



UNIVERSITY OF
NORTHERN COLORADO

Environmental Health and Safety

Paint Recycle Program

August 2023



UNIVERSITY OF
NORTHERN COLORADO

Environmental Health and Safety

Paint Recycle Program

TABLE OF CONTENTS

- I. General
- II. Acceptable Program Products and Unacceptable Products
- III. Acceptable Containers vs. Unacceptable Containers
- IV. Bin Pick-Ups, Scheduling and Inspections
- V. Training and Recordkeeping
- VI. Emergency Spill Response and Safety

Appendices

- Appendix A. Paint Care Certification Log
- Appendix B. Emergency Contact Information
- Appendix C. Paint Recycling Inspection Form



UNIVERSITY OF
NORTHERN COLORADO

Environmental Health and Safety

Paint Recycle Program

I. General

The Paint Recycle Program is developed and implemented for faculty, staff, and students at the University at Northern Colorado (UNC), community entities, contractors, and individuals who may be participating on campus. It is the purpose of this plan to provide guidance in the safe and proper storage, handling, transportation, and disposal of latex and oil-based paint. It is the responsibility of each department to ensure that all their employees are properly trained.

II. Program Products and Non-Program Products

A. Acceptable Products (Program Products)

Below is a list of acceptable products for paint recycling

- Interior and exterior paints: latex, acrylic, water-based, alkyd, oil-based, enamel (including textured coatings)
- Deck coatings and floor paints (including elastomeric)
- Primers, sealers, under coaters
- Stains
- Shellacs, lacquers, varnishes, urethanes (single component)
- Waterproofing concrete/masonry/wood sealers and repellents (not tar or bitumen-based)
- Metal coatings, rust preventatives
- Field and lawn paints

B. Unacceptable Products (Non-Program Products)

Below is a list of unacceptable products for paint recycling

- Paint thinner, mineral spirits, solvents
- Aerosol paints (spray cans)

- Auto and marine paints
- Art and craft paints
- Caulking compounds, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
- Original Equipment Manufacturer (OEM) (shop application) paints and finishes

III. Acceptable Containers vs. Unacceptable Containers

A. Acceptable Containers

Below are the acceptable containers that can be placed in the paint care recycling bins

- The Program Product must be in its original container
- The container is labeled as containing one of the designated Program Products in Section II
- The container must be in good condition and not leaking
- The container must be 5 gallons in size or smaller

B. Unacceptable Containers

Below are the containers that are NOT acceptable in the paint care recycling bins

- The container is not original (e.g., paint was transferred into a jar)
- The container does not have an original label
- The container is leaking or has no lid
- The container is smaller than 1 quart
- The container is larger than 5 gallons
- The container is empty

Any unacceptable product and container placed inside the bin will be returned to UNC/EHS department. EHS staff will review the “problem” site to determine if additional training is needed.

IV. Bin Pick-Ups and Scheduling

EHS will contact the transporter for extra bins, liners, labels, spill kits & schedule pick-ups five days in advance. Each pickup for latex and oil-based paint products requires the signature of an EHS staff on the certification log (Appendix A).

A. Transportation/Recycle Information

When calling for a bin pick up EHS is to indicate the following information:

- Bin drop off site
- Site name
- Site address
- Site phone number and EHS staff contact number
- Number of bins to be picked up for replacement
- EHS will assist the transporter with collection container loading and off-loading when reasonable.
- The transporter will provide EHS staff a copy of the bill-of-lading.

B. Inspections

Monthly bin inspections will take place to ensure the condition of the bin, the quantity of product and proper labeling is within standards to ship (Appendix C).

- Paint Care collection bins must be lined and must have identification labels which are provided by the hauler.
- Make sure bins are not damaged and report damaged bins to the hauler
- The label must contain the date, which is the date of the first can that is placed in the bin 270-day storage limit.
- Bins must be placed in a cubic yard area on impermeable surface (concrete, asphalt, sealed wood)
- Bins must be secured from the public-not a "self-service" program
- Bins should always remain closed other than when adding Program Products
- Bins must be kept away from ignition sources and drains
- Bins must be protected from temperature extremes- indoor area with adequate ventilation
- Maintain enough space around bins for emergency access and inspecting for leaks.

V. Training and Recordkeeping

Training for collection facility personnel is based on the EHS Paint Recycling Guidelines and other materials provided to collection facilities as part of the training requirement.

Training includes information on the following:

- Paint recycling collection facilities
- Acceptable program products/unacceptable program products
- Program operations
- Working with transporters
- Inspections and records
- Training, safety, and spill response
- Personal Protective Equipment (PPE)

EHS will provide training to staff on the Paint Recycling Program annually. All training will be documented, and records shall be maintained in the Environmental Health and Safety Department. Record keeping of employee training, inspections, and bills of lading must be kept on site for a minimum of seven years.

Onsite paint recycling materials will consist of:

- Operations binder with recordkeeping forms
- Storage Bin(s) & labels

VI. Emergency Spill Response

If a spill is small enough to be managed by UNC staff, follow these steps:

- Isolate the area and restrict access to the spill
- Ensure personal safety, put on protective gear (glasses and gloves)
- Stop the movement of paint by placing the leaking container upright or in a position where the least amount will spill, and place leaking container in plastic bags
- Contain the spill by placing absorbent pads or granular absorbent around and on the spill – if outdoors, place barriers around storm drains to prevent a release to the environment
- Collect the contaminated absorbent material and place it in plastic bag(s), along with the leaking container and contaminated PPE, seal the bag(s)
- Remove any clothing that may be contaminated, wash thoroughly to remove spilled material from your hands or body

- Replace any used spill control supplies
- Document the date, location and amount and type of material spilled
- If required, report the spill to the appropriate governmental authority

The spill response equipment will be stored in the FM Transportation office (safety supply room).

- Inspect all equipment and storage area regularly
- Emergency procedures and contact information shall be posted near the paint storage area
- Each bin should be secured when it is closed or not attended

A. Reporting

Any spill or release of Program Products to the environment through a storm drain, waterway or soil contamination must be immediately reported to the appropriate governmental authority, including the Colorado Department of Public Health and Environment. Contact UNCPD within 24 hours of making such a report (Appendix B).

**IN CASE OF SPILL OR
EMERGENCY**

CALL 911

U.N.C. Police Department

(970)351-2245

ENVIRONMENTAL HEALTH AND
SAFETY DEPARTMENT

(970)351-2446

Appendix C. Paint Recycling Inspection Form



UNIVERSITY OF
NORTHERN COLORADO

Environmental Health and Safety

Universal Waste Area Monthly Inspection Form

Instructions: Inspect Paint Recycle collection site holding wastes once a month for leaks, signs of corrosion, swelling, and proper labeling. If an item in the collection site is found to be leaking, immediately transfer the waste to a new container. Containers must be closed at all times. Unacceptable wastes must not be stored in the paint recycling collection site.

Date of Inspection												
Inspector Initial												
All containers closed?	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N
All containers properly labeled, legible and complete?	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N
All containers undamaged, free of leaks/spills	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N
Containers free of debris?	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N
Container is compatible with other materials within close vicinity?	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N
Containers properly stored in secondary containment	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N
Proper access/isle space available?	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N
Unacceptable containers are not present	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N	Y N
Corrective action taken/comments												

**Circle Y for YES or N for No for each question
All NO responses require immediate corrective actions.**

Accumulation Area Location: _____

Inspector Signature: _____ Date: _____