



# Architectural Paint Management for paint collection sites

This fact sheet will provide guidance from the Minnesota Pollution Control Agency (MPCA) to sites in Minnesota:

- That wishes to become Licensed Paint Collection Sites (LPCS) to receive oil-based architectural paint from households or other businesses
- Are not already licensed as a Household Hazardous Waste Collection Program (HHWCP) or as a Very Small Quantity Generator Collection Program (VSQGCP)
- That is not located in one of the seven metropolitan counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, or Washington (Metro Counties)

If your site is located in one of the Metro Counties, contact your Metro County regulatory staff for county-specific requirements, which may be different from those discussed in this fact sheet.

Existing HHWCPs and VSQGCPs should contact their licensing agency for requirements.

## How can my site become a paint collection site?

All LPCS must be licensed by the MPCA or Metro County where the site is located. Non-Metro sites may apply by completing MPCA form #w-hw7-19, Paint Collection Site Application, at:

<https://www.pca.state.mn.us/sites/default/files/w-hw7-19.doc>.

Prior to submitting an application, you will need to sign a contract with a paint stewardship organization approved by the MPCA. Currently, the approved paint stewardship organization is PaintCare, Inc. Find more information about PaintCare, at: <https://www.pca.state.mn.us/quick-links/paintcare-minnesota-program>.

Your LPCS license is separate from your hazardous waste generator license and will not increase your annual license fees. Paint received at your LPCS from other businesses will not count towards your site's hazardous waste generator status, requirements, or fees.

## What waste paints may I accept as a licensed paint collection site?

Acceptable architectural product wastes	Unacceptable paint-related wastes
Architectural paint, including interior & exterior latex, acrylic, water-based, alkyd, oil-based, and enamel	Additive, colorant, tint, and resin
Deck and floor coating, including elastomeric	Aerosol paint (spray cans)
Field and lawn paint	Art and craft paint
Metal coating, including rust preventative	Automotive and marine paint
Primer, sealer, and undercoat	Caulk, epoxy, glue, and adhesive
Shellac, lacquer, varnish, and urethane	Deck cleaners
Stain	Original Equipment Manufacturer (OEM) and Industrial Maintenance (IM) coatings
Water-proofer, sealer, and water repellent for concrete/masonry/wood that is not tar or bitumen-based	Roof patch and repair
	Tar and bitumen-based product
	Thinner, stripper, and solvent
	Traffic and road marking paint
	Wood preservative containing pesticide

You may accept interior or exterior architectural coating products sold and received in containers of five gallons or less. The manufacturers and brands of products you may accept will be stipulated in your contract with the paint stewardship organization, and are generally described by type in Table 1. You must, however, accept eligible products sold by any retailer, not just your own site or company.

You may only accept eligible products in their original container with a legible label attached. Containers must be closed, in good condition, and not leaking.

The MPCA will allow your site to accept up to 220 gallons of oil-based and any amount of latex paint at one time from a business that is a VSQG, and any amount of oil-based or latex paint at a time from a household, however your contract with a paint stewardship organization may establish lower limits than these.

The MPCA will also allow your site to accept any amount of oil-based or latex paint from another licensed Paint Collection Site.

## What paint collection records must I keep?

You may rely on a customer's reasonable statement of whether they are bringing paint from a household or business, and, if a business, that the business is a VSQG eligible to bring oil-based paint to your site. However, you may not assist a known business customer to avoid reporting their business's oil-based paint waste.

You are not required to provide any receipts or keep a log of either oil-based or latex paint received from households. However, since you are responsible for the proper handling of the paint once you receive it, the MPCA still encourages keeping such a log.

Document oil-based paint received from VSQG businesses by providing receipts to the generators and keeping a copy of each receipt. The receipts must include at least the following:

- Name and HWID of the collection site.
- Date the oil-based waste paint was received.
- Name of the generator business.
- Hazardous waste identification number (HWID) of the generator business. If the HWID is not known, then the address and telephone number of the generator business.
- Name and signature of the generator's representative (the employee bringing in the paint).
- Estimated volume of oil-based paint received from the generator.

Do not send a copy of these receipts to the MPCA; keep them at your site for at least three years from the date of the receipt.

Annually complete an LPCS license renewal when you receive the form or a notification to complete an online renewal from the MPCA.

