

Colorado Paint Stewardship Program Evaluation

FINAL REPORT

August 2019



The Product Stewardship Institute

The Product Stewardship Institute (PSI) is a national nonprofit committed to reducing the health, safety, and environmental impacts of consumer products with a strong focus on sustainable end-of-life management. PSI works to develop and promote legislation and voluntary initiatives whereby manufacturers are responsible for recycling or safely disposing of their products once consumers are done with them. We believe that manufacturers have a responsibility for the safe management, reuse, and recycling for their products. When manufacturers assume this responsibility, the result is reduced waste, lower environmental impacts, reduced costs for governments and taxpayers, and job creation. Headquartered in Boston, Mass., PSI takes a unique approach to achieving this vision by facilitating dialogues among diverse stakeholders to jointly develop effective product stewardship policies and programs for a wide array of consumer products. With members from 47 state environmental agencies and hundreds of local governments, and 120 corporate, academic, non-U.S. government, and organizational partners, we work to design, implement, evaluate, strengthen, and promote both voluntary and legislative product stewardship initiatives across North America.

Acknowledgements

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Executive Summary

Colorado residents purchased approximately 14 million gallons of architectural paint (paint used in the interior and on exterior of structures) in 2018.¹ Studies on paint use (conducted prior to 2007) have shown that approximately 10% of paint typically goes unused, meaning about 1.4 million gallons of leftover paint per year in Colorado.

The Colorado Architectural Paint Stewardship Act came into effect on July 1, 2015. Prior to that time, leftover architectural paint was managed mostly through municipal household hazardous waste (HHW) programs, which created a financial burden on municipal budgets and taxpayers. The Act requires paint manufacturers to establish a system to manage leftover paint, funded by paint consumers. The nonprofit organization PaintCare manages the stewardship program on behalf of manufacturers. Fees applied to each can of paint pay for the collection, transportation, and recycling or disposal of leftover paint, outreach and education, and program administration.

At PaintCare's request and with the help of the Colorado Department of Public Health & Environment and other stakeholders, the Product Stewardship Institute (PSI) evaluated the performance of the stewardship program in the state. This report summarizes PSI's findings, based on surveys conducted with four stakeholder groups – HHW facility managers, paint retailers, painting contractors, and Large Volume Pick-Up service (LVP service) customers. PSI also conducted interviews with non-participating retailers (retailers that do not serve as a drop-off site). Surveys and interviews were supplemented with information provided in PaintCare's 2018 Annual Report.

Colorado Paint Stewardship Program Successes

Based on PSI's evaluation, key program successes include the following:

- 1. Increased reuse, recycling, and beneficial use of leftover paint.** PaintCare has processed 2.3 million gallons of leftover paint over a three-and-a-half-year period ending December 31, 2018. More than 72% of latex paint recovered was recycled back into latex paint, for a total of more than 1.2 million gallons of paint recycled. More than 6% of latex paint and 4% of oil-based paint was managed through reuse, and 96% of oil-based paint was managed as fuel through energy recovery and incineration.
- 2. Substantial financial savings for Colorado's municipal HHW programs.** The PaintCare program alleviates participating local government HHW programs of most of the costs of managing post-consumer paint. HHW programs reported annual cost savings ranging between \$24,000 and \$132,000 per year.
- 3. Significantly better access to convenient paint drop-off options for residents and businesses.** Prior to the PaintCare program, most waste paint was handled through HHW programs, local latex recyclers, or by drying and disposing of latex paint. However these services were not available in all areas of the state, and most of these options charged participants to take their

paint. By the end of 2018, PaintCare had 169 year-round paint drop-off locations throughout the state, with 94.7% of residents living within 15 miles of one of these sites, and another 202 supplemental sites and services, including events and LVPs.

4. **Broad satisfaction with the program among all stakeholder groups.** The majority of respondents in each stakeholder group surveyed indicated that they were satisfied or very satisfied with the PaintCare program. Based on survey data and on interviews with non-participating retailers, customers appreciate the opportunity to safely and responsibly dispose of unwanted paint in convenient locations.
5. **The program makes it easy for retailers and HHW managers to participate and easy for customers to use.** A majority (66%) of retailers indicated that it was easy or very easy to participate in the PaintCare program. Most (90%) retailers indicated that it was easy or very easy for their customers to participate in the program. Most (92%) HHW program managers indicated that it was easy or very easy for their facility to participate in the PaintCare program as a paint drop-off site, and most (92%) indicated that the PaintCare program was easy or very easy for their residents to use.
6. **Responsive staff.** A large majority (74%) of retailers and all (100%) HHW program managers indicated that the PaintCare staff was helpful or very helpful.
7. **High-quality outreach and education.** All drop-off site retailers provided printed educational materials to customers about the PaintCare program. A large majority (71%) of the retailer respondents indicated that PaintCare's printed materials are helpful or very helpful.

Program Challenges

Some program challenges noted in PSI's evaluation include:

1. **Consistency and timing of pick-ups from retail locations.** While retailers are satisfied with the program overall and report that PaintCare staff is helpful, some survey and interview respondents noted problems with late or missed pick-ups.
2. **Retailers' perceived "costs" of participating.** While participating as a retail drop-off site has a number of benefits, survey and interview respondents noted challenges or costs as well, including extra work for staff, dealing with non-program items left by customers, and managing missed or overdue pick-ups.
3. **Dissatisfaction with the fee.** There is general acceptance of and understanding about the fee, but some stakeholders continue to be dissatisfied with the fee.
4. **Confusion about program and non-program products.** Several comments on surveys and during interviews indicated some confusion about what products are covered by the program and noted that retail customers sometimes drop off non-program items, which stores must then dispose of.

Recommendations

Based upon PSI's findings, we recommend the following.

1. **Work closely with retail drop-off sites and haulers to ensure regular bin pick-up service.** For long-term retailer satisfaction and for the program's reputation (which impacts retention, recruitment, and retail customer satisfaction), work with vendors to aim for consistent, on-time pick-ups.
2. **Give stores recognition.** Store employees say that participating as a drop-off site is a lot of work, and want their customers to know that they are volunteering to provide this valuable service.
3. **Maintain continuous, consistent communications with retailers and the general public.** There is a lot of noise to break through today when communicating with any audience. PaintCare has excellent communication materials and messaging, and PSI recommends continuing existing communication efforts.
4. **To combat confusion about program and non-program products, work with HHW collection sites to provide easy access to information on how and where to dispose of non-program items.** In cooperation with the local HHW sites, ask stores to offer information about non-program items, including drop-off site locations and hours, alongside PaintCare information.

1. Introduction

Approximately 10% of all paint purchased in the U.S.—78 million gallons in 2018—is leftover each year. That's enough paint to fill more than 100 Olympic-sized swimming pools. The cost of managing leftover consumer paint is about \$8 per gallon, for a potential cost of more than \$624 million nationally. Leftover paint can be collected for reuse, recycling, alternative beneficial use, and energy recovery. However, doing so requires sustainable funding and a convenient and effective collection and processing infrastructure—something that often eludes state and local governments.

Paint Stewardship in the U.S.

Knowing that the leftover paint problem could not be addressed without participation and input from the paint industry, PSI brought the issue to the attention of the American Coatings Association (ACA), the primary trade association of paint manufacturers, which—in turn—agreed to take part in a national dialogue of paint stakeholders. In 2002 PSI started a national Paint Product Stewardship Initiative, which engaged more than 200 stakeholders, including paint manufacturers, federal, state, and local government officials, recyclers, and nonprofit organizations, working collaboratively to develop a product stewardship model for leftover paint management. The Initiative resulted in a Memorandum of Understanding in 2007 supporting the establishment of an industry-funded paint stewardship program.²

Through this agreement, stakeholders established a sustainable financing system for the management of leftover architectural coatings, both latex and oil-based paint, including a plan for the passage of state legislation to create stewardship programs on a state-by-state basis. ACA created PaintCare, a separate nonprofit paint stewardship organization, to develop and implement these programs. In July 2009, Oregon passed the nation’s first paint stewardship law. Between September 2010 and July 2019, eight other states and the District of Columbia passed paint stewardship legislation. Colorado’s law passed in 2014 (see Table 1).

TABLE 1: PAINT STEWARDSHIP LAWS IN THE U.S.

State	Law Passed	Program Implemented
Oregon	June 2009	July 2010
California	September 2010	October 2012
Connecticut	June 2011	July 2013
Rhode Island	June 2012	June 2014
Vermont	June 2013	May 2014
Minnesota	May 2013	November 2014
Maine	July 2013	October 2015
Colorado	June 2014	July 2015
District of Columbia	March 2015	November 2016
Washington	May 2019	Targeted start date: summer 2020

Generally in the U.S., without paint stewardship legislation, latex paint is typically managed as part of the municipal waste stream, which poses several challenges. Paint containers with liquid paint inside can cause problems in transport and can contaminate leachate if placed in a landfill. Liquids, including paint, are generally prohibited from landfills. In the absence of a latex paint collection program, residents are therefore instructed to dry out leftover latex paint before placing it in the trash. Drying paint before disposal can be messy, time consuming, and risky for households with children and pets. Oil-based paint collected from residents through municipal HHW programs can result in a significant expense for taxpayers.

Where paint stewardship laws are in place, leftover paint (both latex and oil-base) is collected through participating sites and managed by PaintCare from the point of collection through final disposition, including financing for the paint collection bins, transportation, and processing. In addition to managing paint collected by participating municipal HHW programs, HHW events, and solid waste management facilities (transfer stations, landfills, and recycling centers), PaintCare establishes retail and other paint drop-off locations throughout each state (more than 1,725 nationally) and provides a Large-Volume Pick-Up (LVP) service. PaintCare also hosts one day collection events to provide service in rural communities that lack participating retail stores and to supplement drop-off sites in high population areas. Each of these services increases convenience for consumers and relieves local governments of much of the financial burden of managing large volumes of paint. To inform residents, businesses, and others of paint drop-off opportunities, PaintCare conducts public outreach campaigns with a variety of media customized

to each state's needs, which may include television, radio, newspaper, social media, and other channels, and also provides brochures, posters, and other outreach materials to retailers to provide to their customers and display in their stores.

Purpose of the Study

PSI conducted this study to evaluate the performance of the PaintCare program in Colorado. The study was conducted on behalf of PaintCare at the request of the Colorado Department of Public Health & Environment. The results in this report present findings from surveys of municipal HHW facility managers, retailers participating as drop-off sites, painting contractors, and LVP service customers. It also provides insights from non-participating retailers regarding their reasons for not participating in the program as a drop-off site. It assesses the program's successes and challenges and provides recommendations for PaintCare's Colorado program. First, the following section provides a brief overview of the Colorado Paint Stewardship Program.

2. Overview of the Colorado Paint Stewardship Program

Paint Collection Infrastructure

Since the start of the Colorado paint stewardship program, paint collection infrastructure has expanded substantially. Prior to implementation of the PaintCare program, leftover paint from residents and some qualifying small businesses (Conditionally Exempt Small Quantity Generators or CESQGs) was managed through HHW programs, four local recyclers that collected good quality paint for a fee (GreenSheen Paint, Old Western Paint Company Inc., Three Painted Ladies, and Southern Colorado Services & Recycling), or through municipal solid waste programs (i.e., residents placing cans of dried out latex paint in the trash). Larger businesses contracted with private haulers for paint disposal or recycling services.

Convenience Standards

A primary focus of the paint stewardship program is to provide convenient year-round paint drop-off sites and services for residents. Colorado's paint stewardship law requires a year-round drop-off site within a 15-mile radius of 90% of residents' homes, and an additional site for every 30,000 residents of an urbanized area. For those without convenient access to a year-round drop-off site, there must be a paint drop-off event at least once per year. The Colorado Department of Public Health & Environment has discretion to grant exceptions regarding the convenience standards.

Participating Collection Locations

In 2018, participating drop-off locations where Colorado consumers can return leftover paint included 169 year-round sites at HHW facilities, solid waste management facilities, paint and hardware stores, and paint recycler sites, plus 17 PaintCare-hosted drop-off events and “sweeps” (rural routes with pick-ups during a 3-4 day period to serve the more remote areas). 94.7% of residents lived within 15 miles of a year-round drop-off site. Since the start of the program, there have been 300 instances of painting contractors, universities and other commercial or institutional sites that accumulated (or regularly produce) large quantities of leftover paint (at least 200 gallons) using PaintCare's LVP service. PaintCare has helped cover the costs of collection materials, transportation and processing for 112 HHW events and 85 other paint events throughout the state since the beginning of the program. PaintCare has also hosted 44 drop-off events in underserved areas through the end of 2018.

Meeting Convenience Goals

To meet the statutory convenience goals, the program needs an additional 24 sites in the Denver-Aurora area, and 6 in Colorado Springs. Expanding drop-off locations will require enlisting more retail stores and other sites to volunteer for the program. About 367 retail sites in the state are potentially able to serve as drop-off sites (not including big box stores, which have declined to participate in all states with paint stewardship laws). Non-participating stores are a primary target of PaintCare’s recruiting efforts. For example, while in a rural locale for a paint drop-off event, PaintCare staff regularly visit non-participating retailers and other potential drop-off sites such as solid waste facilities. Staff also speak with event participants to explain how paint retailers could participate and offer the service year-round and encourage the participant to speak to their local retailers about joining the program.

Many stores, particularly in urban areas, have space constraints that prevent them from participating as a drop-off site. PaintCare is evaluating the use of smaller bin sizes for certain circumstances where a smaller bin would allow a store to participate but also would be economically and logistically (from a transportation standpoint) feasible.

Paint Transportation and Disposition

PaintCare contracts with transporters to pick up paint from drop-off sites and events and from LVP service customers. In Colorado, 8 vendors provide transportation services: Clean Harbors, Gallegos Sanitation, GreenSheen Paint, Southern Colorado Services & Recycling, Stericycle, Veolia, Waste Management at Your Door, and Waste Management of Colorado. As registered hazardous waste haulers, Clean Harbors, Veolia, Stericycle, and Waste Management at Your Door and Waste Management of Colorado can transport oil-based paints. The remaining vendors transport latex only.

Transporters then contract with recyclers for latex paint recycling. Paint processors include GreenSheen Paint, Southern Colorado Services & Recycling, Old Western Paint Company Inc., and Waste Management of Colorado.

