

Hazardous waste training for users of architectural paint

- Painting contractors
- Property management companies
- Building maintenance

Outline

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Introduction

- Proceed with this training if you use architectural paint as part of a property management or paint contracting business or if you maintain a building.
- This training is intended to teach you the common wastes in your industry AND covers:
 - Container labeling and closure requirements
 - Disposal requirements and options
 - Evaluation requirements
 - Recordkeeping requirements
 - Where to find other resources
- After reviewing this industry-specific training, you will be instructed to complete the Step 2 Online Waste Survey.

Common hazardous wastes

This presentation will cover the following hazardous wastes:

- Oil-based paint and stain
- Aerosols
- Paint/thinner to be recycled and recycling waste
- Paint booth filters
- Disposable paint/solvent rags
- Launderable rags or towels
- Used oil
- Used oil filters
- Fluorescent and HID lamps

Waste oil-based paint and stain

Storage requirements:

- Containers must be labeled:
 - "Hazardous Waste"
 - Clear descriptive name, such as "Paint/Stain"
 - Accumulation Start Date
- Containers must be closed when not adding waste
- Document weekly container inspections on a log

Resources:

[Label and Store Hazardous Waste](#) (Minnesota Pollution Control Agency)

[Weekly container inspection log](#) (Hennepin County)



Disposal options for oil-based paint and stain

You may dispose of oil-based paint and stain using

- A permitted hazardous waste transport and disposal facility
- Very small quantity generator collection site
- PaintCare collection site

Resources

- [Hazardous waste disposal companies](#) (Hennepin County)
- [Very small quantity generator collection programs](#) (Minnesota Pollution Control Agency)
- [PaintCare Minnesota](#) (PaintCare)

PaintCare architectural paint collection program

- PaintCare is a non-profit organization established by the paint industry to manage postconsumer architectural paint.
- Drop-off sites accept house paint and primers, stains, sealers, and clear coatings free-of-charge from certain businesses, organizations and households. See <http://www.paintcare.org/drop-off-locations/> to find a drop-off site near you.
- Products must be in containers that are no larger than 5 gallons. They must be in their original containers, clearly labeled and not leaking. In-store daily limits may apply – please call ahead if you have more than five gallons.



PaintCare architectural paint collection program

Any non-household dropping off oil-based paint must have Very Small Quantity Generator (VSQG) status and a Hazardous Waste Identification Number. Sites can accept up to the VSQG hazardous waste limit (220 pounds, approx. 20-30 gallons, per business per month) for oil-based paints.

Non-households with 300 gallons or more of accumulated paint are eligible for a direct large volume pick-up (<http://www.paintcare.org/wp-content/uploads/docs/xx-factsheet-large-volume-pick-up.pdf>).



Wastes accepted by PaintCare

- Architectural paint, including interior & exterior latex, acrylic, based, alkyd, oil-based, and enamel
- Deck and floor coating, including elastomeric
- Field and lawn paint
- Metal coating, including rust preventative
- Primer, sealer, and undercoat
- Shellac, lacquer, varnish and urethane
- Stain
- Water-proofer, sealer, and water repellent for concrete/masonry/wood that is not tar or bitumen-based
- [Products we accept \(PaintCare\)](#) for up-to-date information and a current list of drop-off sites.



Wastes not accepted by PaintCare

- Additive, colorant, tint, and resin
- Aerosol paint (spray cans)
- Art and craft paint
- Automotive and marine paint
- Caulk, epoxy, glue and adhesive
- Deck cleaners
- Original Equipment Manufacturer (OEM) and Industrial Maintenance (IM) coatings
- Roof patch and repair
- Tar and bitumen-based product
- Thinner, stripper, and solvent
- Traffic and road marking paint
- Wood preservative containing pesticide*
- Paint chips with lead



[Products we accept \(PaintCare\)](#) for up-to-date information and a current list of drop-off sites.

Disposal options for wastes not accepted by PaintCare

- A permitted hazardous waste transport and disposal company
- Very small quantity generator collection site

Resources

- [Hazardous waste disposal companies](#) (Hennepin County)
- [Very small quantity generator collection programs](#) (Minnesota Pollution Control Agency)

Aerosols

Partially-filled, unusable aerosol cans are Universal hazardous wastes and must be managed properly

Storage requirements

- Containers must be labeled:
 - Clear descriptive name, such as “Universal Waste Aerosols”, “Waste Aerosols” or “Used Aerosols”
 - Accumulation Start Date
 - Accumulate hazardous waste aerosols for no more than one year from the date you generated them

Disposal:

Ship hazardous waste (non-empty) aerosols without a hazardous waste manifest to any site that has agreed to accept and properly manage them. Hazardous waste aerosols may not be placed into normal solid waste.

