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OREGON PAINT RECYCLING PROGRAM

Collection Site Guideline

June 2010

Objective

This guideline is intended to provide practical guidance and best management practices for collection site operators regarding staff handling and storing of program products collected under the PaintCare program. This guideline should be used by collection site operators to instruct staff in using required practices of the program.

The practices described in this guideline are not intended to replace any standards, acts or regulations required under Local, State or Federal law; nor is the guideline intended to relieve the collection site operator or staff of any requirements under the law.

PaintCare accepts no responsibility and assumes no liability resulting from the incorrect use of information contained in this guideline or from the use of this information in any circumstances other than those described.

TABLE OF CONTENTS

INTRODUCTION	4
ABOUT PAINTCARE	5
INFORMATION FOR THE COLLECTION SITE	7
INFORMATION FOR COLLECTION SITE STAFF	8
APPROVED PRODUCTS	9
WHO CAN DROP OFF PAINT?	10
CHARGING FEES AT COLLECTION SITE	13
CONDITION OF CONTAINERS FOR ACCEPTED MATERIALS.....	13
PRODUCTS ACCEPTED BY THE PROGRAM	14
PRODUCTS NOT ACCEPTED BY THE PROGRAM.....	14
OPERATION OF THE COLLECTION SITE	16
COLLECTION SITE REQUIREMENTS.....	17
STORING PRODUCTS CORRECTLY	20
PAINT EXCHANGE.....	21
SHIPPING & RECIEVING	23
INSPECTIONS, TRAINING & RECORDS.....	24
HEALTH & SAFETY and EMERGENCY RESPONSE	25
WORKER SAFETY AND TRAINING REQUIREMENTS.....	26
EMERGENCY & SAFETY EQUIPMENT.....	26
SPILLS	27
SPILLS	28
SPILL KITS.....	28
TRAINING	29
SPILL RESPONSE PROCEDURES	30
Appendix A – CEG Declaration Form	31
Appendix B – CEG Certification Log Book	32
Appendix C – CEG Q&A	33
Appendix D – Paint Exchange Waiver	35
Appendix E - Paint Exchange Report Form	36
Appendix F – Poster	37
Appendix G – Emergency Contact Information	38
Appendix H – Training Records for PaintCare Collection Site	39

Chapter 1



INTRODUCTION

In this chapter you will find:

- Information about PaintCare
- Information for collection site and staff

ABOUT PAINTCARE



The Legislation

Oregon has passed legislation (HB 3037) which provides for the establishment of a statewide paint stewardship pilot program through a stewardship organization which will:

- (1) Establish an environmentally sound and cost-effective architectural paint stewardship program;
- (2) Undertake responsibility for the development and implementation of strategies to reduce the generation of post-consumer architectural paint;
- (3) Promote the reuse of post-consumer architectural paint; and
- (4) Collect, transport and process post-consumer architectural paint for end-of-product-life management.

This legislation requires the program to promote the reuse of post-consumer architectural paint and to have a system in place for the end-of-product-life management for paint that includes the recycling, energy recovery and disposal using sound management methods.

About PaintCare

AmericanCoatings
ASSOCIATION



PaintCare Inc. is the industry non-profit association formed by the American Coatings Association (ACA), (formerly the National Paint and Coatings Association (NPCA)) as the “stewardship organization” of the producers of architectural paint sold in Oregon. ACA is a voluntary, nonprofit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory and judicial issues, and provides forums for the advancement and promotion of the industry through educational and professional development services.

PaintCare encourages consumers to assist with the program and do their part in protecting our environment, through its education and outreach strategy which includes the following objectives:

- Building awareness of the program among consumers
- Identifying what products are included in the program
- Identifying collection site locations
- Emphasizing the negative environmental impact if leftover paint is not managed properly
- Emphasizing the purchase of the correct amount of paint in order to reduce the amount of leftover paint
- Promoting the reuse of leftover paint
- Promoting recycling and proper disposal of leftover paint

More Information

Collection site staff may obtain further information by contacting PaintCare at:



Phone: (503) 406-2590
Email: rick@productcare.org
Fax: 503-406-2594

Consumers may obtain program information by visiting www.paintcare.org or to find their nearest collection site to drop of paint call Earth 911 at 1-800-cleanup (253-2687).

Know Your Responsibilities

As an approved collection site, under the program, you are responsible for correctly maintaining the PaintCare program at your collection site. This means that you must ensure that:

- The requirements described in this guideline are applied correctly at the collection site
- Staff have read this guideline and can demonstrate to you that they are familiar with the practices contained within this guideline

In addition to the requirements of this program, the collection site is subject to all applicable federal, state, and local statutes, regulations, and ordinances as it pertains to all activities at the collection site.

Collection sites that are permitted or licensed household hazardous facilities will have existing approved operating procedures. This guideline is not intended to replace such operating procedures, but to provide handling instruction for paint that is collected and destined for the program. In the event that there is a conflict between procedures outline in this guideline and those of the approved operating procedure, the approved operating procedures take precedence.