In 2018, The Colorado PaintCare program processed 654,476 gallons (see Table 2). Approximately 80% of latex paint processed was reused or recycled into recycled-content paint (see Figures 1 and 2). The

portion of paint processed that was recycled back into recycled-content paint has increased from 66% in 2015 to 75% in 2018.

Four percent of oil-based paint was reused. The remaining 96% was used for fuel.

TABLE 2: COLORADO PAINTCARE PAINT DISPOSITION (GALLONS)

Disposition Method		Year 1 (July 2015 – December 2015)	Year 2 (January 2016 – December 2016)	Year 3 (January 2017 – December 2017)	Year 4 (January 2018 – December 2018)
Latex	Reuse	14,868	31,565	26,379	26,663
	Recycled Paint	133,564	353,768	386,502	357,410
	Decorative Ground Cover			369	0
	Alternative Daily Cover		28,162	11,548	0
	Disposal	54,182	112,009	84,318	94,823
	TOTAL LATEX	202,614	525,504	509,116	478,896
Oil-Based	Reuse	3,503	7,849	6,557	6,574
	Energy Recovery	9,840	36,399	41,399	63,089
	Incineration	9,184	124,019	129,772	105,917
	TOTAL OIL-BASED	22,527	168,267	177,728	175,580
TOTAL PAINT		225,141	693,771	686,844	654,476

FIGURE 1: PAINTCARE LATEX PAINT MANAGEMENT (2018)

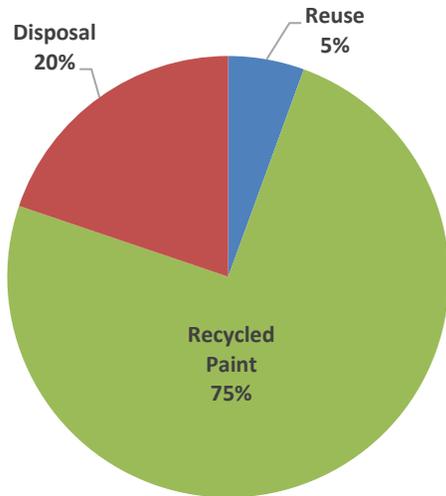
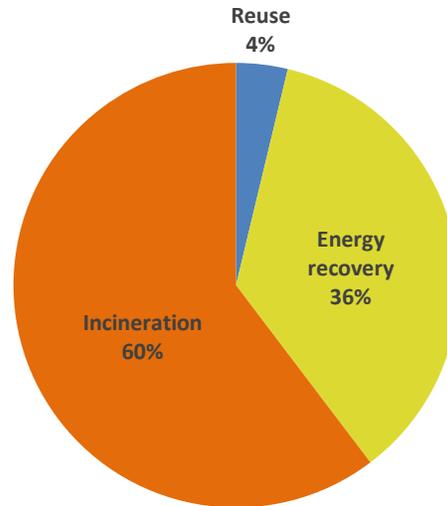


FIGURE 2: PAINTCARE OIL-BASED PAINT MANAGEMENT (2018)



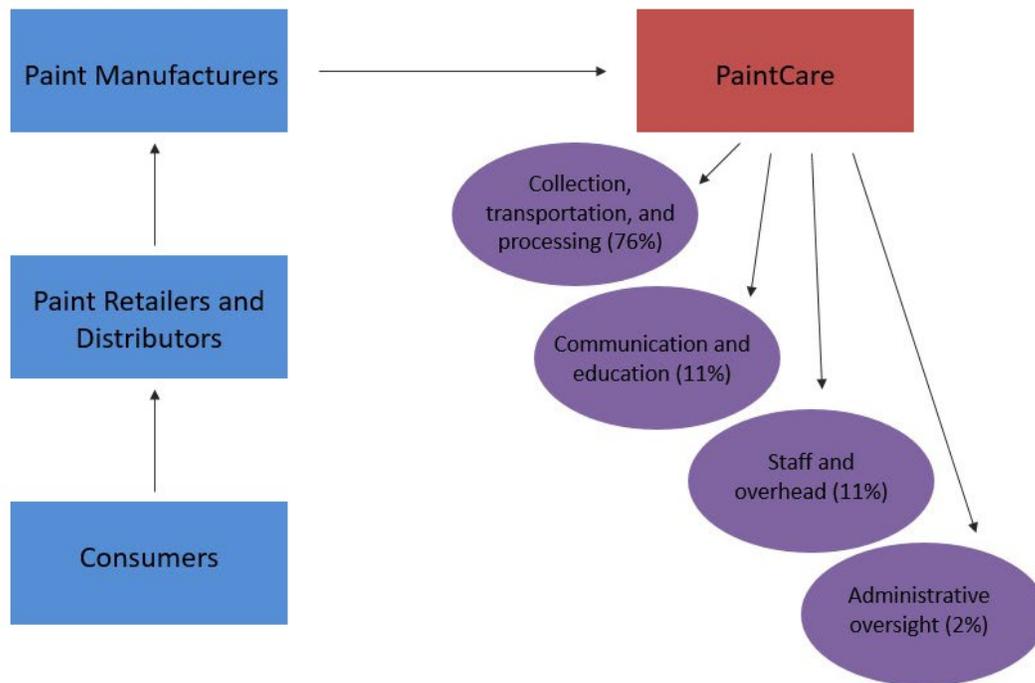
Program Financing

In Colorado, as in all other states with existing PaintCare programs, financing of the program works as follows: by law, manufacturers must apply a stewardship fee to the wholesale price of architectural paint sold in Colorado (see Table 3 for a list of fees by container size). Manufacturers pay the fee to PaintCare and pass the cost along to dealers (distributors and retailers). Also by law, retailers and distributors must apply the fee to the price of architectural paint they sell to consumers (see Figure 3). The system ensures a level playing field for all parties with respect to the fee. Fees are used for program implementation.

TABLE 3: COLORADO PAINT STEWARDSHIP ASSESSMENT

Container Size	Fee
Half pint or smaller	No Charge
Larger than half pint to smaller than 1 gallon	\$ 0.35
1 gallon	\$ 0.75
Larger than 1 gallon up to 5 gallons	\$ 1.60

FIGURE 3: THE FLOW OF FUNDS THROUGH THE PAINT STEWARDSHIP SYSTEM IN COLORADO



Program Revenue and Expenses

Revenue and Reserves

The revenue collected from the paint stewardship assessment, which totaled \$6,926,702 in 2018, is used to cover program expenses (see Table 4). The program has mostly earned investment income each year of operation from reserve funds. PaintCare maintains reserve funds to allow the program to operate continuously through periods of lower paint sales or increased collection volumes as the program continues to grow. PaintCare’s reserve target is 100% of annual operating expenses (equal to 12 months of operating expenses), with a minimum threshold of 75% and maximum of 125%, based on targets set by similar non-governmental organizations.³ Reserves for the Colorado program were projected to be at 80% in 2018 and 2019 and are expected to remain below 100%.

Expenses

The cost of Colorado's PaintCare program in 2018 was \$5,796,723 (see Table 4). The major expenses related to paint transportation, paint processing, and collection supplies. Communications, including advertising and outreach materials, was another major program expense. Other expenses included Colorado program staff, fees paid to the state for oversight, and a portion of corporate activity costs shared across all PaintCare programs, which include auditing fees, software licenses, legal fees, and general communications.

The cost per gallon has mostly decreased over time, as the program has achieved efficiencies. In year 1 of the program, the average cost per gallon was \$10.07. In 2018 (year 4), it was \$8.86. Cost per gallon in 2018 was higher than the previous two years because a large volume of paint collected in 2018 was not yet processed before the end of the year, and PaintCare calculates cost per gallon based on gallons of processed paint, rather than collected paint.

TABLE 4: COLORADO PAINTCARE PROGRAM REVENUE AND EXPENSES

	Year 1 Jul 2015 – Dec 2015	Year 2 Jan 2016 – Dec 2016	Year 3 Jan 2017 – Dec 2017	Year 4 Jan 2018 – Dec 2018
<i>Program revenue</i>				
Revenue from fees	3,476,099	6,778,509	6,935,250	6,926,702
<i>Program expenses</i>				
Paint Processing	1,213,416	2,849,217	2,964,721	3,167,860
Paint transportation	302,085	666,803	720,863	717,570
Collection supplies and support	321,361	498,368	461,817	503,530
Communications	171,952	644,074	592,779	636,823
Personnel, professional fees, and other	73,337	173,154	210,574	279,296
State administrative fees	-	240,000	120,000	120,000
Allocation of corporate activity	184,823	351,687	348,486	371,644
Expenses	2,266,974	5,423,303	5,419,240	5,796,723
Investment activity	17,964	32,066	194,159	(67,151)
Change in net assets (revenue less expenses plus investment activity)	1,227,089	1,387,272	1,710,169	1,062,828
Net assets, beginning of reporting period	(499,664)	727,425	2,114,697	3,824,866
Net assets, end of reporting period	727,425	2,114,697	3,824,866	4,887,694
Average cost/gallon	\$10.07	\$7.82	\$7.89	\$8.86

3. Stakeholder Surveys

Method

Survey Design and Administration

PSI conducted online surveys with four stakeholder groups that participate in the paint stewardship program:

- Municipal HHW Programs;
- Participating Retail Drop-Off Sites;
- Painting Contractors; and
- Large Volume Pick-Up Customers.

The surveys were adapted from an earlier evaluation of the Connecticut PaintCare program, conducted by PSI in 2016.⁴ In several instances where open-ended questions in the Connecticut surveys yielded small groups of similar answers, those questions were converted to closed-response (i.e., multiple choice) questions for this study. All questions were reviewed for clarity and quality to follow best practices (e.g., avoiding double-barreled questions, avoiding leading questions). PSI collected feedback from PaintCare staff, and both PSI and Paintcare staff reviewed the surveys.

PSI distributed all four surveys online to contact lists provided by PaintCare. After an initial mailing, PSI sent three reminders to each group, and then followed up with personalized email messages to individual non-respondents. In addition, PSI called HHW contacts who did not respond to messages. PSI and PaintCare both reached out to local painting contractor associations and a regional HHW association to alert them of the survey and enlist their help in encouraging members to respond to the survey.

Participants completed the survey using the online tool SurveyGizmo. Two participants completed the survey by phone at their request.

Response Rate

PSI collected responses from representatives of 8 year-round HHW facilities (7 respondents representing 8 facilities), 67 retail drop-off sites, 24 painting contractors, and 28 large volume pick-up customers (see Table 5). The response rates for the surveys are as follows:

TABLE 5. SURVEY RESPONSE RATES

	Total Contacted ⁵	Total Responses	Response Rate ⁶
HHW Programs	9 contacts for 10 facilities	7 surveys for 8 facilities	78%
Retail Drop-Off Sites	129	67	52%
Painting Contractors ⁷	78	24	31%
Large Volume Pick-Up Customers	86	28	33%

HHW Facility Survey

Ten year-round HHW facilities participate as PaintCare drop-off sites.⁸ (Two additional HHW facilities in the state do not participate in the PaintCare program.) PSI received survey responses from 7 managers representing 8 participating facilities. Survey results from participating facilities yielded the following key findings on the effects of the PaintCare program on the operations of these facilities.

Key Findings

- **HHW program managers are satisfied with the PaintCare program.** All respondents indicated that they were satisfied or very satisfied with the PaintCare program. All survey respondents reported that the program was easy or very easy to use, both for staff and for their residents, and that PaintCare staff were helpful or very helpful.
- **The PaintCare program provides significant cost savings for HHW programs.** As a result of PaintCare, HHW programs reported annual cost savings for paint management ranging between \$24,000 and \$132,000 per year.
- **Since joining the program, a majority of HHW sites have seen an increase in paint volumes, but no change in non-paint HHW volumes.** More sites experienced an increase in latex volumes than oil-based paint volumes, and one experienced an increase in non-paint HHW volumes.

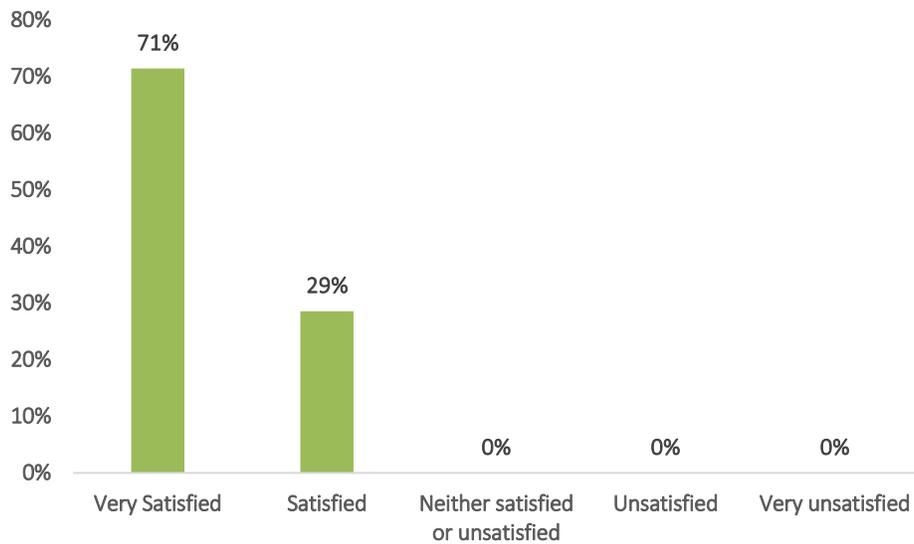
Details of Survey Responses

Program Satisfaction

All HHW facilities responding to the survey were satisfied (29%) or very satisfied (71%) with the PaintCare program overall (see Figure 4). All would recommend that other waste facilities volunteer to participate in the PaintCare program.

FIGURE 4. SATISFACTION: PARTICIPATING PROGRAMS

How satisfied are you with the PaintCare program overall? (n=7)



Ease of Participation

All respondents reported that it is easy (57%) or very easy (43%) for their staff to participate in the PaintCare program (see Figure 5). All respondents also indicated that the PaintCare program was easy (43%) or very easy (57%) for their residents to use (see Figure 6). All respondents reported that PaintCare staff were helpful (14%) or very helpful (86%) (see Figure 7).

