



Product Care Association

Prince Edward Island Paint Stewardship Program Plan

For submission to:

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Table of Contents

1. Introduction	3
2. Product Care Association	3
3. Program Membership and Program Funding	3
4. Program Products	3
5. Paint Collection and Management	5
5.1 Paint Management Options	6
7. Communications and Public Awareness	7
8. Collection and Transportation System	8
8.1 Collection System	8
8.1.1 Collection Facilities and Collection Containers	8
8.1.2 Large Volume Users	8
8.1.3 Environmental Regulatory Requirements	8
8.1.4 Collection Facility Training	8
8.2 Transportation and Consolidation	8
8.3 Tracking and Auditing Mechanisms	8
8.3.1 Tracking and Audit	8
8.3.2 Environmental Risk Management	9
8.3.3. Clean up and Decommissioning	9
Appendices	10

1. Introduction

The Prince Edward Island (“PEI”) Paint Stewardship Program Plan is submitted by Product Care Association to the PEI Department of Environment, Labour and Justice, pursuant to the requirements of the *Environmental Protection Act* R.S.P.E.I. 1988, Cap. E-9; *Materials Recycling Regulations – Paint Stewardship* (the “Regulation”).

The stewardship plan covers the years 2012-2017.

2. Product Care Association

The PEI Paint Stewardship Program (the “Program”) will be operated and managed by Product Care Association. Product Care is a federally incorporated, not for profit product stewardship association formed in response to stewardship regulations and is governed by a multi sector industry board of directors.

Product Care also operates or is developing paint stewardship programs in six other Canadian provinces: BC, SK, MB, NS, NL and NB.

3. Program Membership and Program Funding

The plan is submitted by Product Care on behalf of the paint brand owners who have appointed Product Care as their agent under the Regulation. The program is open to any brand owner to join.

The program is funded by membership fees, known as “eco fees”, remitted to Product Care by its members based on the quantity of sales of the designated paint products sold in PEI. The eco fee rates are set by Product Care. Program revenues are applied to the operation of the program, including education, collection system, administration, transport, recycling and disposal of collected residual products as well as a reserve fund.

4. Program Products

Product Definition

The Product Care Program manages leftover “consumer paint products” as defined in the Regulation:

(X) “consumer paint product” means a tinted or untinted latex, oil or solvent-based architectural coating used for commercial or household purposes, including stain, and includes the coating’s container, or

(xx) a coloured or clear paint or stain sold in an aerosol container and includes the paint’s or stain’s container, but does not include coatings intended for marine antifouling, industrial or automotive applications, non-latex concrete sealant, or bottled paint for hobby, craft, cosmetic or artistic use.

The following is the definition of the paint products (“Program Products”) being utilized by the Program in order to harmonize with paint stewardship programs in other Canadian jurisdictions:

- paint, as defined, and related containers, (including already empty containers) to a maximum container size of 25L, which are sold in PEI
- all paint aerosols including industrial and automotive paints

Products Accepted

For further clarity, the following paints and coatings are included as accepted Program Products. This list is subject to change by Product Care.

(Maximum Container Size – 25 Litres)

- Interior & Exterior: latex, acrylic, water-based, alkyd, enamel, oil-based consumer paints
- Deck coatings and floor paints (including elastomeric)
- Varnishes and urethanes (single component)
- Concrete/masonry paints
- Drywall paints
- Primers (metal, wood)
- Undercoats
- Stucco paint
- Marine paints (unless registered under Pest Control Product Act)
- Wood finishing oils
- Wood preservatives (unless registered under Pest Control Act)
- Melamine, metal & anti-rust paints, stains, shellac
- Swimming pool (single component)
- Already empty paint containers
- Stain blocking paint
- Textured paints
- Block fillers
- Wood, masonry, driveway sealers or water repellents (non tar-based or bitumen based)

Product Aerosols Accepted *(Maximum Container Size - 660g or 24 oz)*

- Paint aerosols of all types, including automotive, craft and industrial products

Non Program Material

Non-program materials, whether paint (e.g. industrial coatings) or non paint products (e.g. paint thinners), introduce unfunded costs and safety hazards into the system and are not accepted. Minimization of non-program material will be achieved through a comprehensive program of public education, signage, collection facility staff training, as well as effective regulatory enforcement against those who abandon products at or near collection facilities.