Use This Guideline for Training

This guideline must be used to instruct staff in the correct handling and storage practices for paint products collected under the program.

INFORMATION FOR THE COLLECTION SITE

Supplies Provided By Paint Care:

The program will supply you with rack cards for distribution to your customers. The rack cards containing important information about the program and the products that may be returned. More rack cards may be obtained by phone or fax from the PaintCare office.



Phone: (503) 406-2590
Email: rick@productcare.org
Fax: 503-406-2594

Prior to opening as a collection site, a number of supplies will be delivered to you by PaintCare's contracted transporter to assist you in maintaining the program. They include:

- Collection bins
- Labels for collection bins
- Spill kit
- CEG Declaration Form, Certification Log Book, and CEG Q&A (Appendix A, B and C)
- Paint Exchange waiver form (if applicable) (Appendix D)
- Collection site Poster (Appendix F)
- Program Rack Cards to inform customers about the program



The program does not provide personal protective gear that may be required by the Occupational Safety and Health Administration (OSHA) Regulations for your place of work.

How to Get More Information about the Program

Collection site staff may obtain further information by contacting PaintCare:



Phone: (503) 406-2590
Email: rick@productcare.org
Fax: 503-406-2594

INFORMATION FOR COLLECTION SITE STAFF

How to Use This Guideline

Read the following instructions completely and ensure that you are familiar with the requirements before beginning work on collecting paint.

Be sure to find out (and remember) where this guideline is kept. You may need to refer to it until you become familiar with the program and the products brought to the collection site.

Chapter 2



APPROVED PRODUCTS

In this chapter you will learn about

- Who can drop off paint?
- Charging fees at collection site
- Condition of containers
- Products that are accepted by the program
- Products that are not accepted by the program

WHO CAN DROP OFF PAINT?

Legislation (HB 3037) defines Architectural Paint as follows:

Section 2(1)

(a) 'Architectural paint' means interior and exterior architectural coatings sold in containers of five gallons or less.

(b) 'Architectural paint' does not mean industrial, original equipment or specialty coatings.



Architectural paint is sold in Oregon primarily through retail stores, which may be dedicated paint stores, hardware stores, home improvement stores or other. Purchasers may be residential consumers, trade painters, institutions or businesses. All architectural paint can be classified as either latex (water based) or alkyd (oil-based).

This program only permits the collection of **alkyd** leftover architectural paint from non-households (businesses, institutions, non-profit and government organizations) that are a **Conditionally Exempt Hazardous Waste Generator (CEG)**.

What is a Conditionally Exempt Hazardous Waste Generator?

Businesses and other entities such as government facilities, schools, and non-profit organizations that generate solid waste are subject to applicable state and federal hazardous waste management regulations. Businesses and other entities that produce and accumulate small amounts of hazardous waste are called *Conditionally Exempt Hazardous Waste Generators (CEGs)* and are conditionally exempt from most state and federal hazardous waste management requirements if they:

- Produce less than 220 pounds of hazardous waste each month,
- Produce less than 2.2 pounds of acutely hazardous waste each month, and
- Accumulate no more than 2,200 pounds of hazardous waste (or 2.2 pounds of acutely hazardous waste) on site at any one time

The Program will **not accept** leftover architectural **alkyd paint** from businesses and organizations not meeting the conditions for the CEG exemption although latex paint can be accepted from all consumers including those that do not meet the CEG exemption as latex paint is not considered a hazardous waste in Oregon.

