up costs for essential HHW management services, necessitating adjustments to sustain these programs.

3.0 Strategies for HHW Management

Communities can implement several strategies to manage HHW disposal costs effectively while ensuring environmental and public health protection.

3.1 Regional Collaboration and Partnerships

Shared services through regional collaboration have proven to be an effective strategy for managing HHW. Interlocal agreements between municipalities, such as those between the City of Fort Worth and neighboring communities like Crowley, allow multiple cities to utilize centralized HHW facilities. For instance, Crowley residents can access the Fort Worth ECC under an agreement that reduces individual program costs by sharing disposal infrastructure. Similarly, regional facilities like the ECC serve multiple municipalities, allowing cities without permanent collection centers to offer their residents HHW disposal options without incurring the expense of establishing standalone facilities. These collaborative efforts reduce costs through economies of scale and enhance access to safe HHW disposal services across the region.

Cities like Denton also leverage competitive bidding processes to secure contracts with certified HHW management companies, ensuring cost-effective and environmentally compliant disposal. These partnerships help mitigate the financial burden on municipalities. By combining public and private resources, this collaboration provides the sustainable and efficient management of HHW.

Voucher programs allow residents to access HHW disposal services through a voucher system managed and funded or partially funded by the municipality. This ensures HHW management is integrated into the overall waste management strategy, even when direct curbside or event-based services are not feasible. Residents of the municipality must purchase a disposal voucher. The cities are billed quarterly for the number of vouchers used during the billing period.

3.2 Community and Curbside Collection Programs

Periodic collection events are crucial in providing accessible and convenient options for HHW disposal. These events are widely advertised to ensure maximum participation and often coincide with community clean-up initiatives, making them a valuable tool for promoting environmental stewardship. By offering periodic opportunities for safe disposal, these events reduce the risk of improperly discarding hazardous waste in regular trash or the environment.

Curbside collection programs further enhance the accessibility and convenience of HHW disposal. Curbside collection can be scheduled or included in weekly curbside collection programs. These programs simplify the disposal process, particularly for individuals facing challenges transporting HHW to collection events or facilities.

3.3 Permanent Collection Centers

Permanent collection centers are a cornerstone of effective HHW management. These facilities are designed to accommodate a wide range of items, including paints, batteries, and chemicals, and they operate year-round to provide residents with consistent disposal options. By maintaining permanent facilities,

municipalities can centralize HHW management, reduce the risks of improper disposal, and ensure compliance with environmental regulations.

Integrating HHW collection into existing waste management infrastructure further enhances efficiency and accessibility. For example, the City of Denton co-locates its HHW services with its landfill and recycling center, allowing residents to manage multiple waste types in one convenient location. This approach streamlines operations and encourages residents to participate in sustainable waste practices by consolidating disposal trips.

3.4 Public Education and Outreach

Public education and outreach are critical components of effective HHW management programs, helping to reduce waste generation and increase participation in disposal initiatives. To minimize the generation of HHW, communities can promote the use of non-hazardous or less hazardous alternatives, encouraging residents to make environmentally conscious purchasing decisions. Additionally, educational efforts that teach proper purchasing habits, such as buying only the quantities needed, help prevent surplus hazardous products from accumulating. To increase participation in HHW programs, municipalities can implement awareness campaigns that inform residents about the risks of improper disposal and the availability of local collection services. Instructional materials, including brochures and online resources, can provide clear guidelines for identifying HHW, proper storage practices, and safe handling techniques.

3.5 Alternative Disposal Methods

Alternative disposal methods play a vital role in enhancing the effectiveness of HHW management while reducing the burden on municipal programs. Product stewardship programs and Extended Producer Responsibility (EPR) encourage manufacturers to take back their products at the end of their life cycle, shifting the responsibility for proper disposal away from consumers and local governments. Retail take-back programs further support these efforts by enabling residents to return specific HHW items like batteries and paint directly to participating stores. Public-private partnerships have proven particularly impactful in HHW management, with retailers like Home Depot and Lowe's offering collection programs for items like CFLs, ensuring proper recycling. These collaborative initiatives between businesses, manufacturers, and local governments not only streamline HHW disposal but also cut costs for public agencies by leveraging private resources, creating a more sustainable and cost-effective waste management system.

3.6 Waste Exchange Programs

Waste exchange programs offer a practical and cost-effective solution for reducing HHW by promoting reuse and minimizing disposal needs. Material reuse centers allow residents to drop off usable HHW items like paint, cleaning supplies, or garden chemicals, which can then be redistributed to others at no cost. These centers divert waste from landfills and reduce disposal costs for local governments while providing a valuable resource for residents.

