# Management Options for Old Paint and Paint-related Materials

Minnesota Technical Assistance Program - FACT SHEET

Painters use many materials in their work that typically are considered hazardous waste when they are no longer usable. These materials include ignitable wastes, such as solvents and other cleaners, paints and paint thinners, and adhesives and glues; or toxic wastes with heavy metals. **In Minnesota, ANY amount of business-related hazardous waste is regulated-no matter how small.** These regulations include licensing, managing and reporting requirements from the Minnesota Pollution Control Agency (MPCA) or metro county hazardous waste office. This fact sheet provides information on how to effectively reduce and manage these wastes.

#### Waste Reduction\_

There are a number of simple techniques for reducing waste that any business should practice to remain competitive. Often labeled "good operating procedures, "these techniques include the following:

- Inventory Control. Unusable inventory costs a painter twice: once for the raw materials and again for disposal. A simple waste management tool for controlling inventory is to follow the product label directions for shelf-life limits and proper storage conditions. Remember, inventory is a major investment.
- Scheduling. Cleaning equipment between tasks, shifts or color changes can be a major source of waste. Think about how schedules can be arranged to reduce the need for cleaning.
- Recordkeeping. Recordkeeping develops consistent procedures, and reduces guesswork and mistakes. Successful ideas

need to be recorded in order to review and improve on that success.

- Maintenance. Painters depend on their tools. Poorly maintained tools can reduce transfer efficiency and result in redoing work, which means wasted effort and wasted raw material.
- **Training.** Training promotes efficient and consistent work habits. Trained workers know how to do a task correctly and often will have the best ideas for reducing waste.

If waste or unwanted materials already have accumulated, there are a number of steps that can be taken to organize and find other uses for these materials. These steps include:

- Inventory unopened materials and return unwanted but usable materials to the distributor or manufacturer, if possible.
  Develop agreements with your vendors to make this a routine procedure.
- Identify any material that still may be useful, and log it into your current inventory for use.
  - Use old paint as a base coat or primer. Mix the same or similar types of paint when mixing different colors.
  - Reuse the clean portion of thinner after it has separated from the contaminants.
- Donate unwanted but usable material to community or high school theaters, or community fix-up projects that are willing to accept the material. Generally, these groups are looking for unopened, onegallon cans or larger quantities of lightcolored latex paints. With customer approval, small quantities of paint may be left at the job site as touch-up paint.

(contined)

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• Materials exchange services also may help connect you with others who could use your unwanted specialty and industrial coatings.

Waste Management

Even when the best painters successfully reduce waste, some wastes will be generated. **The MPCA considers paint waste to be hazardous until properly evaluated and shown to be nonhazardous.** The following information addresses proper management of unavoidable wastes.

## Liquid Wastes

Liquid wastes can be pumped, poured and handled relatively easily and usually are the least costly to manage. Unusable liquid materials (wastes) include: oil-based paints, stains and consolidated bulk liquids.

Compatibility (the ability of liquids to mix together)-especially with water, acid and alkaline materials-presents special safety problems because of potential chemical reactions. If you have any doubt about compatibility, seek knowledgeable advice from vendors, consultants, your transporter or disposal facility.

Compatible liquids may be consolidated into 55-gallon U.S. Department of Transportation (DOT) approved shipping drums-check with your permitted hazardous waste disposal facility on its specific requirements before consolidating liquids (see the **Mixtures** section on page 3).

Combustible materials (for example, oil-based paints and stains) and other petroleum-based liquids are often used as alternative fuel sources at permitted hazardous waste disposal facilities.

Waste waterborne paints (latex) may have little or no combustible value and should be managed separately from other liquids. It may be possible to sewer washwater from latex paint cleanup and water-based cleaners. However, disposal into storm sewers or septic tank systems is not permitted. Check with the MPCA or your local treatment plant for permission and restrictions.

**Paint Waste.** Newer latex paint is formulated with less heavy metal constituents than older paints. However, before the waste can be managed, the unusable paint waste may require testing-such as the toxicity characteristic leaching procedure (TCLP) test or ignitability (flashpoint) -to determine whether or not the waste is classified as hazardous. Material Safety Data Sheets (MSDS), available from vendors for each paint product, may help identify TCLP constituents or the flashpoint in the paint. Certification or testing to prove that the paint is free from all toxic constituents above the regulatory limit may allow you to manage the paint as nonhazardous waste.

Large volumes of nonhazardous latex paint still may require disposal management by a permitted hazardous waste facility because disposal options for this type of liquid waste are limited.