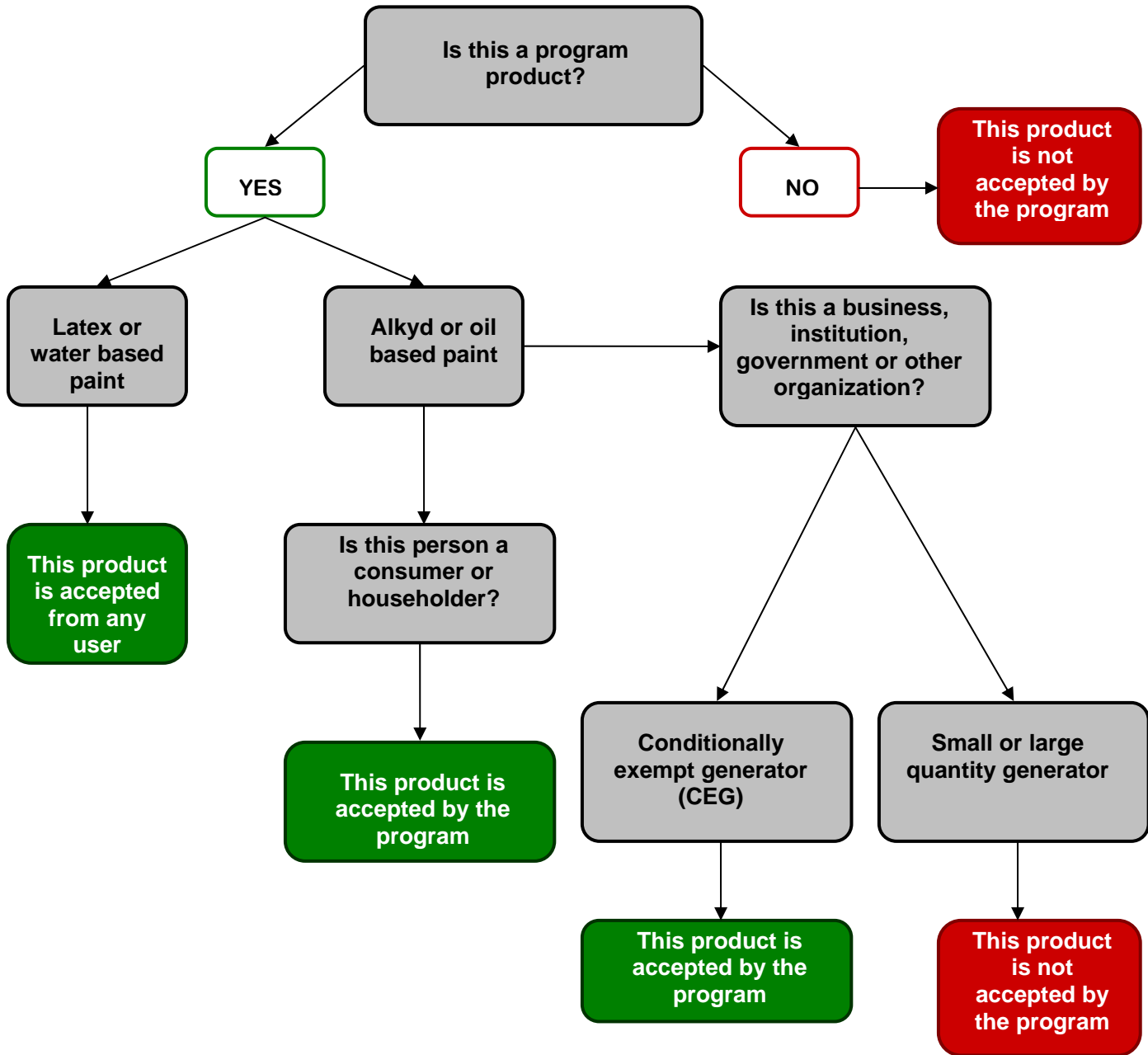
CEG Screening Procedure

Non-households (businesses, non-profit and government organizations) bringing in leftover alkyd paint to a PaintCare collection center must first be screened to ensure that they are indeed a conditionally exempt hazardous waste generator.

When an individual brings in paint to a collection facility, they will be given a flyer (or shown a poster) indicating acceptable paint products (see page 15).

- The Collection site staff will ask the person if they are bringing in household paint. If the answer is yes, and the paint and containers are acceptable, the paint will be collected.
- If the person bringing in paint says that the paint is not household paint and they are bringing in only latex paint and paint and containers are acceptable, the paint will be collected.
- If the person says that they are not a household and they have alkyd paint, they will be asked to read the CEG declaration form (see Appendix A) or CEG log book (see Appendix B) and sign the CEG declaration form or log book certifying they are indeed a CEG. The form will include the date, the name and address of their business. If the customer requires further information, then supply them with a copy of the CEG Q & A (see Appendix C). The CEG Q & A handout will encourage people to contact the Department of Environmental Quality (DEQ) for technical assistance if they need additional information about hazardous waste management. If they are unsure of their generator status, they will be referred to the DEQ hazardous waste technical assistance webpage at: <http://www.deq.state.or.us/lq/hw/technicalassistance.htm>

Acceptance Screening Procedure Decision Tree



Declaration forms may be reviewed by PaintCare or other agencies and compared with a list of registered hazardous waste generators from DEQ to ensure that hazardous waste was not collected from large or small quality hazardous waste generators. When regulated generators are suspected, the information will be given to the appropriate DEQ regional office for possible follow-up.

CHARGING FEES AT COLLECTION SITE

The legislation **prohibits** the charging of a fee to a consumer/ customer at the point of collection. Therefore, **no fee can be charged** to any customer returning program paint to a PaintCare collection site. Existing household hazardous waste facilities that are also PaintCare collection sites, may **not charge a fee** to a consumer/customer for dropping off paint but may charge a fee, for any materials accepted outside of the PaintCare scope of products.

CONDITION OF CONTAINERS FOR ACCEPTED MATERIALS

To facilitate safe handling of collected materials,

- Paint must be in original paint containers,
- The container must have original label
- The container must be in good condition and not leaking, and
- The container must be 5 gallons or less in size

PRODUCTS ACCEPTED BY THE PROGRAM



Maximum container size: 5 gallons

- Interior and Exterior Paints: Latex, acrylic, water-based, alkyd, oil-based, enamel (all types of finishes and sheens, including textured coatings)
- Deck coatings and floor paints (including elastomeric)
- Waterproofing concrete/masonry/wood sealers and repellents (not-tar-based or bitumen-based)
- Melamine, metal and rust preventative
- Primers, undercoaters and sealers
- Stains and Shellacs
- Swimming Pool Paints (single component)
- Varnishes and urethanes (single component)
- Lacquers, Lacquer Sanding Sealers, and Lacquer Stains
- Wood Coatings (containing no pesticides)

PRODUCTS NOT ACCEPTED BY THE PROGRAM



Already empties paint containers are excluded from the program

The following types of paint and coatings are excluded.