Resources

[Waste aerosols and compressed gas cylinders](#) (Minnesota Pollution Control Agency)

Aerosols

Puncturing

- You may puncture aerosols as long as any unavoidable liquid residuals are collected and properly managed as hazardous waste unless evaluated to be non-hazardous.
- The aerosol puncturing unit must meet any applicable Minnesota State Fire Code and OSHA employee requirements. See Resources below (MPCA factsheet on Waste Aerosols and Compressed Gas Cylinders).

How to show an aerosol is empty

Empty aerosol containers meet these criteria:

- Contain no compressed ignitable gas propellant or product
- All liquid product that can be dispensed through the valve has been
- Less than 3% of the product capacity of the container remains

Resources

[Waste aerosols and compressed gas cylinders](#) (Minnesota Pollution Control Agency)

Disposable & launderable paint/solvent rags

Evaluation

You must follow the flow chart outlined in MPCA's Managing Sorbents Factsheet (see Resources below) to determine if your rags are hazardous or nonhazardous waste

Labeling and closed container requirements

- Hazardous waste paint/solvent rags must be properly labeled with a clear descriptive label such as "Hazardous Waste Rags" and container must be closed when not adding waste

Disposal

- If hazardous waste, send to an authorized hazardous waste disposal facility
- Rags must contain no free liquids before leaving your site. Collect liquids removed from rags and manage the recovered liquid as hazardous waste

Resources

[Hazardous waste disposal companies](#) (Hennepin County)

[Managing sorbents: towels, wipes and rags](#) (Minnesota Pollution Control Agency)

Paint/thinner to be recycled and recycling waste (generated from a recycling unit)

Storage requirements

- Containers of solvent to be recycled and the waste from recycling (sometimes called “pucks” or sludge) must be labeled:
 - “Hazardous Waste”
 - Clear descriptive name, such as “Paint/Thinner to be Recycled ” and “Paint/Thinner Recycling Waste”
 - Accumulation Start Date
- Containers must be closed when not adding waste
- Document weekly container inspections on a log

Resources

[Example weekly inspection log](#) (Hennepin County)

[Recycling hazardous waste](#) (Minnesota Pollution Control Agency)



We recommend you label useable, recycled solvent to distinguish it from waste (unrecycled) solvent and sludge



Violation: Failure to label pail of un-recycled waste paint/thinner

Paint booth filters



Nonhazardous paint booth filters are improperly stored outside in an uncovered dumpster. These filters can contaminate stormwater, so they represent a significant material. Read below.

Many facilities with **uncovered** scrap bins, trash compactors or other significant materials exposed to the elements need to complete a Stormwater Pollution Prevention Plan, and then apply for stormwater permit coverage

Evaluation requirements

To determine if your waste is hazardous, refer to 'Managing Paint Booth Filters' below

- Don't spray gun-cleaning solvents into the filters as it will make the filters hazardous waste (solvent must be collected for proper disposal)
- Hazardous waste paint booth filters must be properly labeled and closed (similar requirements as waste paint thinner)
- Never store spent filters outside in an uncovered container, even if they are non-hazardous

Disposal options

- Non-hazardous filters are to be managed as industrial waste
- If hazardous waste, send to an authorized hazardous waste disposal facility

Resources

[Managing paint booth filters](#) (Minnesota Pollution Control Agency)
[Stormwater program for industrial activity: steps to compliance](#) (Minnesota Pollution Control Agency)

Used oil

Storage requirements

- Used oil containers must be labeled "Used Oil"
- Keep containers closed, and funnel lids latched, when not adding or removing waste

Disposal options

A permitted hazardous waste transport and disposal company
Very Small Quantity Generator Collection site



Violations:
Failure to close
and label used oil



Violations:
Open funnel still in
bung opening (not
closed) and failure to
label used oil

Resources

[Used oil and related wastes](#) (Minnesota Pollution Control Agency)

Used oil filters

Storage requirements

- Filters must be drained to remove free liquids
- Containers must be labeled "Used Oil Filters"
- Keep containers closed when not adding a waste

Disposal requirements

- Do not dispose used oil filters in the trash

Resources

[Used oil and related waste](#) (Minnesota Pollution Control Agency)

[Hazardous waste disposal companies](#) (Hennepin County)



Violation: Used oil filters in trash



Violation:
Failure to close and label used oil filter container

Used oil sorbents/disposable rags/floor dry

Container labeling and closure requirements

- Label containers using the word's "Used Oil" Examples include:
 - "Used Oil Sorbents"
 - "Used Oil Rags"
 - "Used Oil Floor Dry"
- Containers must be closed when not adding a waste

Disposal requirements

Do not dispose oily rags and sorbents such as floor dry and paper towels in the trash

Resources

[Used oil and related waste](#) (Minnesota Pollution Control Agency)

[Hazardous waste disposal companies](#) (Hennepin County)



Violation: Used oil filters and oily rags in trash

Fluorescent & HID lamps



Container labeling and closure requirements

- Containers must be labeled:
 - "Used Lamps", "Universal Waste Lamps"
- Used lamps must be containerized
- Containers must be closed when not adding a waste.

