



OPERATIONS - PAINTING & PAINT REMOVAL

ENVIRONMENTAL GUIDELINES



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PURPOSE

The purpose of this guideline is to provide guidance on what DEN's expectations are for Painting and Paint Removal. This EG needs to be used as a guide to prevent improper disposal of waste, stormwater, sanitary system, and air pollution, along with promoting compliance with DEN's related Permits. This guidance aligns with compliance with DEN's Business Partners' environmental permits and was designed to support and elevate DEN's compliance obligation. Every entity conducting any painting activities is responsible for understanding the applicable regulations and managing their activities accordingly.

ACTIVITY DEFINITION

This EG covers the management of regulatory requirements, product selection, any materials used/generated during painting or paint removal and cleanup activities, and hazardous and non-hazardous wastes, solvents, pigments, and debris, training requirements, and document retention.

EXPECTATIONS

Best Practices:

- Review painting operations for environmental regulatory processes with an emphasis on air permitting, waste characterization, and subsequent compliance management.
- Review air permitting regulations before beginning any painting operations to determine if an Air Pollutant Emission Notice (APEN) is required.
- An APEN may be required for paint booth operations
- Operators are responsible for acquiring and maintaining applicable air permits and maintaining records
- Operators are responsible for maintaining applicable records on air permitting requirements, such as paint usage data from paint booths.
- Emissions for the paint booth is limited to 2 tons per year of volatile organic compounds
- Shall not dispose of volatile organic compounds by evaporation, or spillage, unless a reasonably available control technology is implemented
- Control techniques and work practices shall be implemented at all times to reduce volatile organic compound emissions from fugitive sources:
 - Covered containers for solvent wiping cloths
 - Proper disposal of dirty clean-up solvent
- DEN policy requires a waste management plan for the use of any non-aqueous paints or products. Plan must be approved by DEN ES prior to its use.



- Purchase and use paints without lead, chromium, and other heavy metals, as well as paints with low volatile organic compound (VOC) content whenever possible. Continually investigate low VOC and lower toxicity replacement coating materials.
- Use of non-volatile or aqueous (water-based) coatings wherever possible is expected. VOC or solvent-based paints are acceptable only where technical substitution is not available or practicable.
- Research available coating products for reduced waste and air emission characteristics
- Confirm that an SDS for any new paint and/or painting materials has been received and made available to employees and retained for waste determination purposes.
- When removing paint, collect and dispose of all removed paint, grit, and any other related wastes properly.
- When removing paint outdoors, use protective barriers to control overspray from unnecessarily contaminating the air and/or stormwater collection system.
- Specify the use of non-solvent paint removal practices.
- Review material handling to minimize hazardous waste generation and to determine recordkeeping requirements.
- Properly label all paint and paint removal supplies and store them in areas with secondary containment, proper signage and support system.
- Reuse grit blast material whenever practical; when it is no longer usable, test and dispose of properly.
- Avoid contaminating sanitary and stormwater drainages with cleanup debris, solvents, and other waste materials
- When cleaning painting equipment, containerize and control all generated wastes for proper disposal.
- Waste disposal:
 - Strategize to segregate waste materials for cost-efficient disposal.
 - Use SDS and/or analytical results for waste determination
 - Properly characterize and dispose of paint-related wastes, such as paint rags and paint booth filters.
 - A waste profile must be completed and accepted by the disposal facility before any hazardous waste materials can be shipped.
 - Non-hazardous (latex) paint should be recycled through drop off locations or coordinated for a pickup from qualified non-hazardous paint collectors to be recycled.
 - Waste Water-based or Latex paints need to be recycled via proper channels, primarily via drop off locations or qualified haulers that participate in the Waste Water-based or Latex paints need to be recycled via proper channels, primarily via drop off locations or qualified haulers that participate in the Colorado PaintCare program.
 - The Operator should maintain all disposal and usage documents on file for at least 3 years.
- Maintain adequate supplies of spill response equipment and materials in locations where spills of paint and solvent materials are likely to occur. Use good painting and coating spill prevention and control practices.
- If a spill occurs, call DEN Communications Center immediately at 303-342-4200.
- Employee training programs shall inform personnel at all levels of responsibility who are involved in painting and paint removal activities that may impact stormwater runoff and sanitary sewer system. Records of this training should be maintained and available upon request.



Shall Not:

- Dispose of hazardous paint waste without the following:
 - EPA Generator Identification Number
 - Completed Land Disposal Restrictions (LDR) form
 - Hazardous Waste Profile and receiving facility acceptance forms
 - Hazardous Waste Manifest
- Disposal of used paint booth filters, paint rags and other paint-activity related wastes in the trash is restricted or prohibited. These materials may be considered hazardous waste and must be handled and disposed of with all proper regulations.
- Do not dispose of paint waste or solvents into any drain or compactor.
- Vehicle Painting – Vehicle painting is prohibited except in DEN-approved vehicle painting facilities.

REFERENCES

Contacts

- DEN Environmental Services (Main Line): 303-342-2730;
DENEnvironmental@flydenver.com

Additional Resources

- 40 CFR 260-279, RCRA Hazardous Waste Regulations
- 6 CCR 1007-3, Colorado Hazardous Waste Regulations
- 5 CCR 1001-2,-3, and -5, Colorado Air Quality Regulations
- Colorado State Air Permit, 99DE0142 (City Facilities only)
- (DEN) Air Permit Operations and Maintenance Plan, EMS Work Instruction (DEN Facilities only)
- D.R.M.C Title II, Chapter 4, Air Pollution Control, Article III
- 29 CFR Part 1910 OSHA
- 49 CFR 100 – 185 DOT Regulations
- 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- 40 CFR 122-124, NPDES Regulations for Storm Water Discharges
- 40 CFR 401 Effluent Limitation Guidelines
- Denver Wastewater Management Division Rules and Regulations



- Metro Wastewater Reclamation District Rules and Regulations
- DEN Rules and Regulation 180