- Industrial Maintenance Coatings
- OEM and Industrial surface coating (shop application) paints and finishes
- Aerosol Paints
- Automotive Paints
- Marine Paints
- Craft Paints
- Caulking Compounds, epoxies, glues or adhesives
- Colorants and tints
- Resins
- Paint Thinners, mineral spirits or solvents
- Paint Additives
- Pesticide containing products
- Roof patch or repair
- Tar-based or bitumen based products
- 2-Component Coatings
- Deck Cleaners
- Road Marking or Traffic paint
- Aircraft & railcar paints
- Unlabelled paint containers
- Leaking paint containers

Architectural vs Industrial

One of the primary ways to distinguish between architectural and industrial maintenance coatings is the manufacturer's recommendation. In fact, industrial maintenance coatings must be labeled under the rules as:

- (1) "For industrial use only."
- (2) "For professional use only."
- (3) "Not for residential use" or "Not intended for residential use."

Therefore, if the coating is labeled as an industrial product and not intended for architectural use, it is not accepted under the program

For Safety: paint must be in original container with original label, properly sealed and not leaking.



Contact the PaintCare office at (503) 406-2590 if further clarification is required on any product.

Chapter 3



OPERATION OF THE COLLECTION SITE

In this chapter you will learn about

- Collection Site Requirements
- Storage Requirements
- Shipping and Receiving
- Inspections, Training and Record Keeping

COLLECTION SITE REQUIREMENTS

The management requirements in this chapter are intended to:

- Minimize releases of hazardous material into the environment, and
- Protect worker and public safety.

General Requirements

- Collection site must be able to accept program materials from consumers during operating hours.
- Program materials must be accepted by the collection site at no cost consumer at the time of collection. Collection sites cannot charge a fee for accepting PaintCare program materials.

Collection sites under the program may be any of the following:

- Local government HHW collection sites
- Local government HHW events
- Paint retailers
- Other private or not for profit entities or businesses

Below are the general requirements for a collection site. Depending on the type of collection site, not all requirements may be applicable.

Comply with *applicable* federal, state and local laws, including:

- Zoning requirements for their activities;
- Fire and building codes;
- Oregon Department of Environmental Quality (DEQ) permit requirements (air, hazardous waste, water quality, solid waste or storm water permits); and
- Oregon OSHA requirements.
- Have the capability (e.g., adequate space, staffing, and training) to collect and store paint;
- Have adequate comprehensive and/or commercial general liability insurance to cover potential risks and liability associated with activities on premises;
- Provide staff to collect paint and be open to the public with a frequency adequate to meet the needs of the area being served; and
- Have appropriate signage that informs customers of the hours of operation

Security Requirements

The collection site should be secure and locked at all times when it is closed or not attended.



Only collection site staff should have access to the collection and storage area.

Signage

A poster will be supplied to the collection site to help identify to the consumer that you are a collection site for the program, refer to appendix F. This poster should be posted in a highly visible area, preferably near or at the entrance or service counter.

Waste Storage Requirements

The following are the storage requirements for all collection facility:

- Establish a dedicated storage area for paint collection;
- Place collection bins on an impermeable surface (e.g., concrete, asphalt, sealed wood floor) whenever possible. Collection bins providing secondary containment must be stored on a solid surface such as concrete, asphalt or compacted gravel, not bare soil. In rare cases when paint is collected in containers that do not provide secondary containment, the containers shall be placed on an impermeable surface designed to contain spills or releases while the material is being collected or accumulated.
- Protect storage containers from temperature extremes by storing them inside or under cover whenever practicable;
- Store collection bins away from ignition sources;
- Place collection bins away from any type of storm or floor drain;
- Limit public access to the collection area;
- Keep collection bins closed except when adding leftover paint;
- Maintain sufficient space around collection bins to permit inspection for leakage and access to the bin in an emergency;
- Establish a dedicated storage area for leftover paint collection which ensures that there is sufficient separation of collection bins from other materials or products;
- Do not over-fill collection bins;
- Pack 5 gallon containers on the bottom of the collection bin whenever practical;
- Pack all containers upright and as tightly as possible and in a manner which will protect them from breakage, rupture, and conditions which may cause them to break or leak;
- Use safe materials handling, storage, and management practices, including adhering to good housekeeping standards, such as keeping all leftover paint storage areas clean and orderly; and
- Ensure that the collection bins are marked on two opposite vertical sides of the package with the arrows pointing in the correct upright direction and marked "this end up." Collection bins will be provided by PaintCare to the collection sites.