FIGURE 5. EASE FOR HHW FACILITY STAFF

How easy or difficult is it for your staff to participate in the program? (n=7)

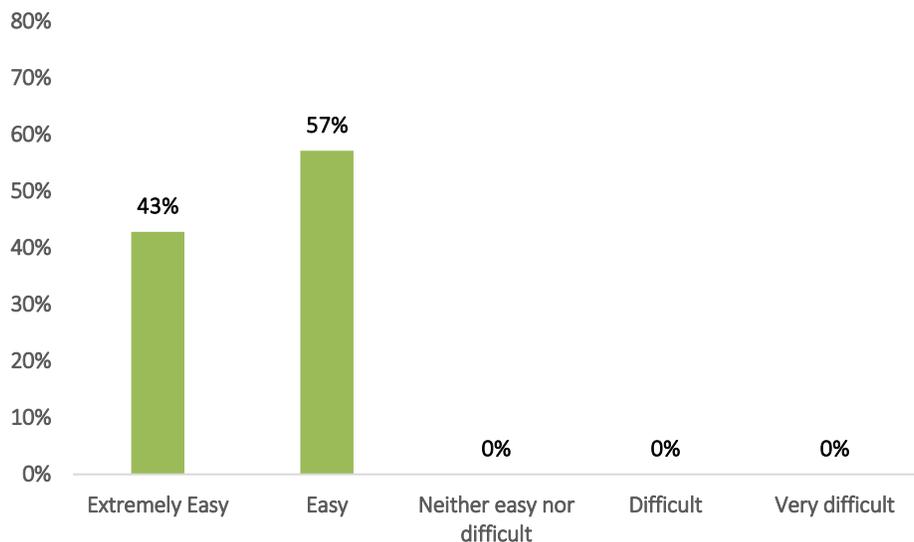


FIGURE 6. EASE FOR RESIDENTS

How easy or difficult is it for residents to use the program? (n=7)

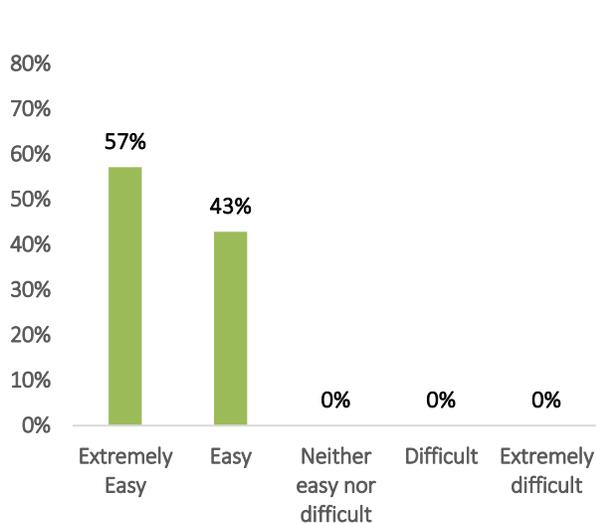
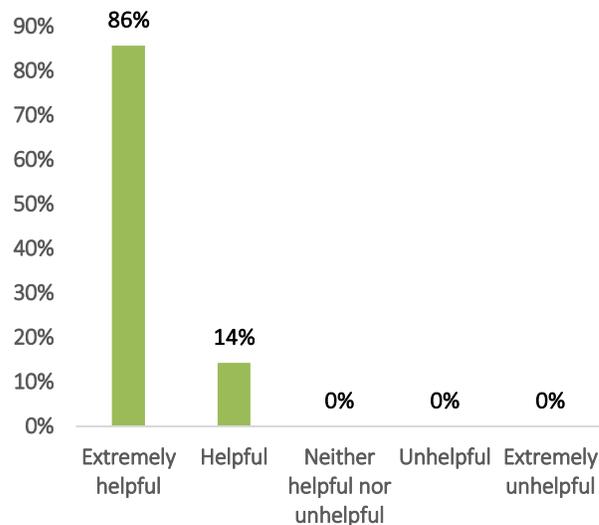


FIGURE 7. PAINTCARE STAFF

How helpful has PaintCare staff been? (n=7)



Colorado HHW Collections: Comments on the PaintCare Program

"I would recommend the use of PaintCare to other HHW facilities looking to reduce costs."

PaintCare has been extremely beneficial. We look forward to continued participation in the program."

"Keep up the good work!"

HHW Program Costs

HHW facilities realized savings associated with paint disposal and transportation costs (see Figure 8). Based on survey responses, paint-related savings range from \$24,000 to \$132,000 per year. Most participating HHW managers indicated that their overall program costs decreased due to the PaintCare

program. Note that savings do not capture the additional value of increased paint recycling services provided by the PaintCare program via retail locations, one-day events, and the LVP service.

HHW programs used their cost savings to increase the time they are open, to expand the materials accepted, to increase staff, and to invest their facilities (e.g., maintenance, upgrades) (see Figure 9).

One site reported increased costs due to increased participation from residents, which brought more non-paint HHW into the facilities. One reported incurring legal expenses at the start of the program.

FIGURE 8. CHANGES TO HHW PROGRAM COSTS

Have your overall HHW costs changed since your participation in the PaintCare program began (n=6)

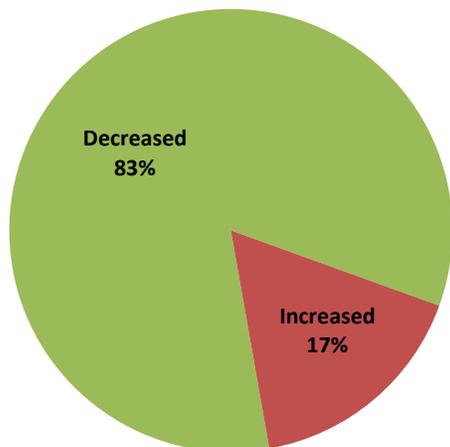
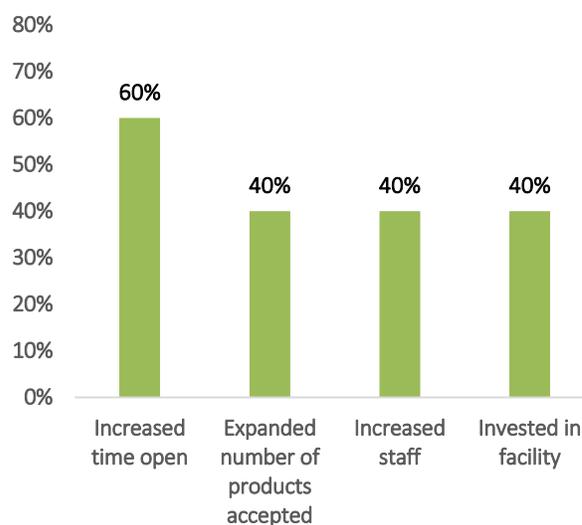


FIGURE 9. APPLICATION OF COST SAVINGS

If your overall costs have decreased, how have you used (or do you plan to use) your cost savings? (could choose more than one) (n=5)



Quantity of Paint and Non-Paint HHW Collected

All HHW respondents indicated that the amount of latex paint collected at their site increased (57%) or stayed the same (43%) since the start of the PaintCare program (see Table 6). 29% indicated that the amount of oil-based paint their program collected increased, while 29% reported it decreased. (Keep in mind that these percentages are based on the *number of facilities* responding, not overall volume. Some sites may have experienced a decrease in volume due to residents' increased access to drop-off options, even while overall volume across sites increased.) Most HHW respondent indicated that the volume of non-paint HHW collected by their facility has stayed the same since they began participating. One has seen an increase.

TABLE 6. QUANTITY OF PAINT AND NON-PAINT HHW COLLECTED

	Latex Paint	Oil-Based Paint	Non-Paint HHW
Program 1	↑	↓	-
Program 2	↑	↑	↑
Program 3	↑	↓	-
Program 4	-	-	-
Program 5	-	-	-
Program 6	-	-	-
Program 7	↑	↑	-

Non-Participating HHW Sites

PSI completed one phone interview with a non-participating HHW site that collects paint outside the PaintCare program. Local residents can drop up to 20 items at this HHW site, including paint, without charge. Businesses pay 40 cents per pound for latex paint, and 50 cents per pound for oil-based paint.

The facility places latex paint in a solidification basin, where it is mixed with wood chips or sawdust before being moved to the on-site landfill. Oil-based paint is sent off site for incineration.

Revenue from businesses provides the HHW site with money to manage residents' paint and helps offset the cost of managing e-waste and other materials.

After reviewing the contract and rules for the PaintCare program and considering potential revenue loss, the county decided not to participate in the program. The fact that the county can dispose of latex on-site at a small cost factored into its decision to not participate in the PaintCare program.

The second non-participating HHW site does plan to join the program but has not yet been able to complete the sign-up process.

Retailer Survey

PSI collected survey responses from 67 retail drop-off sites, including 24 stores owned by paint manufacturers (e.g., Sherwin Williams), 13 independent paint stores, 23 hardware stores, and 7 lumber yards, farm & ranch, and other stores. The results of this survey yielded the following key findings on the effects of the PaintCare program on retail stores.

Key Findings

- **Retailers that serve as drop-off sites are generally satisfied with the PaintCare program.** A large majority (74%) of retail respondents indicated that they were satisfied or very satisfied with the

PaintCare program and that PaintCare staff was helpful or very helpful, and a majority (57%) indicated that they would recommend that other retailers volunteer to be PaintCare drop-off sites.

- **The retail program is easy to use.** A majority (66%) of retailers find it easy or very easy to be a paint drop-off site, and most (90%) indicated that it was easy or very easy for customers to use the program.
- **Collecting leftover paint may increase customer foot traffic, loyalty, and sales.** More than 40% of respondents indicated that foot traffic increased due to participation in the PaintCare program, 30% indicated that customer loyalty increased, and more than half indicated that at least 10% of customers returning paint made a purchase.
- **Most retailers believe that their customers understand the PaintCare fee, though customers still have questions.** Most (84%) respondents indicated that their customers understand that the fee pays for a recycling program, and a majority (66%) indicated that customers understand the fee is not a tax. Overall, respondents largely (76%) believe their customers are satisfied or very satisfied with the program, although about one-third agreed that customers are upset about the fee.
- **While retailers are generally satisfied and plan to continue with the program, their responses and comments suggest room for improvement.** Most notably, several respondents expressed concerns about the consistency and timing of pick-ups from PaintCare's program haulers and about the amount of work required by store staff to participate in the program. 20% would not recommend other stores volunteer to be a drop-off site, and another 23% were not sure if they would recommend it.

Details of Survey Responses

Program Satisfaction

The majority (74%) of drop-off site retailers indicated that they were satisfied (61%) or very satisfied (13%) with the PaintCare program (see Figure 10). The rate of satisfaction was highest among retailers from hardware, lumber, and farm & ranch stores, followed closely by independent paint retailers. 70% of respondents from hardware stores, 67% of respondents from lumber yards and farm & ranch stores, and 67% of independent paint stores indicated that they were satisfied or very satisfied with the program; as compared with 48% of respondents from paint manufacturer stores. A majority (57%) of respondents indicated that they would recommend other stores volunteer to be PaintCare drop-off sites, while 20% would *not*, and 23% were not sure (see Figure 11). Most respondents indicated they would definitely (59%) or very likely (32%) continue participating (see Figure 12).

FIGURE 10. PAINTCARE PROGRAM SATISFACTION: RETAIL DROP-OFF SITES

Overall, how satisfied are you with the PaintCare program? (n=61)

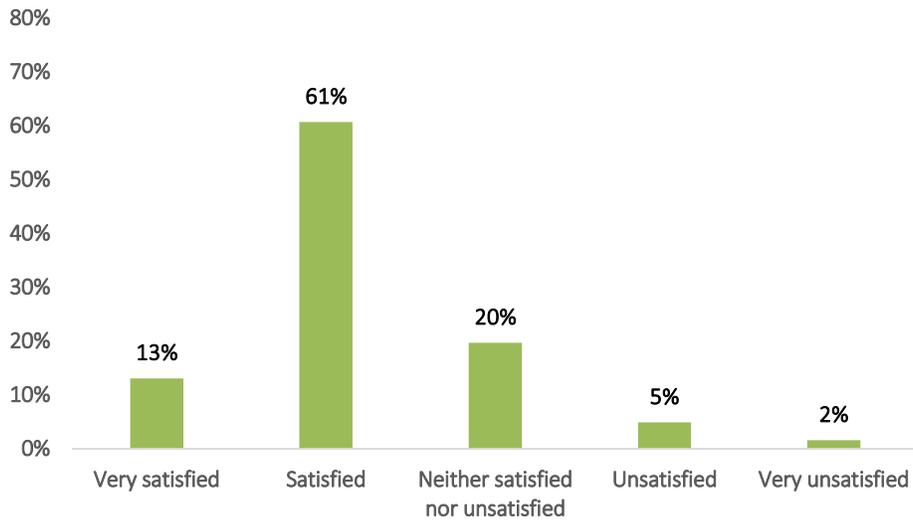


FIGURE 11. RECOMMENDATIONS FOR OTHER RETAILERS

Would you recommend that other stores volunteer to become a PaintCare drop-off site? (n=60)

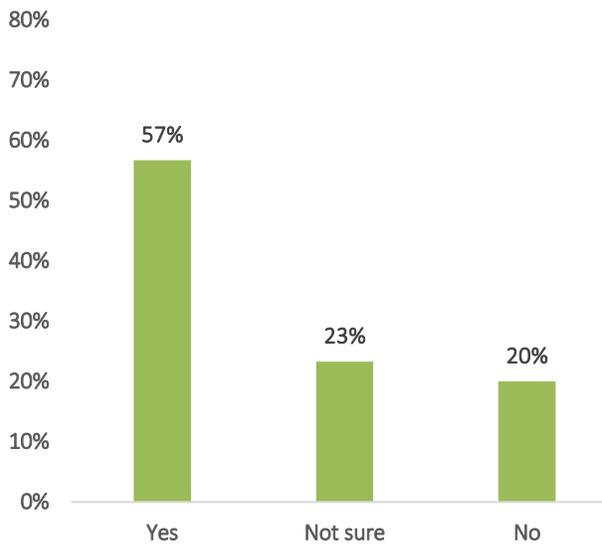
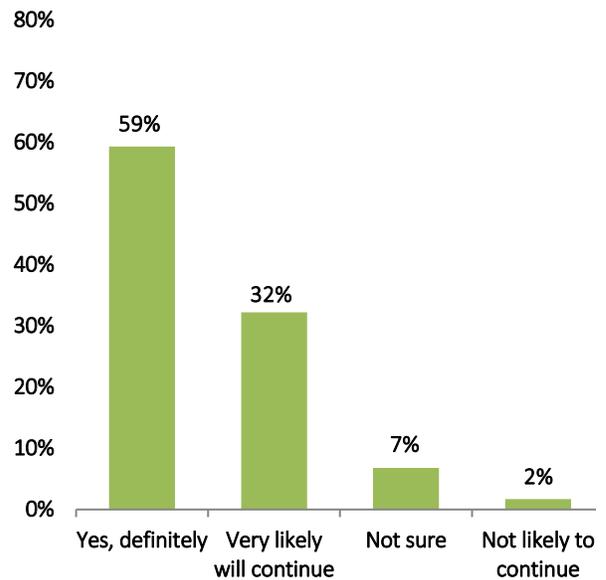


FIGURE 12. CONTINUED PARTICIPATION

Will your site continue to participate in the program? (n=59)



Colorado Retailers: Comments on the PaintCare Program

"It is an easy program to participate in for the consumer and the retailer."