Additionally, online platforms can connect individuals to share or donate excess materials, further extending the life cycle of potentially hazardous products. By fostering a culture of reuse and leveraging digital tools to facilitate exchanges, these programs reduce the volume of HHW requiring costly disposal and promote community engagement and environmental sustainability.

4.0 Incorporating HHW Management into RFPs

Incorporating HHW management into residential solid waste Request For Proposals (RFPs) offers municipalities a streamlined and efficient way to address hazardous waste disposal challenges. By integrating HHW services into existing contracts, communities can ensure residents have consistent and accessible options for disposing of items like paint, batteries, and chemicals, reducing the risks of improper disposal that can harm the environment and public health. This approach also allows for greater flexibility, as cities can tailor HHW services to meet the needs of their residents through options like subscription-based programs or on-call pickups. Including HHW management in contracts promotes environmental sustainability and provides a cost-effective solution that enhances the overall efficiency of municipal waste management programs.

4.1 Subscription Based

Including HHW services as an optional component in residential solid waste, contracts provides communities with a flexible and cost-effective approach to hazardous waste management. By offering these services on an opt-in basis, municipalities can cater to residents' varying needs while minimizing the financial burden on those who may not require frequent HHW disposal. This flexibility allows communities to tailor their waste management programs to their budgets and the specific demands of their population, ensuring a more sustainable approach to HHW management.

4.2 On-Call Pickups

Another practical approach is offering on-call pickups, where residents can request HHW collection as needed, eliminating unnecessary collection trips and associated costs. This service ensures efficient use of resources while providing convenience for residents with limited storage space for hazardous materials.

4.3 Implementation Considerations

Several key considerations can ensure successful implementation when incorporating HHW management into residential solid waste contracts. Contracts should be flexible, allowing for adjustments in response to changes in participation rates, disposal volumes, or costs, ensuring that services remain effective and scalable. Partnering with waste management companies with proven expertise in handling HHW is essential to guarantee compliance with safety and environmental regulations. Additionally, clear communication with residents about available services, associated fees, and proper disposal practices is critical to encouraging participation and preventing improper waste handling. Including specific HHW management requirements in RFPs ensures contractors understand and address this critical component of municipal waste services, setting clear expectations.

4.4 Key Considerations for Effective RFPs

When developing RFPs for HHW management, several critical factors should be addressed to ensure effective service delivery. Contractors should demonstrate HHW management experience and possess the necessary permits and certifications to manage hazardous materials. Compliance with federal, state, and local regulations and detailed safety protocols for handling and transporting HHW is mandatory.

The RFP should define performance metrics, such as collection frequency, responsiveness, and customer service, and require regular reporting on HHW volumes and disposal methods. Transparent pricing is

essential, with contractors providing detailed cost breakdowns and including provisions for managing cost increases.

Education and outreach programs should also be a focus, with contractors outlining plans to educate residents about HHW risks and disposal options. Flexibility and scalability are also crucial, ensuring contracts can adapt to regulatory changes or increase participation, guaranteeing long-term effectiveness and community satisfaction. By incorporating these considerations, communities can select contractors equipped to manage HHW effectively and align with municipal goals for environmental safety and cost efficiency.

5.0 Case Studies

The following case studies showcase diverse approaches to HHW collection and disposal, each tailored to meet the unique needs and resources of its respective area.

5.1 Case Study 1: City of Dallas, Texas

2023 Population (estimate¹): 1,302,868

The City of Dallas has implemented the following strategies for HHW management.

Key Strategies Implemented:

- *Regional Collaboration and Partnership:* To manage HHW, the City of Dallas participates in a regional program with Dallas County.
- *Permanent Collection Center:* The facility, Dallas County Home Chemical Collection Center, is a free service for residents of several cities and areas, including the City of Dallas. The County bills participating cities monthly based on actual costs.
- Community Collection Events: The City of Dallas and Dallas County host mobile collection events for HHW and electronic materials. Separate from the mobile events, the city offers a mobile collection of batteries, oil, paint and antifreeze (BOPA) throughout the city and the year.
- *Alternative Disposal Methods*: The city promotes retail take-back programs at hardware stores and auto parts retailers, which will accept fluorescent bulbs and batteries via their website.

Program Outcomes:

- Participation in HHW mobile events, BOPA mobile collection events, and drop-offs at the Dallas County Home Chemical Collection Center averages 12,000 participants annually.
- The annual cost for the City of Dallas to utilize the Dallas County Home Chemical Collection Center is approximately \$950,000, translating to an average cost of \$84 per participant per year.

