



**PaintCare®**

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# Vermont Paint Product Stewardship Program Plan



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- B. Definition of Program Products
- C. Examples of Education and Outreach Materials
- D. Drop-Off Site Guidelines and Forms

# 1. Introduction

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## SECTION OVERVIEW

This section discusses:

- Introduction
- The history of paint stewardship in the United States
- Expansion of the Vermont paint stewardship program to add additional product categories
- Paint product stewardship program plan
- Citations

## A. INTRODUCTION

In June 2013, Governor Shumlin signed Act 58, creating the Vermont Paint Stewardship Program for architectural paint. In June 2025, Governor Scott signed Act 59, expanding the program to include additional product categories and revising the name of the program to the Vermont Paint Product Stewardship Program to reflect its broader scope. The provisions of Act 58 (2013) and Act 59 (2025) are codified in Title 10: Conservation and Development; Chapter 159: Waste Management; subchapter 4: Paint Product Stewardship Program (10 V.S.A. Chapter 159, subchapter 4.).

Vermont’s paint product stewardship law requires manufacturers of paint products, as defined in the statute, and referred to herein as “program products” or “PaintCare products,” to establish a program to reduce the generation of postconsumer (leftover) paint; promote reuse of leftover paint; and to collect, transport, and process leftover paint. The program should increase opportunities for consumers to properly manage leftover paint, reduce costs for local governments managing leftover paint, work to keep paint out of the waste stream, and conserve natural resources.

## B. PAINT STEWARDSHIP IN THE UNITED STATES

At the urging of state environmental agencies and government household hazardous waste programs across the United States, the Paint Product Stewardship Initiative began in 2002 to develop an industry-operated paint stewardship system. Facilitated by the Product Stewardship Institute, the initiative involved several years of stakeholder dialogue and research focused on paint management practices and recycling opportunities. Participants included the American Coatings Association, paint manufacturers, paint recyclers, the U.S. Environmental Protection Agency, and state and local governments from across the country.

The initiative led to the development of a model state law designed to create an economically and environmentally sustainable system for managing leftover paint through an industry-operated stewardship program. To date, paint stewardship legislation has been signed into law in California,

Colorado, Connecticut, the District of Columbia, Illinois, Maine, Maryland, Minnesota, New York, Oregon, Rhode Island, Vermont, and Washington.

### **C. PAINT PRODUCT STEWARDSHIP PROGRAM PLAN**

The Vermont paint product stewardship law requires manufacturers of paint products, as defined in statute, to submit a paint product stewardship program plan for approval by the Secretary of the Vermont Agency of Natural Resources (ANR), either individually or through a representative organization.

PaintCare's original program plan for architectural paint was approved by ANR in March 2014. Since then, ANR has approved several revisions to the architectural paint stewardship program plan. In response to the 2025 statutory amendments of the program, program plan updates are needed to address the addition of three new product categories.

Per statute, this program plan must:

- (1) List participating manufacturers and brands covered by the program.
- (2) Provide information on the paint products covered under the program.
- (3) Describe how the program will collect, transport, recycle, and process postconsumer paint products for end-of-life management, including recycling, energy recovery, and disposal, using environmentally sound management practices.
- (4) Describe how the program will provide for convenient and available statewide collection of postconsumer paint products in urban and rural areas of the state, including partnering with existing household hazardous waste collection programs and with paint retailers.
- (5) Provide geographic information system modeling to determine the number and distribution of sites for collection of postconsumer architectural paint based on the following criteria: (a) at least 90 percent of Vermont residents shall have a permanent collection site within a 15-mile radius, and (b) one additional permanent site will be established for every 10,000 residents of a municipality and additional sites shall be distributed to provide convenient and reasonably equitable access for residents within each municipality, unless otherwise approved by the Secretary of ANR.
- (6) Establish goals to reduce the generation of postconsumer paint products, to promote the reuse of postconsumer paint products, and for the proper management of postconsumer paint products as practical based on current household hazardous waste program information. The goals may be revised by the producer or stewardship organization based on the information collected for the annual report.
- (7) Describe how postconsumer paint products will be managed in the most environmentally and economically sound manner, including following the waste-management hierarchy. The management

of paint under the program shall use management activities that promote source reduction, reuse, recycling, energy recovery, and disposal.

(8) Describe education and outreach efforts to inform consumers of collection opportunities for postconsumer paint products and to promote the source reduction and recycling of paint products for each of the following: consumers, contractors, and retailers.

(9) Include a budget and proposed funding mechanism under which each manufacturer remits to a stewardship organization payment of a paint stewardship assessment for each container of architectural paint it sells in Vermont. The proposed budget and assessment structure must be reviewed by a third-party auditor agreed upon by ANR, and the third-party auditor must provide a recommendation as to whether the proposed budget and assessment is cost-effective, reasonable, and limited to covering the cost of the program.

In addition to providing the information required under applicable law, this plan may discuss additional aspects of the program, including the budget and funding mechanism, which are included for informational purposes only.

#### **D. CITATIONS**

To aid the reader, each section of the plan begins with citations to laws or regulations, if applicable, that relate to the information discussed in that section.

## 2. Stewardship Organization & Program Contacts

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### SECTION OVERVIEW

This section discusses:

- PaintCare Vermont LLC
- Program contacts

#### A. PAINTCARE VERMONT LLC

On behalf of participating paint manufacturers, PaintCare Vermont LLC (PaintCare) is pleased to submit to ANR an updated Vermont Paint Product Stewardship Program Plan, incorporating revisions to address three additional product categories.

PaintCare Inc. was formed in 2009 by the American Coatings Association, the primary trade association for the paint and coatings industry. PaintCare Inc. established a separate single-member limited liability company (LLC), PaintCare Vermont LLC, in 2026 as a subsidiary to serve as the representative stewardship organization for participating manufacturers (also referred to as producers) of program products. PaintCare Inc. and PaintCare Vermont LLC are both 501(c)(3) nonprofit entities.

PaintCare's corporate office is in Washington, D.C. State program staff work in the states in which PaintCare programs operate.

As of the date of this plan, PaintCare Inc. and its subsidiaries, are governed by an 11-member, unpaid board of directors.

#### B. PROGRAM CONTACT

Primary contact for the Vermont program:

Agnes Barsalow  
Vermont Program Manager  
(802) 245-4821  
abarsalow@paint.org

PaintCare will notify ANR if the primary contact changes.

### **3. Manufacturers and Program Products**

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#### **STATUTORY CITATION**

10 V.S.A. § 6673. PAINT PRODUCT STEWARDSHIP PROGRAM

(a) The plan shall address the following:

(1) Provide a list of participating producers and brands covered by the Program.

(2) Provide specific information on the paint products covered under the Program, such as interior or exterior water- and oil-based coatings, primers, sealers, or wood coatings.

#### **SECTION OVERVIEW**

This section discusses:

- Manufacturer and brand registration
- Private label agreements
- Registration lists
- Program products

#### **A. MANUFACTURER AND BRAND REGISTRATION**

Representation by PaintCare is open to all manufacturers of program products who are obligated to take part in the Vermont program. Manufacturers register their company and brands of program products with PaintCare.

Prior to the start of the Vermont program, PaintCare identified potential participating manufacturers through a variety of sources, including existing manufacturer registrations with other PaintCare programs, the American Coatings Association and other paint-related trade associations, and internet research.

Before program implementation, PaintCare notified manufacturers about the Vermont law and upcoming program through email communication and notices posted on PaintCare's primary website and PaintCare's manufacturer reporting website.

In preparation for the addition of new product categories, PaintCare once again worked to identify new potential participating manufacturers through the sources listed above, as well as through direct contact with the Art & Creative Materials Institute, discussions with other state regulatory agencies that register similar products for environmental compliance purposes, and purchased business information data sets.

The identification of and communication with new manufacturers is a continual process and the list of registered manufacturers and brands changes over time as new manufacturers are identified, or as companies are acquired, merge, change names, discontinue product lines, enter or exit the market, or cease operations.

## **B. PRIVATE LABEL AGREEMENTS**

Private label agreements (or services) represent products manufactured or distributed by one company for use under another company's label. The products are also referred to as store brands or generic brands, and the agreements are also known as tolling agreements. These agreements are often kept confidential to protect the arrangements from competitive interests. Therefore, PaintCare typically does not specify which brands are produced by which manufacturer, unless the name of the manufacturer is included in the brand name. Instead, registered manufacturers and their registered brands are presented in separate lists to protect the confidentiality of these agreements.

## **C. REGISTRATION LISTS**

PaintCare posts the lists of registered manufacturers and brands on its website to make them available for retailers and distributors to learn which brands may be legally sold under the Vermont paint stewardship law.

The lists of registered manufacturers and brands as of the submission date of this plan are provided in the appendix. PaintCare intends to provide ANR with current lists monthly and post them to PaintCare's website.

## **D. PROGRAM PRODUCTS**

The terms "program products," "PaintCare products," and "paint products" are used interchangeably in this plan and in PaintCare communications. Vermont program products fall into four categories: architectural paints, aerosol coatings, nonindustrial coatings, and coating-related products. Act 59 (2025) added the last three to the Vermont program and they are referred to as "additional product categories" in this program plan.

Program products must be sold in containers of five (5) gallons or less in size and be for household, commercial, or institutional use. Products that meet the following criteria are not considered additional covered products: products labeled and intended exclusively for industrial, original equipment manufacturer (OEM), or professional use in a shop application.

Many of the coatings and coating-related products identified as non-program products under the original Vermont program for architectural paint are now considered program products under one or more of the additional product categories. PaintCare has started working to update its communication materials, particularly those that describe products covered by the program, but this work is not yet complete. Until this work is complete, the historical guidance document describing

program and non-program products under the architectural paint-only program may contain guidance that conflicts with the recently developed guidance describing the additional product categories. PaintCare is working closely with stakeholders to prevent confusion and will provide updated communication materials when this program plan is resubmitted later this year. In the meantime, the current guidance describing architectural paint and the guidance describing the additional product categories are provided in the appendix.

These definitions are used to determine the products on which manufacturers are to apply the PaintCare fee to fund the program, as well as to determine which products are accepted by the program. PaintCare uses the term "PaintCare fee" to refer to the fee/assessment that the Vermont paint product stewardship statute requires to be added to the purchase price of program products sold in the state.

As needed, PaintCare issues notifications to explain or clarify whether and why certain types of products are a part of the program or not. PaintCare posts these updates on its website and notifies stakeholders, as needed.

## 4. Drop-Off Sites and Services

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### STATUTORY CITATION

10 V.S.A. § 6673. PAINT PRODUCT STEWARDSHIP PROGRAM

(a) The plan shall address the following:

(3) Describe how the Program proposed under the plan will collect, transport, recycle, and process postconsumer paint products for end-of-life management, including recycling, energy recovery, and disposal, using environmentally sound management practices.

(4) Describe the Program and how it will provide for convenient and available statewide collection of postconsumer paint products in urban and rural areas of the State. The producer or stewardship organization shall use the existing household hazardous waste collection infrastructure when selecting collection points for postconsumer paint products. A paint retailer shall be authorized as a paint collection point of postconsumer architectural paint for a Paint Product Stewardship Program if the paint retailer volunteers to act as a collection point and complies with all applicable laws, rule, and regulations.

(5) Provide geographic information modeling to determine the number and distribution of sites for collection of postconsumer architectural paint based on the following criteria: (A) at least 90 percent of Vermont residents shall have a permanent collection site within a 15-mile radius; and (B) one additional permanent site will be established for every 10,000 residents of a municipality and additional sites shall be distributed to provide convenient and reasonably equitable access for residents within each municipality, unless otherwise approved by the Secretary.

(6) Establish goals to reduce the generation of postconsumer paint products, to promote the reuse of postconsumer paint products, and for the proper management of postconsumer paint as practical based on current household hazardous waste program information.

### SECTION OVERVIEW

This section discusses:

- Program audience
- Drop-off sites and services
- Convenience criteria
- Drop-off site operations

PaintCare uses the term “drop-off” site in place of “collection” site in this plan to denote the action of users of the program (which is to drop off paint), rather than the action of drop-off sites (which is to collect paint).

## **A. PROGRAM AUDIENCE**

PaintCare accepts program products from all Vermont households, businesses, and others with leftover program products, subject to applicable legal requirements and to practical and economic feasibility, through various partnerships and services. Future changes to applicable law may change the type and/or volume of materials that the program accepts from different program audiences. Any changes made to the program audience served by the program will be reported to ANR and will comply with all applicable legal requirements.

## **B. DROP-OFF SITES AND SERVICES**

PaintCare partners with owners and operators of household hazardous waste (HHW) collection facilities and events (referred to as HHW programs in this plan) and increases collection of program products through additional drop-off sites and services. The current Vermont program includes the following for architectural paint:

- HHW programs
- Solid waste facilities (transfer stations, recycling centers and landfills)
- Retail stores
- Material reuse stores
- Direct pickup services
- PaintCare events

PaintCare will manage the additional product categories through its partnerships with the state's HHW programs, which already accept these from their customers. If PaintCare would like to modify collection options for additional product categories, PaintCare will notify ANR.

Aside from the limitations noted above, all eligible locations are invited to participate as drop-off sites for architectural paint if they can meet PaintCare's operational and other program requirements. For example, the bin storage space must be secure, inaccessible to the public, have an impermeable surface, and be protected from the elements.

Drop-off sites must have staff available to accept applicable program products during operating hours, free of charge, from households and businesses. In addition, sites agree to be listed on the site locator on PaintCare's website and post and distribute PaintCare point-of-sale outreach materials, including a poster advertising their site as a drop-off site.

Some exceptions may be allowed in recognition of pre-existing restrictions on HHW programs and other non-retail sites. Current examples include:

- Non-retail sites with a limited geographical service area due to their funding source (e.g., local tax or utility) are not required to accept program products from participants outside of their service area.
- Non-retail sites that do not accept waste from businesses are not required to do so.
- Programs that already charge businesses a fixed amount to drop-off program products may continue this practice as long as it is clear to the customers that the charges do not relate to services funded by PaintCare.

For all drop-off sites, PaintCare covers the cost of collection bins used to store and transport program products, as well as transportation and processing (end-of-life management) costs of program products. In addition, all drop-off sites other than HHW programs are offered spill kits and provided signage, training, and training materials.

PaintCare also intends to cover additional costs incurred by HHW programs for managing the additional product categories, as required by statute, and discussed later in the plan.

### **B1. Household Hazardous Waste Programs**

HHW programs are excellent partners because they provide their customers with the convenience of dropping off all PaintCare products, as well as other household hazardous waste, and they often have regular customers that have used their programs for many years.

HHW programs partner with PaintCare to help reduce their costs, offer expanded services to their community, reduce waste, and increase recycling.

### **B2. Solid Waste Facilities (Transfer Stations, Recycling Centers, Landfills)**

Solid waste facilities, particularly transfer stations, can be important program partners because like HHW programs, they provide their customers with the convenience of dropping off other products at the same time as architectural paint, and they may also have regular customers that have used their facilities for many years. Solid waste facilities are also beneficial, particularly in rural areas, where there might not be HHW facilities or paint retailers to be drop-off sites.

### **B3. Retailers**

Paint retailers are valuable program partners because they are located throughout the state, are often centrally located in cities and towns, are open five or more days per week, and have staff familiar with architectural paint products and their safe handling. In addition, their customers are likely to have some leftover architectural paint and often ask store staff for advice on what to do with it. Retailer participation as a PaintCare drop-off site is voluntary and retailers are not compensated for being a drop-off site.

## **Material Reuse Stores**

Material reuse stores, such as Habitat for Humanity ReStores, are a subset of retailers that can offer reuse in addition to serving as drop-off sites. When architectural paint is dropped off at these sites, it can be screened for possible reuse and then donated or sold back to the local community. PaintCare typically compensates these sites for architectural paint reuse. Architectural paint that is not set aside for reuse is typically placed in PaintCare collection bins.

### **B4. PaintCare Events**

Drop-off events for architectural paint may be held by PaintCare, especially in areas of the state that are not within 15 miles of a drop-off site or have too few drop-off sites for the population of the area. PaintCare may offer drop-off events for the additional product categories at PaintCare's discretion if practical and economically feasible.

### **B5. Direct Pickup Services**

#### **Large Volume Pickup (LVP) Service**

The LVP service is a free pickup service offered to painting contractors, other businesses, organizations, and households with a minimum quantity of architectural paint, currently 100 gallons (measured by container volume and not liquid paint volume). PaintCare may offer the LVP service for the additional product categories at PaintCare's discretion if practical and economically feasible.

Under current practices, users of the LVP must submit an LVP request form, where they are asked to identify themselves as a household or as a business and provide specific information about their volume of leftover architectural paint, type (latex or oil-based), and container sizes. If the architectural paint is usable, PaintCare may suggest the requestor drop it off at their nearest reuse location before proceeding with a pickup request. Once approved for pickup, they are put in direct contact with PaintCare's transporter to arrange an appointment.

#### **Recurring Large Volume Pickup (RLVP) Service**

The RLVP service is a free service offered to painting contractors and other businesses and organizations that generate large volumes of architectural paint on an ongoing basis. These sites are set up and trained by PaintCare staff on program requirements similar to PaintCare drop-off sites, but they may only use the program for architectural paint from their own operations. PaintCare may offer the RLVP service for the additional product categories at PaintCare's discretion if practical and economically feasible.

Users of the RLVP service are asked to provide information about the volume and type of architectural paint they generate on a regular basis, and they must have an agreement for service with PaintCare.

## **B6. Additional Activities**

The descriptions of additional activities in this section apply to architectural paint. However, PaintCare may support additional activities for the additional product categories provided that the activities are compliant with any applicable laws and PaintCare program policies.

PaintCare drop-off sites that conduct specific additional activities that are beneficial to the program may be compensated for their work. Examples of these activities include operating a reuse program, reprocessing latex paint, bulking oil-based paint, and providing local transportation services.

### **Reuse**

Drop-off sites may operate reuse areas in which they place leftover architectural paint brought to their site in good condition to be given away or sold “as is” to their customers and local community. This paint management method represents the highest, best use of architectural paint and typically reduces program costs by avoiding the transportation and processing costs that would otherwise be required to manage architectural paint. To support existing reuse programs for architectural paint and to provide incentive for additional sites to offer reuse, PaintCare compensates sites for conducting reuse, typically based on the quantity given away or sold.

### **Latex Paint Reprocessing by HHW Programs**

Latex paint reprocessing involves color sorting, combining, and mixing leftover latex paint together to make recycled-content paint. The paint is usually mixed in batches, poured off into 5-gallon containers and given away or sold locally. Reprocessing is the same thing as paint-to-paint recycling, but PaintCare uses the term reprocessing to distinguish this activity when conducted by HHW programs from the activity when conducted by commercial paint recyclers. As with reuse, latex paint reprocessing typically reduces program costs by avoiding the transportation costs that would otherwise be required to manage the architectural paint. To support existing latex paint reprocessing programs and to provide an incentive for additional sites to reprocess latex paint, PaintCare may provide compensation for reprocessed latex paint that is given away or sold.

### **Oil-Based Paint Bulking by HHW Programs**

PaintCare makes architectural paint management simple for drop-off sites by allowing them to place architectural paint directly into paint collection bins. However, if an HHW program chooses to bulk oil-based paint, it typically results in lower transportation costs for PaintCare. To support these sites, PaintCare may provide compensation for this activity.

### **Internal Transportation by HHW Programs**

Sometimes it is more cost-effective for an HHW program to transport architectural paint from one of its locations to another, or to transport architectural paint from an event back to its facility, rather than using PaintCare’s contracted transporter. In these cases, PaintCare may provide compensation for this activity, typically based on a per-event or per-bin basis.

### **C. CONVENIENCE CRITERIA FOR ARCHITECTURAL PAINT**

To determine whether the program provides adequate and convenient architectural paint recycling opportunities throughout the state, PaintCare used ArcGIS, a mapping and analytics software, and the U.S. Census Bureau’s 2020 population data to conduct convenience analysis. The distribution and density criteria set out for architectural paint in the Vermont law are explained further below.

PaintCare considers a site (including events) as year-round if it was open at least one day per month in the reporting year or if it is a new site and the site plans to be open at least one day per month going forward. Sites that are open less frequently are considered supplemental sites.

Although year-round site analysis was conducted for drop-off sites in place at the time of this plan submission, supplemental site analysis was based on 2025 data, as not all HHW events scheduled for 2026 have been completed at the time.