Resources

[Managing universal wastes](#) (Minnesota Pollution Control Agency)
[Hazardous waste disposal companies](#) (Hennepin County)



Violation:
Failure to containerize used lamps



Violation: Intentionally breaking lamps. If a lamp accidentally breaks, you must place in a seal-tight container to prevent an airborne mercury release

Recordkeeping

- Waste evaluation records (records that show your waste is or is not hazardous e.g. testing reports, waste profiles, generator knowledge, etc.):
 - Keep for as long as you generate that waste and for at least 3 years after waste is no longer generated
- Recycling and disposal records:
 - Keep any recycling and disposal record for 3 years from the date of shipment
 - Shipping paper or receipt
 - Disposal log
 - Hazardous waste manifest

Resources

[Keep hazardous waste records](#) (Minnesota Pollution Control Agency)

Recordkeeping

- Weekly hazardous waste container inspection logs
 - Check for:
 - Any sign of spills/leaks
 - All containers in good condition (no rust/cracks/damage)
 - All containers are closed
 - All containers labeled with a clear description of their contents
 - All containers labeled with the accumulation start date
 - Aisle space between containers enough to reach all sides
 - Note any problems and what was done to correct the problem
 - Keep weekly hazardous waste container inspection logs for 3 years

Resources

[Weekly inspection log](#) (Hennepin County)

Recordkeeping

- Records must be kept at or accessible from, if electronic, the licensed site
- Make sure you receive a copy of the manifest signed and mailed to you by the designated facility on receipt of the waste and keep it for at least three years

Resources

[Manifest shipments of hazardous waste](#)

Poor housekeeping contributes to violations

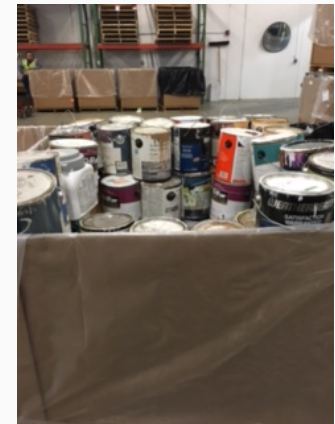


Here are examples of violations:

- Failure to label actual waste container
- Open waste paint/solvent containers
- Failure to containerize, label and close used oil filters
- Failure to containerize and label used oil rags

How to avoid violations

- Apply for license
- Report all wastes
- Organize containers
- Separate incompatible wastes
- Label containers (one of the most common violations)
- Close your containers (one of the most common violations)
- Clean up spills
- Maintain spill kits
- Train your employees
- Manage your waste properly
- Keep records
- More information available on our website: hennepin.us/hwgenerators



Enforcement

\$575.00 citation for operating without a license

Resources

- ❖ [Hazardous waste generator citation payable fines](#)
- ❖ [Hazardous waste licensing and renewal](#)

\$525.00 citation for not reporting all wastes

Operating Without License	ORD 7(3)(1)	\$575
Submit License Renewal Application	ORD 7(3)(5)	\$575
Submit License Application – Facility	ORD 7(3)(5)(C)	\$500
Feedstock Records	MNR 7045.0125(5)(B)	\$825
By-product Records	MNR 7045.0125(6)(A)(1)	\$825
Evaluate Waste	MNR 7045.0214(1)	\$825
Evaluate Waste prior to Mingling	MNR 7045.0215(1)	\$825
Identification Number	MNR 7045.0221	\$275
Post License Public Area	MNR 7045.0225(2)	\$275
Amended License Application for New Waste	MNR 7045.0243(3)(G)	\$575
Update License Renewal Application	MNR 7045.0248(1)	\$525
Improperly Completed Manifest	MNR 7045.0261(7)	\$575
Manifest Requirements	MNR 7045.0265(1)	\$325
Submit Initial Manifest Copy	MNR 7045.0265(1)(D)	\$325
Submit Final Manifest Copy	MNR 7045.0265(4)	\$325

1. Report all wastes to Hennepin County using the [Step 2 Online Waste Survey](#)
2. Finish the steps to obtain a generator license if you are directed to do so
3. Properly manage and dispose of your waste



Your next steps

- Congratulations, you have finished the STEP 2 training for users of architectural paint.
- Please return to the STEP 2 Online Waste Survey and complete the fields. **You may use this presentation to help answer the STEP 2 questions, so we suggest you keep this presentation open.**
- If you have questions about this training, please call 612-348-3777 and ask for the environmentalist on call.