"Outstanding program and very easy to administer. Our customers love the fact we are all participating in a great way to help keep Colorado a clean state. It also shows we are a business that cares as well."

"We think it is a great opportunity to give our customer options in recycling."

"Consistent pick-ups are the key to this program being successful in the paint stores."

About two-thirds of respondents left comments explaining their level of satisfaction. Many offered positive comments about the ease of using the program (see above examples). Negative comments focused mainly on three aspects of the program:

- *Problems with missed pick-ups or scheduling of pick-ups.* Several respondents shared concerns about the pick-up service from PaintCare. Two respondents reported problems with scheduled pick-ups (multiple missed pick-ups that required rescheduling, pick-ups at unscheduled times), two reported concerns with overdue pick-ups that cause them to run out of room to store paint (which generates complaints when customers who are trying to drop off paint are turned away), and one stated pick-ups were inconsistent.
- *Amount of work required for a store to participate.* Five respondents complained that the program generates extra work without benefit (such as increased sales) to the store. To alleviate some of the work, one respondent suggested that it should be mandatory for stores that sell paint to provide drop-off service, while another suggested big box stores should provide drop-off service.
- *Dealing with products beyond the scope of the program (non-program items and after-hours drop-offs).* Two respondents reported that customers leave spray cans, chemicals, and garbage at the store after hours, while another expressed concern that staff spend too much time explaining what can and cannot be accepted, and then face angry customers who are turned away with non-program items.

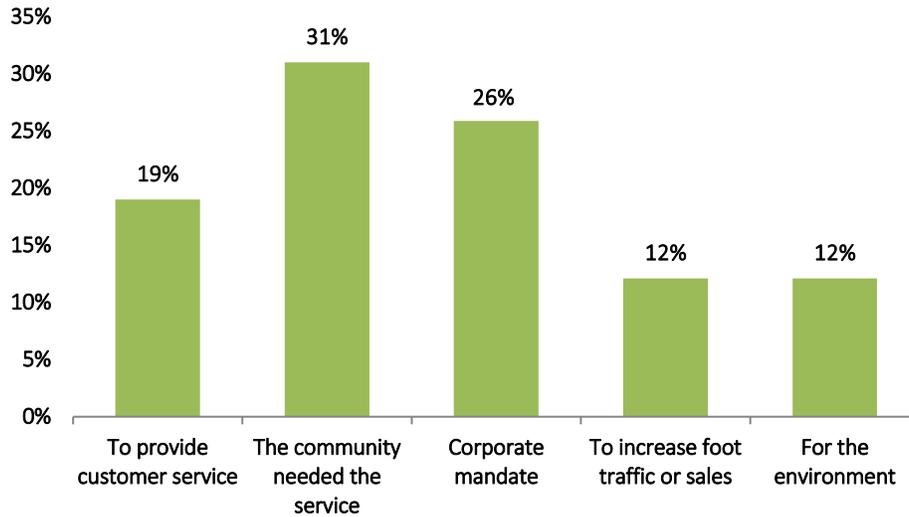
Reasons for Participation

About one-third (31%) of respondents reported that the primary reason their store began participating in the PaintCare program was that there was a need in the community for a paint drop-off site (see Figure 13). Another 31% began participating to provide their customers with a service (19%) or to increase foot

traffic or sales (12%). 26% reported that their participation was primarily due to a corporate mandate, while 12% cited environmental reasons.

FIGURE 13. REASONS FOR PARTICIPATION

Why did your store decide to be a PaintCare drop-off location? (n=58)



Ease of Participation

A majority (66%) of respondents indicated that it was easy (29%) or very easy (37%) for their stores to participate in the PaintCare program as a paint drop-off site, with another 27% reporting participation was neither easy nor difficult (see Figure 14). Most (91%) respondents indicated that the PaintCare program was easy (47%) or very easy (44%) for their customers to use (see Figure 15). Most (74%) respondents indicated that PaintCare staff members were helpful (52%) or very helpful (22%) (see Figure 16).

FIGURE 14. EASE OF PAINT DROP-OFF FOR RETAILERS

How easy or difficult is it for your store employees to participate in the program? (n=62)

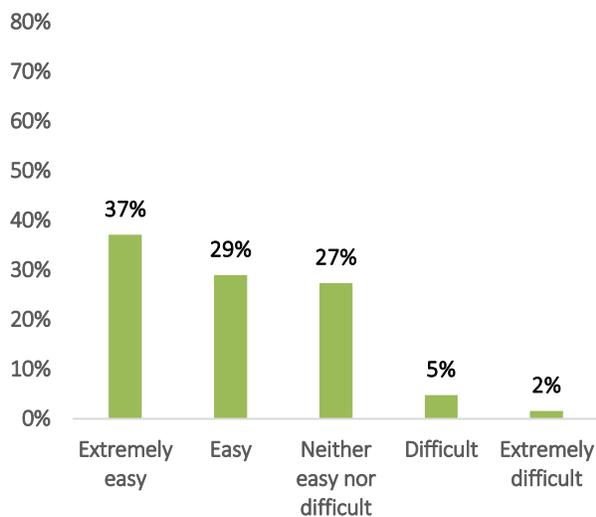


FIGURE 15. EASE OF PAINT DROP-OFF FOR CUSTOMERS

How easy or difficult is it for customers to use the drop-off program? (n=62)

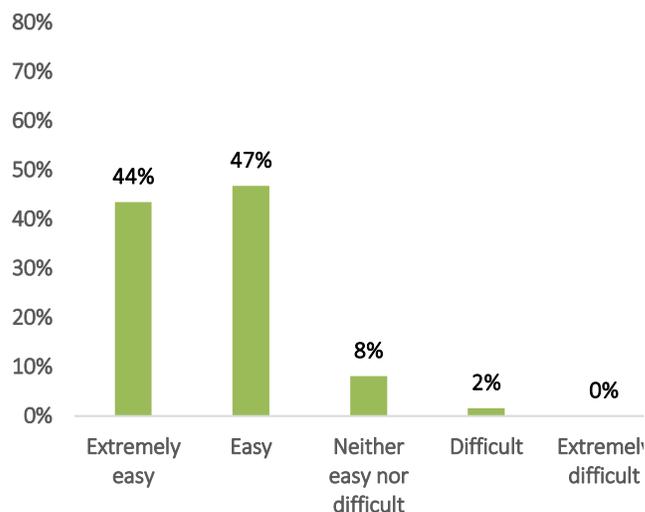
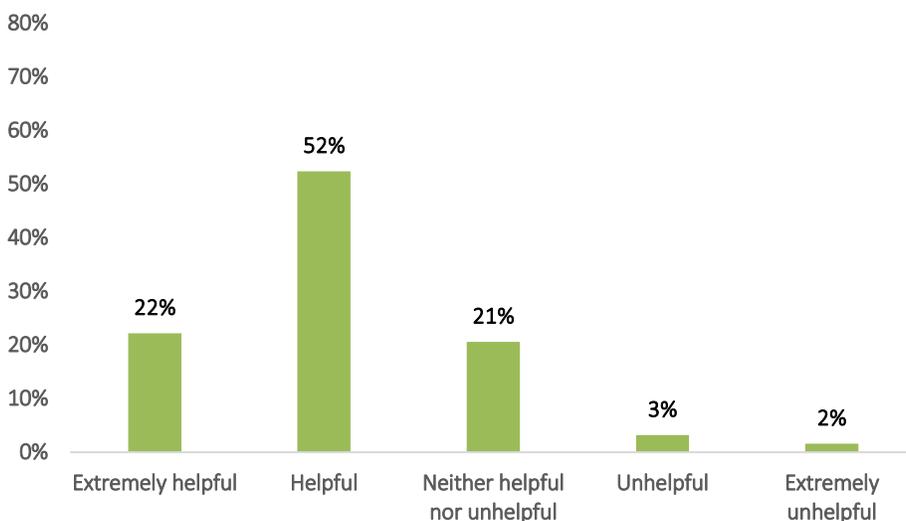


FIGURE 16. PAINTCARE STAFF

How helpful has PaintCare staff been? (n=63)



Benefits to Retailers

Becoming a paint drop-off site offers several potential benefits to retailers, including increased foot traffic and customer loyalty, and an enhanced public image. 41% of the drop-off site retailers surveyed experienced an increase in foot traffic as a result of being a drop-off site (see Figure 17). More than half of respondents indicated that at least 10% of customers returning paint made purchases during the visit

(see Figure 18). In addition, 30% of retailers reported an increase in customer loyalty as a result of the PaintCare program (see Figure 19).

FIGURE 17. FOOT TRAFFIC

How has participation in the PaintCare program affected foot traffic in your store? (n=59)

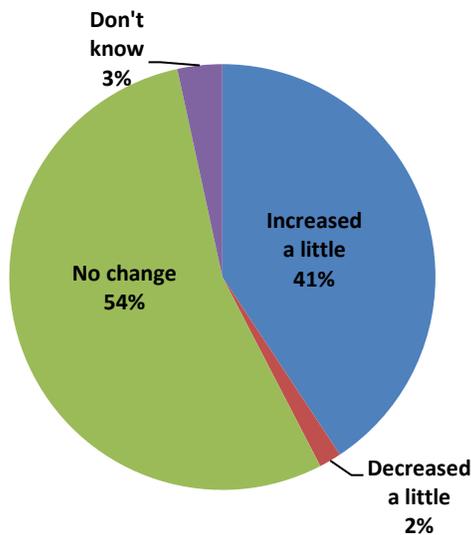


FIGURE 18. CUSTOMER PURCHASING PATTERNS

What percent of customers who drop off leftover paint also buy something while they are in the store? (n=59)

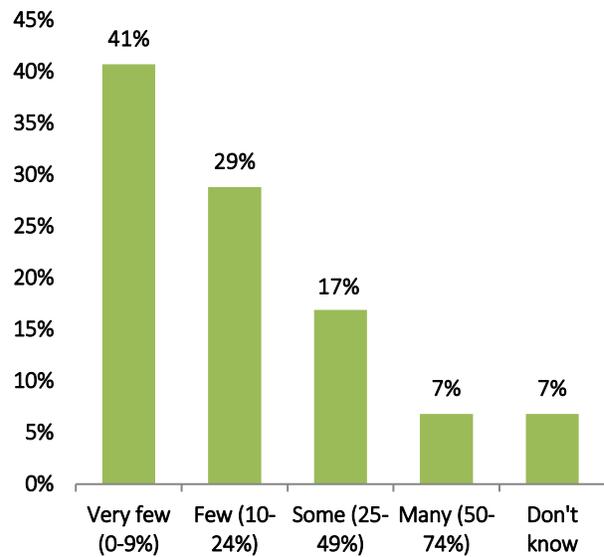
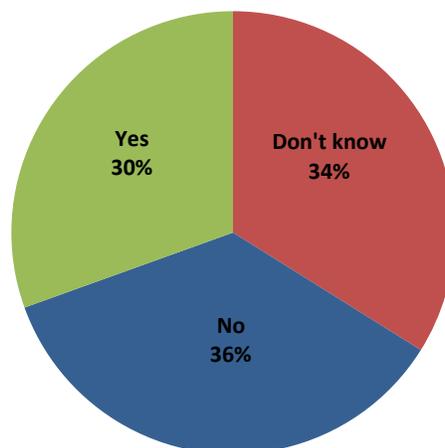


FIGURE 19. CUSTOMER LOYALTY

Has collecting leftover paint through the PaintCare program improved customer loyalty? (n=59)

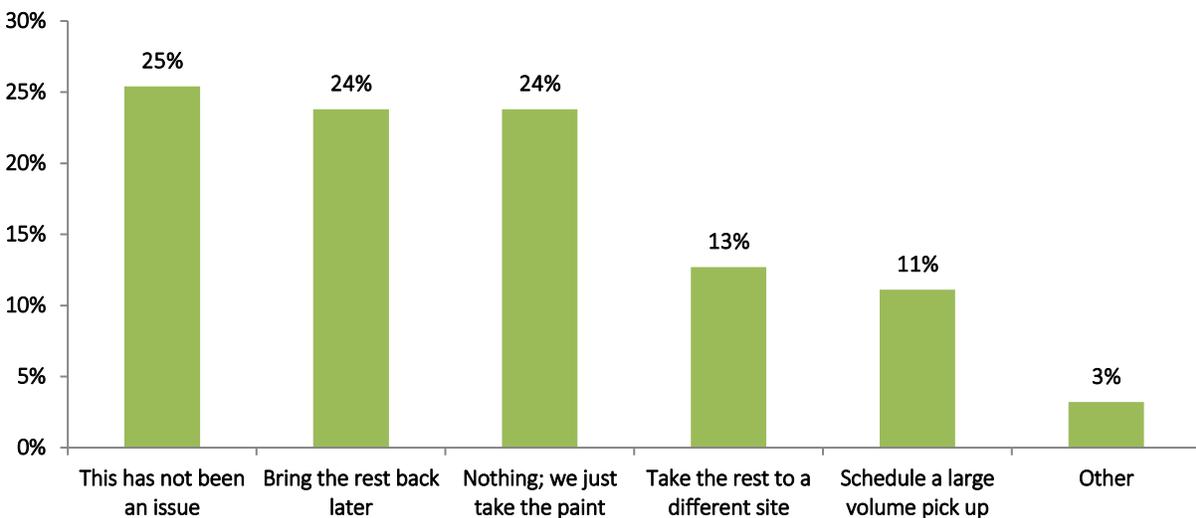


Excess Paint

Retail stores may sometimes reach their capacity for leftover paint before transporters arrive to pick up the collected paint, or customers may bring more paint than the store can accept from one customer. Stores varied on how they handle such a situation: some instruct customers to bring the paint back later (24%) or to take it to a different store (13%), while others simply take the paint (24%). About one-quarter indicated that this had never been a problem for their stores (see Figure 20).