Any non program material which does enter the system will be segregated at the time of processing for special handling. Non program paint material includes but is not limited to the following:

- Paints for industrial use
- Paints containing pesticides e.g. antifouling paints
- Automotive paints (non aerosols)
- Baked on coatings
- Craft paints (non aerosols)
- 2 component epoxies
- 2 part paints
- Nitrocellulose or catalyzed lacquers
- Traffic or line marking paint
- Unlabelled or improperly sealed containers

5. Paint Collection and Management

The objective of the PEI Paint Recycling Program will be to promote proper management of leftover paint and unwanted paint, while recovering the resources present in leftover paint. The following will be the management options for paint in accordance with the pollution prevention hierarchy:

Latex Paint

- Paint Exchange (Reuse)
 - Reprocessing as Paint
 - Engineered Landfill

Oil Based Paint

- Paint Exchange (Reuse)
 - Energy Recovery

Aerosol Paint

- Energy Recovery
 - Incineration

Empty Paint Containers

- Recycling
 - Engineered Landfill

5.1 Paint Management Options

Paint Exchange (Reuse)

Product Care will explore the viability of implementing a “paint exchange” program, which gives away better quality returned paint (latex or alkyd) to the public at participating collection facilities. This is an efficient way to manage leftover paint as the product is used for its purpose, and does not require transportation and reprocessing. However, this may reduce the average quality of the paint available for reprocessing.

As with other second hand products, users of the paint exchange program will be notified that the suitability of the container contents cannot be guaranteed. Special labels are applied by collection facility staff to each container informing consumers of this. Participants will also be required to sign a waiver form prior to taking the paint away for reuse.

Paint Reprocessing

Approximately 80% of paint sold today is of the latex type. Not all leftover latex paint is of suitable quality for paint recycling and the remaining percentage must be sent to an engineered landfill. Recycled paint is marketed through a number of channels in Canada and overseas. The Canadian market continues to grow, and is influenced by the steady improvement in consumer awareness and the trend to “green” building practices.

Alkyd paint represents about 20% of the architectural paint market and is generally declining in sales due to regulations relating to volatile organic compounds and other factors. The program has been informed by its current service provider in other provincial paint programs, that alkyd paint recycling is no longer an option. Leftover alkyd paint will be utilized for its energy value, blended with other hydrocarbons as an alternative fuel in facilities such as cement kilns with high level air quality controls. The program will continue to seek and evaluate options for alkyd paint recycling.

Aerosol Paints

The residual volumes recovered from paint aerosols are very small and represent a variety of product formulations that limit the options for recycling. Paint aerosols will be punctured and the contents drained. The residual paint contents will be used for energy recovery. The steel containers will then be recycled, where markets exist and are viable.

Empty Paint Containers

The program intends to recycle paint containers, where possible and economic viable. Empty steel containers will be recycled as scrap metal. In order to reduce unnecessary transportation and cost, collection facilities already managing scrap metal on site will be encouraged to include already empty metal paint containers with other scrap metal.

Plastic 5 gallon (HDPE #2) and 1 gallon pails (HDPE #5) will be recycled back into plastics where possible.

PCB Contaminated Paint and Non-program Material

Alkyd /oil based paint are tested on a regular basis for PCB (Polychlorinated biphenyl) contamination. Where allowable PCB limits are exceeded, the paint is managed as PCB waste according to regulatory requirements.

Non-program material which enters the system will be segregated at the processing stage for shipment to a hazardous waste management company for processing. Depending on material type, processing methods for non-program material include landfilling, physical or chemical treatment, energy recovery or incineration.

7. Communications and Public Awareness

7.1 Program Communications

Product Care will use a number of methods to communicate information about the program to the public and to increase awareness of the program and its objectives, including:

- **Program Website** – A PEI paint website will provide information to PEI residents on:
 - Collection facility locations with details on hours of operation and products accepted
 - Description of products accepted and not accepted by the program
 - Annual reports and other program information
 - Information for consumers on buying the right amount of paint as well as the safe storage and handling of program products
- **Local Partnerships**- the Program will work with Island Waste Management Corporation (IWMC) to promote the paint recycling program. This will include advertisements placed in IWMC's newsletter and information on their website.
- **Point of Sale (PoS) Materials** – promotional material such as rack cards and posters in English and French identifying the nearest collection facility will be placed at paint retailer locations. Orders are replenished upon request, free of charge, and materials are regularly updated.
- **Collection Facility Materials** - the paint collection facilities will have point of return Program information and identifying what are accepted and not accepted Program Products. Orders are replenished upon request, free of charge, and materials are regularly updated
- **Annual Report** – the Program will prepare and submit an annual report on the program within 6 months of the end of each calendar year (June 30). The annual report will be posted on the program website.

8. Collection and Transportation System

8.1 Collection System

8.1.1 Collection Facilities and Collection Containers

Product Care does not directly own or manage any collection facilities, but intends to work with Island Waste Management Corporation to utilize IWMC's six Waste Watch Drop-off Centers (WWDCs). Paint retailers will also be invited to participate as return-to-retail sites in order to expand accessibility throughout the province. There will be no charge to drop off Program Products. Before the Program launch, collection facility locations will be made available online in an interactive map on the Product Care website. See Appendix A for a list of the current WWDCs including their hours of operation and locations.