¹ U.S. Census Bureau QuickFacts: Dallas city, Texas

• The combination of permanent and mobile collection options ensures that residents across the city have multiple ways to dispose of hazardous materials responsibly.

5.2 Case Study 2: City of Fort Worth, Texas

2024 Population (estimate²): 978,468

The following strategies are implemented in the City of Fort Worth for HHW management.

Key Strategies Implemented:

- *Regional Collaboration and Partnerships:* Some participating entities utilize a voucher system. Municipal residents must purchase a disposal voucher. The cities are billed quarterly for the number of vouchers used during the billing period.
- *Permanent Collection Center*: The City of Fort Worth has a permanent HHW facility, the ECC. The ECC is open to Fort Worth residents and participating cities. Four Drop-off Stations are also available for proper disposal of hazardous materials.
- *Community Collection Program*: The City of Fort Worth holds multiple mobile events within the city and at participating entities.
- *Waste Exchange Program*: The City of Fort Worth has implemented a Help-Yourself-Shelf where chemicals, cleaners, and paint in like new condition are offered free of charge.
- Alternative Disposal Methods: The City of Fort Worth has included an action item in their Comprehensive Solid Waste Management Plan to pursue participation in product stewardship interest groups, such as the Texas Product Stewardship Council and promotion of EPR as an alternative to government-provided collection programs. This action item includes pursuing opportunities for EPR of paint³.

Program Outcomes:

- Serving over 16,000 households, the ECC has an extensive community impact.
- Disposal rates for participating cities were increased from \$50 to \$95 per household, ensuring the program remains financially sustainable amidst rising operational costs.
- Multiple mobile collection events, held both within Fort Worth and in participating municipalities, improve accessibility for residents who may not be able to visit the ECC.

5.3 Case Study 3: Town of Trophy Club, Texas

2023 Population (estimate⁴): 13,666

The Town of Trophy Club has implemented the following strategies for HHW management.

² U.S. Census Bureau QuickFacts: Fort Worth city, Texas

³ 2017-2037 Comprehensive Solid Waste Management Plan

⁴ U.S. Census Bureau QuickFacts: Trophy Club town, Texas

Key Strategies Implemented:

- *Regional Collaboration and Partnership:* The town has an agreement with the City of Fort Worth to take their HHW at the ECC.
- *Community Collection Program:* The Town of Trophy Club holds a community clean-up twice a year, during which residents can recycle their HHW.
- *Partnerships:* The solid waste service provider provides garbage, brush/bulk, and recycling services and supplies all the dumpsters for the HHW event. The HHW service is included in the RFP for solid waste services.

Program Outcomes:

- Each four-hour event includes HHW collection, electronics recycling, document shredding, metal recycling, and bulk disposal, providing residents with a one-stop solution for responsible waste management.
- The HHW events utilize five 30-yard roll-offs for waste collection, demonstrating the program's scale and effectiveness in handling community waste needs.

5.4 Case Study 4: City of Heath, Texas

2023 Population (estimate⁵): 11,238

The City of Heath has implemented the following strategies for HHW management.

Key Strategies Implemented:

- *Curbside Collection Program:* Utility customers can contract with a service provider for weekly "front porch pickup" of HHW items and can also schedule on-call picks.
- *Partnerships:* The service provider collects HHW waste and electronics from single-family residential units.

Program Outcomes:

- The program is a very convenient disposal option with a nominal fee. The fee for curbside HHW is \$1.13, billed annually on the utility bill.
- The collection program also includes electronic recycling.

5.5 Case Study 5: City of Plano, Texas

2023 Population (estimate⁶): 290,190

The City of Plano has implemented the following strategies for HHW management.

⁵ U.S. Census Bureau QuickFacts: Heath city, Texas

⁶ U.S. Census Bureau QuickFacts: Heath city, Texas

Key Strategies Implemented:

- *Curbside Collection Program:* Plano residents may schedule HHW collection through the city's trash and recycling team.
- *Waste Exchange Program:* Once collected, the items are redistributed to Plano residents for free at the Household Chemical Reuse Center.

Program Outcomes:

- The program encourages residents to participate actively in proper waste management by offering convenient collection services, reuse opportunities, and educational resources.
- The flexible approach of on-call collection services reduces unnecessary collection trips.

6.0 Action Steps for Communities

Based on the strategies and outcomes reviewed by HHW management programs in cities with varying populations within the NCTCOG region, communities can take the following steps to improve their HHW management systems.