FIGURE 20. EXCESS PAINT

If someone has more paint than you can handle, what do you tell them? (Respondents could choose more than one answer) (n=63)



Drop-Off Site Promotion

31% of retailers indicated that they would like PaintCare to more widely promote their site as a drop-off location, while more than half (54%) indicated that PaintCare already did enough to promote their store.

Customer Education

Nearly all (97%) respondents provided print educational materials to customers about the PaintCare program, and many provide more than one type of material. The most common material provided was a brochure (81%), followed by a poster (36%), fact sheet, (31%), and minicard (30%) (see Figure 21). A large majority (71%) of respondents indicated that PaintCare's printed materials are useful (53%) or very useful (18%) (see Figure 22).

FIGURE 21. CUSTOMER EDUCATION

Information about PaintCare provided to customers (could choose more than one) (n=60)

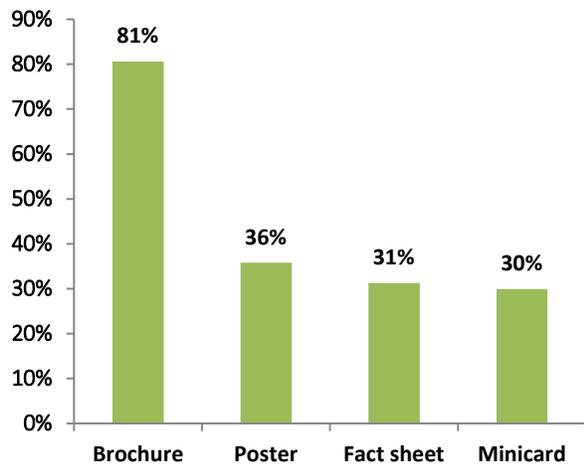
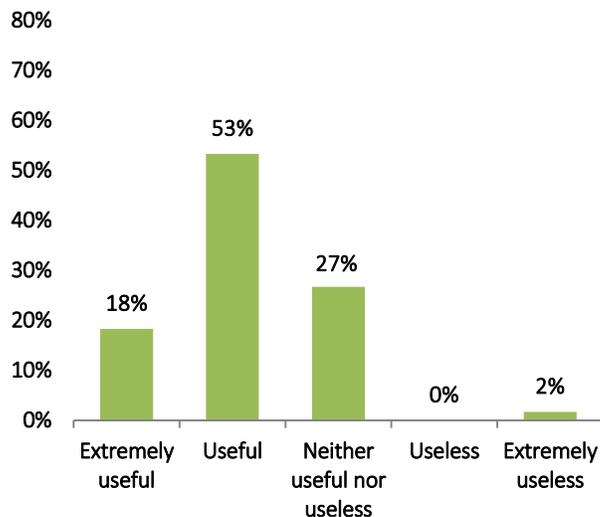


FIGURE 22. PAINTCARE OUTREACH MATERIALS

Are PaintCare printed materials useful? (n=60)

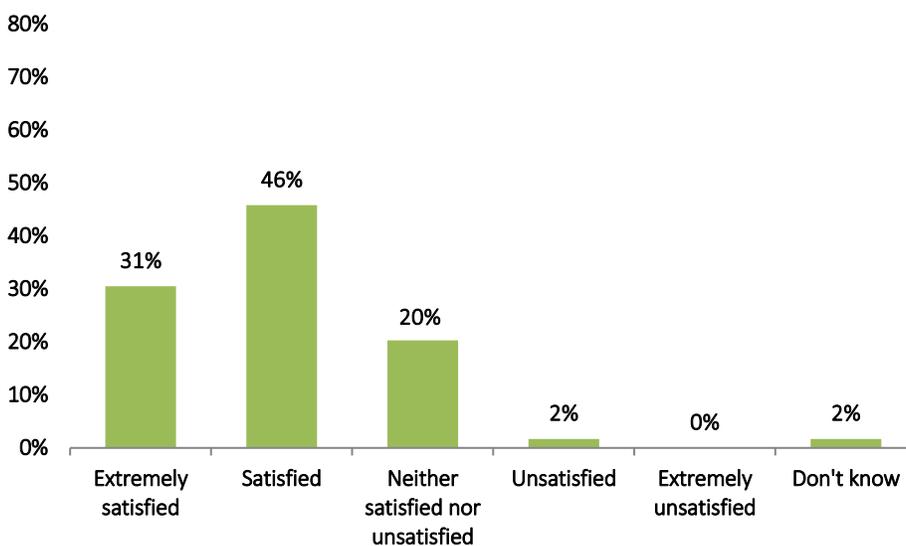


Customer Satisfaction

Three-quarters of respondents believe their customers are satisfied (46%) or very satisfied (31%) with the PaintCare program, while only 2% are unsatisfied (see Figure 23).

FIGURE 23. CUSTOMER SATISFACTION

Overall, how satisfied do you think your customers are with the PaintCare program today? (n=59)

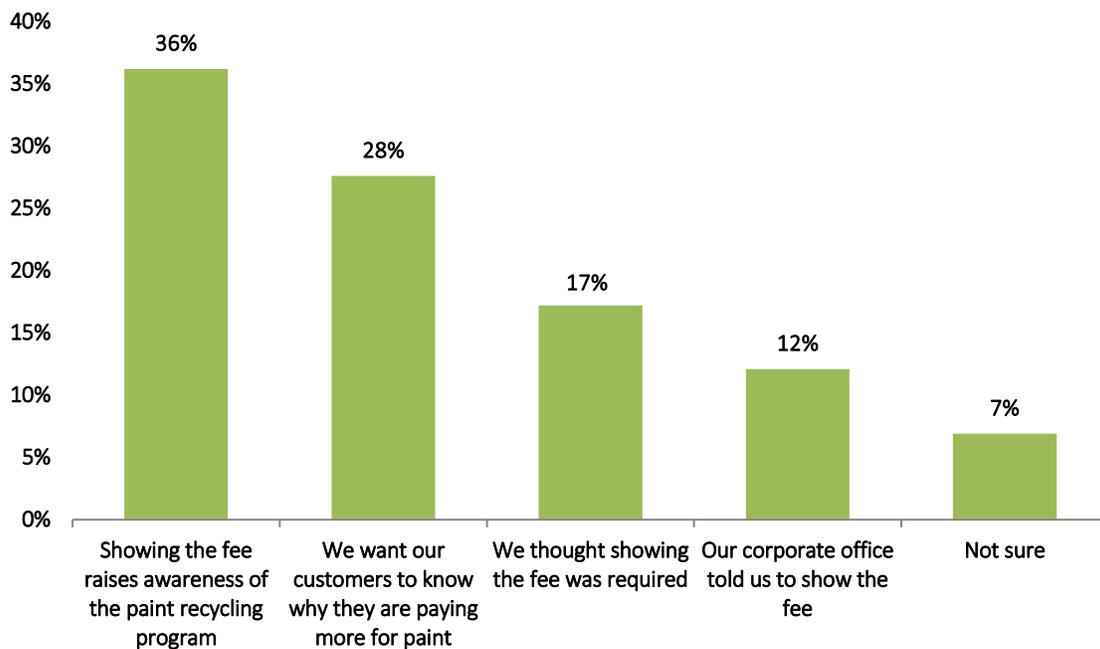


Customer Response to Fee

Although the law does not require retailers to make the fee visible on receipts or invoices, all retailers who responded disclose the fee on their receipts. (While it is not required, PaintCare encourages retailers to show the fees). Retailers most frequently indicated that they show the fee on receipts to explain the program to customers and raise awareness of the recycling program (36%) or to show customers why they are paying more for paint (28%) (see Figure 24), and 12% indicated that showing the fee was a corporate decision. 17% thought showing the fee was required. 7% thought showing the fee was required.

FIGURE 24. REASONS FOR DISCLOSING PAINT STEWARDSHIP FEE TO CUSTOMERS

Why do you show the PaintCare fee? (n=58)



Retailers were asked a series of questions about customers' understanding of, attitude about, and questions regarding the fee. Most (84%) agreed (67%) or strongly agreed (17%) that customers understand that the paint fee pays for a recycling program (see Figure 25). Most (89%) also agreed (52%) or strongly agreed (37%) that customers understand that the fee is not a deposit (see Figure 26). About two-thirds (66%) agreed (48%) or strongly agreed (18%) that customers understand that the fee is not a tax (see Figure 27).

When asked whether their customers are upset about the fee, less than a third (30%) of respondents agreed (25%) or strongly agreed (5%), while more (39%) disagreed (27%) or strongly disagreed (13%) (see Figure 28). Nearly half of respondents reported a decrease in questions about the fee over time (see Figure 29). About 20% indicated that customers always have questions or comments about the fee (see Figure 30).

FIGURE 25. CUSTOMER UNDERSTANDING OF THE PAINTCARE FEE (RECYCLING)

Customers understand that the paint fee pays for a recycling program (n=60)

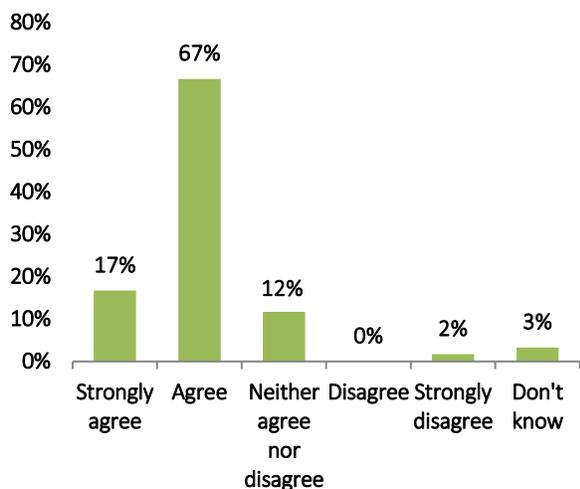


FIGURE 26. CUSTOMER UNDERSTANDING OF THE PAINTCARE FEE (NOT A DEPOSIT)

Customers understand that the paint fee is not a deposit (n=60)

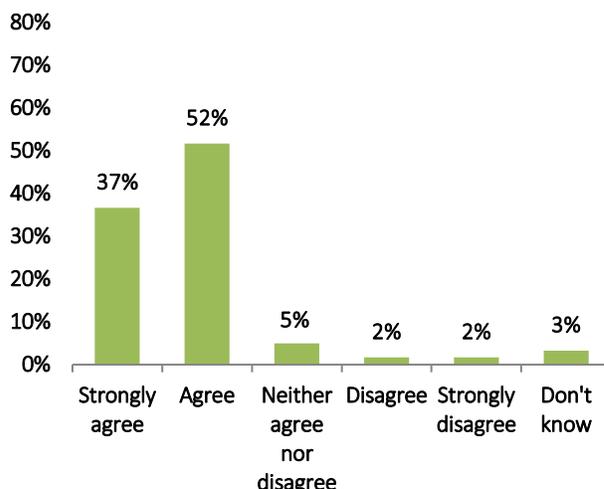


FIGURE 27. CUSTOMER UNDERSTANDING OF THE PAINTCARE FEE (NOT A TAX)

Customers understand that the paint fee is not a tax (n=60)

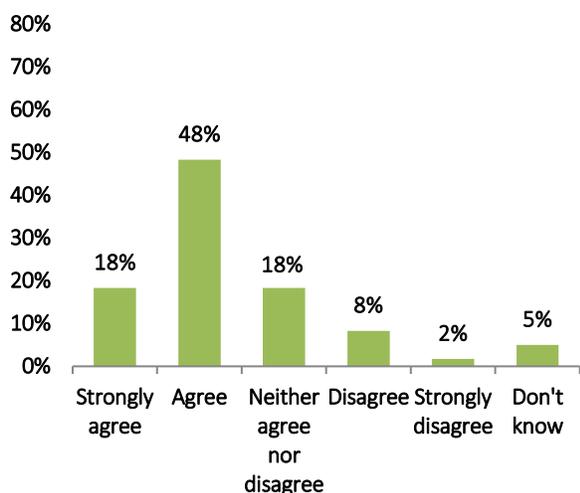


FIGURE 28. CUSTOMER RESPONSE TO PAINTCARE FEE

Customers are upset about the fee (n=60)

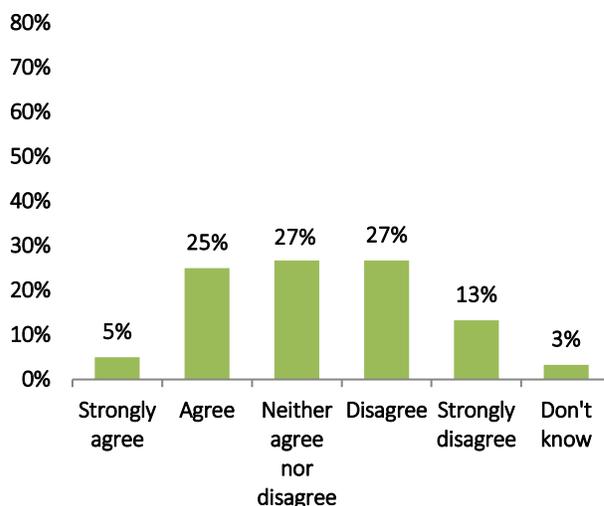


FIGURE 29. FREQUENCY OF QUESTIONS ABOUT THE PAINTCARE FEE

We have experienced a decrease in customer comments about the paint fee over time (n=59)