The Program will supply collection facilities with collection containers such as tubskids or other collection containers. Collection sites will be required to keep collection containers in a secure location, not accessible to the public when the collection site is closed. Full collection containers will be picked up when full by the Program's contracted transporters.

8.1.2 Large Volume Users

Certain collection facilities that will be better able to handle large volumes will be designated as "preferred collection facilities" for commercial painters. Advance notice of large volumes will be requested to ensure proper storage and handling at the collection facility

8.1.3 Environmental Regulatory Requirements

Product Care will file an application to the Minister of Environment, Energy and Forestry seeking an approval to operate a consumer paint material stewardship program. All collection facilities participating in the Program will have an approved recycling facility permit.

8.1.4 Collection Facility Training

The program will visit most collection facilities annually to ensure adequate training of collection facility operators in conjunction with IWMC. This is important for customer service and environmental risk reduction.

8.2 Transportation and Consolidation

Transporters contracted by the Program will service collection sites as need picking up full collection containers and dropping of replacement collection containers and any related supplies.

8.3 Tracking and Auditing Mechanisms

8.3.1 Tracking and Audit

The Product Care Program will utilize a database tracking and control system to record and track waste materials managed from point of collection to recycling and disposal.

Data will be collected to track volume of paint containers managed by the collection system. Also, data will be required of all processors and recyclers to determine the residual paint volumes collected by the program, and the quantities of paint managed by each of the recycling or disposal methods. In the case of paint aerosols, actual residual amounts may not be measurable due to the processing method utilized, in which case residual paint volumes will be estimated based on data from other programs. This data will be recorded and used for tracking, auditing and reporting purposes. The program employs best management practices and guidelines including handling and safety requirements.

8.3.2 Environmental Risk Management

A necessary element of a tracking and audit system is environmental risk management. Product Care is cognizant of the need to minimize the potential for environmental incidents. Product Care works with contracted program service providers (collection facilities, transporters and processors) to ensure compliance with environmental regulations and best environmental practices with respect to the collection, transportation and consolidation of leftover paint. The environmental risk management system includes:

- system wide shipping documentation and tracking system
- due diligence reviews of collection facilities, transporters and recyclers (initial processors and downstream) to ensure compliance and for tracking system verification, conducted by third party auditor or in-house
- requirement of certificates of disposal and recycling, use of only reputable recyclers
- development of “recycler standards” as necessary
- development of best management practices, including training, reporting and guidelines etc. for collection facilities and transporters
- environmental impairment insurance.

8.3.3. Clean up and Decommissioning

The Program will take a preventive approach, as described in its environmental risk management section (regular reporting, collection facility inspections, etc.). From Product Care’s experience, the risk of environmental impact at collection facilities or consolidation points is minimal because of the following:

- paint is generally returned to the collection facilities in original consumer container, on average 1/3 full
- collection facilities and transporters do not open containers
- containers of paint is stored in secondary containers such as leakproof tubskids
- tubskids are stored on pavement or solid floors
- paint tends not to migrate in the ground in the event of spill
- dried paint is not considered environmentally hazardous

Unless there is a major incident, the Program does not anticipate any site mitigation required for the closure of collection facilities.

Appendices

Appendix A – List and Map of Six Potential Paint Collection Facilities (current WWCDs)

Current Waste-Watch Drop-off Centres (WWDCs)	Address	Hours
Brockton, West Prince	2202 Dock Road Rte # 150	Mon, Wed, Fri: 8:00am to 4:30pm Sat: 8:00am to 12:30pm
EPWMF, Wellington Centre	29786 Rte # 2	Mon to Fri: 8:00am to 4:30pm Sat: 8:00am to 12:30pm Summer Hours: (1st Mon. in May - mid-Sep.) Open at 7:00 am Mon. to Sat.
New London, Central	10142 Rte # 6	Tues & Thurs: 8:00am to 4:30pm Sat: 8:00am to 12:30pm Summer Hours: (mid-June, July & August) Mon, Tues & Thurs: 8am - 4:30pm Sat: 8am - 2:00pm
GreenIsle, Charlottetown	8 Superior Cres.	Mon to Fri: 7:00am to 5:30pm Sat: 7:00am to 2:00pm* <i>*subject to change</i>
Dingwells Mills, North Kings	100 Selkirk Road Rte # 309	Mon, Wed, Fri: 8:00am to 4:30pm Sat: 8:00am to 12:30pm
Murray River, South Kings	378 Cape Bear Rd. Rte # 18	Tues, Thurs and Sat: 8:00am to 4:30pm