#### **Distribution Criterion**

To achieve the distribution criterion in the Vermont law, the program should provide at least 90% of Vermont residents with a permanent (e.g., year-round) drop-off site for architectural paint within 15 miles.

As of the submission of this plan, the program has 81 year-round drop-off sites, which provide 99.6% of the state’s residents access to a drop-off site within 15 miles, surpassing the distribution goal. When supplemental sites are included, coverage increases to 99.8%.

#### **Density Criterion**

To achieve the density criterion in the Vermont law, the program should provide an additional permanent drop-off site for architectural paint for every 10,000 residents of a municipality.

The following table lists municipalities in the state with more than 10,000 residents, the number of sites they require, and the number of sites participating in that municipality including sites that were considered supplemental in 2025. Municipalities are defined as either cities, towns, or villages. Estimated population totals for municipalities are updated annually by the U.S. Census Bureau and available in May for the previous July. The most recent municipal population estimates are for July 2025.

**TARGET NUMBER OF DROP-OFF SITES IN MUNICIPALITIES  
WITH MORE THAN 10,000 RESIDENTS**

MUNICIPALITY	2025 POPULATION	NUMBER OF SITES NEEDED	NUMBER OF YEAR-ROUND SITES	NUMBER OF YEAR- ROUND & SUPPLEMENTAL SITES
Burlington	44,019	4	1	1
South Burlington	21,394	2	4	4
Colchester	17,565	1	1	1
Rutland City	15,363	1	4	4
Bennington	14,953	1	1	2
Brattleboro	11,872	1	4	4
Essex Town	11,346	1	1	2
Essex Junction	10,921	1	1	1
Milton	10,646	1	1	2
Hartford	10,911	1	1	2

In 2017, ANR granted PaintCare an exemption to the density criterion for Burlington. The exemption was based on residents having access to HHW drop-off events supported by PaintCare and other sites in the surrounding towns. With the Burlington exception provided by ANR, the density criterion is currently met.

**D. DROP-OFF SITE OPERATIONS**

All drop-off sites must have an agreement in place with PaintCare, and potentially amendments thereto for the additional product categories, follow PaintCare’s operational requirements, and operate in accordance with applicable federal, state, and local environmental laws, regulations, and permits.

**D1. Drop-Off Site Training**

PaintCare offers training by PaintCare staff and a training binder for all architectural paint drop-off sites. PaintCare typically requires such training for all non-HHW drop-off sites and RLVP sites. The binder includes the site guidelines for architectural paint, and a training log to be signed by all employees at the site who handle architectural paint for the program. Examples of current training topics for architectural paint include:

- History and goals of paint stewardship programs
- Identification of program products
- Safe handling and storage of program products
- Spill clean-up and reporting

- Procedures for scheduling a pickup
- Screening for generator status to determine if a business qualifies to use the program for oil-based paint
- Recordkeeping

A current version of the site guidelines for architectural paint and related forms are provided in the appendix.

## **D2. Collection Volumes**

Drop-off sites may set their own limit on the amount of program products they accept, as long as the limit is otherwise compliant with any applicable laws and PaintCare program policies.

## **D3. Program Products Storage**

Drop-off sites are required to follow PaintCare's bin storage requirements. For example, PaintCare's current practice requires sites to (1) keep collection bins in a secure location that does not have public access, (2) place the bins on an impermeable surface, and (3) if stored outdoors, be protected from the elements.

Collection bins for the storage and transportation of program products may include but are not limited to reusable plastic bins or cardboard bins with liners (approximately 1 cubic yard in size); 55-gallon metal or plastic drums; 30- and 50-gallon cardboard boxes with liners; and 20- and 30-yard roll-off containers.

## **D4. Non-Program Products**

PaintCare uses public education, signage at drop-off sites, and drop-off site training on product identification to minimize the volume of non-program products entering the program.

PaintCare's transporters and downstream processors are required to track and manage any incidental non-program products that they receive. They are instructed to notify PaintCare of incidents and identify the specific drop-off site from where the non-program products originated and the quantity and type that were found. Depending on the number of non-program products, PaintCare may do one or more of the following: (1) contact the site to let them know about the incident, (2) provide additional/refreshers training on identification of program and non-program products, or (3) in extreme cases, remove the site from the program.

## **D5. Site Visits**

PaintCare staff visit drop-off sites on a regular basis. PaintCare targets visiting retail drop-off sites about every six months and targets visiting HHW facilities, solid waste facilities, and RLVP sites annually.

The purpose of these visits is to ensure compliance with program requirements, provide refresher training if needed, address any needs or concerns the sites may have, check their supplies of outreach materials, and solicit feedback about the program.

## 5. Materials Management

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### STATUTORY CITATION

10 V.S.A. § 6673. PAINT PRODUCT STEWARDSHIP PROGRAM

(a) The plan shall address the following:

(3) Describe how the Program proposed under the plan will collect, transport, recycle, and process postconsumer paint products for end-of-life management, including recycling, energy recovery, and disposal, using environmentally sound management practices.

(7) Describe how postconsumer paint products will be managed in the most environmentally and economically sound manner, including following the waste-management hierarchy. The management of paint under the Program shall use management activities that promote source reduction, reuse, recycling, energy recovery, and disposal.

### SECTION OVERVIEW

This section discusses:

- Transportation of program products
- Processing of program products
- Non-program products and empty containers
- Legal compliance
- Insurance and financial assurance

All descriptions in this section refer to current or typical activities for architectural paint as of the submission of this program plan. Procedures for the additional product categories are still under development.

### A. TRANSPORTATION

#### A1. Transportation System

An efficient transportation system is required to move architectural paint from a large number of drop-off sites to processing facilities. The transporters hired by PaintCare, which may include both private and public entities, usually have significant experience in scheduling pickups and routing to maximize efficiency—taking into account the number of stops, locations, volume of architectural paint to be transported, and projected weight of the loads. Transporters must comply with all applicable state and federal rules and regulations and must track the architectural paint from the point of collection to its final destination. Transporters, subsequent processors, and their records, are subject to audit by PaintCare.

PaintCare has contracted transporters to provide service to architectural paint drop-off sites. PaintCare aims to contract with all transporters that service HHW programs within the state so that the HHW programs have the option of having the same transporter handle architectural paint as the HHW program uses to manage non-architectural paint products.

PaintCare requires its transporters to provide service to architectural paint drop-off sites on an on-call basis (e.g., sites call for pickup when their storage capacity is 50% full) or on a set schedule (e.g., every Tuesday) determined on a site-by-site basis. Transporters are required to deliver empty collection bins and spill kits to architectural drop-off sites and pick up full bins in a timely manner. Transporters are typically required to provide service to architectural drop-off sites within five days. For HHW events, transporters are required to deliver empty collection bins prior to the start of the event and pick up full bins on the day of the event, unless other arrangements are agreed to prior to the day of the event.

All sites are asked to accommodate a minimum of two collection bins because it is less expensive and more efficient to pick up two or more bins from one location than to serve the same location several times and pick up only one bin each time.

PaintCare will work directly with HHW programs for transportation of the additional product categories, and either expand its transporter agreement to encompass the additional product categories or reimburse HHW programs directly for these transportation costs.

## **A2. Transporters**

As of the submission of the plan, the following transporters are under contracts for architectural paint:

- Chittenden Waste Management District
- Clean Harbors
- MXI Environmental Services
- US Ecology

The list of transporters utilized by the program may change over time, as needed.

## **B. PROCESSING**

### **B1. Processing System**

PaintCare contracts for processing and proper end-of-life management of architectural paint collected in the program. Prior to releasing the transportation and processing request for proposal (RFP), PaintCare makes reasonable effort to contact all known processors of architectural paint (both in-state and out-of-state) to inform them of the RFP and contracting process.

The condition of architectural paint when it is received by the program may limit the available management options. If architectural paint containers are not sealed well or are stored improperly (e.g., exposed to extreme temperatures), the paint can dry out or be spoiled by mold, or the container may rust or leak, rendering the architectural paint no longer usable or recyclable.

PaintCare requires that the following hierarchy be followed when prioritizing management of architectural paint collected through the program, subject to practical and economic feasibility in each state. The options are prioritized by highest, best use:

#### **Latex Paint**

- 1) Reuse
- 2) Recycling
- 3) Energy recovery
- 4) Disposal

#### **Oil-Based Paint**

- 1) Reuse
- 2) Recycling
- 3) Energy recovery
- 4) Incineration

The following provides a more detailed description of the latex and oil-based paint management methods that may be utilized by the program. With regard to the above hierarchies, PaintCare determines how to classify each management method based primarily on guidance provided by the EPA and the applicable state environmental agency. Due to differing state views on how particular management methods are classified, PaintCare may classify the same management method differently in different states. For all management methods, processors are required to comply with all applicable law. Because legal requirements vary from state to state, some management methods may not be feasible in every state. Some of the processing methods described below may only be available in certain geographic areas of the country and not available in all PaintCare states or to all transporters.

PaintCare will work directly with HHW programs for processing of the additional product categories and what processing methods will be allowable. PaintCare will either expand its transportation and processing agreements to encompass the additional product categories or reimburse HHW programs directly for allowable processing costs.

## **B2. Latex Paint Management**

### **Reuse**

Latex paint may be managed via reuse, meaning that the collected paint is sold or given away in its original labeled container without any alteration of the container contents.

PaintCare supports reuse of latex paint through partnerships with reuse sites including HHW facilities and material reuse stores. These sites are required to document their reuse activities for the paint distributed to the public and to obtain a participant waiver acknowledging that they accept the material “as is.”

PaintCare may also support reuse of latex paint at PaintCare events. Latex paint collected at the event or collected before the event through PaintCare sites and services, which is deemed suitable for reuse may be made available to the public. PaintCare may also support reuse events where the primary activity is distribution of reusable paint collected in advance through PaintCare sites and services. There is no cost to participants for paint taken at either event type.

### **Paint-to-Paint Recycling**

Latex paint may be used to make recycled-content latex paint. Drop-off sites (most commonly HHW facilities) that make recycled-content latex paint typically sort the paint by color, then combine and blend the leftover latex paint into a uniform color which varies from batch to batch. The recycled-content latex paint is then typically given away or sold locally. Commercial latex paint recyclers typically manufacture a color-sorted, blended, and filtered recycled-content paint that is sold domestically and/or internationally. Typically, domestic purchasers of this product use the product as is and international purchasers either use/re-sell it as is or use it as feedstock in their recycled-content paint.

### **Lightweight Aggregate**

Latex paint may be used as a component in lightweight aggregate. The lightweight aggregate is then offered for sale as lightweight aggregate, used to produce landscape products, or used as a component in various precast concrete products.

### **Decorative Ground Cover**

Dry latex paint may be used as the primary component in a decorative ground cover product.

### **Energy Recovery**

Latex paint may be processed for energy recovery at a waste-to-energy facility.

### **Alternative Daily Landfill Cover**

Latex paint may be used as a component in alternative daily landfill cover (ADC).

## **Disposal**

Dry and solidified latex paint may be sent to landfill for disposal. Use of a permitted landfill for disposal is the least preferred management method for latex paint.

### **B3. Oil-Based Paint Management**

#### **Reuse**

Oil-based paint may be managed via reuse, meaning that the collected paint is sold or given away in its original labeled container without any alteration of the container contents.

PaintCare supports reuse of oil-based paint through partnerships with reuse sites including HHW facilities and material reuse stores. These sites are required to document their reuse activities for the paint distributed to the public and to obtain a participant waiver acknowledging that they accept the material “as is.”

PaintCare may also support reuse of oil-based paint at PaintCare events. Oil-based paint collected at the event or collected before the event through PaintCare sites and services, which is deemed suitable for reuse may be made available to the public. PaintCare may also support reuse events where the primary activity is distribution of reusable paint collected in advance through PaintCare sites and services. There is no cost to participants for paint taken at either event type.

#### **Paint-to-Paint Recycling**

Oil-based paint may be used to make recycled-content oil-based paint. Commercial paint recyclers typically manufacture recycled-content oil-based paint in a variety of colors.

#### **Energy Recovery**

Oil-based paint may be processed for energy recovery (e.g., at cement kilns or waste-to-energy facilities).

#### **Incineration**

Oil-based paint may be incinerated. Some hazardous waste incinerators process oil-based paint, flammable liquids, and other hazardous wastes and industrial byproducts as a substitute fuel source because they are readily available and have a high BTU value.

### **B4. Processors**

As of the submission of the plan, the following processors may be utilized for architectural paint by the transporters listed in Section A above:

## LATEX PAINT PROCESSORS

PROCESSOR	LOCATION	PROCESS
Chittenden Solid Waste District	Burlington, VT	Paint-to-Paint Recycling
Eco Safe Landfill	Blountville, TN	Disposal
GDB International	Nashville, IL	Paint-to-Paint Recycling
Loop	Niagara Falls, ON	Paint-to-Paint Recycling
MXI	Abingdon, VA	Paint-to-Paint Recycling
Perry Ridge Landfill	Du Quon, IL	Disposal

## OIL-BASED PAINT PROCESSORS

PROCESSOR	LOCATION	PROCESS
Buzzi Unicem	Cape Girardeau, MO	Energy Recovery
Buzzi Unicem	Greencastle, IN	Energy Recovery
Clean Harbors	El Dorado, AR	Incineration
Clean Harbors	Kimball, NE	Incineration
Clean Harbors	Corunna, ON	Incineration
Green America	Hannibal, MO	Energy Recovery
Heidelberg Materials	Logansport, IN	Energy Recovery
Holcim	Holly Hill, SC	Energy Recovery
Loop	Niagara Falls, ON	Paint-to-Paint Recycling

The list of processors utilized by the program may change over time, as needed.

### C. NON-PROGRAM PRODUCTS AND EMPTY CONTAINERS

#### C1. Non-Program Products

Although drop-off sites are instructed and trained to screen for non-program products, a small number of containers of non-program products may enter the program and be screened out during the sorting process by PaintCare’s transporters and processors. PaintCare requires its transporters and processors to appropriately manage such products under applicable law, rather than returning them to a drop-off site.

#### C2. Empty Paint Containers

To the extent feasible, empty metal and plastic architectural paint containers are recycled. PaintCare works with the program’s contracted transporters, processors, and interested recyclers to identify and utilize available opportunities for architectural paint container recycling, as necessary. Unrecyclable architectural paint containers are typically disposed of as solid waste.

#### **D. LEGAL COMPLIANCE**

As part of their contract, all transporters, processors and their subcontractors are required by PaintCare to have processes in place to ensure compliance with applicable federal, state, and local environmental laws, regulations, and permits. Transporters and processors must require any subcontractors they use to comply with all applicable environmental regulations and other laws relating to the services provided by those subcontractors. Under the contract terms, violations of law constitute a breach and can be grounds for termination.

PaintCare has established procedures for monitoring both transporters and processors that manage materials in connection with the PaintCare program. Such procedures include both routine monitoring of performance by transporters and processors, as well as a vendor audit program. These procedures are designed to provide reasonable assurances that all transporters and processors comply with all applicable laws and engage in appropriate recordkeeping, tracking, and reporting of materials managed through the program.

Examples of typical audit criteria include the following: a review of applicable licenses/permits, emergency response planning, insurance coverage (including environmental insurance for vendors that transport or process hazardous materials in connection with the PaintCare program), data tracking, and reporting practices.

#### **E. INSURANCE AND FINANCIAL ASSURANCE FOR ARCHITECTURAL PAINT**

PaintCare requires all contractors managing architectural paint—drop-off sites, transporters, processors, etc.—to carry insurance appropriate to the services provided for the PaintCare program. The specific amount and terms vary from contractor to contractor and may include the following:

- Commercial General Liability Insurance
- Commercial Automobile Liability Insurance
- Workers' Compensation Insurance
- Environmental Pollution Liability Insurance
- Endorsements to name PaintCare as an additional insured on relevant insurance policies

Because contractors have widely different insurance policies (e.g., commercial insurance vs. self-insurance, differing limits), PaintCare evaluates (often with the assistance of outside legal counsel) the insurance terms in each contract on a case-by-case basis with the aim of ensuring that all contractors maintain insurance of the types and in the amounts appropriate for the services each contractor provides to the PaintCare program. PaintCare itself also carries Pollution Liability and Commercial General Liability Insurance.

PaintCare also requires all contractors to comply with all federal, state, and local laws. If financial assurance requirements are applicable to a PaintCare contractor by law, then they must be in compliance with those laws.

## 6. Communications

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### STATUTORY CITATION

10 V.S.A. § 6673. PAINT PRODUCT STEWARDSHIP PROGRAM

(a) The plan shall address the following:

(8) Describe education and outreach efforts to inform consumers of collection opportunities for postconsumer paint products and to promote the source reduction and recycling of paint products for each of the following: consumers, contractors, and retailers.

### SECTION OVERVIEW

This section discusses:

- Outreach methods
- Message platform
- Target audiences
- Joint outreach with local government programs
- Website and site locator
- Hotline
- Evaluation of outreach
- Examples of outreach materials

### A. OUTREACH METHODS

PaintCare is committed to providing robust and effective statewide education and outreach for the Vermont program using a variety of communication methods, which typically include:

- Print materials (e.g., brochures, fact sheets, cards, signage)
- Digital media (e.g., streaming audio channels, online video, website banner ads)
- Social media (e.g., organic and paid promotion on social media websites like Instagram, Facebook)
- Traditional media (e.g., newspaper, radio, television)
- Earned media (e.g., articles in news outlets, TV & radio interviews, other press coverage)
- Face-to-face communications (e.g., retail site visits, presentations, tabling at conferences, expos and public events, webinars)

## **B. MESSAGE PLATFORM**

### **B1. Paint Smarter – Buy Right, Use It Up, Recycle the Rest**

The “Reduce, Reuse, Recycle” message platform has been used by environmental organizations and waste management programs for many years. To reduce the amount of leftover program product and to inform the public how and where to recycle or properly dispose of their leftover program products, PaintCare uses a custom version of Reduce, Reuse, Recycle:

- Reduce: Buy Right.
- Reuse: Use It Up. (Also: Store Right and Give It Away)
- Recycle: Recycle the Rest.

“Buy Right” means purchase the right amount of program product for a job to reduce potential waste; “Use It Up” means use up program product whenever possible; and “Recycle the Rest” means if you still have unwanted program product, drop it off at a PaintCare site for management. PaintCare also promotes “Store Right” and “Give It Away” as part of Reuse. “Store Right” means that if you hold on to a program product, keep it in good condition for use later, and “Give it Away” means pass it on to other households or organizations in the community in need of that material.

### **B2. Program Awareness**

Additional messages are used to create awareness of the program and answer these questions:

- What is PaintCare and why does the program exist?
- Why was the law passed (e.g., product stewardship, potential cost savings to local government waste collection programs)?
- How much is the PaintCare fee and what is it for?
- Which products are accepted in the program and which products are not?

## **C. TARGET AUDIENCES**

PaintCare’s outreach and education strategy focuses appropriate messages to the following audiences:

- Households
- Businesses and organizations that use program products (e.g., professional painters, contractors, property managers, schools and universities, hotels) Relevant trade groups (e.g., associations that serve professional painters and builders, realtors, and building managers)
- Paint and other program product retailers
- HHW programs and solid waste facilities

- Manufacturers
- Multi-lingual communities

The following examples illustrate how the program adjusts the emphasis of messaging in outreach materials based on target audience:

### **C1. Households**

- Emphasize how to find a drop-off site, the information most often requested.
- Promote using up leftover program products.
- Educate consumers on how to buy the right amount of program products by describing factors involved (e.g., square footage of walls, surface texture, coverage rate of paint, whether surfaces have been primed) and prompting consumers to consult with paint professionals.

### **C2. Businesses that Generate Program Products**

- Emphasize how to find a drop-off site for program products.
- Promote using up leftover program products.
- Promote the LVP service so they can request a direct pickup of large quantities of leftover program products, rather than transport program products to drop-off sites a little at a time.

### **C3. Relevant Trade Groups**

Associations of painting and building contractors have proven an effective avenue for PaintCare to reach out to professional painters who use large amounts of program products. In addition to utilizing PaintCare available services for leftover program products, professionals also often purchase program products on behalf of clients and can make them aware of the PaintCare program.

PaintCare seeks out other professional associations, such as networks of realtors and building managers. Realtors can provide information to home buyers who may find program products left behind by previous owners, or they may work with contractors to paint homes being prepared for sale. Building managers often accumulate leftover program products while maintaining buildings and facilities.

PaintCare also reaches out to associations of retailers and/or manufacturers of particular types of coatings and coatings related products to ensure their members are aware of their roles and responsibilities in the program.

