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Next, the paint booth filters should be analyzed for each of the RCRA metals contained in your paints to determine if they are at levels above the RCRA regulatory limit. If so, the filters are hazardous for the characteristic of Toxicity. The test required is the Toxicity Characteristic Leaching Procedure (TCLP). However, the ‘Totals’ test method may be used initially for screening purposes. Also, please note that a laboratory with an approved DOH (Department of Health) National Environmental Laboratory Accreditation Program (NELAP) should be used (list available from EPC).

It is also possible for paint filters to be considered F-listed hazardous waste. When cleaning the spray gun, if the spent solvent is sprayed out in such a way that it comes into contact with the filters, those filters may become F-listed hazardous waste, depending on the solvent(s) used. MSDS’s can also be used to determine the ingredients of the solvents you use. If the solvent is listed under F001, F002, F004, or F005 on the F-list in RCRA, anything the spent solvent contaminates may be considered hazardous waste. A common example of a solvent that becomes F-listed waste is lacquer thinner, since it frequently contains toluene and methyl ethyl ketone. To help ensure your paint booth filters do not become an F-listed hazardous waste, cleaning solvent should only be sprayed out into the product paint for thinning or into a hazardous waste container.

Be aware that a hazardous waste determination must be repeated whenever there is a change in products, processes, or procedures that could potentially affect whether the filters will be hazardous or non-hazardous.

Once the waste determination is complete, the proper disposal method must be chosen. If the filters are non-hazardous, they can be disposed as a solid waste in the normal solid waste stream (i.e. dumpster) once they have been dried out overnight in the paint booth. However, your local solid waste department should be contacted for approval prior to disposal (Hillsborough County #272-5860 and City of Tampa #274-8083). If the filters are hazardous, then a licensed hazardous waste transporter should be used to dispose of the waste (list available from EPC).

Documentation of proper disposal must be kept on site for a minimum of three years. This includes any of the following: data and laboratory analyses used in the hazardous waste determinations, “generator’s knowledge” statements, uniform hazardous waste manifests, and disposal receipts from the disposal facility. Questions regarding the proper management of solid and hazardous waste should be directed to EPC’s Small Quantity Generator Program at (813) 627-2600.



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