Enhance Regional Collaboration and Partnerships:

- Interlocal Agreements: Develop or expand agreements with regional facilities, such as Fort Worth's ECC or Dallas County's Home Chemical Collection Center, to provide residents with accessible HHW disposal options.
- *Voucher Programs:* Implement or improve voucher systems for residents to use regional HHW facilities, with clear communication about access and costs.
- *Cost-Sharing Models:* Collaborate with neighboring cities to share infrastructure and operational costs for HHW collection and disposal.
- *Partnerships*: Partner with service providers to offer community and curbside collection programs.

Increase Community Collection Opportunities:

- *Host More Mobile Collection Events*: Schedule regular mobile HHW events in underserved areas to improve access, especially in rural or southern regions with limited services.
- *Expand Collection Scope*: Include additional materials like lithium-ion batteries and electronic waste, which are becoming more prevalent and challenging to manage.

Promote Alternative Disposal Methods:

• *Retail Take-Back Partnerships*: Work with local retailers to accept everyday HHW items like fluorescent bulbs, batteries, and paint through take-back programs.

• *Waste Exchange Programs*: Establish community reuse programs, such as Fort Worth's "Help-Yourself-Shelf," to encourage the reuse of items like paint and cleaning supplies.

Improve Accessibility for All Residents:

- *On-Call Services*: Introduce on-demand curbside HHW collection services to provide convenient options for residents unable to attend events or visit permanent facilities.
- Service Equity: Address gaps in accessibility, such as ensuring apartment residents or those in underserved areas have access to HHW disposal options.

Educate and Engage the Community:

- *Clear Communication*: Simplify messaging about HHW services, including accepted materials, event schedules, and locations, using multiple platforms like websites, social media, and community newsletters.
- *Resident Education*: Launch outreach campaigns to educate residents on HHW risks, proper disposal methods, and the benefits of participation in HHW programs.
- *Workshops and Events*: Host educational events to promote waste reduction strategies, such as buying smaller quantities of hazardous products or how to make non-toxic cleaning supplies.

Address Rising Costs and Operational Challenges:

- *Advocate for EPR*: Join efforts to promote EPR policies, shifting manufacturers' responsibility for HHW disposal costs.
- *Evaluate Cost Structures*: Review and adjust program fees regularly, as needed, to balance sustainability with affordability for residents.

Monitor and Measure Program Success:

- Set Performance Metrics: Track participation rates, volumes collected, and cost per participant to assess program effectiveness.
- *Regular Reporting*: Require waste management contractors to submit detailed reports to identify trends and areas for improvement.
- *Feedback Mechanisms*: Collect resident feedback to understand service gaps and improve overall satisfaction.
- *Celebrate Success*: Officially recognize milestones and successes, such as the number of participants served or hazardous materials safely disposed of. Share these achievements through community newsletters, social media, or local events to build community pride and encourage continued participation in HHW programs. Highlighting positive outcomes reinforces the program's value and fosters stronger community engagement.

7.0 Conclusion

Effective HHW management is critical for protecting public health, preserving the environment, and fostering sustainable communities in the NCTCOG. By examining the successful strategies implemented by cities like Fort Worth, Dallas, Trophy Club, Heath, and Plano, it is evident that a combination of regional collaboration, community engagement, and innovative disposal methods can address the diverse challenges associated with HHW management. Programs such as permanent collection centers, mobile collection events, waste exchange initiatives, and on-call services demonstrate the importance of tailoring solutions to meet local needs while maximizing accessibility and efficiency. Additionally, integrating HHW management into residential solid waste contracts and promoting public-private partnerships provide cost-effective ways to enhance services and share responsibilities.

8.0 Additional Resources

Texas Commission on Environmental Quality (TCEQ):

- Guidance on HHW regulations and management
- Website: Homepage Texas Commission on Environmental Quality www.tceq.texas.gov
- Website: Managing Your HHW Program: Additional Program Guidance Texas Commission on Environmental Quality www.tceq.texas.gov

North Central Texas Council of Governments (NCTCOG):

- Regional HHW resources, initiatives, and support.
- Website: NCTCOG Home

U.S. Environmental Protection Agency (EPA):

- HHW guidelines and best practices for HHW management
- Website: Household Hazardous Waste (HHW) | US EPA

National Household Hazardous Waste Forum:

- Platform for networking and sharing for HHW professionals
- North American Hazardous Materials Management Asso Home Page

Product Stewardship Institute:

- Information on product stewardship initiatives
- STAR | State of Texas Alliance for Recycling
- Homepage Product Stewardship Institute