#### **C4. Paint Retailers**

PaintCare has developed print materials for use by all paint retailers to educate store staff and the general public about the program, regardless of whether they are drop-off sites. PaintCare provides these materials at no charge. Examples include:

- Brochures and cards that help the public find drop-off sites and explain the program.
- Signage that promotes general awareness of the program and provides links to detailed information about the PaintCare fee and accepted products, and finding a drop-off site.
- Fact sheets designed for a variety of audiences and subjects (e.g., general information, how to become a drop-off site, how to use the LVP service).

Retailers are able to download or order printed materials using PaintCare's website order form or by phone. Drop-off sites also receive materials from PaintCare staff during site visits.

PaintCare will notify retailers before changes to the program to add additional product categories go into effect. Notification of retailers may include:

- In-person visits, phone calls with, and emails to retail managers and staff informing them of program changes.
- Mailing updated point-of-sale materials reflecting changes to PaintCare fee structures and products.
- Mailing information about the statutory requirements to include the PaintCare fee in their product price, to only sell registered products, and provide information about the program to customers.

#### **C5. HHW Programs and Solid Waste Facilities**

PaintCare provides fact sheets and interest forms to explain how HHW programs and solid waste facilities, including transfer stations, recycling centers, and landfills, can partner as drop-off sites and the benefits of participating in the program.

#### **C6. Manufacturers**

PaintCare maintains a webpage tailored to manufacturers which includes the following information:

- Dedicated staff contact.
- Information on the manufacturer and brand registration process, and a link to the registration area.
- Publicly posted registration lists.
- Information on PaintCare products.
- Information about additional product categories added to the program and definitions.

- Information on remitter agreements for manufacturers.

Changes in the program, including fee structure or programs products, are communicated to manufacturers in a variety of ways, including:

- Email newsletters.
- Alerts on PaintCare’s websites.
- Prompts in the remittal system.

## **C7. Non-English Speakers**

PaintCare has translated its program brochure for all PaintCare programs into Amharic, Arabic, Armenian, Bengali, Cantonese, Farsi, French, Haitian Creole, Hawaiian, Hindi, Hmong, Italian, Japanese, Khmer, Korean, Lao, Mandarin, Polish, Portuguese, Punjabi, Russian, Somali, Spanish, Tagalog, Thai, Turkish, Ukrainian, Vietnamese, and Yiddish. Three widely used fact sheets that provide information about the LVP service, guidance for painting contractors, and the program products list are also available in the 29 languages listed above. Translated materials are available to retailers, HHW programs and other stakeholders, and electronic copies are posted on PaintCare’s website. PaintCare considers translating materials to other languages upon request.

## **D. JOINT OUTREACH WITH LOCAL GOVERNMENT PROGRAMS**

PaintCare promotes HHW and other local government drop-off site partners through its outreach efforts if they wish to be promoted. PaintCare has also established a process for local governments to coordinate joint outreach projects, through which PaintCare assists them with funding and developing outreach campaigns focused on managing program products for digital, print, radio, and other media. To initiate a project, the local government partners are asked to complete a form describing the project and budget for approval. PaintCare considers a reimbursement proportional to the amount of the campaign devoted to the PaintCare program services. For example, when staff of the Central Vermont Solid Waste Management District published a four-part series of ads in local newspapers promoting collection options for various materials, they devoted the fourth round to PaintCare collection information, and PaintCare funded 25% advertisement cost.

Local governments may propose any project that includes a PaintCare message using any medium. The current version of the joint outreach fact sheet is provided in the appendices.

## **E. WEBSITE AND SITE LOCATOR**

PaintCare’s website provides public access to information about all key aspects of the program. The site makes it easy for the public to find drop-off options, request LVPs, view accepted products, and answer questions about the program. It also provides targeted resources for retailers, manufacturers, painting contractors, and local government waste facilities. State-specific pages for each PaintCare program contain links to program plans, annual reports, laws, and other official documents. The

“Paint Smarter” section educates the public about PaintCare’s “Buy Right, Use It Up, Recycle the Rest” messages, including useful tips and resources. PaintCare’s website is available in Spanish translation.

PaintCare strives to continually provide accurate, up-to-date information regarding options for managing program products available to the public. PaintCare has developed and maintains a national database of drop-off sites and makes the information available through a drop-off site locator on its website. The locator provides an easy-to-use search tool for the nearest available drop-off site. Site-specific information explains who is eligible to use a site, products and quantities accepted, and what limitations apply.

The site locator resource is currently organized as follows: for PaintCare states, the locator lists only drop-off sites, including HHW programs, that partner with PaintCare. For non-PaintCare states, it lists HHW programs as locations where the public can bring leftover paint.

## **F. HOTLINE**

PaintCare operates a daily hotline to assist the public with finding the nearest drop-off site and to answer questions about the program. The hotline staff speak English and can access live language interpretation in Spanish and a number of other languages when requested.

## **G. EVALUATION OF OUTREACH**

PaintCare typically conducts surveys to evaluate the effectiveness of the education and outreach efforts. The surveys measure awareness of paint recycling among households and painting professionals and include questions about reducing leftover program products, opportunities for reuse and recycling paint, and intention to use those options in the future. Other questions may vary from one survey to another. PaintCare typically reports on the results of each survey in annual reports.

## **H. EXAMPLES OF OUTREACH MATERIALS**

Current versions of the following outreach materials are provided in the appendix:

- Program trifold brochure
- Fact sheet for HHW programs about becoming a PaintCare partner under the paint stewardship law
- Fact sheet for solid waste facilities about becoming a drop-off site under the paint stewardship law
- Fact sheet for retailers describing their responsibility and providing a program overview
- Fact sheet for retailers about becoming a drop-off site
- Fact sheet for painting contractors describing the PaintCare fee and services

- Fact sheet about the LVP service
- In-store informational poster
- “Recycle Here” poster for drop-off sites
- Fact sheet on joint outreach with local governments

Outreach materials will be updated to reflect the inclusion of additional product categories prior to implementation of additional product management.

## 7. Funding and Budget

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### STATUTORY CITATION

10 V.S.A. § 6673. PAINT PRODUCT STEWARDSHIP PROGRAM

(b) The producer or stewardship organization shall submit a budget for the Program proposed under subsection (a) of this section, and for any amendment to the plan that would affect the Program's costs. The budget shall include a funding mechanism under which each paint product producer remits to a stewardship organization payment of a paint product stewardship assessment for each product it sells in this State. Prior to submitting the proposed budget and assessment to the Secretary, the producer or stewardship organization shall provide the budget and assessment to a third-party auditor agreed upon by the Secretary. The third-party auditor shall provide a recommendation as to whether the proposed budget and assessment is cost-effective, reasonable, and limited to covering the cost of the Program. The paint product stewardship assessment shall be added to the cost of all paint products sold in Vermont. To ensure that the funding mechanism is equitable and sustainable, a uniform paint product stewardship assessment shall be established for all paint products sold. The paint stewardship assessment shall be the amount established in section 6681 of this title.

### SECTION OVERVIEW

This section discusses:

- Funding mechanism
- Sales of program products
- Collection volume
- Budget description
- PaintCare fee structure
- Program budget

#### A. FUNDING MECHANISM

The PaintCare fee is applied to qualifying containers of program products sold in Vermont. The PaintCare fee is set at a rate to cover but not exceed the cost of operating and sustaining the Vermont program. All revenue generated by the fee is spent to support the Vermont program. The following steps describe the application of the PaintCare fee:

- Manufacturers add the PaintCare fee to containers of program products sold in Vermont directly or through dealers (retailers and distributors).
- Retailers and distributors pass the PaintCare fee to their customers by including it as part of the purchase price of program products they sell in Vermont. This is how retailers and

distributors recoup the PaintCare fee they paid when purchasing program products from their suppliers.

- When consumers buy program products in Vermont, the PaintCare fee is included as part of the purchase price. Although the fee must be part of the purchase price, retailers can choose whether to list the fee as a line item on the receipt. PaintCare encourages retailers to show the fee to aid in customer education and provide consistency across the program. Most retailers choose to show the fee as a line item on receipts.
- Manufacturers report sales of program products and remit to PaintCare the PaintCare fee for program products they sold in Vermont in the preceding month. Manufacturers will have already recouped the PaintCare fee they pay to PaintCare because the fee is included as part of the price of their program products when they sold it to their dealers.

## **B. SALES OF PROGRAM PRODUCTS**

PaintCare is in the process of developing Vermont sales projections for the additional product categories, and will include information about this process, as well as information about architectural paint sales when this plan is updated.

## **C. COLLECTION VOLUME**

PaintCare is in the process of developing Vermont collection volume projections for the additional product categories, and will include information about this process, as well as information about architectural paint collection volumes when this plan is updated.

## **D. BUDGET DESCRIPTION**

As noted above, PaintCare is in the process of developing Vermont sales and collection volume projections for the additional product categories, as well as architectural paint. Once this information is available, work will begin on developing a program budget.

The primary elements of the budget are discussed here.

### **Revenue**

Revenue is calculated using the proposed fee structure and anticipated sales and container mix of program products.

### **Operations Expenses**

Operations Expenses include all in-state expenses (also called direct expenses) specific to operating the Vermont program. These costs are borne entirely by the Vermont program and not shared with other PaintCare programs.

They are categorized as follows:

- **Processing.** This is typically the most significant expense of the program. Costs are based on vendor pricing and payments for the additional activities (e.g., reuse) at sites.
- **Transportation.** This expense includes the cost of transporting collection bins from drop-off sites to processing locations.
- **Collection supplies and support.** These expenses include the cost of collection bins, spill kits, PaintCare event expenses, training materials, signs, labor to pack program products at LVP sites, and other collection-related support.
- **Communications.** These expenses include advertising and educational materials to increase awareness of the program and to promote drop-off sites, events, and other services.
- **Personnel, professional services, and other.** These expenses include the cost of staff working directly to implement the Vermont program; legal costs for regulatory review and developing contracts; and other logistical, professional support (including government affairs but specifically excluding lobbying that must be reported on IRS Form 990 or 990-EZ Schedule C), office expenses, and other miscellaneous items.
- **State agency administrative fees.** This expense will be paid by PaintCare to ANR for oversight of the program.

In addition to the standard cost categories discussed above, the program will incorporate additional costs, as required by statute, for the additional product categories. The additional costs include facility costs, equipment costs, labor, supplies, maintenance, events costs, and event contractor costs, including collection event set-up fees, environmental service fees, insurance fees, and shipping containers and materials. Additional information about these costs and requirements for HHW programs to receive reimbursement from PaintCare will be discussed when this plan is updated.

### **Corporate Expenses**

Corporate expenses (also called indirect expenses) are those that are not specific to the Vermont program but support all current and future PaintCare programs. These costs include but are not limited to corporate staffing (e.g., PaintCare's president, director of operations, communications team); back-office support (e.g., information technology, legal, and accounting); company-wide auditing, insurance, outside counsel, and other professional services; software licenses and maintenance of data management systems; occupancy; general communications; and other supplies and services that support all PaintCare programs.

Corporate expenses are allocated among all PaintCare programs based on their relative populations in the most recent census. New programs begin to pay their relative share about six months before program starts. At the time of plan submission, Vermont represents 0.6% of the combined population

of the PaintCare programs (based on 2020 census data). In future years, PaintCare may update the corporate allocation based on the population estimates published annually by the Census Bureau.

In addition, as additional states pass paint product stewardship legislation, those states are added to the corporate allocation formula and the share of corporate expenses decrease for each of the current programs.

### Operating Reserves

Reserves represent the net assets (cash and investments) of the Vermont program. Reserves are needed to sustain the program in times of either higher-than-expected collection of program products resulting in higher-than-expected expenses, lower-than-expected sales of program products resulting in lower-than-expected revenue, or a combination of the two.

PaintCare’s reserves policy establishes a target reserve as a percentage of annual expenses and sets a minimum and maximum threshold. If the reserves fall below the minimum threshold or rise beyond the maximum threshold, an evaluation of the program’s expenses and revenue is performed to determine if changes are needed in operations, outreach, and/or the fee structure to bring the reserve balance within range. PaintCare currently has a target reserve of 100% of annual expenses (i.e., 12-months of operating expenses), with a minimum threshold of 75% (i.e., nine months) and a maximum threshold of 125% (i.e., 15 months).

### E. PAINTCARE FEE

The fee structure in the following table is currently in place for architectural paint.

SIZE	DESCRIPTION	FEE
Very Small	Half pint or smaller	\$0.00
Small	Larger than half pint up to smaller than 1 gallon	\$0.65
Medium	1–2 gallons	\$1.35
Large	Larger than 2 gallon up to 5 gallons	\$2.45

Once sales and expense estimates are completed for the additional product categories, PaintCare will develop proposed fee structures for the additional product categories. Following approval from PaintCare’s Board of Directors and review by an independent financial auditor, PaintCare will update this program plan with the proposed fee structures and work with ANR to receive approval from the Vermont legislature.

## **Audit of the PaintCare Fee**

To help ensure that the program’s funding mechanism is appropriate to cover the cost of the program, the Vermont law requires the PaintCare fee to be reviewed by an independent financial auditor.

PaintCare conducted a search for a qualified financial auditor to review the PaintCare fee as required by law. Criteria for selecting an auditor included: relevant experience; cost; independence (e.g., no conflicts of interest with PaintCare, its related companies, PaintCare’s Board member companies); ability to meet PaintCare’s contractual requirements (including confidentiality requirements); and approval from ANR. Lydon Fetterolf Corydon, P.A., previously approved by ANR for the architectural paint fee change that took effect in 2024, will also conduct the audit of the proposed fee structures for the additional product categories, once they have been developed.

## **F. FINANCIAL SUMMARY**

Once sales and expense estimates are completed for the additional product categories and updated for architectural paint, PaintCare will develop and update this program plan with a financial summary, including a three-year budget.

## Appendix A

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### REGISTERED MANUFACTURERS AND BRANDS

- 1 Ace Hardware Paint Division
- 2 Acrylic Technologies Inc.
- 3 Advanced Protective Products, Inc.
- 4 AFM Safecoat
- 5 American Formulating & Manufacturing
- 6 Ames Research Laboratories, Inc.
- 7 Amrize
- 8 Annie Sloan US Inc
- 9 Armstrong-Clark Company
- 10 Backdrop Inc
- 11 Basic Coatings
- 12 Behr Process LLC
- 13 Benjamin Moore & Co.
- 14 Betco Corporation LTD
- 15 Beyond Paint
- 16 Bioshield Paint
- 17 Bond Distributing, Ltd.
- 18 Brouns & Co LLC
- 19 C&M Coatings
- 20 California Products Corp.
- 21 CamCoat Inc.
- 22 CBD Group
- 23 Chittenden Solid Waste District
- 24 Clare Paint, LLC
- 25 Clemons Concrete Coatings
- 26 Clinical Paints
- 27 Coating Development Group, Inc.
- 28 Coatings Alliance, LLC
- 29 Color Atelier
- 30 Color Baggage LLC
- 31 Conklin Company, Inc.
- 32 Continental Products
- 33 Country Chic Paint Ltd.
- 34 CRC Industries, Inc.
- 35 Creative Oxygen Labs
- 36 Custom Building Products, Inc.
- 37 Custom Paint Product Group
- 38 Cutek USA



- 39 Daly's Wood Finishes
- 40 Davis Paint Co.
- 41 Davis Paint Company
- 42 Decotime, Inc.
- 43 Diamond Vogel, Inc.
- 44 Dunn-Edwards Corporation
- 45 Eagle IFP Company
- 46 Eco Advancements, Inc.
- 47 Eco Safety Inc.
- 48 Eco Safety Products, Inc.
- 49 Ecobond LBP, LLC
- 50 ECOS Paints
- 51 Emiron Corporation
- 52 Farrow & Ball Ltd
- 53 Farwest Paint Mfg. Company
- 54 Fine Paints Of Europe
- 55 Forrest Paint Co
- 56 Franklin Paint Company, Inc.
- 57 Gardner-Gibson
- 58 GDB International, Inc.
- 59 Gemini Coatings, Inc.
- 60 Gemini Industries, Inc.
- 61 General Finishes
- 62 Golden Artist Colors, Inc.
- 63 GPS Paints LLC
- 64 GreenSheen Eco-Friendly Paint
- 65 H. Behlen & Bro.
- 66 Harrison Paints & Coatings, LLC
- 67 Heartwood Corp
- 68 Heirloom Traditions Paint
- 69 HempShield Products LLC
- 70 Henry Company LLC
- 71 Heron Paint
- 72 Hood River Industrial LLC
- 73 ICP Construction
- 74 Imperial Paints LLC
- 75 James Alexander Specialty Paints LLC
- 76 Lakestone Enterprises Inc.
- 77 Lanco & Harris Corporation

- 78 Laticrete International, Inc.
- 79 Lauzon Distinctive Hardwood Flooring
- 80 Lexington Paint & Supply Co. Inc.
- 81 Liquid Rubber
- 82 Loba-Wakol LLC
- 83 Loop Recycled Products Inc
- 84 Lowe's Home Centers, LLC
- 85 Lullaby Paints
- 86 Martin Studios LLC
- 87 Masterchem Industries LLC
- 88 Messmer's Inc.
- 89 Mia Colore
- 90 Miller Paint Company Inc.
- 91 NCH Corporation
- 92 NewLook International
- 93 Old Village Paint, Ltd
- 94 One Time
- 95 Osmo USA
- 96 Penofin
- 97 Performance Coatings, Inc.
- 98 Perma-Chink Systems, Inc.
- 99 Premier Finishes Inc.
- 100 Preserva Products, Ltd
- 101 Protek Paint LTD
- 102 Pure and Original
- 103 Quikrete
- 104 Rainguard Brands LLC
- 105 Recolor Paints, LLC
- 106 Richard's Paint Manufacturing Co Inc.
- 107 Rodda Paint Company
- 108 Roman Decorating Products, LLC
- 109 RPM Industrial Coatings Group, Inc.
- 110 Rubio Monocoat USA, LLC
- 111 Rust-Oleum Corporation
- 112 Sage Restoration Inc.
- 113 SamaN
- 114 Sansin America Inc.
- 115 Sashco, Inc
- 116 SaverSystems, Inc.