Waste Acceptance Requirements

Greeting the Consumer

This program is not a self-serve program and prohibits self-service returns. The drop off of paint from customers is to be supervised at all times. Collection site staff should greet each customer that is returning paint to the program to ensure the customer is eligible to return paint to the program (see CEG screening procedure on page 12) and that the products being returned is acceptable under the program.

Examining the Product

The container of products should be visually examined to ensure they are:

- Accepted by PaintCare
- In containers size of 5 gallons or less
- In original containers with original and readable label
- Properly sealed to prevent leakage
- If the paint is suitable for Paint Exchange (if applicable)

Screen returns to ensure **only** the following leftover architectural paint is collected:

- Latex and alkyd paint from households;
- Latex paint from non-households regardless of their hazardous waste generator status; and
- **Alkyd paint** from conditionally exempt small quantity hazardous waste generators (CEGs); generator status will be verified using the generator screening procedure. If a customer is suspected of being a CEG (e.g., large numbers of 5 gallon containers, paint type not normally sold for residential use, or business logos on clothing or truck), request that they certify that they are a conditionally exempt small quantity generator. Have the customer read the CEG qualification requirements and sign the certification statement, including their business name and address. **Do not accept alkyd paint from small and large quantity hazardous waste generators or customers that will not certify CEG status.**

IMPORTANT: Never open the product or allow the customer to open a product to see what is inside.

Drop-off Limits

While the program intends to collect as much leftover paint as possible, the program also recognizes that there may be operational limitations such as storage capacity limitations. As such, collection sites may voluntarily limit the amount of paint accepted from a customer at any one time to avoid over capacity.

If your collection bins are completely full, inform the customer that you are temporarily unable to accept their paint and redirect them to the nearest alternative PaintCare collection site or ask them to comeback at a later date once you've had a pickup. To locate the nearest collection site, direct customers to 1-800-cleanup (253-2687) or the online collection site locator at www.paintcare.org.

Collection sites should request larger volume consumers/customers to book an appointment for drop off to ensure the collection site has sufficient collection and storage capacity. Collection sites should contact a PaintCare service provider in advance to drop off additional collection/storage container if required.

Dealing With an Unacceptable Product

If a product cannot be accepted under the program, it must be refused and given back to the consumer and explain that the product is not covered under the program. For existing collection sites that are household hazardous waste collection facilities, the unacceptable product may be acceptable under your existing household hazardous waste program onsite.

- Inform any person bringing in unacceptable material to the collection site why their material cannot be accepted and direct them to a local hazardous waste collection facility if available. Give customers a rack card which provides contact information and where to find more information about the program such as acceptable products and unacceptable products, or provide the customer with the statewide toll-free household hazardous waste hotline number (1-800-732-9253) or the website at <http://www.deq.state.or.us/lq/sw/hhw/index.htm>.
- For non-households, the CEG handout will provide information about the DEQ hazardous waste technical assistance program including the address to their website at <http://www.deq.state.or.us/lq/hw/technicalassistance.htm>.

For further clarification on products accepted or not accepted, contact PaintCare at:



Phone: (503) 406-2590

Email: [rick@productcare.org](mailto:ricker@productcare.org)

Fax: 503-406-2594

STORING PRODUCTS CORRECTLY

Paint products received at the collection site must be stored correctly to ensure that the containers will not be knocked over, spilled or add to the risk of fire. Collection site staff should handle leftover paint containers in a manner that minimizes spills and releases.

Here are some simple rules for packing paint into the paint collection bins:

- Once the products are deemed acceptable, accept the products from the customer and place them into the collection bins immediately or in the event that that is not possible,

place the product temporary in a controlled area, restricted from public access and then transfer to the collection bins at first opportunity

- Ensure all 5-gallon containers are packed at the bottom of the collection bin whenever possible.
- Place all containers upright to avoid leaks or spills.
- Pack the paint containers as tightly as possible inside the collection bin. This helps to keep containers in place and avoids spillage.
- Always keep lids on collection bins to protect the contents from rain.
- Never overfill a collection bin
- Make sure the collection bin lid sits flat on top the collection bin

IMPORTANT:

All paint products must be stored in the collection bin at the end of each business day.

PAINT EXCHANGE

In order to increase the quantity of leftover Architectural Paint which is re-used, Program collection sites and other locations may offer “Paint Exchange” to their customers. In the Paint Exchange program, better quality containers of paint are placed on display shelving and available at little or no cost to another consumer. This section is only applicable to collection sites that offer paint exchange service.

Requirements:

- All paint containers must be labeled, more than half full, and in good condition; contents must be liquid and relatively new. This must be determined by gently moving the container, not opening the container.
- Paint for the Paint Exchange will be sorted and segregated in a separate storage area by staff.
- Paint cans must not be opened. The consumer may return it to the collection site if they take it home and realize that it is not suitable for their purposes.
- PaintCare will provide paint exchange waiver form (appendix D) which explain that the paint is taken as-is and there is no guarantee of quality or contents. The customer is required to read, complete and sign the form and the staff is required to verify what has been given away and initial the form.
- The collection site is required to track the number of paint cans given away or sold through the paint exchange. At the end of each month the collection site must send a report to the program reporting the volume of each type of paint (waterbased/latex vs oil based/solvent) given away through paint exchange even if their current operating procedures do not require this. The report form is provided on Appendix (E).

