

Management of Paint Booth Filters and Wastes from On-site Solvent Distillation

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Waste & Materials Management
P.O. Box 7921
Madison, WI 53707-7921

This publication provides information to help you determine if waste paint booth filters and still bottoms from reclaiming solvent waste are hazardous waste and ensure their proper management.

Paint Booth Filters

Individuals, companies or institutions that generate waste paint booth filters or still bottoms from reclaiming waste solvent onsite must determine if the waste is hazardous or non-hazardous, and disposed of properly. Some types of paints used in spray painting booths contain solvents that are listed hazardous wastes. However, the resulting paint booth filters are not listed wastes because the solvents are part of the paint formulation and not used solely for their solvent purposes. Though spent paint booth filters usually are not listed hazardous wastes, they may exhibit a characteristic that would cause them to be hazardous waste.

Note: Spraying listed solvents, such as a paint gun cleaning solvent, into filters as a means of disposal is a violation of the department's air management regulations, s. NR 419.03, Wis. Adm. Code, and would also cause the filters to be classified as a listed hazardous waste.

A generator can determine if a waste exhibits a characteristic by testing, or applying knowledge of the waste, or a combination of both.

Testing: Test a representative filter sample for metals by a Wisconsin Certified environmental testing laboratory, using the Toxicity Characteristic Leaching Procedure

(TCLP) method. Cadmium, chromium, barium and lead are the most common metals of concern. If the filters are completely dry before removing them from the paint booth, organic constituents and ignitability should not be a concern. However, the generator should evaluate the need to test the paint filters for the volatile toxicity characteristic constituents that may be present.

Note: Certain chemicals, even when completely dry, will react with each other and spontaneously combust. It is important to work with your coating manufacturer to address this important concern. Paint filters that spontaneously combust are a D001 characteristic hazardous waste.

Applying knowledge: Paint manufacturers or suppliers may be willing to certify that their coatings do not contain toxic metals or do not leach toxic metals above regulatory levels. Material safety data sheets may also provide information to document that the coatings do not contain toxic metals. Again, if the filters are completely dry before removal, organic constituents and ignitability should not be of concern.

Note: Removing filters from the paint booth and drying them is treatment subject to the hazardous waste facility licensing requirements of NR 664 and NR 670.

Paint filters that are hazardous waste must be managed at a licensed, permitted or exempt hazardous waste management facility. Other hazardous waste generator requirements in ch. NR 662, such as accumulation times, marking and record keeping must be complied with. Non-hazardous filters may be disposed along with other solid wastes.

For liability reasons, persons generating non-hazardous filters may still choose to dispose of the filters through a licensed hazardous waste facility.

Still Bottoms

Still bottoms resulting from distillation of spent listed solvents (F001 to F005) or from the manufacturing of K-listed chemicals are considered hazardous waste. If still bottoms are generated by something other than an F-listed spent solvent or a K-listed chemical, then the generator should determine if the waste exhibits hazardous waste characteristics as described above.

Test results, certifications or other documentation used to determine if the filters and still bottoms are hazardous or non-hazardous must be kept on file for future reference. In addition, the regulatory status of the waste must be re-evaluated when products, processes, or operating procedures change. The requirements for making a waste determination are in s. NR 662.011.

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