- 117 Scotch Paint & Coatings, LLC
- 118 Seymour of Sycamore
- 119 Sika Corporation
- 120 Standard Paints, Inc.
- 121 Sto Corp.
- 122 Structures Wood Care, Inc.
- 123 Sunnyside Corporation
- 124 Sutherland Welles Ltd.
- 125 Sydney Harbour Paint Company
- 126 Tex-Cote LLC
- 127 Texturline Decorative Products
- 128 The CrystaLac Company
- 129 The Little Greene Paint Company
- 130 The Pittsburgh Paints Co.
- 131 The Sherwin-Williams Company
- 132 Timber Pro Coatings
- 133 TV Paints, LLC
- 134 UC Coatings LLC
- 135 United States Gypsum Company (USG)
- 136 UP Paint
- 137 Van Votz USA, LLC
- 138 Vasari Lime Plaster and Paint
- 139 Vasari Plaster and Stucco, LLC
- 140 Vermont Natural Coatings
- 141 Ware Products LLC
- 142 Waterlox Coatings Corporation
- 143 Wood Iron Wood Finishes, Inc.
- 144 Woodborn USA LLC

Acri-Shield Max	Armstrong Stains	Cabinet Coat
Acri-Soy Penetrating Clear Sealer	Aspire	Cabot
Advance Interior Paint	Aura Bath & Spa Interior Paint	Cabot "The Finish"
AFM Safecoat	Aura Exterior Paint	Cabot Australian Timber Oil
Allbäck Linseed Oil Paint	Aura Interior Paint	Cabot Cabothane
Allbäck Linus Wall Paint	Backdrop	Cabot Clear solutions
All Coat Interior/Exterior	Barn & Fence Paint	Cabot OVT
AllPro Acrylic Masonry Waterproofer	Basic Coatings	Cabot Problem Solver
Allpro Commercial Grade	Basic Coatings Hardwood Floor	Cabot PROVT
Waterproofing Sealer	Refinisher Gloss	Calcimine Recoater
AllPro Concrete Floor & Paver Sealer	Basic Coatings Hardwood Floor	California Paints Alkyd Vapor Barrier
Allpro Concrete Floor Sealer	Refinisher Satin	Primer Sealer & Enamel
Allpro Concrete Waterproofing Paint	Basic Paints FW 1700 , 2700	Undercoater
AllPro Marine Spar Varnish	Basic Paints GW 2765 gloss	California Paints AllFlor Porch &
Allpro Masonry Waterproofing Sealer	Basic Paints SGW 2735 semi gloss	Floor Enamel
Allpro Multi-Surface Water Repellent	Behr	California Paints All Wall & Trim
AllPro Polyurethane Varnish	Behr Premium Plus	Primer, Sealer and Undercoater
AllPro QD Urethane Floor Varnish	Behr Premium Plus Ultra	California Paints Aquaborne Ceramic
AllPro Waterproofing Sealer	Behr Premium Select	Universal Primer
AllPro WB Acrylic Urethane Varnish	Behr Pro-X	California Paints ASAP Enamel
Alumify	Benchmark	Undercoater Primer & Sealer
Ames Block & Wall, acrylic	Ben Interior Paint	California Paints California Ceiling
Ames Block & Wall, rubber	Benjamin Moore Block Filler	White
Ames Blue Max	Benjamin Moore Drywall Primer	California Paints CalPro
Ames Paint & Prime	Benjamin Moore Element Guard	California Paints Diamond Ceiling
Ames Reflective Paint	Benjamin Moore Fast Sanding	White
Ames Safe-T-Deck Granulated	Primer	California Paints Drywall Primer
Ames SafeT-Deck Smooth	Benjamin Moore High Build Exterior	California Paints Fres-Coat
Ames Super Elasto Barrier	Texture	California Paints Malibu
Ames Super Primer	Benjamin Moore Multi-Purpose	California Paints Muralo 268
Amteco 3200 Satin Varn	Primer	California Paints Muralo 563
Amteco Silicone (various colors)	Benjamin Moore Special Vinyl Latex	California Paints Nextech 2
Amteco TWP (various colors)	BenMate Danish Tung Oil Finish	California Paints Preference
Amteco Water Based Satin Varn	Beyond Paint All In One Paint	California Paints Prime Touch Primer
Amteco White Satin Varn	(various colors)	and Sealer
Andersons	Beyond Paint Countertop Paint	California Paints ProPaint
Annie Sloan Chalk Paint	Beyond Paint Multi Purpose Sealer	California Paints Sand Finish
Annie Sloan Metallic Paint	Biocontrol Prime-n-Seal	California Paints Texture Finish
Annie Sloan Satin Paint	Block Filler & Sealer	California Paints Trouble Shooter
Annie Sloan Wall Paint	Blue Athletic Field Marker	California Paints Ultra 2010
Aqua Lock Plus Primer/Sealer	Blue Seal	California Paints Ultra Aquaborne
Aqua Lock Plus Primer/Sealer	Brand Test CA/VT 01	Ceramic
Aqua Mix Aqua Stain	Brinkmann's	California Paints Ultra Ceiling White
Aqua Mix Enrich-n-Seal	Brouns & Co Linseed Paint	California Paints Ultra High Build
Aqua Mix High Gloss Sealer	Brouns & Co Oils	Exterior Paint
Aqua Mix Penetrating Sealer	Brouns & Co Primer	California Paints UltraPlate Cabinet &
Aqua Mix ProSolv	Brouns & Co Wood Stain	Trim Enamel
Aqua Mix Seal & Finish Low Sheen	Bruce Fresh Finish	California Paints Verde
Aqua Mix Sealer's Choice Gold	Bunker Hill DIKON Barn & Fence	California Paints WipeOut
Aqua Mix Stone Enhancer	C&M Coatings	California Paints WipeOut II
Aqua Mix UltraSolv	C2 Paint	Cedartone WB Penetrating Stain
Aqua Resin Floor Finish	CAB/Acrylic Clear Topcoat	Chimney Rx Masonry Chimney
Aqua Resin Stain Finish	CAB/Acrylic White Topcoat	Water Repellent
Aqua Resin Trim Enamel Paint	Cabinet Coat	

Chlorinated Rubber Swimming Pool Paint	Curust	Diamond Vogel Pro Max
Clare Exterior	CUTEK Extreme	Diamond Vogel Pro Plate
Clare Interior	Daly's Deck Stain	Diamond Vogel Pro Plus
Clare Multipurpose Primer	Daly's Log Oil	Diamond Vogel Quick Dry
Clark+Kensington Exterior Paint + Primer	Daly's Semi-Transparent Exterior Stain	Diamond Vogel Red Kote
Clark+Kensington Interior/Exterior Paint + Primer	Daly's Waterborne Deck Stain	Diamond Vogel RTU
Clark+Kensington Interior Cabinet Door and Trim Paint	Daly's Waterborne Stain	Diamond Vogel Rural Red
Clark+Kensington Interior Paint + Primer	Daly's Wood Stain	Diamond Vogel Rural White
Clay Paint	Deckmaster Clear Sealer	Diamond Vogel Satinamel
Clinical Paints	Deft	Diamond Vogel Special Red
Color Atelier Bonding Primer	Deft Clear Wood Finishes	Diamond Vogel Super Build
Color Atelier Lime Paint	Deft Lacquer Sanding Sealer	Diamond Vogel Super Pro
Color Atelier Primer	Deft Polyurethanes	Diamond Vogel Super Quick
Color Atelier Sealer (all sheens)	Deft Wood Stains	Diamond Vogel Super Varnish
Color Atelier Varnish	Defy Clear Wood Finish	Diamond Vogel Sure-Block II
Color Changing Ceiling Paint	Defy Composite Deck Sealer	Diamond Vogel SureFlo
Color Changing Ceiling Paint	Defy Deck Stain for Hardwoods	Diamond Vogel Sure Grip
Color Decor	Defy Epoxy Fortified Wood Stain	Diamond Vogel Uni-Fill
Color Extra	Defy Extreme Wood Stain	Diamond Vogel Vantage Plus
Color House Premium Ceiling Paint	Defy Marine Seal	Diamond Vogel Vantage Primer
Color Made Simple	Defy Original Synthetic Wood Stain	Diamond Vogel Vers-Acryl
ColorPlace	Devine	Diamond Vogel Vinyl Kote
Color Wheel	Diamond Collection	Diamond Vogel Weather Plate
Comex Paint	Diamond Vogel Acryl Prime	Diamond Vogel Zero Plus
Conco	Diamond Vogel Apex	DIKON Barn & Fence (Bunker Hill)
Contractor's Edge	Diamond Vogel Ascend	DIKON Dairy Enamel
Contractor Pro Exterior Paint	Diamond Vogel Assure	DIP Color
Contractor Pro Exterior Primer	Diamond Vogel Color Plus	Do It Best
Contractor Pro Interior & Exterior Masonry Primer	Diamond Vogel Diamond Prime	Do-It-Best
Contractor Pro Interior Paint	Diamond Vogel Dia-Pro	Do It Best Best Look®
Contractor Pro PVA Primer	Diamond Vogel Double Hide	Do It Best Color Solutions®
Controlz Primers	Diamond Vogel Elevate	Do-It Best Waterproofer
Convoy - Non Skid Coatings	Diamond Vogel Enamel Undercoat	Door, Trim & Cabinet Enamel
Coronado Texcrete	Diamond Vogel Evercyl	Drylok Clear Penetrating Sealers
Corotech Epoxy Primer	Diamond Vogel Fil-Kote	Drylok Concrete Floor Paint (all colors)
Country Chic Paint	Diamond Vogel Filler Finish	Drylok Concrete Protector
Country Chic Paint - Tough Coat	Diamond Vogel Finium	Drylok E1 Floor Paint (all colors)
Cover & Go	Diamond Vogel Flor Cote	Drylok Extreme
Crackle Lacquer Clear	Diamond Vogel Grain Stain	Drylok Floor Paints
CRC® Rust Converter	Diamond Vogel Health-Kote	Drylok Latex Base Masonry Waterproofer (all colors)
Cryli Cote Exterior Paint	Diamond Vogel Hide Plus	Drylok Natural Look Sealer
CrystaLac PolyOxide	Diamond Vogel Mil Max	Drylok Water Based 5% Silicone
CrystaLac Polyurethane	Diamond Vogel Nu Cling	Drylok Waterproofers
CrystaLac Super Premium	Diamond Vogel OptiKote	Drylok Wet Look Sealer
CrystalFin: Gloss, Semi-Gloss, Satin and Matte	Diamond Vogel Paramount	Drylok Wet Wall Bonding Primer
CrystalFin Floor Finish: Gloss and Satin	Diamond Vogel Permacryl Exterior	Duckback
	Diamond Vogel Permacryl Interior	Dunn's Paints
	Diamond Vogel Permafil	Dunn-Edwards
	Diamond Vogel Permaflex	Duracourt - Sport Court Paint
	Diamond Vogel Plastercyl	DuraSoy One Paint
	Diamond Vogel Posi-Prime	Dutch Boy
	Diamond Vogel Pre Tex	Dutchboy Dimensions
	Diamond Vogel Prime-O-Seal	

Dutchboy Dirt Fighter Interior	Equinox	FixAll Semi-Transparent Interior Stain
Dutchboy Maxbond®	Evolve	FixAll Shop Coat Primer
Dutchboy Refresh	Excesior Coatings (all products)	FixAll Skid Grip
Dutch Standard (all products)	E-Z Kare	FixAll Stain & Odor Barrier
Eagle Armor Seal	Fabulon	FixAll Stopz
Eagle Chattanoogaee Sealer	Farrow & Ball Dead Flat	FixAll Ultimate Universal Primer
Eagle Concrete Polish	Farrow & Ball Estate Eggshell	FixAll WearAll
Eagle Exterior Dye	Farrow & Ball Estate Emulsion	Flood Easy Seal
Eagle Gloss Coat	Farrow & Ball Exterior Eggshell	Floor & Patio Enamel
Eagle Interior Dye	Farrow & Ball Full Gloss	Floor & Trim Interior/Exterior Enamel
Eagle Natural Seal	Farrow & Ball Interior /Exterior Wood Primer & Undercoat	Fluorescent Orange Field Marker
Eagle Paver Sealer	Farrow & Ball Interior Wood Primer & Undercoat	Formby's
Eagle Premium Coat	Farrow & Ball Masonry & Plaster Stabilising Primer	Forrest Paint
Eagle Satin Seal	Farrow & Ball Masonry Paint	Franklin Paint - Halftime
Eagle Solid Color Sealer	Farrow & Ball Metal Primer & Undercoat	Franklin Paint - Winning Streak
Eagle Supreme Seal	Farrow & Ball Modern Eggshell	Frazee
Eagle Top Coat	Farrow & Ball Modern Emulsion	Fred Myers
EasyCare	Farrow & Ball Wall Ceiling Primer & Undercoat	French Lac
Easy Care	Farrow & Ball Wood Floor Primer & Undercoat	Fresh Start All-Purpose Primer
EasyCare 365	Farrow & Ball Wood Knot & Resin Blocking Primer	Fresh Start Deck & Siding Primer
EasyCare Cabinet Trim & Door Paint	Field Marking Paint	Fresh Start Hight-Hiding All-Purpose Primer
EasyCare Ceiling Paint	Field Marking Paint	Fresh Start Undercoater & Primer/Sealer
EasyCare Everyday	Final Touch	GacoDeck (A56, DT, & DK)
EasyCare Limitless	Fine Paints of Europe ECO	Galvanized & Aluminum Primer
EasyCare Platinum	Fine Paints of Europe Eurolux	Gardner-Gibson Black Jack (white elastomeric coatings only)
EasyCare Platinum WeatherALL Extreme	Fine Paints of Europe Eurothane	Gardner-Gibson Dynamite
EasyCare Porch & Floor	Fine Paints of Europe Hollandlac	Gardner-Gibson Eterna Kote
EasyCare Ready To Use Colors	Fixall (all products)	Gardner-Gibson Gardner
EasyCare Ultra Premium	FixAll Acrylic Floor Sealer	Gardner-Gibson Shur-Stik
EasyCare Woodsman	FixAll Acrylic Stain Killer	Gardner-Gibson Sta-Kool
EasyCare Woodsman Revive	FixAll Alkyd Stain Killer	Gemini Coatings Artisan Effects Collection
EasyCare X-O Rust	FixAll Aquaborne Ceramithane	Gemini Coatings Craftsman
Easy Color	FixAll Clear Waterproofing Sealer	Gemini Coatings Gem Clear
EasyGuard	FixAll Dry Fall	Gemini Coatings Gem Coat
Eco Advance Concrete & Masonry Waterproofer	FixAll Everlife Fast Dry Alkyd Enamel	Gemini Coatings Gem Cryl
Eco Advance Wood Waterproofer	FixAll Everlife Urethane Enamel	Gemini Coatings Gem Dye
Ecobond LBP	FixAll Everlife Waterborne Enamel	Gemini Coatings Gem Glo
Economy	FixAll Everlife Weatherproof Aluminum Enamel	Gemini Coatings Gemini
ECOS Paints	FixAll Exposed Concrete Sealer	Gemini Coatings Gemini Tone Stain
Eco Spec WB Interior Paint	FixAll Fix-Rite	Gemini Coatings Gem Pro
Eco-Tuff Coatings	FixAll Fix Rust Primer	Gemini Coatings Gem Tone
Elastite Elastomeric Coating	FixAll Grabber Bonding Primer	Gemini Coatings Gem Var
Elastite Elastomeric Roof Coating	FixAll Latex Block Filler	Gemini Coatings Gulf Synthetics - PermaBond
Elastite Masonry Sealer	FixAll PVA Drywall Primer	Gemini Coatings Master's Magic
Element Guard Exterior Paint	FixAll RustPlate Primer	Gemini Coatings Storm Shield
Encase		Gemini Coatings Titanium Series
Enrich		Gemini Coatings Total Wood Preservative
EPIC Ceiling White		
EPIC Interior Primer		
EPIC Premium Interior Paint and Primer		
Epoxy Swimming Pool Paint		

Gemini Coatings TWP	Glidden Essentials	HGTV Weathershield by Sherwin Williams
Gemini Coatings WFS	Glidden Everyday	High Build Interior Primer
Gemini Coatings Wood Finishers Supply	Glidden EZ Track	High Build Peel Bonding Primer
Gemini Evo	Glidden Fundamentals	High Build Peel Bonding Primer
Gemini Rudd	Glidden Grab-N-Go	High Solid Floor Oil
Gemini Zero Rust	Glidden Gripper	Homax Premixed Popcorn Ceiling Texture
General Finishes Arm-R-Seal Urethane Topcoat	Glidden Gripper	Homax Premixed Wall Texture
General Finishes Black & White Undercoat	Glidden High Endurance	Homax Roll-On Texture
General Finishes Brushable White Enamel	Glidden High Endurance Plus	Homax Tile Guard
General Finishes Clear Poly Topcoat	Glidden High Performance	Homax Wet Look Cure Seal
General Finishes Enduro	Glidden Kitchen and Bath	Homestead
General Finishes Enduro-Var	Glidden Max-Flex	Imperial Alkyd Solid Stain
General Finishes Enduro-Var II	Glidden Metallic Tones	Imperial Dry Brite HS Sealer
General Finishes Enduro-Var Polyurethane	Glidden Multi-Pro	Imperial Ducklac
General Finishes Exterior 450	Glidden Porch & Floor	Imperial Enamel Undercoat
General Finishes Exterior 450 Clear Finish & Stain	Glidden Premium	Imperial Exterior 100% Acrylic
General Finishes Exterior 450 Stains	Glidden PVA Drywall Primer	Imperial Exterior Latex
General Finishes Gel Stains	Glidden Quick Cover	Imperial HB Pre-Cat Lacquer
General Finishes Gel Topcoats	Glidden Spred	Imperial High Solids Tuff
General Finishes GF Milk Paints	Glidden Stain	Imperial Int/Ext Aluminum Enamel
General Finishes High Performance Poly	GloSthane Finish	Imperial Interior Lolustre Latex
General Finishes Industrial Dye Stains & Concentrates	Golden Paintworks	Imperial Interior Oil Wiping Stain
General Finishes Oil Base Wood Stains	GPM	Imperial Interior Ultrapro Latex
General Finishes Original Seal-A-Cell CLEAR	Grass Green Athletic Marker	Imperial Machinery Enamel
General Finishes Outdoor Oil	GreenSheen® (all products)	Imperial Marproof Lacquer
General Finishes Pigmented Poly	Guardian Contractor Grade	Imperial Master Painter Enamel
General Finishes PolyAcrylic	Guardian Professional Quality	Imperial Norsekote Latex
General Finishes Pre-Cat Urethane	H&C	Imperial Polar Latex
General Finishes Pre-Stain Wood Conditioner	H&K Paints All Coat	Imperial Polyurethane Varnish
General Finishes Pro Image	Hammerite	Imperial Porch & Deck Enamel
General Finishes RTM Stains	Hard Oil	Imperial Recharge
General Finishes Sanding Sealer	Harrison Paint (all products)	Imperial Rust-Inhibitive Primers
General Finishes Sealer	HD® Designs	Imperial Silguard Sealer
General Finishes Stain Blocker	Heavy Bodied Glazing Stain (Various colors)	Imperial WB Edge Seal
General Finishes Water Base Dye Stains	Heirloom Traditions Paint	Insl-X Off Broadway
General Finishes Water Base Lacquer	Hemp Shield	Insl-X Tru-Flex Concrete Bond Coat
General Finishes Water Base Wood Stains	Hemp Shield Log Home Stain and Sealer	Insl-X Tru-Flex Cushion Coat
Geocel	Hemp Shield Wood Deck Sealer	Insl-X Tru-Flex Latex Field Marking Paint
Glidden Diamond	Henry/Bakor	Insl-X Tru-Flex Line Marking Paint
Glidden Door and Trim	Henry Acryprime Recoat Primer	Insl-X Tru-Flex Neutral Filler Coat
	Henry Aquatac Primer	Insl-X Tru-Flex Smooth Colored Finish Coat
	Henry Enviro-White Roof Coating	Insl-X Tru-Flex Textured Colored Finish Coat
	Henry Grey Elastomeric Roof Coating	James Alexander Specialty Paints
	Henry Light Tan Roof Coating	James Alexander Specialty Paints Botanical Paint
	Henry Premium Elastomeric Base Coating	James Alexander Specialty Paints Lime-Prep Primer
	Henry Premium Non-Fibered Aluminum	James Alexander Specialty Paints Sealer
	Henry Solorflx Tan Elastomeric	
	Herbal Oil	
	Heron Linseed Oil Paint	
	HGTV Home	