## How must I store collected paint?

Store collected oil-based paint in containers according to the terms of your contract with a paint stewardship organization. The MPCA allows you to accumulate up to 660 gallons of collected oil-based paint at your collection site at any one time; however, your contract with a paint stewardship organization may establish a lower limit than this.

Ensure that portable fire extinguishers are available in the paint collection area. Ensure they are appropriate in type and capability, and are inspected and maintained as necessary. Also ensure you provide spill control equipment adequate to respond to the spillage of the largest hazardous waste container in your collection area.

For more information on how to store waste oil-based paint, see MPCA fact sheet #w-hw1-04-05, Label and Store Hazardous Waste at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-04-05.pdf>.

## What training do my employees need?

Any employee who will be accepting waste paint from customers must be trained in proper paint acceptance, recordkeeping, storage, and applicable emergency procedures within six months of beginning paint acceptance duties. Training may be in any form and length, but must be specific to your site and procedures. Keep records of this training. For more information about applicable training requirements, see MPCA fact sheet #w-hw1-09b, Personnel Training for Small Quantity Generators at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-09b.pdf>.

In addition, designate emergency coordinators that will be available at all times your site will be open. For more information on these requirements, see MPCA fact sheet #w-hw1-08b, Plan for Emergencies – Small Quantity Generators, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-08b.pdf>.

## How must collected paint be transported?

Latex or oil-based paint being shipped to another Paint Collection Site or to a Household Hazardous Waste Collection Program or VSQG Collection Program may be transported using a shipping paper. Ensure that the packaging and transporter meet any applicable U.S. Department of Transportation requirements under the Federal Hazardous Materials Regulations.

Oil-based paint being shipped to a hazardous waste treatment, storage, or disposal facility must be transported only under a Uniform Hazardous Waste Manifest.

## More information

You may refer paint waste generators to MPCA fact sheet #w-hw4-37a, Architectural Paint, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-37a.pdf>.

Guidance and requirements in this fact sheet were compiled from Minnesota Statutes, Chapter 115A, and Minnesota Rules, Chapter 7045, and incorporate regulatory interpretation decisions made by the MPCA on February 28, 2014; April 15, 2014; and February 17, 2016. To review Minnesota Statutes and Rules, visit the Office of the Revisor of Statutes at: <https://www.revisor.mn.gov/pubs>.

The MPCA's Small Business Environmental Assistance Program (SBEAP) can provide you with free, confidential regulatory compliance assistance. The Minnesota Technical Assistance Program (MnTAP) can help you reduce your waste generation and risk. Report all hazardous waste spills immediately to the Minnesota Duty Officer.

### Metro County Hazardous Waste Offices

Anoka .....	763-422-7093
.....	<a href="https://www.anokacounty.us/">https://www.anokacounty.us/</a>
Carver .....	952-361-1800
.....	<a href="http://www.co.carver.mn.us/">http://www.co.carver.mn.us/</a>
Dakota .....	952-891-7557
.....	<a href="https://www.co.dakota.mn.us/">https://www.co.dakota.mn.us/</a>
Hennepin .....	612-348-3777
.....	<a href="http://www.hennepin.us/">http://www.hennepin.us/</a>
Ramsey .....	651-266-1199
.....	<a href="https://www.ramseycounty.us/">https://www.ramseycounty.us/</a>
Scott .....	952-496-8475
.....	<a href="http://www.scottcountymn.gov/">http://www.scottcountymn.gov/</a>
Washington .....	651-430-6655
.....	<a href="https://www.co.washington.mn.us/">https://www.co.washington.mn.us/</a>

### Minnesota Pollution Control Agency

Toll free (all offices) .....	1-800-657-3864
All offices .....	651-296-6300
.....	<a href="https://www.pca.state.mn.us/">https://www.pca.state.mn.us/</a>

### Minnesota Duty Officer

Toll free .....	1-800-422-0798
Metro .....	651-649-5451

### Small Business Environmental Assistance Program

Toll free .....	1-800-657-3938
Metro .....	651-282-6143
.....	<a href="https://www.pca.state.mn.us/sbeap/">https://www.pca.state.mn.us/sbeap/</a>

### Minnesota Technical Assistance Program

Toll free .....	1-800-247-0015
Metro .....	612-624-1300
.....	<a href="http://www.mntap.umn.edu">http://www.mntap.umn.edu</a>