Older latex paints that contain mercury-based fungicides (typically phenyl mercuric acetate) must be tested or handled as a hazardous waste and should be managed separately from other material.

**Solvents and Thinners.** Large amounts of these materials can be managed separately from other wastes for recycling purposes. Your disposal company can provide you with disposal costs that compare separated wastes and combined wastes.

Note: Paint strippers and other chlorinated solvents, such as methylene chloride, should always be managed separately. Chlorinated solvents-even in small concentrations-can affect which proper disposal options are available for the waste and add significantly to disposal costs.

### **Nonliquid Wastes**

Unusable nonliquid wastes include: nonpourable materials or cured hardeners, cements, epoxies, adhesives and glazes. Often times, these materials cannot be separated from the container. Disposal will often require placing the entire package into a larger shipping container "lab pack." Disposal of lab packed material is more expensive and should only be used if materials cannot be consolidated together (for example, sludges or dry paint). A hazardous waste disposal company should be contacted for specific information on lab packing.

**Mixtures.** While consolidation does offer some advantages, mixing products together changes the ability to rely on manufacturer information contained in the MSDS. A MSDS, available from product vendors, contains product information that will help disposal companies determine whether or not they can manage the waste material. Laboratory sampling and analysis often will be required to evaluate components in random mixtures before they can be managed and/or disposed.

**Empty Containers.** Outlets for recycling empty containers (plastic and metal) are available. Since the requirements vary for each outlet, contact the outlets directly to make sure that you understand their requirements for accepting empty containers. Most require that containers be completely empty; use a stiff kitchen spatula to thoroughly clean out the containers. If an outlet is not available, ask your solid waste hauler if they will accept the containers.

**Spray Paint Cans and Other Aerosols.** Waste spray containers that are not empty, and waste pressurized containers are subject to hazardous waste disposal rules. However, simple maintenance-such as keeping nozzles unclogged-will help companies empty the containers and avoid hazardous waste disposal requirements. Prevent nozzle tips from clogging by inverting the can after each use and spraying the nozzle to clear any residual paint. Clogged aerosols also may be fixed by cleaning or replacing the nozzle tip. Aerosol cans with clogged nozzles may be emptied by specially designed equipment. Residues from cans containing the same materials may be collected and reused. Add residues from cans that contain different materials to other compatible wastes (see the **Mixtures** section on this page).

Note: Materials containing chlorinated compounds always should be managed separately. Chlorinated  $c \circ m p \circ u n d s$  - in small concentrations-can affect which proper options are available for the waste and add significantly to disposal costs.

Reusable aerosol containers may be used to spray a variety of liquids that are available in bulk packages, such as solvents and cleaners. Businesses can lower purchase costs and reduce or eliminate empty container disposal costs by using reusable aerosol containers.

## Additional Resources\_

**Regulatory Contacts for Information about Hazardous Waste Requirements.** Professionals in the building trades and in painting companies often work for small operations with many priorities requiring their attention. Compliance with environmental regulations is an important priority. For information about regulatory requirements on disposal of paintrelated waste materials or other regulatory questions, contact the MPCA Generator Technical Assistance Unit at 8001657-3724 or 612/297-8363, or the appropriate metro county hazardous waste office listed below.

#### Metro Area Hazardous Waste Offices:

Anoka County: 422-7063 Carver County: 361-1800 Dakota County: 891-7011 Hennepin County: 348-4919 Ramsey County: 773-4466 Scott county: 496-8473 Washington County: 430-6655

**Technical Assistance.** Users of significant amounts of hazardous materials can effectively reduce their wastes and realize cost benefits. MnTAP, a nonregulatory business assistance program at the University of Minnesota, can help you reduce the amount of hazardous waste that you generate.

MnTAP has a variety of free publications available on Minnesota hazardous waste rules and requirements, as well as reference lists for recycling and disposal options. These include the following:

- Disposal of Industrial Wastewater and Alternatives (SR7-MHW19]
- Evaluating Paint and Ink Wastes [#44]
- Managing Empty Containers [SR7-REG H8]

- Materials Exchange: An Alternative to Disposal [#35]
- Outlets for Empty Containers [#23]
- Waste Reduction and Recycling Tips for Empty Containers (#67]
- Waste Reduction Alternatives for Spray Painting and Coating [#85]

To receive assistance, order a publication or inquire about additional information or services, call MnTAP at 612/627-4646 or 800/1247-0015 if you are calling from greater Minnesota.