James Alexander Specialty Paints Venetian Plaster	Laticrete StoneTech® Professional Salt Water Resistant Sealer	Majic Diamond Hard Acrylic Enamel
James Alexander Specialty Paints Water Based Limewash	Laticrete StoneTech® Professional Sealer	Majic Diamond Hard Direct-To-Metal
Kilz	Laticrete StoneTech® Professional Semi Gloss Finishing Sealer	Majic Diamond Hard Kidproof Wall Paint
Kilz Casual Colors	Laticrete StoneTech Quartz & Porcelain Tile Sealer	Majic Diamond Hard Repurpose
Kilz Pro-X	Laura Ashley	Majic Easy Spread
Kilz True Tone	Lauzon wood Clear Finish	Majic Exterior/Interior Paint
Kitchen & Bath Interior Paint	Lauzon wood stain	Majic Fence Paint
Kolor Kote	Lead Block	Majic Field Marking Paint
Kool Seal	Lexington Paint & Supply Enamel Pro White	Majic Floor Paint
Krylon	Lexington Paint & Supply Farm Pro Red	Majic House & Deck Stain
Krylon Commercial	Lexington Paint & Supply Fence Pro Black	Majic Industrial Aluminum
Kwal	Lifeline Accents	Majic Kitchen & Bath Paint
Lanco Aqua Proof Roof Primer	Lifeline Acrylic	Majic Latex Enamel
Lanco Color Collection Wall & Trim Paint	Lifeline Advance	Majic Lifestyle
Lanco Coolguard Roof Coating	Lifeline Endure	Majic No Hunting Purple
Lanco Dura-Life Clear Sealer	LifeLine Exterior	Majic NWP
Lanco Natural Look Clear Sealer	Lifeline Interior	Majic Oil-Base Floor Enamel
Lanco Seal Rubber Roof Coating	Lifeline Ultra-2	Majic Polyurethane Wood Coating
Lanco Siliconizer Roof Coating	Lifeline Ultra-7	Majic Premium Paint & Primer
Lanco Titanium Paint & Primer	Liquid Rubber Cool Foot Deck Coating	Majic Pride
Lanco Wet Look Clear Sealer	Liquid Rubber Multi Purpose Primer	Majic Primer & Paint
Laticrete Blue 92 Anti-Fracture Membrane	Liquid Rubber Polyurethane Deck Coating	Majic Professional
Laticrete Fracture Ban SC	Little Greene Absolute	Majic Rust Kill Coating
Laticrete Hydro Ban Waterproofing & Crack Isolation Membrane	Little Greene Intelligent	Majic Stain Blocking Primer Sealer
Laticrete Hydro Barrier Plus	Little Greene Intelligent All Surface Primer (ASP)	Majic Town & Country
Laticrete Prime N Bond	Loba Deck Oil	Majic Tractor, Truck & Implement Enamel
Laticrete Primer Plus	Loba Deck Oil Color	Majic Waterproofing Sealer
Laticrete StoneTech® Professional Enhancer	Local Color Recycled Latex Paint	Majic Water Sealer
Laticrete StoneTech® Professional Enhancer Pro™ Sealer	Long End Seal	Majic Wood Varnish
Laticrete StoneTech® Professional Grout Release	Loop Premium Recycled Paint	Martin Senour Paints
Laticrete StoneTech® Professional Heavy Duty Exterior Sealer	Lullaby Paints	Marvins
Laticrete StoneTech® Professional Heavy Duty Sealer	Magnolia Home Paint	MasonrySaver #25 Floor Finish
Laticrete StoneTech® Professional High Gloss Finishing Sealer	Maintenance One	MasonrySaver Acrylic Waterproofing Sealer
Laticrete StoneTech® Professional High Gloss Lacquer	Majic	MasonrySaver All-Purpose HD Water Repellent
Laticrete StoneTech® Professional Impregnator Pro® Sealer	Majic All Purpose	MasonrySaver Decorative Concrete Sealer
Laticrete StoneTech® Professional Maximum BulletProof® Sealer	Majic Barn & Fence Paint	MasonrySaver Garage Floor Sealer
Laticrete StoneTech® Professional Natural Stone Countertop Sealer	Majic Barn Paint	MasonrySaver Paver Sealer
Laticrete StoneTech® Professional Paver Sealer & Enhancer	Majic Barricade Primer & Paint	MasonrySaver VOV Compliant Solvent Base Water Repellent
	Majic Barricade Primer & Sealer	MasonrySaver Water Repellent for Brick
	Majic Basement Paint	MasonrySaver Water Repellent for Split-Face Block
	Majic Buggy Enamel	Masterchem
	Majic Camouflage Paint	Master Gel® Finish Clear
	Majic Clear Coat Gloss Lacquer	Master Guard Oil and Spot Primer
	Majic Concrete Sealer	Master Guard Sealer
		Master Guard Wood Sealer
		Max Block

Max Block	NewLook International Original	Osmo Anti-Slip Decking Oil
MaxLife	NewLook Stains	Osmo Decking Oil
McCloskey	NewLook International Proteshield	Osmo Natural Woodstain Oil Effect
McCloskey Man-O-War	NewLook International SharkSeal	Osmo One Coat Only
McCloskey Multi-Use	NewLook International SmartColor	Osmo Polyx-Oil
McCloskey Special Effects	NewLook International SmartSeal	Osmo Polyx-Oil Raw
McCloskey Stains	NewLook International Wall Stain	Osmo Spray-Polyx
Messmer's Decking Stain	NuDeck	Osmo Top Oil
Metal Ready Universal	Odds N Ends	Osmo UV-Protection Oil
Minwax Color Wash	Old Masters Brushing Lacquer	Osmo Wood Wax Finish
Minwax Lacquer (all types)	Old Masters Exterior Water-based Spar Urethane	Oxygen
Minwax Polycrylic	Old Masters Fast Dry Stain	Painter's Select
Minwax PolyShades	Old Masters Gel Stain	Painter's Select Basics
Minwax Polyurethane (all types)	Old Masters Graining Base	Painter's Select Clean & Fresh
Minwax Stain (all types)	Old Masters H2O Wood Stain	Painter's Select PRO BEST
Minwax Tung Oil	Old Masters Oil Based Gel Polyurethane	Painter's Select PRO GOOD
Minwax Urethane	Old Masters Oil Based Polyurethane	Painter's Select Specialty
Minwax Varnish	Old Masters Oil Based Quick-Dry Varnish	Pantone
Minwax Wipe-On Poly	Old Masters Oil Based Sanding Sealer	Parks Pro Finisher
Minwax Wood Effects	Old Masters Oil Based Spar Marine Varnish	Penetrating Oil Sealer
Minwax Wood Finish	Old Masters Oil Based Super Varnish	Penofin Wood Finishes
Miracle Sealants 511 Anti-Slip	Old Masters Penetrating Sealer	Per-Ma-Lite Marking Paint
Miracle Sealants 511 Glass Tile & Shower Door Sealer	Old Masters Penetrating Stain	Pittsburgh Paints & Stains Acri-Shield
Miracle Sealants 511 H2O Plus	Old Masters Penetrating Tung Oil Varnish	Pittsburgh Paints & Stains Anti-Scuff
Miracle Sealants 511 Impregnator	Old Masters Water-based Clear Finish	Pittsburgh Paints & Stains Break-Through
Miracle Sealants 511 Porcelain & Ceramic Tile Sealer	Old Masters Water-based Polyurethane	Pittsburgh Paints & Stains Builder Performance
Miracle Sealants 511 Porous Plus	Old Masters Water-based Sanding Sealer	Pittsburgh Paints & Stains Flood
Miracle Sealants 511 Quartz Counter Top Sealer	Old Masters Wiping Stain	Pittsburgh Paints & Stains Flood Pro
Miracle Sealants 511 Seal & Enhance	Old Masters Wood Conditioner	Pittsburgh Paints & Stains Manor Hall
Miracle Sealants High Gloss Finish Sealer	Old Masters Woodgrain Filler	Pittsburgh Paints & Stains Metallic Tones
Miracle Sealants Matte Finish Sealer	Old Village Paint	Pittsburgh Paints & Stains Mopako
Miracle Sealants Mira Matte	Olympic Ascent	Pittsburgh Paints & Stains Multi-Pro
Miracle Sealants Tile, Stone & Grout Sealer	Olympic Elite	Pittsburgh Paints & Stains Paramount
ML Campbell	Olympic Maximum	Pittsburgh Paints & Stains Perma-Crete
Modern Masters	Olympic Paint	Pittsburgh Paints & Stains Perm-Crete
MultApply Acrylic Enamel	Olympic Pool Paint	Pittsburgh Paints & Stains Pitt-Glaze
Multi-Surface Waterproofer	Olympic Rescue It!	Pittsburgh Paints & Stains Pitt-Tech Plus EP DTM
Muresco Ceiling Paint	Olympic Stain	Pittsburgh Paints & Stains Premier
NewLook International DriveHard	Olympic Summit	Pittsburgh Paints & Stains Pure Performance
NewLook International Endura Concrete Sealer	Olympic Triumph	Pittsburgh Paints & Stains Seal Grip
NewLook International Endura Enhancer	Olympic Waterguard	Pittsburgh Paints & Stains Speed Cryl
NewLook International Endura Faux Fusion	Olympic Wood Protector	Pittsburgh Paints & Stains Speedhide (except Dry Fog)
NewLook International Endura Solid Stain	One Time Wood Preservative (various colors)	
	Optimus	
	Orgill	

Pittsburgh Paints & Stains Speedhide Pro EV Zero	Precision PC6 Waterborne Urethane (all colors and sheens)	Rainguard Advanced Waterproofer 10 year
Pittsburgh Paints & Stains Sun Proof	Prelude	Rainguard Blok-Lok Water Repellent Concentrate
Pittsburgh Paints & Stains Timeless	Premier Aluminum Roof Coating Fibered	Rainguard Blok-Lok Water Repellent Ready to Use
Pittsburgh Paints & Stains Ultra-hide 150	Premier Finishes Tuff-Kote High Performance Restoration Primer	Rainguard Clear-Seal 1 part High Gloss Acrylic Urethane Sealer
Pittsburgh Paints & Stains Ultralast	Premier Finishes Tuff-Kote Interior HP Restoration SemiGloss	Rainguard Clear-Seal 1 part Low Gloss Acrylic Urethane Sealer
Pittsburgh Paints & Stains Wall Supreme	Premium	Rainguard Color-Lok Solid Color Silicone Stain ATB
Pittsburgh Paints & Stains Weather King	Premium Decor	Rainguard Color-Lok Solid Color Silicone Stain DTB
Pittsburgh Paints & Stains Wonder Hide	Pre-Stain Clear Wood Stain	Rainguard Color-Lok Solid Color Silicone Stain WTB
Pittsburgh Paints & Stains Wonder Pro	Prestige	Rainguard Floor-Lok Sealer Concentrate
Pittsburgh Paints & Stains Wonder-Pro	Prime All Multi-Surface Primer Sealer	Rainguard Micro-Seal Water Repellent Concentrate
Pittsburgh Paints & Stains Wonder Shield	Prime All Primer Sealer	Rainguard Micro-Seal Water Repellent Ready to Use
Pittsburgh Paints & Stains Wonder Tones	Prime Choice (all products)	Rainguard Plugger Acrylic Sealer 10% Solids
Pittsburgh Paints & Stains ZoneMark	Prime Lock Plus	Rainguard Plugger Acrylic Sealer 25% Solids
Pittsburgh Paints and Stains	Prime Lock Plus	Rainguard Satin-Lok Water Base Medium Gloss Repellent
Revolution	Prime Lock Plus	Rainguard Super Stucco Primer Sealer Concentrate
Pitt-Tech Plus EP	Prime-n-Seal	Rainguard Vandl-GuardFinish Coat Graffiti Barrier
Plastic Kote	Prime Time	Rainguard Vandl-GuardFIVE Permanent Anti-Graffiti Coating
Plasti-Kote	Prime Time Plus	Rainguard Vandl-GuardONE Permanent Anti-Graffiti Coating
PolyWhey	Pro Best	Rainguard Vandl-Guard Permanent Anti-Graffiti Coating
PolyWhey Exterior (various colors)	Professional Coatings	Rainguard Vandl-GuardTEN Permanent Anti-Graffiti Coating
PolyWhey Floor	Profin:Gloss and Satin	Rainguard Vandl-Top Sacrificial Anti-Graffiti Coating
PolyWhey MVP Sport Floor Finish	Pro Good	Rainguard Waterproofer 7 year
PolyWhey MVP Sport Floor Sealer	Pro Grade	Rainguard Wet Look Sealer Wood &Masonry
PolyWhey Series 1000 Infusion Wood Modifier	Proluxe	Rapid Roof HV
PolyWhey Series 2000 Stain Base	Puma	Rapid Roof III
PolyWhey Series 3500 Wood Floor finish	Puma-XL	Ready Seal (all products)
PolyWhey Series 3500 Wood Floor Sealer	Pure & Original Classico	Ready to Spray Athletic White
PolyWhey Wood Cleaner	Pure & Original Dead Flat Ecosealer	ReColor™ (All Products)
Pore-O-Pac™ Grain Filler (various colors)	Pure & Original Fresco Lime paint	Red Athletic Field Marker
Pore-O-Pac™ Grain Filler Reducer	Pure & Original Limesoap	Reduced Odor Oil-Based Primer
Pratt & Lambert®	Pure & Original Marrakech Walls	Reduced Odor Primer
Pratt & Lambert Accolade®	Pure & Original Wallprim	Redwood Stain Interior/Exterior
Pratt & Lambert RedSeal®	Qualalacq™ Lacquer Gloss	
Pratt & Lambert RedSeal® Zero VOC	Qualalacq™ Lacquer Reducer	
Pratt & Lambert STAINShield®	Qualalacq™ Lacquer Satin	
Precision DTM 1600 Waterborne Urethane Primer	Qualalacq™ Sanding Sealer	
Precision PC6 Waterborne Clear Coat (all sheens)	Qualarenu™ #1	
	Qualasole™	
	Quik Hide	
	Quikrete Concrete & Masonry High Gloss Sealer	
	Quikrete Concrete & Masonry Waterproofing Sealer	
	Quikrete Masonry Waterproofer	
	Quikrete Penetrating Concrete Stain	
	Quikrete Textured Acrylic Concrete	
	Quikrete Translucent Concrete Stain	
	Radcon (various colors)	

Regal Select Exterior MoorGard Paint	Roman Pro-999 Rx-35 Roofers Choice	Rustoleum Flash Bond 400
Regal Select Exterior MoorGlo Paint	Room & Board by Valspar	Rustoleum Home
Regal Select Exterior MoorLife Paint	Rosco Chroma Key	Rustoleum MasterClear Supreme
Regal Select Interior Paint	Rosco Color Coat	Rustoleum Metallic Paint Collection
Reserve	Rosco Crystal Gel Clear Coating	Rustoleum Multispec
Resin & Oil Stain Finish	Rosco DigiComp HD	Rustoleum OKON
Restore-X	Rosco Fluorescent	Rustoleum Painter's Touch
Richard's Paint Barricade	Rosco FoamCoat	Rustoleum Peel-Bond
Richard's Paint Bondcrete	Rosco Off Broadway Artists Paint & Metallic Finishes	Rustoleum Perma White
Richard's Paint Deck Guard	Rosco Premier Clear	Rustoleum Plastic And Vinyl NT
Richard's Paint Deck Pro	Rosco Supersaturated	Rustoleum Prime Start
Richard's Paint Driveway and Floor Coating	Rosco Tough Prime	Rustoleum Simply Home
Richard's Paint EnduraTread	Rosco TV	Rustoleum Stop Rust
Richard's Paint Eternity	Rosco Video Paint CK	Rustoleum Studio Color
Richard's Paint Excel	Royal Drywall Interior Primer	Rustoleum Sure Color
Richard's Paint FlexDeck	Royal Exterior House & Trim Primer	Rustoleum Theme Paint
Richard's Paint Floor-Tite	Royal Exterior Paint & Primer	Rustoleum Trim Magic
Richard's Paint Garage Shield	Royal House Paint & Primer	Rustoleum Varathane
Richard's Paint H2O Fusion	Royal Interior & Exterior Sealing & Blocking Primer	Rustoleum Watco Danish Oil
Richard's Paint Holzon	Royal Interior Artistic Finishes Glazing Liquid	Rustoleum Watco Exterior Wood Finish
Richard's Paint Holzout	Royal Interior Paint & Primer	Rustoleum Watco Lacquer + Color Tint
Richard's Paint Holztite	Royal Porch + Floor Enamel	Rustoleum Watco Lacquer Clear Wood Finish
Richard's Paint Painter's Pride	RPM Water Based Grain Filler (various colors)	Rustoleum Watco Teak Oil + Stain
Richard's Paint Paverseal	RPM Wood -15 Minute Wood Stain (various colors)	Rustoleum Watco Tung Oil
Richard's Paint Pliolite	RPM Wood-8x Wipe On Water Base Urethane Satin	Rustoleum Watco Wipe-On Poly
Richard's Paint Pool Guard	RPM Wood -Polyurethane Satin	Rustoleum Wolman
Richard's Paint PPS	RPM Wood- Vinyl Sealer	Rustoleum Zehrung
Richard's Paint Python	RPM Wood Waterborne Urethane Finish Satin	Rustoleum Zinsser
Richard's Paint Rich Air Zero VOC	Rubber Based Swimming Pool Paint	Rust Stop Indoor/Outdoor Enamel
Richard's Paint Rich Classic	Rubberzeit Dura-Rubber	Rust Stop Indoor/Outdoor Primer
Richard's Paint Rich Flex	Rubberzeit Dura-Rubber	SafeChoice
Richard's Paint Rich Pro	Rubberzeit Primer	Safecoat
Richard's Paint Rich Shield	Rubberzeit Primer	Safecoat Naturals
Richard's Paint Rich Tex	Rubio Monocoat WoodCream	Saman hybrid based varnish
Richard's Paint Rich Wall	Rust-A-Void	Saman hybrid stain
Richard's Paint Richwood	Rustoleum 900 Clear Coat	Saman water based stain
Richard's Paint Roof Shield	Rustoleum Advanced Technology UMA	Saman water based varnish
Richard's Paint Rust Sheild	Rustoleum American Accents	Sansin Boracol 20-2
Richard's Paint Shields All	Rustoleum BIN	Sansin Classic
Richard's Paint Signature Ceramic	Rustoleum Bulls Eye	Sansin DEC
Richard's Paint Signature Series	Rustoleum Colorfast	Sansin ENS
Richard's Paint Signature Series Plus	Rustoleum Decorative Painter's Products	Sansin Foundation RTU
Richard's Paint Step Guard	Rustoleum Elastomeric Roof Coating	Sansin MDF Primer
Richard's Paint Thor	Rustoleum Epoxy Shield	Sansin Precision Coat
Richard's Paint Timber Tuff		Sansin Purity Interior
Richard's Paint Viper		Sansin Roof Tec
Richard's Paint Wall Guard		Sansin SDF
Roman ECO-988 Pigmented Primer		Sansin Timber Tec
Roman Golden Harvest PRO-988		Sashco Capture® Log Stain
Roman PRO-909 Vinyl Prep		Sashco Cascade® Clear Coat
Roman PRO-935 R-35		
Roman PRO-977 Ultra Prime		

Sashco Symphony® Interior Clear Coat	Seal-Krete Epoxy-Seal Concrete Paint #920 White Base	Seal-Krete GraniTex Decorative Natural Stone Contractor Kit - EarthStone
Sashco Transformation Stain® Deck & Fence	Seal-Krete Epoxy-Seal Concrete Paint #921 Armor Gray	Seal-Krete GraniTex Decorative Natural Stone Contractor Kit - GrayStone
Sashco Transformation Stain® Log and Timber	Seal-Krete Epoxy-Seal Concrete Paint #922 Slate Gray	Seal-Krete GraniTex Decorative Natural Stone Contractor Kit - SandStone
Sashco Transformation Stain® Siding & Trim	Seal-Krete Epoxy-Seal Concrete Paint #940 Deep Base	Seal-Krete GraniTex Decorative Natural Stone Finish - DesertStone
Satin Impervo	Seal-Krete Epoxy-Seal Low VOC Paint	Seal-Krete GraniTex Decorative Natural Stone Finish - EarthStone
Satin Thane Finish	Seal-Krete Epoxy-Seal Low VOC Paint #960 White Base	Seal-Krete GraniTex Decorative Natural Stone Finish - GrayStone
Scotch Acry-Flex	Seal-Krete Epoxy-Seal Low VOC Paint #961 Armor Gray	Seal-Krete GraniTex Decorative Natural Stone Finish - SandStone
Scotch Acry-Sheen	Seal-Krete Epoxy-Seal Low VOC Paint #962 Slate Gray	Seal-Krete Heavy Duty Waterproofer
Scotch Draw-Tite	Seal-Krete Epoxy-Seal Low VOC Paint #970 Deep Base	Seal-Krete Lock-Down Epoxy Bonding Floor Primer
Scotch Elast-A-Crylic	Seal-Krete Floor-Tex	Seal-Krete Multi-Surface Water Repellent
Scotch Elast-O-Bond	Seal-Krete Floor-Tex Non-Slip Textured Coating	Seal-Once Original Waterproofing Sealer
Scotch Ever-Gloss	Seal-Krete Floor-Tex Tintable #440 White Base	Seal-Krete Stucco Guard
Scotch Kid-Proof	Seal-Krete Floor-Tex Tintable #450 Deep Base	Seal-Once Exotic Premium Wood Sealer
Scotch Latex Enamel Undercoat	Seal-Krete Floor-Tex Tintable Low VOC #460 White Base	Seal-Once Marine Premium Wood Sealer
Scotch PVA Sealer	Seal-Krete Floor-Tex Tintable Low VOC #470 Deep Base	Seal-Once Multi-Surface Concentrate
Scotch Selz	Seal-Krete Floor-Tex Topcoat	Seal-Once NANO + POLY Concrete & Masonry Sealer
Scuff-X Interior Paint	Seal-Krete GraniteFX	Seal-Once NANO + POLY Premium Wood Sealer
SeaFin AquaSpar Gloss and Satin	Seal-Krete GraniteFX Brush & Roll Decorative Concrete Coating - Gulfshore	Seal-Once NANO Penetrating Wood Sealer
SeaFin Filler/Stain	Seal-Krete GraniteFX Brush & Roll Decorative Concrete Coating - Keystone	Seal-Once Negative Pressure Waterproofer
SeaFin Ship n'Shore Sealer	Seal-Krete GraniteFX Brush & Roll Decorative Concrete Coating - Monterey	Seal-Once POLY Premium Wood Sealer
SeaFin Super Spar Varnish	Seal-Krete GraniteFX Brush & Roll Decorative Concrete Coating - Sedona	Seal-Once Seal Ends Once SearS
Seal-Krete Clear-Seal	Seal-Krete GraniteFX Professional Grade Decorative Natural Stone Finish - DesertStone	Severe Weather Contractor Finish Shading/Glazing Stain (various colors)
Seal-Krete Clear-Seal High Gloss Sealer	Seal-Krete GraniteFX Uniforming Primer - Gray	Shake Shield
Seal-Krete Clear-Seal Low Gloss Sealer	Seal-Krete GraniteFX Uniforming Primer - Tan	Sherwin Williams
Seal-Krete Clear-Seal Premium High Gloss Sealer	Seal-Krete GraniTex Decorative Natural Stone Contractor Kit - DesertStone	Sherwin Williams A-100
Seal-Krete Clear-Seal Premium High Gloss Sealer Low VOC		Sherwin Williams All Surface Enamel
Seal-Krete Clear-Seal Satin Sealer		Sherwin Williams Blok-Tite™
Seal-Krete Concrete Colors Low Lustre Sealer		Sherwin Williams Bright Life
Seal-Krete Concrete Colors Low Lustre Sealer		Sherwin Williams Builders Masterpiece
Seal-Krete Concrete Colors Semi-Transparent Stain		
Seal-Krete Concrete Colors Semi-Transparent Stain #300 Tint Base		
Seal-Krete Concrete Colors Semi-Transparent Stain #310 Terra Cotta		
Seal-Krete Concrete Colors Semi-Transparent Stain #320 Brownstone		
Seal-Krete DampLock Concrete Waterproofing Paint		
Seal-Krete Epoxy-Seal Concrete Paint		