This form must be completed (ensure had writing is legible) and sent in at the end of every month to:



Fax: 503-406-2594

Email: rick@productcare.org

Note: Should the collection site choose not to use the waiver form, all liability and risks will be the responsibility of the collection site.

SHIPPING & RECIEVING

PaintCare has contracted with a service provider to provide transportation services for the delivery of collection equipment/supplies and the pickup of full collection bins of collected paint.

Shipping Collected Paint Off-site

When to Request a Pickup

Pickup should be ordered when ½ of the collection bins on your site are full.

To order a pickup call the following toll free number.

Transportation Service Provider

Phillips Service Corporation (PSC) 1-800-547-2436

When ordering a shipment for pick up please indicate:

- Name of Collection Site
- Your name
- Your phone number
- Number of full collection bins to be pickup and the number of empty collection bins on site

Collection sites should not expect next day service. Please allow for at least a minimum of a couple of business days from the time of your call to when the actual date of pickup. In more remote areas, collection sites should expect the time frame to be significantly longer. Once a pickup date has been set, you will be notified by the transportation service provider.

Preparing Collection Bins for Removal

On the scheduled pickup day, collection bins should be packed and the loading area kept clear. Assist the transporter in completing the necessary shipping documents. Make sure you keep a copy of the shipping documents for your records

Please assist the transporter in loading and off loading collection as needed or request by the transporter.

INSPECTIONS, TRAINING & RECORDS

Inspections

- At the end of each day, inspect collection area to ensure the containers are closed properly and the facility secured. Inspect collection bins for damage and/or missing labels. Correct if possible. Report any problems not corrected to the PaintCare program for replacement or repair as soon as possible;
- Perform monthly inspections to insure that all emergency and safety equipment is available and operable. Repair or replace defective or missing equipment as soon as possible; and
- Perform weekly inspections of the facility for inadequacies and deterioration, and for practices which may be causing (or may lead to) release of paint waste constituents to the environment or a threat to human health.

Record Keeping

- Maintain shipping, inspection, and employee training records for a minimum of 3 years;
- Maintain CEG certification records for a minimum of 3 years.; and
- Maintain shipping records for off-site shipments collected paint for at least 3 years.



Closing of Collection site

The following are the required procedures for the closure of a collection site.



- Notify the PaintCare program in writing a minimum of 60 days in advance of closing;
- Notify customers 30 days in advance of closing, by posting a sign at the entrance areas;
- Ensure all collected product is removed by PaintCare from the facility upon closing; and
- Ensure all PaintCare program equipment is returned upon closing.

Chapter 4



HEALTH & SAFETY and EMERGENCY RESPONSE

In this chapter you will learn about

- Worker Safety & training
- Emergency & Safety Equipment

WORKER SAFETY AND TRAINING REQUIREMENTS

Collection sites should:

- Ensure that all employees handling returned paint receive training in paint collection/handling, inspection and emergency response procedures before collecting paint;
- Ensure that employees conduct paint collection activities in a safe manner that protects workers and the public;
- Ensure paint collection activities follow good general health & safety practices, such as proper lifting procedures, proper hygiene, etc.;
- Ensure all staff are equipped for and understand:
 - Hazards that may be encountered in the work environment;
 - Safety practices needed to protect themselves and others from harm; and actions needed to be taken in an emergency (e.g., fire or spill). (For more information regarding training, refer to Oregon OSHA webpage at: <http://www.orosha.org/pdf/pubs/htmlpubs/betrained/betrained.html>); and
 - Maintain training plans and records for each employee in the operating record.



EMERGENCY & SAFETY EQUIPMENT

Collection Sites should:



- Establish storage area(s) for personal protection and spill response equipment in an accessible location adjacent to the paint collection area;
- Ensure that the facility is equipped with appropriate emergency response equipment (including a fire extinguisher, spill kit, and personnel protective equipment). All equipment is to be inspected monthly;
- Ensure spill kit contains at a minimum safety goggles, gloves, absorbent, duct tape, and plastic bags; and
- Ensure emergency procedures and contact information is posted by phone near the collection area. Emergency procedures and contact information template are included in paint manual provided to the collection site by PaintCare.

Chapter 5



SPILLS

In this chapter you will learn about:

- Spills
- Spill Kits
- Training
- Spill Response Procedures

The information in this Chapter is to assist you in dealing with a spill if a product is dropped or damaged in handling. It is important that all collection site staff know the correct actions to be taken.

IMPORTANT: Always be sure to act quickly when dealing with a spill so that paint does not harm the environment.