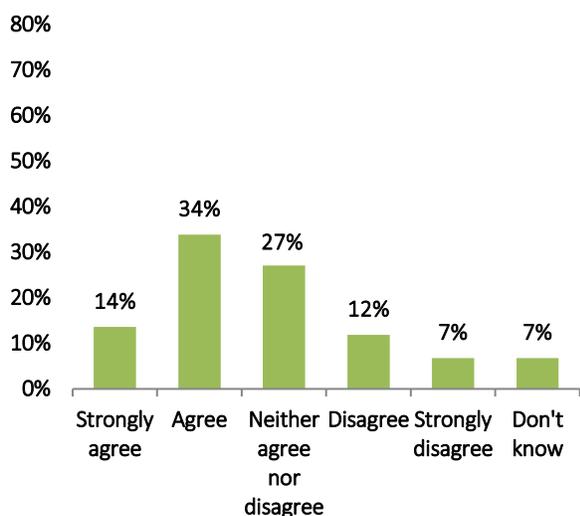
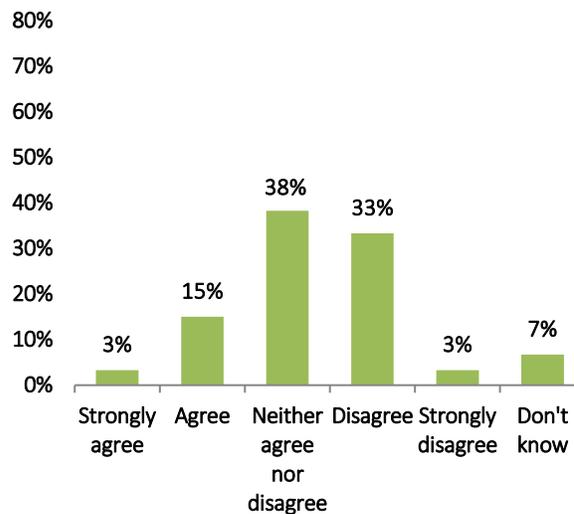


FIGURE 30. CUSTOMER RESPONSE TO PAINTCARE FEE

Paint customers always have questions or comments about the fee (n=59)



Painting Contractor Survey

PSI collected survey responses from 24 painting contractors in Colorado. The results of this survey yielded the following key findings on the effects of PaintCare program on painting contractors.

Key Findings

- **A large majority of the contractors surveyed were satisfied with the PaintCare program.** 80% of respondents indicated that they were satisfied or very satisfied with the PaintCare program.
- **A majority of the contractors surveyed found the fees to be fair.** 52% of respondents indicated that fees were fair or very fair, while 29% indicated that they thought the fees were unfair or very unfair. 63% of respondents indicated that they pay more in fees today than they paid for paint disposal prior to implementation of the PaintCare program.

Details of Survey Responses

Program Satisfaction

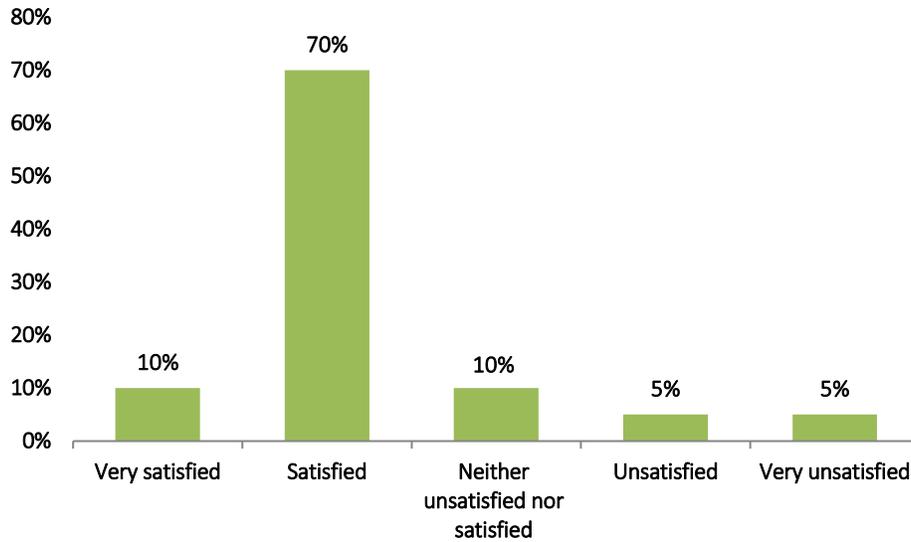
All contractors surveyed had used the PaintCare LVP program. Approximately 44% of respondents had also used a PaintCare drop-off site. A quarter of respondents serve mostly commercial customers, a

quarter serve mostly residential customers, and half serve both types of customers. Their companies employ an average of 15 people (ranging from 1 to 60).

A large majority (80%) of respondents indicated that they were satisfied (70%) or very satisfied (10%) with the PaintCare program (see Figure 31).

FIGURE 31. SATISFACTION WITH PAINTCARE PROGRAM

How satisfied are you with the PaintCare program overall? (n=20)



Colorado Painting Contractors: Comments on the PaintCare Program

"We have found the program most helpful. Thank You."

"It is a great thing for the environment."

"They are timely with pick-up and their employees are always professional and helpful."

"I've been very pleased with the service!"

Excess Paint

A majority (59%) of respondents typically have between 6 and 30 gallons of extra, unneeded paint per month (see Figure 32). Almost two-thirds (63%) of respondents sometimes leave excess paint with customers, while 38% use leftover paint for other jobs (see Figure 33). Nearly half (46%) of respondents

store paint for the LVP service. Fewer (17%) reported using a retail drop-off site (13%) or another drop-off site (4%).

FIGURE 32. EXCESS PAINT

How many of gallons of extra, unneeded, paint do you end up with in a typical month? (n=24)

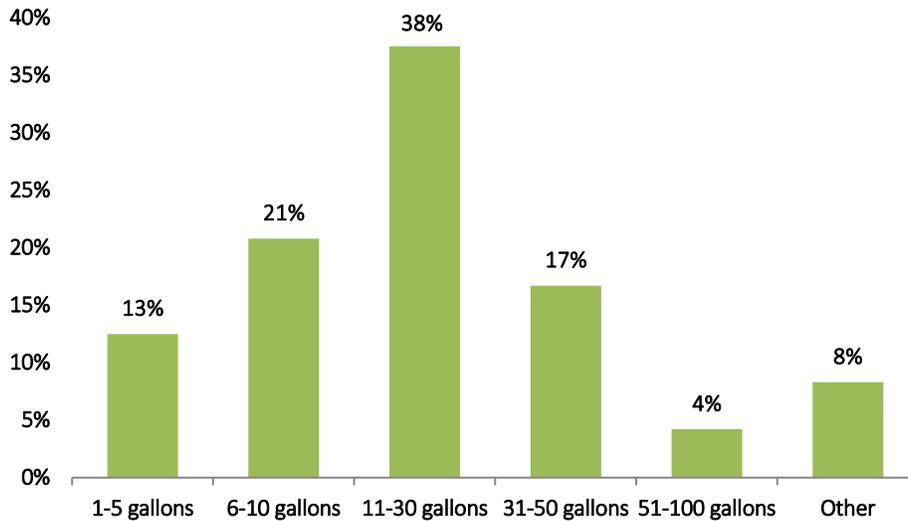
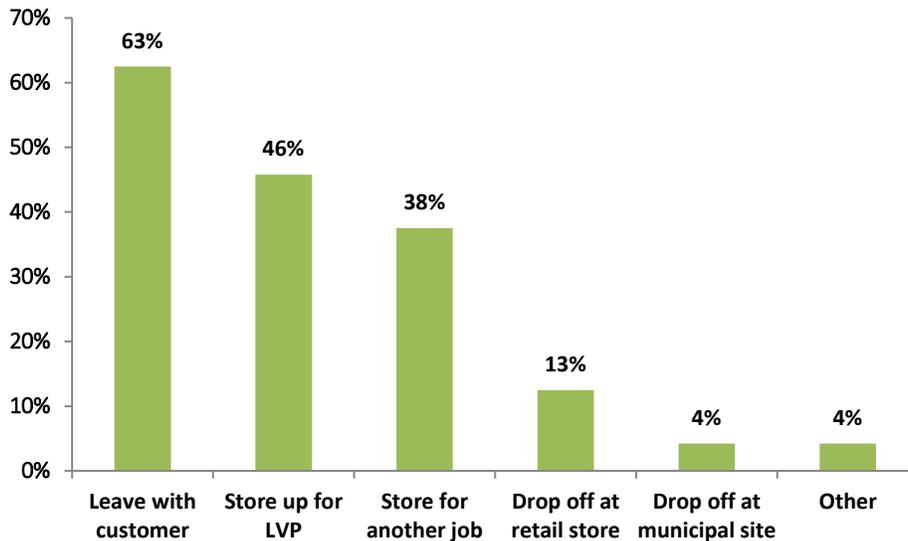


FIGURE 33. MANAGEMENT OF EXCESS PAINT

When you finish a job and have extra paint, what do you typically do with it? (could choose more than one) (n=24)



PaintCare Fees

Fewer than half of painting contractor respondents (37%) indicated that they tell their customers about the PaintCare fee and/or list the fee on estimates or invoices, while 63% do not tell their customers about the fee. A majority (52%) of painting contractor respondents indicated that they found the PaintCare fee

used to fund the paint recycling program to be fair (38%) or very fair (14%), while about a third indicated that they thought the fees were unfair (24%) or very unfair (5%) (see Figure 34). More than half (63%) of respondents indicated that they pay more in fees than they paid for paint disposal prior to implementation of the PaintCare program, while 21% indicated that they pay less in fees than they previously paid for paint disposal (see Figure 35). Those who reported paying more in fees under the program than they paid for disposal prior to the program may have been drying and disposing of paint in the trash (i.e., not paying for pick up or recycling, and not accounting for any added trash expense).

FIGURE 34. CONTRACTOR RESPONSE TO FEES

What is your opinion of the fee? (n=19)

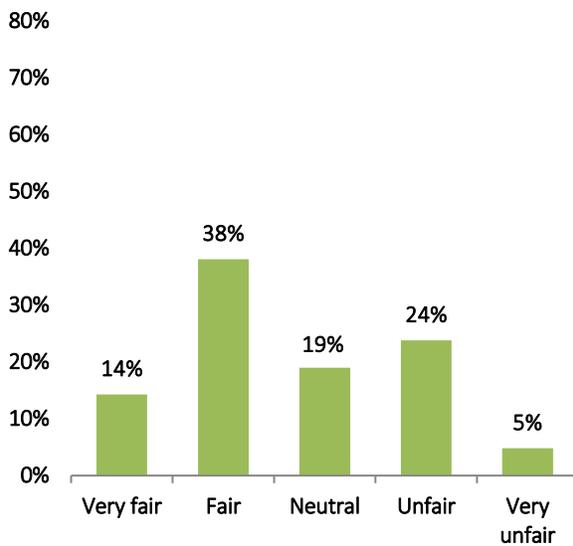
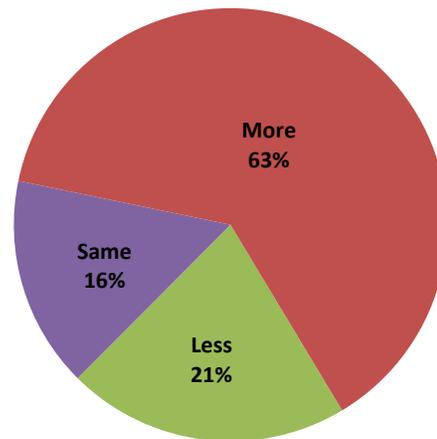


FIGURE 35. CONTRACTOR RESPONSE TO FEES

Since the PaintCare program started in July 2016, what has been your experience with costs for disposal? (Pay more in fees today than used to pay for disposal; pay less in fees than used to pay in disposal; pay the same) (n=19)



Large Volume Pick-Up Customer Survey

PSI collected survey responses from 28 businesses or other organizations that used PaintCare’s LVP service available for those that have over 200 gallons of paint. LVP customers typically include businesses with large facilities, universities, state agencies, and property management companies. Note that this section does not include contractors, who were reported on separately (see the previous section). The results of this survey yielded the following key findings on the effects of PaintCare’s LVP service.

Key Findings

- **Almost all LVP customers responding to the survey are satisfied with the LVP service and PaintCare overall.** 96% of respondents indicated that they were satisfied or very satisfied with the PaintCare program overall and with PaintCare’s LVP service.
- **A large majority of respondents indicated that they used the LVP service because they wanted to dispose of their paint safely or properly.** 79% cited proper disposal, while 36% cited convenience, and 21% cited cost savings. 79% of respondents indicated that they use LVP service for paint that has accumulated over time.
- **LVP customers responding to the survey think the fee is fair.** Three-quarters of respondents indicated that they found the PaintCare fee to be fair or very fair.

Details of Survey Responses

Program Satisfaction

Nearly all (96%) LVP customers were satisfied (9%) or very satisfied (87%) with the LVP service, and nearly all (96%) were satisfied (28%) or very satisfied (68%) with the program overall (see Figures 36 and 37).