Sherwin Williams Builders Solution Int.	Sherwin Williams PrepRite	SoyCrete Architectural Concret Stain
Sherwin Williams Captivate	Sherwin Williams ProBlock	Spar Restoration Varnish
Sherwin Williams Cashmere Interior	Sherwin Williams ProClassic	StainMaster
Sherwin Williams Classic 99 Int	Sherwin Williams ProGreen 200	Stanley Steemer
Sherwin Williams Classic Cote	Sherwin Williams Pro-Hide® Gold	Start Right
Sherwin Williams ColorAccents Interior Alkyd	Sherwin Williams Pro-Hide® Green	Stays Clear Polyurethane
Sherwin Williams ColorPlace®	Sherwin Williams Pro-Hide® Silver	Stix Bonding Primer
Sherwin Williams ConFlex XL	Sherwin Williams Pro Kote	Stix Bonding Primer
Sherwin Williams DeckScapes Ext	Sherwin Williams ProLine Supreme	StoClear Coat Sealer
Sherwin Williams Design Accents	Sherwin Williams ProMar 200	StoColor Acryl Flat
Sherwin Williams Design Basics Interior	Sherwin Williams ProMar 400	StoColor Acryl Plus
Sherwin Williams Drywall Primer	Sherwin Williams ProMar 700	StoColor Coat
Sherwin Williams Dura Clad	Sherwin Williams Property Solution	StoColor Coat Sand
Sherwin Williams DuraCraft Acrylic Latex	Sherwin Williams Red Devil	StoColor Dryonic
Sherwin Williams Duraseal	Sherwin Williams Resilience	StoColor DTM
Sherwin Williams Duration	Sherwin Williams Rich Lux	StoColor Lastic
Sherwin Williams Duron	Sherwin Williams Rust-O-Lastic	StoColor Lastic Sand
Sherwin Williams EasyLiving®	Sherwin Williams Sea Shore	StoColor Lotusan
Sherwin Williams EcoSelect® Zero VOC	Sherwin Williams Shellac Primer	StoColor Lotusan Plus
Sherwin Williams Emerald	Sherwin Williams Sher-Crete	StoColor Metallic Base
Sherwin Williams Eminence®	Sherwin Williams SherStripe	StoColor Metallic Topcoat
Sherwin Williams Enviropure	Sherwin Williams Signature Select	StoColor Silcolastic
Sherwin Williams EverLast	Sherwin Williams Skylight®	StoColor Texture Coarse
Sherwin Williams Faux Impressions®	Sherwin Williams Solo 100% Acrylic	StoColor Texture Fine
Sherwin Williams Flex Bon	Sherwin Williams SuperBond	StoColor Texture Medium
Sherwin Williams Fresh Kote	Sherwin Williams SuperPaint	StoColor Wood Stain
Sherwin Williams Harmony	Sherwin Williams Terminator™	StoPrime BlockSurfacer
Sherwin Williams Impressions	Sherwin Williams Twist & Try	StoPrime Conditioner
Sherwin Williams Infinity®	Sherwin Williams UltraCrete	StoPrime DTM
Sherwin Williams Latitude	Sherwin Williams Ultra Deluxe	StoPrime Hot
Sherwin Williams Lok-Tite	Sherwin Williams Ultra Guard	StoPrime Sand
Sherwin Williams Loxon	Sherwin Williams WithSTAND®	StoPrime Smooth
Sherwin Williams Luxury Living	Sherwin Williams Wood Classics	StoPrime UV
Sherwin Williams Maintenance Pro	Sherwin Williams WoodScapes	Storm Systems (all products)
Sherwin Williams Masterline	Show Kote	StoTique
Sherwin Williams Master Painters	Sikagard® 510	Structures Wood Care NatureColor®
Sherwin Williams Master Touch	Sikagard® 550W Elastocolor	Structures Wood Care NatureOne®
Sherwin Williams Maxflex™	Sikagard® 552W Primer	Stucco, Masonry & Brick Exterior Paint
Sherwin Williams Maxwood®	Sikagard® 570	Sunnyside Waterproofer
Sherwin Williams Modac	Sikagard® Elastic Base Coat Smooth	Sunnyside Wood Protectant
Sherwin Williams Optima Formula 360	Sikagard® Elastic Base Coat Textured	Super Hide Interior Paint
Sherwin Williams Painters Edge	Silox Seal "A" Side	Super Kote 3000 Interior Paint
Sherwin Williams PalGard®	Simply Glaze	Super Kote 5000 Interior Paint
Sherwin Williams Platinum	Sirca	Super Kote 5000 Zero Interior Paint
Sherwin Williams Ply-Mastic	Skylight	Sure Shine
Sherwin Williams Ply-Thane	Snow Roof	Sure Step Anti-Slip Coating
Sherwin Williams Ply-Tile	Solar-Lux™ Stain (various colors)	Sure Step Anti-Slip Coating
Sherwin Williams Porcelain®	Solar-Lux™ Waterborne Dye Stain (various colors)	Sutherland Welles Ltd. Marine Spar Varnish
	Solar-Lux™ Waterborne Glaze (various colors)	Sutherland Welles Ltd. Murdoch's Line 500 Floor Finish
	Solar-Lux™ Waterborne Wiping Stains (various colors)	Sutherland Welles Ltd. Murdoch's Line Hard Oil

Sutherland Welles Ltd. Murdoch's Line Hard Sealer	Tex-Cote Reflect-Tec®	Ultra Spec Exterior Stain
Sutherland Welles Ltd. Murdoch's Line Table Top	Tex-Cote Stone-Tex®	Ultra Spec EXT Exterior Paint
Sutherland Welles Ltd. Wiping Varnish (Sealer, Low, Medium, High Lustre)	Tex-Cote Tex-Bond Primer	Ultra Spec Masonry Filler Finish
Sydney Harbour Alchemy Liquid Gold	Tex-Cote Tex-Glaze	Ultra Spec Masonry High Build Block Filler
Sydney Harbour Aqua Enamel	Tex-Cote Tex-Tura®	Ultra Spec Masonry Primer
Sydney Harbour Clearcoat	Tex-Cote Top-Cote™	Ultra Spec Masonry Sealer
Sydney Harbour Duchess Satin	Tex-Cote Trim-Cote®	Ultra Spec Masonry Waterproof Coating
Sydney Harbour Eggshell Acrylic	Tex-Cote Tuff-Guard 99	Uniflex
Sydney Harbour Industrial Lustre	Tex-Cote Ty-Cote™	Up Paint
Sydney Harbour Instant Rust Clear Sealer	Tex-Cote Ultra-Tex™	Ura-Floor Gloss WB Urethane
Sydney Harbour Interno Lime Wash	Tex-Cote Wash-Guard	UV Plus
Sydney Harbour Limeproof Undercoat Sealer	Tex-Cote Wood Primer 27 W	UV Plus for Hardwoods
Sydney Harbour Liquid Copper & Patina Green	Tex-Cote XL70®	Valspar
Sydney Harbour Liquid Iron & Instant Rust	Texcrete Water Repellent	Valspar Anti-Rust
Sydney Harbour Liquid Tin	The Paint Drop™	Valspar Ceiling Paint
Sydney Harbour Low Sheen Acrylic	Thompson's WaterSeal	Valspar Climate Zone
Sydney Harbour Matt Wall Sealer	TileLab Gloss Sealer & Finish	Valspar Color Style
Sydney Harbour Original Lime Wash	TileLab Matte Sealer & Finish	Valspar Decorator
Sydney Harbour Palm Beach Black	TileLab Sealer/Cleaner/Resealer Combo Pack	Valspar Duramax
Sydney Harbour Stone Paint	TileLab Stone Enhancer	Valspar Elan
Sydney Harbour Ultra Flat Acrylic	TileLab SurfaceGard	Valspar Integrity
Sydney Harbour Universal Primer	Timberflex	Valspar Medallion
Sydney Harbour Wood Wash Tack Coat	Timberflex Pro	Valspar Medallion Primers
Temproof 1200 Stove paint	Timber Pro UV Crystal Urethane	Valspar Prep-Step Primers
Tex Cote®	Timber Pro UV Deck & Fence Formula	Valspar Pro 2000 Interior Contractor Finish
Tex-Cote 300	Timber Pro UV Internal Concrete Sealer	Valspar Professional
Tex-Cote 600	Timber Pro UV Internal Wood Stabilizer	Valspar Professional Bonding Primer
Tex-Cote Clear-Seal™	Timber Pro UV Log & Siding Formula	Valspar Professional Exterior
Tex-Cote Color Cote™	Timber Pro UV Masonry Top Sealer	Valspar Professional Exterior Primer
Tex-Cote Color Tex®	TimberSoy Penetrating Natural Wood Stain	Valspar Professional Interior
Tex-Cote Concrete/Masonry Primer	Tough Shield Porch & Floor	Valspar Professional New Construction Primer
Tex-Cote Cool-Tec®	Tough Shield Porch & Floor	Valspar Professional PVA Primer
Tex-Cote Cool-Tex®	Tough Walls Interior Paint	Valspar Restoration Series
Tex-Cote Coolwall®	Tru-flex Concrete Bond Coat	Valspar Signature Colors
Tex-Cote Fade Block Roof with Kynar	Tru-flex Cushion Coat	Valspar Tractor & Implement
Tex-Cote Fade Block Super-Cote	Tru-flex Finish Coat	Valspar Ultra
Tex-Cote Flex-On®	Tru-flex Line Marking Paint	Valspar Ultra Premium
Tex-Cote Graffiti Gard®	Tru-flex Neutral Filler Coat	Valspar Weathercoat
Tex-Cote Hi-Build Textured Primer	Tru Seal	Value
Tex-Cote Hi-Reflective Primer	TRU-SEAL	Van Sickle Barn and Outbuilding Paints
Tex-Cote Metal-Prime™	TruStripe	Van Sickle Exterior Latex (Economy, Premium or Super Premium)
Tex-Cote Rainstopper®	TruStripe All-Star	Van Sickle Exterior Stains
Tex-Cote Re-Cote Primer	TuffCrete Concrete Stain	Van Sickle Floor Enamel
	TuffCrete Concrete Stain	Van Sickle Interior Latex (Economy, Premium or Super Premium)
	TuffCrete Waterproofing Stain	Van Sickle Multi Purpose Enamel
	Two Minute Repair Liquid	Van Votz Hi-Tech Waterproofer
	TWP Mildew Sealer	Vapor Barrier Primer/Sealer
	Ultra Spec 500 Interior Paint	
	Ultra Spec 500 Interior Primer	

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Vasari Lime Paint	Wood Royal Exterior Siding and Trim Stain
Vasari Mineral Primer	Wood Shield
Wall Kote	Woodsmen
Wall Paint	Woodtone Series (various colors)
Wall-Up	Woodturners Finish
Walmart	X-O Rust
WaterBlock Masonry Waterproofer	Yellow Athletic Field Marker
WaterBlock Masonry Waterproofer	ZAP Primers
Waterborne Ceiling Paint	Zar Classic (all Gloss Levels)
Waterborne Swimming Pool Paint	Zar Clear Wood Sealer
Waterlox H2OLox	Zar Deck&Siding Stains Solid and Semi-Transparent (all colors)
Waterlox Original	Zar Exterior Polyurethane (Gloss/Satin)
Waterlox TrueTone	Zar Exterior Stains
Waterlox Urethane	Zar Exterior Water Base Polyurethane (Gloss/Satin)
Waterlox UTOS	Zar Interior Polyurethane (all Gloss Levels)
Waterlox VOC Compliant	Zar Interior Stains
Weather All	Zar Polyurethanes
WeatherSeal	Zar Ultra Exterior Polyurethane (all gloss Levels)
White Athletic Field Marker	Zar Ultra Interior Polyurethane (all Gloss Levels)
White Pickling Stain	Zar Ultra Max OMU (all gloss Levels)
Wood Defender 200 Series Multi-Purpose Semi-Transparent Stain & Seal	Zar Wood Stains (all colors)
Wood Defender 200 Series Multi-Purpose Transparent Stain & Seal	Zinsser SmartCoat
Wood Defender Semi-Solid Latex Stain	Zone Marking Paint
Wood Defender Semi-Transparent Fence Stain & Seal	
Wood Defender Transparent Fence Stain & Seal	
Wood Defender Universal Stain & Sealer	
Wood Defender Wood Glow Water-Based Stain	
Wood Iron Deck, Fence & Siding Stain	
Wood Iron Doors & More Finish	
Wood Iron Exterior Oil Finish	
Wood Iron Generations Water-Based Stain	
Wood Iron Top Coat Finish	
Woodlux Deck + Siding Exterior Stain	
Woodlux Waterproofing Exterior Stain + Sealer	
Woodlux Waterproofing Stain + Sealer	
Wood Royal Exterior Deck & Siding Stain	
Wood Royal Exterior Deck & Siding Toner	
Wood Royal Exterior Deck Stain	

# Appendix B

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## DEFINITION OF PROGRAM PRODUCTS

# DEFINITION OF ARCHITECTURAL PAINT PRODUCTS

## *for the Purposes of the Assessment*

All PaintCare state programs include architectural paint. Vermont, California, and Connecticut are adding additional coatings and coatings-related products to their state programs. To learn more, visit [www.paintcare.org/additional-products](http://www.paintcare.org/additional-products).

Architectural paint is defined under the Paint Stewardship Program as:

*Interior and exterior architectural coatings sold in containers of five gallons or less.*

Architectural paint does not include:

*Industrial maintenance (IM), original equipment manufacturer (OEM) or specialty coatings.*

To distinguish between what is an architectural coating for the purpose of the assessment and what coatings should not be assessed the fee, PaintCare uses definitions and terminology from the U.S. Environmental Protection Agency, California Air Resources Board, and other state and local Architectural and Industrial Maintenance (AIM) rules. To determine the products on which the fee is assessed and the products on which the fee is not assessed, follow these steps:

- A. Start with the type of coating. If the coating is an architectural coating, go to B. If the coating is not an architectural coating, it is not assessed a fee.
- B. If the coating meets the definition of architectural coatings (see below), does not meet the definition of Industrial Maintenance Coatings (also below), and is not specifically excluded, it is assessed a fee.

## I. Architectural Coatings

*Architectural coating* means a coating recommended for application to stationary structures and their appurtenances, portable buildings, pavements, curbs, fields and lawns. This definition excludes adhesives, aerosol coatings and coatings recommended by the manufacturer or importer solely for shop applications or solely for application to non-stationary structures, such as airplanes, ships, boats, and railcars.

## II. Industrial Maintenance Coatings

*Industrial Maintenance (IM) coating* means a high-performance architectural coating, including primers, sealers, undercoaters, intermediate coats, and topcoats formulated and recommended for application to substrates exposed to one or more of the following extreme environmental conditions in an industrial, commercial, or institutional setting:

1. Immersion in water, wastewater, or chemical solutions (aqueous and non-aqueous solutions), or chronic exposure of interior surfaces to moisture condensation;
2. Acute or chronic exposure to corrosive, caustic, or acidic agents, or to chemicals, chemical fumes, or chemical mixtures or solutions;
3. Repeated exposure to temperatures above 120 °C (250 °F);
4. Repeated (frequent) heavy abrasion, including mechanical wear and repeated (frequent) scrubbing with industrial solvents, cleansers, or scouring agents; or
5. Exterior exposure of metal structures and structural components.

One of the primary ways AIM rules distinguish IM coatings from other architectural coatings is the manufacturer's recommendation for restricted usage. IM coatings must be labeled under the rules as:

1. "For industrial use only."
2. "For professional use only."
3. "Not for residential use" or "Not intended for residential use."

Thus, if the product is not intended for and not labeled as an IM coating, it should be deemed a covered architectural coating and the fee should be assessed, unless it is specifically excluded (see next page).

### III. Original Equipment Manufacturer (OEM) Coatings

*Shop application* means that a coating is applied to a product or a component of a product in a factory, shop, or other structure as part of a manufacturing, production, finishing or repairing process (e.g., original equipment manufacturing coatings).

Since OEM (shop application) coatings may be intended but not labeled for industrial or professional use, and may be sold in containers of 5 gallons or less, if a company can clearly document that the coating was sold exclusively for OEM use, the fee should not be assessed. However, if this coating can be sold to a consumer or contractor for other than shop application and/or the use cannot be distinguished via the method of sale, the fee should be assessed.

### IV. Specialty Coatings

Specialty or Special Purpose Coatings, include arts and crafts, and automotive refinish coatings. These products are included as non-assessed products on the list below. The fee should not be assessed for these coatings.

#### Assessed Products (maximum container size of 5 gallons)

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

#### Non-Assessed Products (regardless of container size)

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

# GUIDE TO ADDITIONAL COVERED PRODUCTS

This guide applies exclusively to Vermont, California, and Connecticut. These states have enacted extended producer responsibility (EPR) laws that expand the scope of PaintCare covered products beyond architectural paint. To learn more about the architectural paint program visit [www.paintcare.org](http://www.paintcare.org).

The additional covered products are defined by three categories: **aerosol coatings**, **nonindustrial coatings**, and **coating-related products**, and are further described in this guide. In Vermont and California, manufacturers are required to register any products sold in the state(s) that fall within the three additional product categories. In Connecticut, manufacturers are required to register any aerosol coatings sold in the state.

PaintCare intends to implement the requirements of these laws on behalf of manufacturers of covered products. Manufacturers will be required to register their brands and products with PaintCare, report units sold, add fees to the wholesale price, and remit the associated fees to PaintCare. Fees will be used to cover the cost of managing these materials collected at household hazardous waste programs and other related services (retail collection is not anticipated at this time).

To learn more about the requirements of the law, including manufacturer obligations, please visit <https://www.paintcare.org/manufacturers/>.

## How Do I Know which Additional Products are Covered?

### The products must meet the following basic eligibility criteria:

- The product is a household, commercial, or institutional product sold in a container five (5) gallons or less in size, and is sold at retail including in-person, online, or other electronic sales outlets;
- In Vermont and California:  
The product meets one of the specific definitions for **aerosol coatings**, **nonindustrial coatings**, or **coating-related products** as described in this guide.
- In Connecticut:  
The product meets the specific definition for **aerosol coatings** as described in this guide.

### Products that meet the following criteria are not considered additional covered products:

- Products labeled and intended exclusively for industrial, original equipment manufacturer (OEM), or professional use in a shop application.

## Category Definitions

### I. Aerosol Coatings

#### Aerosol coatings are defined as:

A pressurized coating product containing pigments or resins dispensed by means of a propellant and packaged and sold in a disposable aerosol container for handheld application, and/or for use in specialized equipment for ground traffic or marking applications.

#### Aerosol coatings do not include:

Paint thinner, paint remover, graffiti remover, and/or caulking compounds that contain no appreciable level of opaque fillers or pigments.