SPILLS

Spill Response

Collection Site Should:

- Use safe materials handling, storage, and management practices, including adhering to good housekeeping standards, such as keeping all leftover paint storage areas clean and orderly; and
- Operate in a manner that minimizes spills and releases of leftover paint;
- Clean up any spill or release of leftover paint immediately and place spill residue in a sealed container in a paint collection bin;
- Report any spill or release or threatened spill or release of **alkyd** paint to the environment (air, water or soil) greater than 10 gallons **or any release of any paint** to the storm drain or waters of the state to the Oregon Emergency Response System (OERS) by calling 1-800-452-0311 and PaintCare within 24 hours;
- Contact the PaintCare program to replenish spill kit materials as needed;
- If applicable, develop and maintain emergency action plan as required by Oregon OSHA. For information regarding who is required to have an emergency action plan refer to <http://www.orosha.org/pdf/pubs/3356.pdf>;
- If required by federal, state or local law, familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of the waste handled at the facility, and evacuation routes; and
- Post emergency contact numbers such as police, fire department, emergency services, and Oregon Emergency Response System (OERS).



SPILL KITS

This program provides each collection site with a spill kit. Be sure that the kit contains all of the supplies that were originally provided and that it is accessible at all times.

The spill kit contains:

- Latex gloves
- Safety glasses
- Absorbent
- Instruction sheet

Any material used should always be replaced. Contact the program to restock the spill kit.

TRAINING

Collection site staff are responsible in an event of an emergency; they must be instructed in their assigned duties, including the correct use of emergency equipment or emergency procedures. They should also practice the correct response actions on a regular basis. Local fire departments may be contacted for instruction on procedures for handling fire fighting equipment.

Reporting Spills

Spills must be reported to the program office at:



Phone: (503) 406-2590

Email: rick@productcare.org

Fax: 503-406-2594

Important: Spills should be reported only if 10 gallons or more of **alkyd paint** is released into the environment (air, water or soil), or if **any paint is released** into the storm drain or waters of the state.

SPILL RESPONSE PROCEDURES

A small spill can be dealt with by collection site staff using the following six steps.

1. Isolate the Area

Restrict access to the spill area

2. Ensure personal safety

Put on the protective gear provided in the spill kit.

2. Stop the flow

Place the spilling container upright or in a position where the least amount will spill or place something under it to catch the spill.

3. Secure the area

Restrict entry into the spill area to those controlling the spill.

4. Contain the spill

If necessary, protect drains, then place absorbent on the spill or place barriers to keep the spill inside a small area.

5. Clean up the spill

Collect all the spilled material with absorbent and place it in plastic bags along with any used spill control supplies, contaminated protective clothing and cleaning materials.

Seal the bags and place them in the collection bins.

Remove any clothing that may be contaminated. Wash thoroughly to remove spilled material from your hands or body. Replace any used spill control supplies.

6. Report the spill

Report the spill to the program office as per Reporting Spill section.

Appendix A – CEG Declaration Form

Collection of Alkyd Paint from Non-households

Why do I need to sign this form?

Most alkyd paint exhibits physical characteristics that makes it a hazardous waste. The PaintCare program is only able to collect and manage left-over alkyd (oil-based) paint from businesses and other types of non-households that are Conditionally Exempt Hazardous Waste Generators (CEGs). You are able to participate in the PaintCare collection program if you are a CEG. By signing this form, you are acknowledging that you are indeed a CEG.

Your business or organization is considered a CEG if it:

- Produces less than 220 pounds (100 kilograms) of hazardous waste each month (about 25 gallons of liquid waste with a weight comparable to water)
- Produces less than 2.2 pounds of acutely hazardous waste each month
- Stores no more than 2,200 pounds of hazardous waste or 2.2 pounds of acutely hazardous waste at their facility at any time.
- Ensures delivery of their hazardous waste to a facility that reuses, recycles or is permitted to dispose of the waste.

If your business or organization does not meet any of the above conditions, you must use a licensed hazardous waste hauler to declare and transport your hazardous waste. For more information, please call the Oregon Department of Environmental Quality at 503-229-5913.

Certification

By signing this document, I certify that my organization complies with requirements for conditionally exempt generator (CEG) status, I also understand that retailer accepting this waste does not assume liability for my waste and that future liability remains with my organization.

Business or organization name: _____

Address of business or organization _____

Name of person bringing in paint (please print): _____

Title: _____

Signature: _____

Phone _____

Appendix C – CEG Q&A



Participating in the PaintCare Leftover Paint Collection Program in Oregon

How can businesses participate in this program?

Businesses, non-profit and government organizations may manage their **alkyd paint** (also called oil-based paint) in the leftover paint collection program if they are a Conditionally Exempt Hazardous Waste Generator (CEG). **If you do not meet the conditions for being a CEG, you may not manage your leftover paint in the PaintCare program.**

What is a Conditionally Exempt Hazardous Waste Generator?

Businesses and other entities such as government facilities, schools, and non-profit organizations that generate solid waste are subject to applicable state and federal hazardous waste management regulations. Businesses and other entities that produce and accumulate small amounts of hazardous waste are called *Conditionally Exempt Hazardous Waste Generators* (CEGs) and are conditionally exempt from most state and federal hazardous waste management requirements.