FIGURE 36. PAINTCARE LVP SERVICE SATISFACTION

How satisfied were you with the large-volume pick-up service? (n=23)

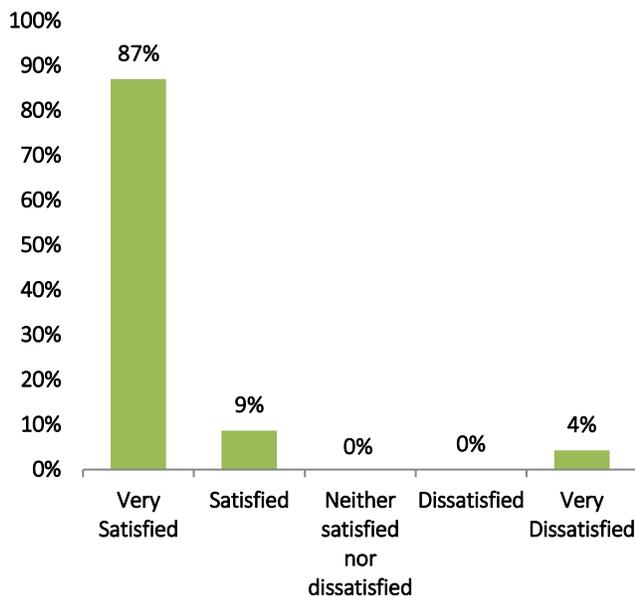
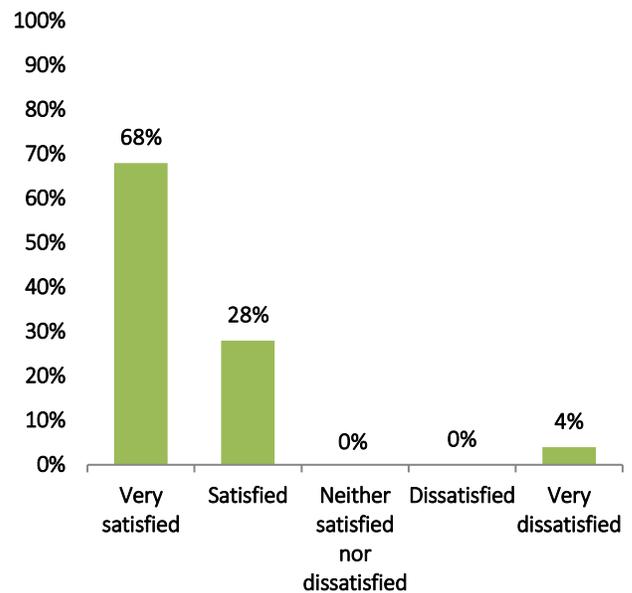


FIGURE 37. PAINTCARE PROGRAM SATISFACTION

How satisfied are you with the PaintCare program overall? (n=25)



Colorado LVP Customers: Comments on the PaintCare Program

"It was so easy. You guys are amazing!"

"Very easy to schedule a large volume pick-up. More people need to know about this."

"Your workers were very helpful."

Excess Paint

About half of LVP respondents typically end up with just 1-5 gallons of excess paint each month (see Figure 38). More than three-quarters (79%) of LVP customers indicated that the paint accumulated over time (see Figure 39). They also noted that they kept excess paint because there were limited, inconvenient, or expensive disposal options prior to the LVP program. Few said they overestimated what they needed (7%) or bought the wrong color or changed a color (4%).

FIGURE 38. EXCESS PAINT (FROM LVP SERVICE CUSTOMERS)

How many gallons of extra paint do you end up with in a typical month? (n=27)

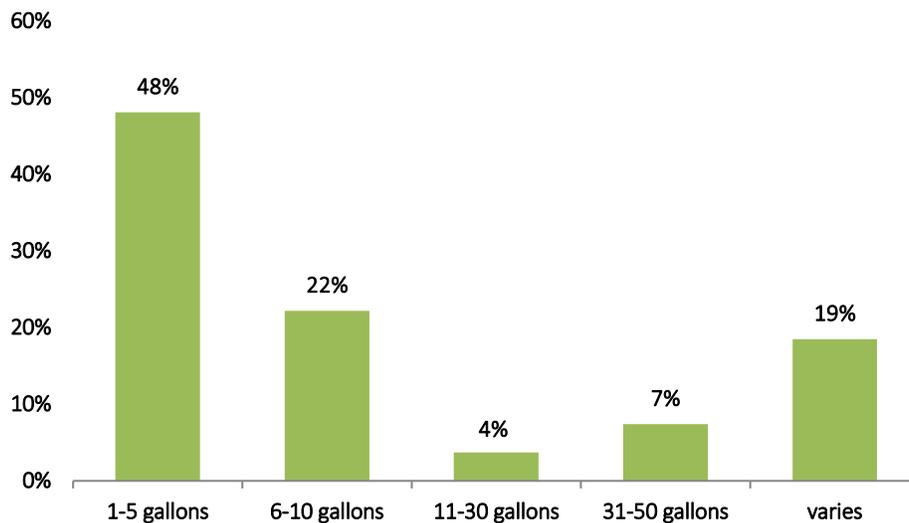
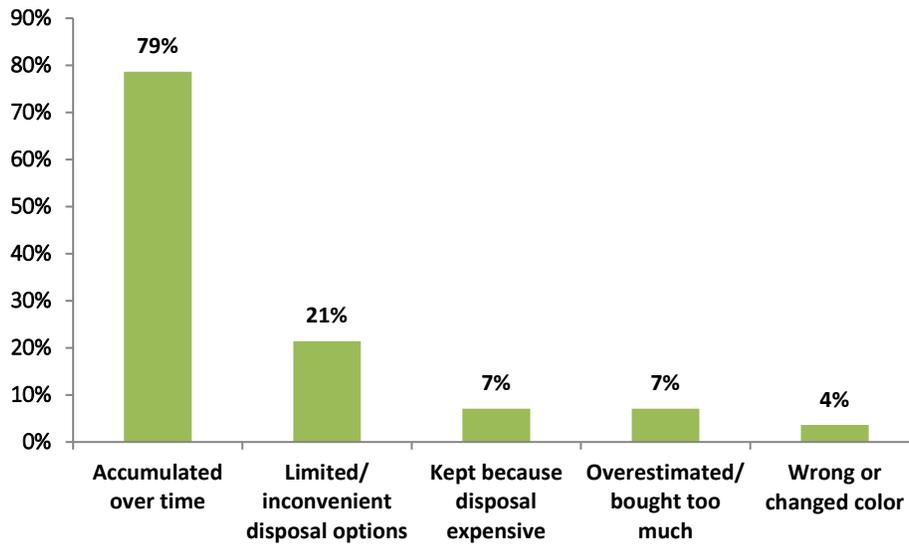


FIGURE 39. SOURCES OF EXCESS PAINT

Why did you have leftover paint? (could choose more than one) (n=27)



Use of the LVP Service

The most frequently cited sources of information about the LVP service were word of mouth (43%) and paint stores (36%) (see Figure 40). Approximately 11% of LVP customers heard about the service from a painting contractor, and 7% from a conference or trade show.

Most (79%) respondents used the service because they wanted to dispose of their old or leftover paint safely or properly (see Figure 41). More than a third (36%) cited convenience, and 21% used the service to save money.

FIGURE 40. USE OF PAINTCARE'S LVP SERVICE

How did you hear about PaintCare's LVP Service? (could choose more than one) (n=28)

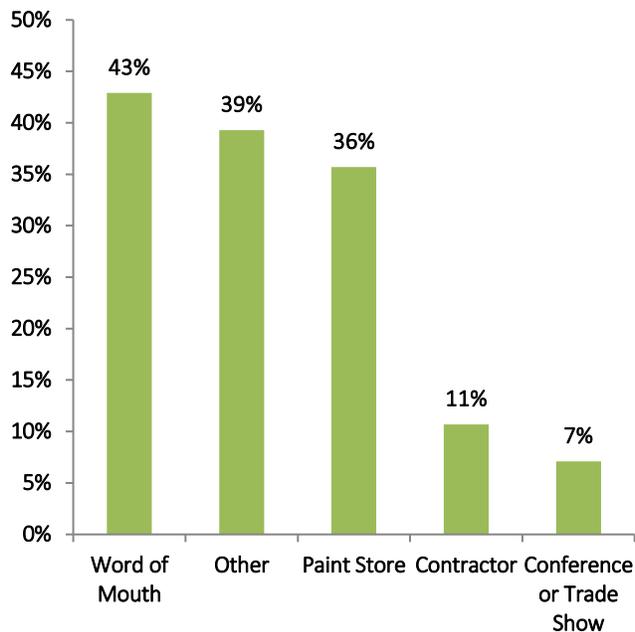
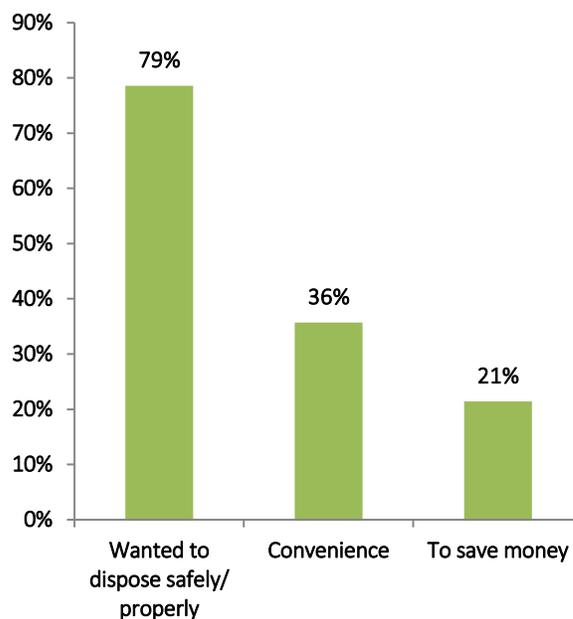


FIGURE 41. USE OF PAINTCARE'S LVP SERVICE

Why did you use the LVP service? (could choose more than one) (n=28)



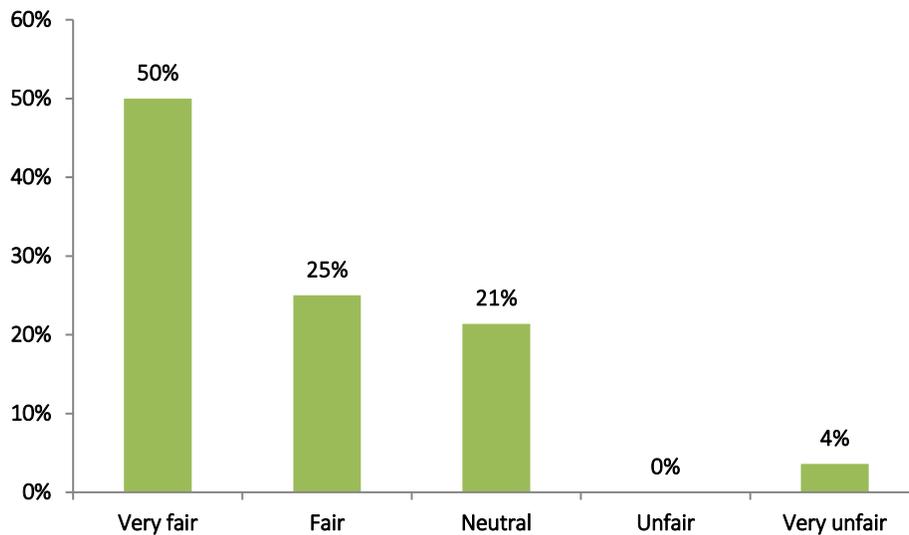
Costs and Savings

Three-quarters of respondents indicated that they found the PaintCare fee that is used to fund the paint recycling program to be fair (25%) or very fair (50%) (see Figure 42).

Most (82%) LVP respondents indicated that they do not know how much money they have saved through the LVP service. 11% of respondents indicated that they had saved money through the LVP service (up to \$1,500), while only 7% believed they had not.

FIGURE 42. PAINTCARE FEE

What is your opinion of the fees on new paint purchases for paint recycling and safe disposal?
(n=28)



4. Non-Participating Retailer Interviews

Method

Interview Design

PSI conducted interviews with non-participating retailers to find out why they did not volunteer as drop-off sites. The interviews were conducted via phone using a semi-structured interview guide with several open-ended questions. Interviewees included store managers, paint department managers, and store owners.

Topics addressed during the interviews included:

- Familiarity with and impressions regarding the PaintCare program;
- Whether the store had considered participating, and if so, reasons for not signing up (or, if a store had been a drop-off site and left the program, the reasons for leaving the program);
- Customer comments about, and views on, the program;
- Suggestions for improvements; and
- Changes that would make it more likely for the store to join the program as a drop-off site.

Response

Stores were targeted for interviews, by region, according to PaintCare's priority areas for recruiting stores to the program. Most people who were reached by phone readily agreed to be interviewed (or referred PSI to someone in the store who was more knowledgeable about the paint program). Six interviews were conducted with Denver-area stores, four with stores in the Colorado Springs area, four in the southeast region of Colorado, three in mountain towns, and one in the northeast area of the state. One interviewee manages three stores, and another manages two.

In total, PSI conducted 18, one-on-one phone interviews with non-participating retailers representing 21 stores. Six of those stores had been part of the PaintCare program but left. The stores included paint-only, hardware, farm & ranch, lumber, and combination (e.g., lumber and farm) stores, and included franchise, manufacturer-owned, and small independent stores. The following sections summarize findings from the interviews with these non-participating retailers and their perceptions of the program, including why they do not participate in program. Quotes are provided to illustrate key points.

Findings

Overall Familiarity with and Impressions about the Program

Most, but not all, interviewees were familiar with the PaintCare program. Some had firsthand experience with the program because they work in multiple stores, including "sister" stores that participate as drop-off sites, or had past experience working in a store that was a drop-off site. Many personally felt PaintCare is a good program, and used words like, "great," "favorable," "extremely useful," and "worthwhile" when asked for their general impressions. They described in a positive way how they answer customer questions and refer customers to nearby drop-off sites. Several mentioned the environmental benefits of the program.

I love it. It's a good program. Even though we charge a little fee, it's the right thing for the earth. Customers love it too.

I would tell any customer that it's a good program.

It's extremely useful. It's a responsible program for returning any paint.... I'm personally a fan. Definitely helps people get paint out of their homes, basements, garages.

If people ask what they can do with their paint, we tell them. We have the [PaintCare informational materials] here, but people just seem to ask us. So we tell them.

Those who were not very familiar with the program tended to know about the fee but little else, such as the location of drop-off sites or whether their store shared information about the program with customers. Among this group, there was a little bit of confusion about what it means to "participate" in the PaintCare program: some thought that by handing out brochures, they were participants, while others thought that because they do not collect paint they do not need to hand out information.

Customers ask if they can drop off paint, but we don't do it, so they say they'll just dry it out at home and throw it out.

I know we're charging a fee. Not sure we participate.

We had [PaintCare informational] materials. We stopped ordering them because we discontinued collecting. I'm pretty sure we don't have them now.

We don't have any brochures – ran out a while ago.