The following aerosol coatings products are **included**:

- Clear coating
- Flat coating
- Fluorescent coating
- Metallic coating
- Non-flat coating: satin, semi-gloss, or gloss finish
- Primer
- Specialty coatings: products designed and labeled for specific functional, application, or aesthetic needs (e.g. exact match finish, high temperature, auto and marine, textured)

The following are **not considered** aerosol coatings products:

- Adhesive\*
- Anti-static
- Cleaners or removers
- Dyes, inks, layout fluid
- Lubricants
- Paint thinners, mineral spirits, solvents\*
- Personal care
- Protectant, preservatives, maskants

\*Products not considered aerosol coatings products may still be included as coating-related products. Refer to the coatings-related section in this guide for more information.

## II. Nonindustrial Coatings

### Nonindustrial coatings are defined as:

Coatings that cover a variety of different formulations that each serve a unique purpose or require a particular application. These generally include specialty architectural coatings previously excluded from the PaintCare program, artistic or decorative paints and coatings, and coatings applied to automobiles, boats, or marine structures.

The following nonindustrial coatings products are **included**:

- Arts and crafts paint
- Automotive refinish paint
- Bituminous and asphalt emulsion-based roof and foundation coatings
- Chalkboard paint
- Conductive paint
- Driveway sealer (with and without bituminous/asphalt ingredients)
- Dry fog and dry fall paint
- Glaze
- Fire retardant paint
- Furniture oil and paint
- Lime wash

For more information, visit [www.paintcare.org](http://www.paintcare.org).

- Marine and antifouling paint
- Road and traffic marking paint
- Two-component (2K) coatings
- Wood preservative

### III. Coating-Related Products

#### Coating-related products are defined as:

Materials added to paint and coatings to enhance their performance or application properties, or materials intended to clean, repair, seal, or otherwise repair a surface prior to painting. These products must be sold or marketed for home improvement purposes, which pertain to the repair, remodel, update, addition, or improvement of residential property including a dwelling and its adjacent structures and land.

The following coating-related products are **included**:

- Paint additives: paint conditioner/extender/retarder, fire retardant, insecticide, mildewcide
- Paint thinner
- Paint colorant
- Paint remover: paint stripper or remover, caulk remover, paint residue remover, paint equipment cleaner
- Surface adhesives: sealants, caulk, contact cement, construction adhesives
- Surface preparation: surface cleaners and degreasers, patches/fillers/surface repair, concrete/masonry etchers, wood conditioner
- Surface sealants: rubberized, silicone or elastomeric patch/sealant/leak repair, grout sealer/sealant

The following are **not considered** coating-related products, and are **not included**:

- General purpose glues and adhesives
- Cementitious materials such as grout, mortar and cement
- All-purpose joint compound and products intended to seam or smooth new drywall installation
- Wallpaper adhesives and removers

# Appendix C

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## EXAMPLES OF EDUCATION AND OUTREACH MATERIALS



# 800 MILLION GALLONS

of architectural paint are estimated to be sold in the U.S. each year.

DID YOU KNOW  
**ABOUT 10%**  
GOES UNUSED  
& CAN BE **REUSED OR RECYCLED?**

## WHAT PRODUCTS ARE COVERED?

PaintCare sites accept house paint as well as primers, stains, sealers, and clear coatings, such as shellac and varnish.

All products must be in their original, labeled containers (no larger than five gallons) and must be covered with a secure lid. Certain products are not accepted.

Please call drop-off sites ahead of time to confirm business hours and whether they can accept the type and amount of paint you intend to recycle.

Review the list of accepted products:  
[paintcare.org/products](http://paintcare.org/products)



Scan for more information about the PaintCare program.  
[paintcare.org](http://paintcare.org)



XX-BREN-1125

# Recycle Leftover Paint



# A PROGRAM TO MANAGE LEFTOVER PAINT

PaintCare makes it easy and free to recycle! Created by paint companies, the nonprofit program provides conveniently located drop-off sites—such as paint and hardware stores—in states that pass paint stewardship laws.

The program provides tips for avoiding waste in the first place, storing paint carefully, and using it up.

## WHAT SHOULD I DO WITH LEFTOVER PAINT?

Find your nearest year-round drop-off site by using our online locator at [paintcare.org](https://paintcare.org), or call us at (855) PAINT09. There is no cost for dropping off paint and our sites accept up to 5 gallons per visit (some take more). Store paint carefully to ensure it stays fresh and can be reused or recycled into new paint! There's no longer any reason to dry out paint and throw it away.

Get tips: [paintcare.org/paint-smarter](https://paintcare.org/paint-smarter)

## DO YOU HAVE A PICKUP SERVICE FOR LARGE VOLUMES OF PAINT?

If you have at least 100 gallons of paint to recycle at your business or home, we offer a free large volume pickup service at your location.

Request a pickup: [paintcare.org/pickup](https://paintcare.org/pickup)

## WHAT HAPPENS TO THE PAINT?

PaintCare manages leftover paint responsibly through reuse, recycling, or proper disposal. Most latex paint collected in the program is sent to recycling processors and made into new paint and most oil-based paint is used as fuel.

## WHO CAN USE THE PROGRAM?

Households and businesses in states where PaintCare operates can use the program. Depending on where you live, limits may apply to businesses for oil-based paint.

Learn more: [paintcare.org/business-limits](https://paintcare.org/business-limits)



## WHAT IS THE PAINTCARE FEE?

PaintCare is funded by a fee added to the price of each container of new paint sold in states that have paint stewardship laws. It is applied to the same products that are accepted at PaintCare drop-off sites, and there is no additional cost when dropping off paint.

### FEE RANGES VARY BY CONTAINER SIZE AND BY STATE:

Small containers

e.g., pints & quarts | \$0.30–\$0.65

Mid-sized containers

e.g., 1–2 gallons | \$0.65–\$1.45

Larger sizes

e.g., up to 5 gallons | \$1.50–\$2.75

*The PaintCare fee is not a tax; it does not go to the state. The PaintCare fee is not a deposit; you do not get it back when you drop off paint.*

Find all fees: [paintcare.org/fee](https://paintcare.org/fee)



It's easy to recycle  
your leftover paint,  
stain, and varnish.

Find a drop-off site near you:  
**(855) PAINT09 | [paintcare.org](http://paintcare.org)**



Scan the code above or visit  
**[paintcare.org/drop-off-sites](http://paintcare.org/drop-off-sites)**  
to find your local drop-off site.  
Get tips on how to buy the right  
amount of paint, use up what's  
left, and recycle the rest at  
[paintcare.org/paint-smarter](http://paintcare.org/paint-smarter).

*A nonprofit organization created by paint  
companies, PaintCare is committed  
to making it easy and convenient to  
recycle leftover paint in states with paint  
stewardship laws.*

xx-mcen-0924

Mini Card



# PaintCare®

RECYCLING MADE EASY

## About the Paint Recycling Program

Paint manufacturers created PaintCare, a nonprofit organization, to provide convenient places for households and businesses to recycle leftover paint. PaintCare sets up paint drop-off sites throughout states that pass paint stewardship laws.

### ✔ PAINTCARE PRODUCTS

These products have a fee when you buy them and are accepted for drop-off at no additional cost:

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

*Leaking, unlabeled, and empty containers are not accepted at drop-off sites.*

### PAINTCARE FEE

The PaintCare fee is applied to the purchase price of architectural paint as required by law. The fee funds collection, transportation, and processing costs. The fee is based on container size as follows:

\$0.00	Half pint or smaller
\$0.65	Larger than half pint up to smaller than 1 gallon
\$1.35	1–2 gallons
\$2.45	Larger than 2 gallons up to 5 gallons

### EFFECTIVE MAY 1, 2024

For more information or to find a place to take your unwanted paint for recycling, please ask for the PaintCare brochure, visit [paintcare.org](http://paintcare.org), or call (855) PAINT09.

### ✘ NON-PAINTCARE PRODUCTS

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



# Counter Mat

## Recycle with PaintCare!



**Buy Right:** Consult with painting professionals and retailers to buy the right amount of paint and reduce potential waste.



**Use It Up:** Use up leftover paint on the surface you are painting, on additional painting projects around the house, or give it to someone else in your community.



**Recycle the Rest:** When you can't use up leftover paint, drop it off with PaintCare to get it recycled!

Visit [www.paintcare.org](http://www.paintcare.org) to find a year-round paint drop-off site near you or schedule a large volume pickup.



### What types of paint products can be recycled with PaintCare?

#### PAINTCARE PRODUCTS

The following are products included in the program. When purchased, the PaintCare fee is applied. These products are accepted at no additional cost when dropped off at PaintCare's participating drop-off sites.

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

#### NON-PAINTCARE PRODUCTS

The following are non-PaintCare products and are not included in the program. When purchased, the PaintCare fee is not applied. They are not accepted at PaintCare's participating drop-off sites.

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

*Containers that are leaking or empty, and containers without the original printed manufacturer's label are not accepted at retail drop-off sites.*

#### PROGRAM FUNDING

The PaintCare fee is applied to the purchase price of architectural paint sold in Vermont as required by law. The fee is based on container size as follows:

Half pint or smaller	\$0.00
Larger than half pint up to smaller than 1 gallon	\$0.65
1-2 gallons	\$1.35
Larger than 2 gallons up to 5 gallons	\$2.45

# Recycle Paint at This Store



## ✓ PAINTCARE PRODUCTS

*Paint must be in sealed, original container with original manufacturer label.*

- House paint and primers (latex or oil-based)
- Stains
- Deck and concrete sealers
- Clear finishes (e.g., varnishes, shellac)

## ✗ NON-PAINTCARE PRODUCTS

*No leaking, unlabeled, or empty containers*

- No aerosol coatings
- No drums or containers larger than 5 gallons
- We cannot accept other hazardous waste or chemicals such as paint thinner, solvents, motor oil, spackle, glue, adhesive, roofing tar, pesticides, cleaning chemicals

**Paint is accepted during business hours only. Staff will check all products before accepting.**



For a complete list of PaintCare Products, scan the code, ask for the PaintCare brochure, visit [www.paintcare.org](http://www.paintcare.org), or call (855) PAINT09.



**PaintCare®**  
RECYCLING MADE EASY



**PaintCare®**

RECYCLING MADE EASY

# We are a PaintCare Partner

The fee on the sale of paint in Vermont funds our program.

*Recycle with PaintCare*

To learn more, visit [paintcare.org](http://paintcare.org)  
or call (855) PAINT09.





# PaintCare™

RECYCLING MADE EASY

## ✓ PaintCare Products

*These products have a fee when you buy them and are accepted for drop-off at no additional cost:*

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

Products must be in original containers with original labels.  
Latex paint that is dried out and "rock hard" is also acceptable.

## ✗ Non-PaintCare Products

*These products do not have a fee when purchased and are not accepted at drop-off sites:*

- Paint thinners, mineral spirits, solvents
- Aerosol paints (spray cans)
- Auto and marine paints
- Arts and crafts paints
- Caulk, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar, and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
- Original Equipment Manufacturer (OEM) (shop application) paints and finishes

Leaking, unlabeled, and empty containers are not accepted at drop-off sites.

To learn more, please call **(855) PAINT09** or visit [www.paintcare.org](http://www.paintcare.org)

**See a staff member for assistance before dropping off paint for recycling.**



XX-MAR-2021

**NO DUMPING**

**STOP!**  
**IT'S ILLEGAL**  
**to dump or abandon**  
**Paint, Oil, or other**  
**Hazardous Waste**



**THIS AREA MAY BE UNDER**  
**VIDEO SURVEILLANCE**

**Violators Will Be Prosecuted**

# LARGE VOLUME PICKUP (LVP) SERVICE

Free Pickups for 100+ Gallons of Leftover Paint



In states where PaintCare operates, households, businesses, and others who have accumulated a large volume of paint may be eligible for PaintCare's free large volume pickup service (LVP) for 100 or more gallons, measured by container size, not liquid volume.

## How to Request an LVP



### 1 Sort and count your paint

Tally the number of each container size and the type of products you have, sorted into two categories:

- Water-based paints and stains
- Oil-based paints and stains and any other program products (sealers and clear top-coat products, such as varnish and shellac)



### 2 Fill out the request form

Fill out the LVP request form at [www.paintcare.org/pickup](http://www.paintcare.org/pickup). Call PaintCare at (855) PAINT09 if you need assistance using the web form.



### 3 Schedule your pickup

PaintCare staff will either approve your site for a pickup or inform you of the best place to take your paint if you do not meet the requirements. If approved, we will connect you with our licensed transporter to schedule a pickup. It may be several weeks before your pickup occurs.



### 4 Prepare for your pickup

Sort your products into the two categories as noted above and store them in an area that has easy access for the transporter. The path should be at least four feet wide to accommodate movement of the paint collection bins.

On the day of your pickup, the transporter is responsible for packing the paint into the bins. Once your paint is properly packed and loaded onto the transporter's truck, you will sign a shipping document and receive a copy for your records. Your paint will then be taken to an authorized facility for processing.

To view a full list of accepted products, please visit [www.paintcare.org/products](http://www.paintcare.org/products). For non-PaintCare products, households should reach out to their local Household Hazardous Waste facility and businesses should contact a licensed hazardous waste transportation company.



### Drums and Bulked Paint Are Not Accepted

PaintCare only accepts paint in containers that are 5 gallons or smaller in size. Leave paint in original cans with original labels; do not combine or bulk paint from small cans into larger ones.



With the exception of businesses in Illinois, to use the PaintCare program for oil-based paint, a business must qualify as an exempt generator under federal and any analogous state hazardous waste generator rules. Please visit [www.paintcare.org/business-limits](http://www.paintcare.org/business-limits) for more information on exempt generator rules. If your business does not qualify as an exempt generator, it will not be able to use the program for oil-based paint, but it can still use the program for latex products. (Non-exempt generators may use the pickup service in New York. Contact PaintCare for details.)

For more information, visit [www.paintcare.org](http://www.paintcare.org).

# Information for PAINTING CONTRACTORS



PaintCare is a nonprofit organization created by paint companies to help consumers manage leftover paint responsibly. We provide drop-off sites and pickups where households and businesses can clear out leftover paint free of charge for recycling, reuse, and other management.



## Convenient Drop-Off Sites

Contractors and their clients can bring paint to PaintCare's drop-off sites year-round. Most sites accept up to 5 gallons per visit; some take more. Find the nearest drop-off sites at [www.paintcare.org/drop-off-sites](http://www.paintcare.org/drop-off-sites).

## Fee and Funding

Paint stewardship laws require a fee to be added by manufacturers to the wholesale price of all paint covered products sold in the states where PaintCare operates. The fee funds PaintCare program operations including paint collection and recycling, consumer education, and program administration.

Fee ranges vary by container size and by state. To find the fee ranges applicable to the products you are purchasing, please visit [www.paintcare.org/fee](http://www.paintcare.org/fee).

The PaintCare fee is only added to the products collected by the program. Visit [www.paintcare.org/products](http://www.paintcare.org/products) for the complete list of accepted and unaccepted products.



## Free Pickup Service for Large Volumes

Painting contractors with at least 100 gallons of leftover paint may qualify for a free pickup. Learn more and request an appointment at [www.paintcare.org/pickup](http://www.paintcare.org/pickup).



**Small containers**  
(e.g., pints & quarts)  
\$0.30–\$0.65



**Mid-size containers**  
(1–2 gallons)  
\$0.65–\$1.45



**Larger sizes**  
(up to 5 gallons)  
\$1.50–\$2.75

## Recommendations for Contractors

When estimating jobs, contractors should take the PaintCare fee into account by checking with suppliers to make sure their quotes for paint products include the fee. PaintCare suggests that painting contractors pass on the fee to customers in order to recoup the cost. Tell customers that quotes include the fee which funds the recycling program they can use.



With the exception of businesses in Illinois, to use the PaintCare program for oil-based paint, a business must qualify as an exempt generator under federal and any analogous state hazardous waste generator rules. Please visit [www.paintcare.org/business-limits](http://www.paintcare.org/business-limits) for more information on exempt generator rules. If your business does not qualify as an exempt generator, it will not be able to use the program for oil-based paint, but it can still use the program for latex products. (Non-exempt generators may use the pickup service in New York. Contact PaintCare for details.)

For more information, visit [www.paintcare.org](http://www.paintcare.org).

# Become a RETAIL DROP-OFF SITE



PaintCare is a nonprofit organization created by paint companies to help consumers manage leftover paint responsibly. PaintCare sets up convenient drop-off locations for unwanted or leftover paint throughout each state with a paint stewardship law.

## Benefits for PaintCare Drop-Off Sites

- Make recycling of leftover paint more convenient for your customers
- Support the paint industry's effort to lead the way in being responsible for end-of-life management of its products
- Put leftover paint to a beneficial use and keep it out of landfills
- Promote your store's environmental responsibility
- Increase customer foot traffic and sales opportunities
- Help relieve local government of their cost of managing leftover paint
- Be advertised by PaintCare on their website and in consumer outreach efforts
- Help your state conserve resources, keep paint out of the waste stream, and prevent the improper disposal of paint in your community

## Drop-Off Sites receive free of charge

- Reusable paint collection bins
- Paint transportation and processing services
- Training materials and staff training at your site
- Program brochures, signage, and customer education materials
- Paint spill kits
- Listing of your store as a drop-off site on our website and in advertisements and promotional materials

## Drop-Off Site Responsibilities

- Provide secure storage area for paint collection bins
- Accept all brands of leftover PaintCare products from the public during regular business hours
- Place only PaintCare products in paint collection bins, taking care not to open containers
- Keep paint collection bins neat and properly packed
- Complete minimal paperwork related to tracking outgoing paint shipments
- Ensure all staff maintain training on PaintCare program guidelines and operating procedures
- Display "drop-off site" signs in store window and provide consumers education materials about the program



Most drop-off sites are paint and hardware stores; others are waste transfer stations, recycling centers, landfills, and household hazardous waste (HHW) facilities. There are more than 2,400 drop-off sites across all PaintCare programs.

Participation as a drop-off site is voluntary. However, all retailers in active PaintCare states should 1) be aware of the program, 2) know that the PaintCare fee is applied to the price of architectural paint products, and 3) know that drop-off sites are available throughout the state.

## Interested in Becoming a Drop-Off Site?

Fill out the interest form online at  
[www.paintcare.org/drop-off-site-interest-form](http://www.paintcare.org/drop-off-site-interest-form).



For more information, visit [www.paintcare.org](http://www.paintcare.org).

# VERMONT PAINT STEWARDSHIP

for Retailers



PaintCare is a nonprofit organization created by paint companies to help consumers manage leftover paint responsibly. PaintCare sets up convenient drop-off locations for unwanted paint throughout each state with a paint stewardship law. Funding for each program comes from a fee applied to the price of paint sold in the same state.

## Participation as a Drop-Off Site is Voluntary

Paint retailers are encouraged to participate as paint drop-off sites. Participating can increase foot traffic and provide an environmentally responsible service for retailers' customers by making it convenient for them to recycle leftover paint. Store staff will screen and accept paint from the public. All supplies, including collection bins, as well as transportation and recycling of the paint, and site training, will be provided by the PaintCare program. PaintCare also promotes sites to the local community.

To become a drop-off site, fill out the interest form: [www.paintcare.org/drop-off-site-interest-form/](http://www.paintcare.org/drop-off-site-interest-form/)

## Requirements of Retailers



### 1. Check Registered Manufacturers and Brands

Paint manufacturers must register their company with PaintCare, and they must register all architectural paint brands they sell in the state. Retailers may not sell architectural paints in Vermont that are not registered. PaintCare publishes lists of registered brands and manufacturers on its website so retailers can check to make sure that the products they sell are registered. Please visit [www.paintcare.org/manufacturers](http://www.paintcare.org/manufacturers) for current registration lists.



### 2. Pass on the PaintCare Fee

State law requires that a stewardship fee (PaintCare fee) be applied by manufacturers to the wholesale price of architectural paint sold in store and online in Vermont. This fee pays for all aspects of running the program. The fee is remitted by manufacturers to PaintCare. Manufacturers then pass the fee to their dealers and retailers, who add it to the wholesale price of covered products. Retailers should see the PaintCare fee on invoices from suppliers. The law also requires that retailers and distributors apply the fee to the price of architectural paint they sell in stores and online. The fee paid by the customers to the retailers offsets the fee charged to the retailers. This ensures a level playing field for all parties.