Map of Prince Edward Island Potential Paint Collection Facilities



- 
Brockton, West Prince
 2202 Dock Rd Rte # 150
 Elmsdale, PE C0B 1K0
- 
EPWMF, Wellington Centre
 29786 Prince Edward Island Rte # 2
 Wellington Station, PE C0B 2E0
- 
New London, Central
 10142 Prince Edward Island Rte # 6
 Green Gables, PE C0A 1M0
- 
Greenisle, Charlottetown
 8 Superior Crescent
 Charlottetown, PE C1E 2A1
- 
Dingwells Mills, North Kings
 100 Selkirk Rd Rte # 309
 Souris, PE C0A 2B0
- 
Murray River, South Kings
 378 Cape Bear Rd Rte # 18
 Murray River, PE C0A 1W0

Appendix B – Point of Sale Materials from the New Brunswick Paint Stewardship Program

New Brunswick's point of sale rack card with Program information

Leftover Paint?

Recycle it!

Getting rid of your leftover paint in New Brunswick is not only easy but it's free too! Just bring your paint to any of the many collection points across the province. You'll be doing your part to protect the environment and create local, sustainable jobs through recycling.

 **Recycle NB**

To find your nearest depot or to learn what products are accepted by the program, visit www.recyclenb.com or call 1-888-322-8473

The New Brunswick Paint Recycling Program is brought to you by Product Care Association on behalf of the manufacturers and retailers of paint in New Brunswick. For information please visit www.productcare.org

Managed by
Product Care Association

New Brunswick's point of sale poster
identifying the nearest collection facility



Leftover Paint? Restants de peinture ?

*Recycle it!
Recyclez-les !*

Easy to do and Free of Charge! • Protect the Environment!
C'est simple et gratuit ! • Protégez l'environnement !



To find your nearest depot or to learn what products are accepted by the program, visit www.recydenb.com or call 1-888-322-8473.
Pour savoir où se trouve le lieu de collecte le plus près de chez-vous et pour obtenir la liste des produits recyclables, visitez le www.recydenb.com ou téléphonez au 1-888-322-8473.

DEPOT LOCATIONS
NEAR YOU

LIEUX DE COLLECTE
PRÈS DE CHEZ VOUS



Managed by / Géré par :
Product Care Association

New Brunswick brochure identifying the accepted and not accepted Program Products



YES

PAINT PRODUCTS ACCEPTED

(Maximum Container Size - 23 Litres)

- Interior and exterior: latex, acrylic, water-based, alkyd, enamel, oil-based consumer paints
- Deck coatings and floor paints (including elastomeric)
- Varnishes and urethanes (single component)
- Concrete/masonry paints
- Drywall paints
- Primers (metal, wood)
- Undercoats
- Stucco paint
- Marine paints (unless registered under Pest Control Product Act)
- Wood finishing oils
- Wood preservatives (unless registered under Pest Control Act)
- Melamine, metal & anti-rust paints, stains, shellac
- Swimming pool (single component)
- Stain blocking paint
- Textured paints
- Block fillers
- Wood, masonry, driveway sealers or water repellants (non tar-based or bitumen based)
- Already empty paint containers

NO

PAINT PRODUCTS NOT ACCEPTED

- Paints or wood preservatives that are registered as a pesticide under the pest control act (has P.C.P. Reg# on label) e.g. marine anti-fouling paint, should be treated as a pesticide
- Craft paint (non-aerosol)
- Automotive paint (non-aerosol)
- Industrial paints & finishes (eg. baked-on, heat resistant etc.)
- 2-part or component paints containing catalyst or activator
- Roof patch or repair
- Tars
- Brushes, rags and rollers
- Paint in glass containers
- Tar-based or bitumen based product
- Bulging containers
- Traffic or line marking paint
- Quick drying paint
- Resins
- Paint thinners, mineral spirits or solvents
- Deck cleaners
- Colourants and tints
- Caulking compound, epoxies, glues or adhesives
- Unidentifiable or unlabelled containers
- Improperly sealed paint containers
- Paint containers with poor integrity (e.g. badly rusted cans) or leaking

**New Brunswick
Paint Recycling
Program**

PRODUCT GUIDELINE

All containers must be properly sealed, labelled and in original container.

Full, partially full and empty containers are acceptable.



www.recyclenb.com 1-888-322-8473
www.productcare.org 1-888-772-9772



PAINT AEROSOLS ACCEPTED

(Maximum Container Size - 600g or 24 oz)
Paint aerosols of all types, including automotive, craft and industrial products