No questions from customers, no brochures, no signs from PaintCare.

A couple of interviewees expressed concerns about the fee, although they still supported the program.

I think it's a tax... There's some challenges, but having a place to drop off is a good thing. It definitely has some benefits. Everyone pays a fee, so few people have asked about it. I'm glad [the paint] isn't going in the river or getting buried.

Customer Views

By and large, interviewees felt that their customers like the program, particularly the environmental aspect and the convenience.

Once people realize they can take paint somewhere, paint they've had for a long time, most people are glad to recycle.

Customers love it. Some houses here are over 100 years old. People are buying them and renovating. And they're finding that there's a ton of old paint there. (from a retailer who works in a company that has other stores that participate as drop-off sites)

Customers with paint in their basement, they're happy to have a place to take it. They were grateful. There were no problems. We didn't have any problems with what they brought, really. (from a store who left the program due to problems with pick-up service)

The fee is on many customers' minds, particularly where the fee is displayed on receipts. Customers understand the fee once someone explains it, although explaining can sometimes take a little effort on the part of store employees.

People appreciate [the program] for sure. The only negative is that, as a company, we print the fee on the receipts – people question why we charge if we don't do collection. It's usually a quick explanation and they understand.

We explain [the fee]. It makes people feel better, the fee is a good conversation piece to help talk to people about the environment. They are fine with it once we talk about it.

When it first came out, people were upset about the fee. Now we have signs. [Store employees] explain to [customers] that there are fees and what they're for. We don't get comments any more from customers.

[The fee] comes into question once in a while, but we've gotten pretty good at explaining it. We explain the advantages of the program. I know some other stores don't necessarily print the fee on the receipt, so I explain that they do charge but we show it.

A small number of stores noted a lack of awareness among customers.

It hasn't been super impactful here. There's not a lot of awareness on the public's side.

People get it once we explain it, but there's not a lot of press. It needs to be out there. Unless it spreads word of mouth, you don't hear anything. Be more proactive on social media.

We get new people all the time [buying paint], but honestly, not that many people know about [the paint collection program] yet.

Customers asking about dropping off paint is one factor that influences a store's decision to participate. If customers do not ask, stores may see that as an indication that there is no demand for the program.

We probably get a call once every three weeks from someone asking if we're a drop-off. So it probably wouldn't be a big destination for people.

Perceptions about Participating in the Program

For many stores, the perception is that participating as a drop-off site is too much work. This perception may come from a general sense that store workers are already maxed out and cannot do more, from hearing about other retailers' experiences, or from firsthand experience at a participating store (at "sister" stores or, in some cases, a store that left the program). One specific concern that several people raised was customers leaving non-program items, sometimes knowingly, sometimes due to misunderstanding. Another concern raised was the timing of pick-ups and the potential for the bins to fill up. One relatively common perception was that there are other places in the area that are drop-off sites (sometimes under the same ownership), so they felt customers had other options.

It's tough enough to wait on customers – to have something that creates more work for associates is hard.

We are very service-oriented stores. It created ill will with customers when we wouldn't take things that weren't covered under the program.

[A competitor] told us that their pick-ups were off. Like they had to wait.

There's a drop-off 100 yards away [at a competitor], so we will send some people there.

Our other stores take paint. There are ones close by.

Finally, a few stores indicated that they act as "informal" drop-off sites. So, while they have not committed to becoming a regular drop-off site, they will take leftover paint as a service to their customers, sometimes transferring it to a different store location under the same ownership.

Barriers to Joining the Program

Some stores have **hard constraints** that prevent them from participating. They may have a "We would if we could" attitude about participating. Examples include:

- The fact that a store leases space and the lease or landlord might prohibit participation;

- Lack of space, such as a store that has limited warehouse space and cannot give up a delivery bay for pick-ups, or a store that is in a basement location or historic building with limited space.

Other stores have *negative impressions but **might be amenable to joining*** in the future. In these cases, the store employees might believe the program is worthwhile, but that participating as a drop-off site is too difficult or that the benefits do not outweigh the costs. Very few have had a bad direct experience and are not open to joining, at least in the short term.

We just opened a new store. We want to get a year under our belt before we introduce any new ideas.

If there were fewer requirements, if they picked up on a weekly basis so there was less risk. One container would be nice too. Depending on the requirements, we would be a willing participant.

The bins are a perfect size for the stores, but it would be better if they were picked up more often because they get full.

I think it's a good program... Maybe be a little more specific about what products they accept. Maybe expanding – aerosols is a big one people want to get rid of... other paint-type items – spackle, things you use when you paint.

A small number of stores lack knowledge to make a judgment about joining and/or do not believe they have any say in the decision because *"It's up to corporate."* This was the case with two small regional chains with out-of-state headquarters.

General Insights

Retailers are not a homogenous group. As with any stakeholder group, there are differences among paint retailers. One helpful way to categorize stores is in terms of what they sell:

- Paint-only retailers;
- Hardware stores (which sell a large variety of items to consumers and contractors);
- Lumber yards (which might serve more contractors than consumers); and farm & ranch stores (which cater more to agricultural clientele).

Another helpful way to categorize stores is by ownership or business structure: independent (stand-alone or multi-store), franchise, and manufacturer-owned. Decision-making processes (including the decision to participate as a PaintCare drop-off site) vary depending on the type of business. Information sharing varies as well. For example, franchisees and stores operating under the same ownership might have regional meetings and other ways of sharing information among multiple stores, including information about experiences with PaintCare.

Not only are retailers busy, retail staff members turn over frequently. The PaintCare program is just one of hundreds of issues a store manager or paint manager deals with daily. A few managers might become very excited about the paint program – and perhaps even become a champion who can spread positive feedback to others – but most do not have the time or interest to learn much of anything about it. In

addition, there is a lot of staff turnover in the retail environment. In the larger organizations, staff members move from store-to-store (or have responsibilities at more than one store), while other store employees simply move on. The result for PaintCare is a continual education process.

5. Program Successes & Challenges

This section summarizes PSI's assessment of the notable successes and challenges of the Colorado paint stewardship program as derived from PSI's stakeholder surveys and interviews and PaintCare's annual program reports.

Successes

- 1. Increased reuse, recycling, and beneficial use of leftover paint.** In the first three-and-a-half years of the Colorado paint stewardship program through December 31, 2018, PaintCare processed 2.3 million gallons of leftover paint. More than 72% of latex paint processed was recycled back into latex paint, for a total of 1.2 million gallons of paint recycled. More than 6% of latex paint and 4% of oil-based paint was managed through reuse, and 96% of oil-based paint was managed as fuel through energy recovery and incineration.
- 2. Substantial financial savings for Colorado's municipal HHW programs.** The PaintCare program alleviates participating local government HHW programs of most of the costs of managing post-consumer paint. HHW programs reported annual cost savings ranging between \$24,000 and \$132,000 per year.
- 3. Significantly better access to convenient paint drop-off options for residents and businesses.** Prior to the implementation of the PaintCare program, there were very limited opportunities for residents or others to drop off paint for recycling, and few options for convenient disposal. By the end of 2018, PaintCare had 169 year-round paint drop-off locations throughout the state, with 94.7% of residents living within 15 miles of one of these sites, and another 202 supplemental sites and services, including events and LVPs.
- 4. Broad satisfaction with the program among all stakeholder groups.** The majority of respondents in each stakeholder group surveyed indicated that they were satisfied or very satisfied with the PaintCare program (see Table 7). Based on survey data and on interviews with non-participating retailers, customers appreciate the opportunity to safely and responsibly dispose of unwanted paint in convenient locations.
- 5. Ease of participation for retailers, HHW program managers, and customers/residents.** A majority (66%) of retailers indicated that it was easy or very easy to participate in the PaintCare program. Most (90%) retailers indicated that it was easy or very easy for their customers to participate in the program. Most (92%) HHW program managers indicated that it was easy or very easy for their facility to participate in the PaintCare program as a paint drop-off site, and most (92%) indicated that the PaintCare program was easy or very easy for their residents to use.

6. **Responsive staff.** A large majority (74%) of retailers and all (100%) HHW program managers indicated that the PaintCare staff was helpful or very helpful.
7. **High-quality outreach and education.** All drop-off site retailers provided printed educational materials to customers about the PaintCare program. A large majority (71%) of the retailer respondents indicated that PaintCare’s printed materials are helpful or very helpful.

TABLE 7. SATISFACTION WITH THE PAINTCARE PROGRAM

Stakeholder Group	Percent Satisfied or Very Satisfied with the PaintCare Program
HHW Facility Managers	100%
LVP Service Customers	96%
Contractors	80%
Retailers	74%

Challenges

1. **Consistency and timing of pick-ups from retail locations.** While retailers are satisfied with the program overall and report that PaintCare staff is helpful, some survey and interview respondents noted problems with late or missed pick-ups.
2. **Retailers' perceived "costs" of participating.** While participating as a retail drop-off site has a number of benefits, survey and interview respondents noted challenges or costs as well, including extra work for staff, dealing with non-program items left by customers, and managing missed or overdue pick-ups.
3. **Dissatisfaction with the fee.** There is general acceptance of and understanding about the fee, but some stakeholders continue to be dissatisfied with the fee.
4. **Confusion about program and non-program products.** Several comments on surveys and in interviews indicated some confusion about what products are covered by the program and noted that retail customers sometimes drop off non-program items, which stores must then dispose of.

6. Recommendations

The recommendations provided below are based on information gleaned from PSI’s stakeholder surveys and interviews.

1. **Work closely with retail drop-off sites and haulers to ensure regular bin pick-up service.** For long-term retailer satisfaction and for the program’s reputation, work with vendors to aim for consistent, on-time pick-ups. Options might include tracking the on-time percentages of a vendor’s pick-ups or offering an easy way for retailers to rate pick-up service, and then providing feedback or incentives and penalties.
2. **Give stores recognition.** Store employees say that participating as a drop-off site is a lot of work and they want their customers to know that they are volunteering to provide this valuable service. The following strategies are primarily aimed at retaining participating retailers in the program, although improving participating retailers’ experiences can also aid in recruiting new retailers. Some examples of how PaintCare might give participating stores recognition:

- a. ***Create different “levels” of participation.*** For example:

- *Bronze:* stores that do a nice job of sharing information;
- *Silver:* stores that allow an event to be held on their site;
- *Gold:* stores that participate as a regular drop-off site; and
- *Platinum:* stores that participate as a drop-off site for five or more consecutive years.

Provide a door sticker for the Gold and Platinum participants (like a TripAdvisor sticker) to help a store show off its achievement. Send an annual letter stating that PaintCare recognizes a store for its high level of service to its community. For those at the bronze and silver, note that, “Many stores in this region provide superior service to their customers and community by participating at the Gold level,” with instructions on how to join.

- b. ***Present awards or certificates of appreciation to retailers.*** While attending regional store meetings and conferences to educate retailers about the program, PaintCare staff could give awards to participating stores (e.g., an award to the store that handled the most volume in the previous year).
- c. ***Work with parent companies to recognize their stores.*** For example, in a company newsletter, a paint company or hardware store might publish, “This month’s green champion is Store ABC, for signing up with the PaintCare program...” or “...for participating in the PaintCare program for three consecutive years.”
- d. ***Work with local civic organizations to give retailers recognition*** for community service for serving as a drop-off site. With PaintCare’s assistance, a Rotary Club, Chamber of Commerce, or other local organization might provide recognition to a store.
- e. ***Recognize stores in press releases and on social media.*** Distribute press releases announcing awards or celebrating stores’ commitments. In addition, any press releases about the PaintCare program, including releases announcing events, could include messaging about participating stores (e.g., “Throughout the year, Store ABC and Store XYZ provide drop-off service to the community”). In places where there are no participating stores, use messaging to prompt customers to ask their local stores about

drop-off (e.g., “In other regions in the state, many hardware and paint stores offer a convenient drop-off service year-round. Ask your favorite store if they participate”).

3. **Maintain continuous, consistent communications with retailers and the general public.** There is a lot of noise to break through today when communicating with any audience. PaintCare has excellent communication materials and messaging, and PSI recommends continuing existing communication efforts.
4. **To combat confusion about program and non-program products, work with HHW collection sites to provide easy access to information on how and where to dispose of non-program items.** In cooperation with local HHW sites, ask stores to offer information about how and where to recycle or dispose of non-program items, including HHW drop-off site locations and hours, alongside PaintCare information. This is especially important for stores that sell many different types of non-paint items that could be safely disposed of at HHW sites, and can impact retailer and customer satisfaction. Note that not all parts of the state offer HHW services.

While the PaintCare program has faced challenges, they can be addressed by the recommendations above. Overall the program has been successful in reaching the core objectives outlined by the paint stewardship legislation, namely providing a product stewardship program for postconsumer architectural paint with environmentally sound management practices that provides substantial cost savings to household hazardous waste collection programs and significantly increases the number of paint collection sites and recycling opportunities for households, businesses, and other stakeholders.

¹ Unless otherwise noted, data on the recovery of paint in Colorado and background information on paint collection in Colorado are from PaintCare annual reports, available at <https://www.paintcare.org/paintcare-states/colorado> and program-wide data is from the 2018 “PaintCare Informational Booklet.”

² More information about the history of paint stewardship in the U.S. can be found through the Product Stewardship Institute’s Resource Library, <https://www.productstewardship.us/page/PSI-Resource-Library>

³ “PaintCare Colorado Program Financial Snapshot,” PaintCare, November 2018. <https://environmentalrecords.colorado.gov/HPRMWebDrawerHM/RecordView/429958>

⁴ “Connecticut Paint Stewardship Program Evaluation,” Product Stewardship Institute, 2016.

⁵ Total number of contacts adjusted to account for undeliverable surveys. Second and third attempts were made to contact potential participants by correcting visible errors in email addresses, using alternate contacts provided by PaintCare in the data, or searching and identifying alternate contacts or addresses.

⁶ For reference, response rates for the Connecticut evaluation were: HHW 69%; Retail (delivered in person) 89%; Contractors 41%; LVP 18%.

⁷ Response rate based on the number of contractors who were identified and contacted from the large volume pick-up list. Additional contractors may have learned of the survey through the contractors’ associations.

⁸ Responses in this section are from year-round facilities (i.e., not event-only program participants).