How do I know if I generate a hazardous waste?

Many products contain certain chemicals or have properties that make them hazardous to human health and the environment. Hazardous wastes are categorized based on the characteristics or criteria they exhibit.

Common hazardous wastes can include:

- Alkyd paint
- Solvents
- Paint Thinners
- Cleaners
- Pesticides
- Unusable products
- Process wastes
- Corrosives (acid and bases)
- Un-emptied aerosol cans

For more information on determining if a waste is hazardous, visit the Oregon Department of Environmental Quality website at:

<http://www.deq.state.or.us/lq/pubs/factsheets/hw/HazardousWasteDetermination.pdf>.

How much hazardous waste can I generate and remain a CEG?

A CEG can **generate** up to **220 pounds** of hazardous waste or up to **2.2 pounds** of certain pesticides or poisons¹ each calendar month. This quantity limit includes all hazardous waste generated at a facility location. Latex paint does not need to be included when making this determination since it is not considered to be a hazardous waste in the state of Oregon.

You may generate waste in many ways when you:

- Decide a chemical product is no longer usable,
- Take the waste product of a process and put it in a container for disposal,
- Clean up a spilled chemical product, or
- Clean equipment with a chemical-based cleaner.

How much hazardous waste can I keep on-site and remain a CEG?

CEGs can **accumulate** up to **2,200 pounds** of hazardous waste at any one time, or **2.2 pounds** of certain pesticides or poisons, at their site before sending the waste off-site for proper disposal or recycling. Latex paint does not need to be included in this total since it is not considered to be a hazardous waste in the state of Oregon.

How are CEGs Regulated?

In Oregon, the hazardous waste rules spell out the waste management requirements that apply to hazardous waste generators. The rules identify generators as conditionally exempt, small, or large quantity hazardous waste generators depending upon the amount of waste they generate in each calendar month **and** the amount of waste they accumulate on-site. Generators must comply with more stringent requirements when they generate or accumulate larger amounts of hazardous waste.

CEGs are exempt from most of the state and federal regulations if they stay within the **generation** and **accumulation** limits described above, and if they do the following:

- Determine if their waste is a hazardous waste (“waste determination”);
- Manage their waste in a way that does not pose a threat to human health or the environment; and
- Ensure that the hazardous waste is delivered to a permitted treatment, storage, and disposal facility, to a legitimate recycler, to solid waste disposal facility permitted to accept CEG waste, or into the sanitary sewer **if you have permission from the local sewer authority.**

¹Wastes with a Quantity Exclusion Limit of 2.2 pounds are called “*acute hazardous wastes*” and are listed at <http://www.deq.state.or.us/lq/pubs/docs/hw/SQGHandbook/SQGChap17A04.pdf>.

Need More Information on Hazardous Waste Management?

The Oregon Department of Environmental Quality (DEQ) offers pollution prevention and compliance assistance to all hazardous waste generators.

The Oregon DEQ has Technical Assistance staff located throughout the state. They can help you determine the hazardous waste regulations that apply to you, including how to identify and manage hazardous waste on-site and to identify potential waste reduction and recycling opportunities.

For more information about the DEQ Technical Assistance program,
call (503) 229-5913 or visit <http://www.deq.state.or.us/lq/hw/technicalassistance.htm>

Appendix F – Poster



RECYCLE YOUR PAINT HERE.

Give your old paint new life with PaintCare, a new non-profit program established to manage the reuse, recycling and proper disposal of unused paint. This store is a proud partner, helping to provide more convenient opportunities to recycle and properly dispose of your leftover paint. Please join us in protecting the environment and preserving our valuable resources through recycling and proper disposal.

To learn what products are accepted by the program either ask your sales associate, call 1.800.CLEANUP or visit www.paintcare.org



buy right. reuse. recycle.



Appendix G – Emergency Contact Information

Facility Emergency Coordinator (name/phone #) _____
Alternate Emergency Coordinator (name/phone #) _____
Fire Department Phone Number _____
Police Phone Number _____
Hospital Phone Number _____

Hazardous material spill or release contacts*:

Oregon Emergency Response System (OERS): 1-800-452-0311 (in-state)
503-378-4214 (out of state)

National Response Center: 1-800- 424-8802

Oregon PaintCare office: 1-877-566-1919

*For spills or releases of PaintCare leftover paint materials:

Report any spill or release or threatened spill or release of **alkyd** paint to the environment (air, water or soil) greater than 10 gallons **or any release of any paint** to the storm drain or waters of the state to the Oregon Emergency Response System (OERS) by calling 1-800-452-0311 and PaintCare within 24 hours at (503) 406-2590. Refer to PaintCare collection site guidelines for more information about responding to spill or releases of PaintCare leftover paint materials.

For spill or releases of hazardous materials that are not PaintCare left-over paint materials, refer to Oregon Department of Environmental Quality guidance located at:
<http://www.deq.state.or.us/lq/pubs/factsheets/cu/WhatToExpectSpill.pdf>