### 3. Provide Information to Customers

Paint retailers in Vermont are required by law to provide customers with information regarding the program and how paint is managed. The requirement to provide paint stewardship information at the time of purchase applies to both in store paint retail and online paint retail. PaintCare has developed educational materials that meet state requirements and provides them free of charge to all paint retailers and others wishing to distribute them.

## Fee ranges vary by container size:



**\$0.00**

Half pint or smaller



**\$0.65**

Larger than half pint up to smaller than 1 gallon



**\$1.35**

1–2 gallons



**\$2.45**

Larger than 2 gallons up to 5 gallons

## COMMON QUESTIONS

### How is the fee calculated?

The fee is set to cover the cost of a fully operating program. PaintCare estimates the annual program expenses and sales of architectural paint in Vermont and determined a fee structure that will provide the revenue needed to fund the program. PaintCare is a nonprofit organization and operates programs on a state-by-state basis, so the fee may increase or decrease in the future and is different from state to state.

### Is sales tax applied to the fee itself?

Yes, the fee is part of the purchase price; therefore, sales tax is collected on the fee. The fee itself is not a tax.

### Is the fee a deposit to be returned to customers?

**The fee is not a deposit.** The fee is used entirely to cover the expenses of running the program. The fee is not given back as a deposit for dropping off covered products or empty paint cans (empty cans are not accepted by the PaintCare program).

### Are we required to show the fee on receipts?

While it's not required, PaintCare encourages retailers to list the PaintCare fee on purchase receipts to aid in consumer education, and most stores do so. Most states have enacted price accuracy statutes that govern the nature of pricing information that must be disclosed to consumers. Retailers should be mindful that regulators in some states may view their state's laws as requiring retailers to incorporate the PaintCare fee in the product price displayed to consumers, regardless of whether a retailer chooses to break the PaintCare fee out separately on purchase receipts. For more information, visit [www.paintcare.org/pricinglaws](http://www.paintcare.org/pricinglaws).

### Do we refund the fee if a product is returned?

Yes, the fee should be refunded because it is part of the purchase price.

### How does the public know about the fee?

PaintCare provides printed materials for retailers to distribute to the public to help explain the purpose of the fee, how the program works, and how to find a paint drop-off site. Translated materials are available in Spanish and over two dozen other languages, provided upon request. Additional materials can be ordered as needed for no charge. In addition to retailers, PaintCare works with contractor associations to inform professional painting contractors and conducts general outreach campaigns that may include digital and online advertising, direct mail, newspaper, radio, and television.

### What products are covered?

PaintCare sites accept house paint as well as primers, stains, sealers, and clear coatings, such as shellac and varnish. All products must be in their original, labeled containers (no larger than five gallons) and must be covered with a secure lid. Certain products are not accepted. Review the list of accepted products at [www.paintcare.org/products](http://www.paintcare.org/products).

#### Contact

Agnes Barsalow  
Program Coordinator (Maine & Vermont)  
(802) 245-4821  
[abarsalow@paint.org](mailto:abarsalow@paint.org)



For more information, visit [www.paintcare.org](http://www.paintcare.org).

## THE PAINTCARE FEE

PaintCare is a nonprofit organization created by paint companies to help consumers manage leftover paint responsibly. PaintCare sets up convenient drop-off locations for unwanted paint throughout each state with a paint stewardship law. Funding for each program comes from a fee applied to the price of paint sold in the same state.

### Fee and Funding

Paint stewardship laws require retailers to add a fee to architectural paint products and make sure they are not selling unregistered brands of architectural paint. The fee is applied to the purchase price of each container of architectural paint sold. It funds all aspects of the PaintCare program including collection, transportation, and processing of unused postconsumer (leftover) architectural paint, public education about proper paint management, and administrative costs.

The fee is paid to PaintCare by paint manufacturers. This fee is then added to the wholesale and retail purchase price of paint, passing the cost of managing postconsumer paint to everyone who purchases paint. This reduces local and state government costs for paint management and provides funding for a more convenient, statewide paint management program.

#### Fee ranges vary by container size and by state:



**\$0.30–\$0.65**

Larger than half pint up to  
smaller than 1 gallon



**\$0.65–\$1.45**

1–2 gallons



**\$1.50–\$2.75**

Larger than 2 gallons  
up to 5 gallons

The PaintCare fee is not a tax; it does not go to the state. The PaintCare fee is not a deposit; customers don't get it back when dropping off paint. Find all fees at [www.paintcare.org/fee](http://www.paintcare.org/fee).

### Setting the Fee

When a new program starts, the fee is set to cover the cost of a fully implemented program. PaintCare estimates annual sales of paint in each state and then divides the cost of the program in that state by the number of containers sold in that state. Next, the fee is adjusted based on container size by taking into consideration the typical percentage of unused paint for each size (e.g., the percentage of unused paint from one 5-gallon container is typically less than from five 1-gallon containers).

PaintCare is a nonprofit organization, so the fee may be decreased if set at a level beyond what is needed to cover program expenses. Likewise, the fee may be increased if PaintCare does not collect enough revenue to cover the costs to operate the state program.

### Passing on the Fee

Each state or jurisdiction's law requires retailers to pass on the fee to consumers, ensuring a level playing field for all parties. This requirement includes paint sold online on any e-commerce websites.

### Recommendations for Painting Contractors

When estimating jobs, painting contractors should take the PaintCare fee into account by checking with suppliers to make sure their quotes for paint products include the fee. PaintCare suggests that painting contractors pass on the fee to customers in order to recoup the fee they pay. Tell customers that quotes include the fee which funds the recycling program they can use.



## Common Questions

### **Are retailers required to show the fee on receipts?**

While it's not required, PaintCare encourages retailers to list the PaintCare fee on purchase receipts to aid in consumer education, and most stores do so. Most states have enacted price accuracy statutes that govern the nature of pricing information that must be disclosed to consumers. Retailers should be mindful that regulators in some states may view their state's laws as requiring retailers to incorporate the PaintCare fee in the product price displayed to consumers, regardless of whether a retailer chooses to break the PaintCare fee out separately on purchase receipts. For more information, visit [www.paintcare.org/pricinglaws](http://www.paintcare.org/pricinglaws).

### **Is the fee taxable?**

Yes, the fee is part of the purchase price of paint. Sales tax is collected on the fee in most cases, except in Oregon, a state that does not have a sales tax, and Maine, per supplemental legislation.

### **Is the fee to be applied to paint sold to customers who are exempt from sales tax?**

Yes, government agencies and other organizations that are exempt from sales tax in PaintCare States must still pay the fee, because it is part of the price of paint. However, the fee, like the rest of the product price, should not be taxed for sales tax-exempt organizations.

### **Do retailers return the fee if someone returns a product?**

Yes. The fee should be returned as part of the purchase price.

### **How does the public know about the fee?**

PaintCare provides public education materials to retailers. These materials explain the purpose of the fee, where to take paint for recycling, and other information about the program. When a new state program begins, PaintCare mails a package of materials to retailers. As needed, retailers may order additional free materials from PaintCare at any time. In addition to retailer information, PaintCare works with contractor associations to provide information to trade painters and conducts general outreach including newspaper, radio, television, and online advertising.

### **How do we as retailers know what products to put the fee on?**

Suppliers' invoices should indicate that you are being charged the fee, so you simply pass on the fee for those items. Additionally, PaintCare and each state's oversight agency list all architectural paint manufacturers and brands that are registered for the program on their websites. Retailers may not sell brands that are not registered with the program. If your store sells architectural coatings that are not on the list of registered products, please notify PaintCare so we can contact the manufacturer to get them registered.

### **What products are covered?**

The products accepted at PaintCare drop-off sites are the same products that have a fee when they are sold. PaintCare sites accept house paint as well as primers, stains, sealers, and clear coatings, such as shellac and varnish. All products must be in their original, labeled containers (no larger than 5 gallons) and must be covered with a secure lid. Certain products are not accepted. Review the list of accepted products at [www.paintcare.org/products](http://www.paintcare.org/products).

### **For New Programs: Do we apply the fee to sales on the first day of the program for inventory purchased before the first day of the program, even though we didn't pay a fee for the product to the distributor or manufacturer?**

Yes, retailers must add the fee on all covered products sold on or after the first day of the program, regardless of when (before or after program launch) they were purchased from the distributor or manufacturer.

For more information, visit [www.paintcare.org](http://www.paintcare.org).

PaintCare is a nonprofit organization created by paint companies to help consumers manage leftover paint responsibly. PaintCare sets up convenient drop-off locations for unwanted paint throughout each state with a paint stewardship law. Most PaintCare sites are paint and hardware stores, but solid waste facilities including transfer stations, recycling centers, landfills, and household hazardous waste (HHW) facilities also participate.

To become a drop-off site, fill out the interest form: [www.paintcare.org/drop-off-site-interest-form/](http://www.paintcare.org/drop-off-site-interest-form/).

## Benefits for PaintCare Drop-Off Sites

- Transportation and recycling costs of accepted products are paid by PaintCare
- Recycling leftover paint is more convenient for customers
- Help relieve local government of their cost of managing leftover paint
- Conserve resources, keep paint out of the solid waste stream, and prevent the improper disposal of paint
- Optional: offer paint in good condition for reuse and receive reimbursement: [www.paintcare.org/paintshare](http://www.paintcare.org/paintshare)

## Drop-Off Site Responsibilities

- Provide secure storage area for paint collection bins
- Accept all brands of leftover PaintCare products from the public during operating hours
- Place only PaintCare products in paint collection bins
- Keep paint collection bins neat and properly packed
- Complete minimal paperwork related to tracking outgoing paint shipments
- Ensure all staff maintain training on PaintCare drop-off site guidelines and operating procedures

## PaintCare Provides

- Reusable paint collection bins
- Training materials and staff training at your site
- Program brochures, signage, and customer education materials
- Listing your drop-off site on PaintCare website and in ads and promotional materials (optional)
- Compensation for value-added services including paint reuse programs and bulking of oil-based paint

## Common Questions

### Will becoming a PaintCare drop-off site require operational changes?

No. Your facility may continue to restrict who can access the paint collection program at your site. If your facility only serves a specific geographic region (e.g., towns, cities, or counties), you will not be required to serve customers that live outside of that area. Similarly, if your facility is not permitted to accept business waste, you will not be required to do so. (PaintCare retail sites accept paint from households and businesses.)

### How do billing and payments work?

In the most common scenario, when your site ships out PaintCare products, the transporter sends PaintCare an invoice directly. This avoids the need for reimbursement. If your site also contracts with PaintCare for value-added services such as paint reuse, your program sends an invoice to PaintCare for reimbursement.

### What products are covered?

PaintCare sites accept house paint as well as primers, stains, sealers, and clear coatings, such as shellac and varnish. All products must be in their original, labeled containers (no larger than five gallons) and must be covered with a secure lid. Certain products are not accepted. Review the list of accepted products at [www.paintcare.org/products](http://www.paintcare.org/products).

### Water-Based (Latex) Paint is a Resource

PaintCare aims to conserve resources by maximizing paint recycling. HHW programs that previously did not accept water-based paint now have a better solution than encouraging consumers to dry it out and place it in the trash.

# SOLID WASTE FACILITIES INCLUDING TRANSFER STATIONS, RECYCLING CENTERS, AND LANDFILLS



PaintCare is a nonprofit organization created by paint companies to help consumers manage leftover paint responsibly. PaintCare sets up convenient drop-off locations for unwanted paint throughout each state with a paint stewardship law. Most PaintCare sites are paint and hardware stores, but solid waste facilities including transfer stations, recycling centers, landfills, and household hazardous waste (HHW) facilities also participate.

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## Drop-Off Site Responsibilities

- Provide secure storage area for paint collection bins
- Accept all brands of leftover PaintCare products from the public during operating hours
- Place only PaintCare products in paint collection bins, taking care not to open containers
- Keep paint collection bins neat and properly packed
- Complete minimal paperwork related to tracking outgoing paint shipments
- Ensure all staff maintain training on PaintCare drop-off site guidelines and operating procedures

## PaintCare Provides

- Reusable paint collection bins
- Training materials and staff training at your site
- Program brochures, signage, and customer education materials
- Listing your drop-off site on PaintCare website and in ads and promotional materials (optional)

## Common Questions

### Will becoming a PaintCare drop-off site require operational changes?

No. Your facility may continue to restrict who can access the paint collection program at your site. If your facility only serves a specific geographic region (e.g., towns, cities, or counties), you will not be required to serve customers that live outside of that area. Similarly, if your facility is not permitted to accept business waste, you will not be required to do so. (PaintCare retail sites accept paint from households and businesses.)

### How can PaintCare benefit Solid Waste Facilities?

Solid waste facilities that generate leftover paint but are not PaintCare drop-off sites can use PaintCare's drop-off sites or free pickup service for 100+ gallons of paint.

### What products are covered?

PaintCare sites accept house paint as well as primers, stains, sealers, and clear coatings, such as shellac and varnish. All products must be in their original, labeled containers (no larger than five gallons) and must be covered with a secure lid. Certain products are not accepted. Review the list of accepted products at [www.paintcare.org/products](http://www.paintcare.org/products).

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# JOINT OUTREACH PROJECTS

for government agencies partnering with PaintCare



If you are a local government that has partnered with PaintCare, we offer limited funding support for outreach activities that promote the PaintCare program. We are most interested in partnering with you when setting up new PaintCare sites, where participation is low, or to promote one-day household hazardous waste events to boost the amount of paint collected. We support costs for radio, newspaper, social media, and direct mail, and will consider other media.

## Joint Outreach Application Process

Project budgets and all creative work must be reviewed and approved by PaintCare. Creative work includes text, images, and scripts. All projects must include PaintCare's website address and logo and mention that other PaintCare drop-off sites can be found at [www.paintcare.org](http://www.paintcare.org). Please complete our Proposal Form for Joint Outreach Projects on the Waste Facilities page at [www.paintcare.org/waste-facilities](http://www.paintcare.org/waste-facilities) or email [smeteer@paint.org](mailto:smeteer@paint.org) with questions. PaintCare can provide artwork and photos you can use for creating drafts.

## Your Responsibilities

At the start of each project, we request that you provide PaintCare with draft text, dimensions and/or specs, and due dates for the materials.

- **Brochures & Postcards:** You are responsible for sending artwork files to your printer, coordinating mailings, and distribution. After the project is completed, we request a description of how, when, and where the piece was distributed and an electronic copy of the final piece.
- **Newspaper:** You are responsible for scheduling and sending artwork files to the newspaper. After the project is completed, we request a list of run dates for each newspaper and a scan of each ad.
- **Radio:** You are responsible for providing the pre-approved scripts to the stations and handling scheduling. After the project is completed, we request you provide text of the final script with a list of run dates and times.
- **Digital Media & Other:** We are open to other types of projects such as digital advertising and social media campaigns, as well as other forms of outreach. Please coordinate details in advance and send PaintCare supporting documentation along with your invoice so we have a record of the projects and examples to show others.

## Design Assistance

PaintCare can assist with basic layout and graphic design for print and digital projects. When we provide this type of assistance, we will provide electronic files for you to send for printing or ad placement. Other than editing and commenting on scripts, we do not provide in-house assistance with audio or video production. Please allow plenty of time for project planning, approvals, and editing. Depending on the time of year, this may take 4–8 weeks.

## Reimbursement

PaintCare provides reimbursements for approved projects only. We do not provide money up front, pay vendors directly, or accept requests for reimbursements on projects that have already been completed. Generally, PaintCare will reimburse costs for approved projects proportional to the amount of the project dedicated to PaintCare information. Funding amounts may also differ depending on available resources and our other outreach taking place in your area.

To be reimbursed after the project is completed, send an invoice from your government agency, samples of final pieces, and copies of invoices from your vendors to [paintcare@bill.com](mailto:paintcare@bill.com) and copy Stacy Meteer at [smeteer@paint.org](mailto:smeteer@paint.org). The "To:" space on the invoice should be addressed to PaintCare, 901 New York Ave NW, Suite 300 West, Washington DC, 20001. In the space for purchase orders please write "6369 Communications: Other, Joint Projects – *[INSERT YOUR STATE]*"

For more information, visit [www.paintcare.org](http://www.paintcare.org).

# REUSE PROGRAMS

## Compensation and Reporting



PaintCare encourages household hazardous waste programs (i.e., swap shops or exchanges) and reuse stores to operate paint reuse programs. Reuse programs return good quality, unused paint to the local community at low or no cost. Reuse is a preferred method of waste management. To encourage reuse, PaintCare will compensate paint drop-off sites operating a reuse program under a contract with PaintCare.

### Operating a Reuse Program

Any PaintCare products (qualifying paint, stain, and varnish as defined by PaintCare – please see [www.paintcare.org/products](http://www.paintcare.org/products)) that are distributed through reuse programs must be in their original container, have an original label, and be in good physical and aesthetic condition. Contents must be liquid and relatively new. Containers should be closed securely before being placed in the reuse storage area.

Customers must sign a waiver form explaining that the paint is taken “as-is” with no guarantee of quality or contents. The customer is required to read, complete, and sign the form, and site staff members are required to verify and record what has been taken by the customer. If a reuse facility does not use a waiver form, the facility accepts the liability for the materials. The staff must record the number of containers taken by each participant and the total estimated volume on the log.



*Reuse room at the Household Hazardous Waste Facility at the Yolo County Central Landfill in Woodland, CA.*

### Track and Report by Volume (gallons)

- Containers may contain any amount of paint in them
- Sites must determine and report total gallons of latex paint and total gallons of oil-based paint distributed for reuse
- Compensation is provided at \$1.60 per gallon

The site must track and report the actual volume of paint in the containers using an internal methodology (e.g., weigh the cans on a scale, estimate weight by hand, do visual inspection). The methodology must be provided to PaintCare upon request.

For more information, visit [www.paintcare.org](http://www.paintcare.org).

# Appendix D

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## DROP-OFF SITE GUIDELINES AND FORMS



# Vermont State Guidelines

**To Storage Time Limit:** 1 year

**Spill Reporting:** Document the date, location, amount, and type of PaintCare product spilled. Report any spill or release of two (2) gallons or more of oil-based paint to the environment to:

- VT Agency of Natural Resources, Waste Management and Prevention Division.
  - Regular business hours: (802) 828-1138
  - Vermont Emergency Management 24/7: (800) 641-5005
- PaintCare within 24 hours of any report

### Basic Local Emergency Contacts

Facility Emergency Coordinator  
(name/phone):

Alternate Emergency Coordinator (name/phone):

Fire Department Phone Number

Police Phone Number

Hospital Phone Number

911
911

**\*\*These State-Specific Guidelines are not intended to replace or supersede the requirements that Drop-Off Sites must follow pursuant to their state-issued permits, registrations, or other applicable law. Applicable laws and regulations take precedence if there is a conflict with these State-Specific Guidelines\*\***



# Drop Off Site Guidelines

This document contains detailed information on PaintCare’s program guidelines and operations procedures. In combination with the state-specific guidelines, it is designed to be used by new staff for self-training and for site refresher training without PaintCare staff.

Note: The supplemental training slides included in the training binder summarize only the most important information from these Drop-Off Site Guidelines. The slides are used during training by PaintCare staff and can also be used to supplement refresher training.

Adherence to these guidelines is critical for drop-off sites participating in the program. Exceptions to these guidelines can be made only with PaintCare’s express written permission. If your site is unable to comply with any of these guidelines, please contact your PaintCare representative so that we may try to find a solution that works for your site but still achieves compliance with applicable legal and operational requirements for the program.

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# Section 1. Training and Safety

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## Training

For the safety of the program and your staff, all employees handling PaintCare products must receive training in product identification, acceptance, handling, packaging, inspection, and emergency response procedures before collecting PaintCare products or engaging in any PaintCare program activities.

Training helps ensure that employees:

- Conduct PaintCare products collection activities in a safe manner that protects workers and the environment
- Are equipped for and understand hazards associated with PaintCare products

Training plans and records should be maintained for each employee. Record staff training using the log included in the training binder.

## Safety

Store personal protective equipment (PPE) and spill response equipment in an accessible location adjacent to the collection bins. Ensure those materials are protected from impacts of weather.

The drop-off site must be equipped with appropriate emergency response equipment including a fire extinguisher, spill kit, and PPE. Monthly inspections of equipment are recommended.

PaintCare products collection activities need to follow general safety practices including proper lifting techniques.

Post emergency procedures and emergency contact numbers including police, fire department, and emergency services by a phone and in close proximity to the collection bins, if possible.

If applicable, develop and maintain an emergency action plan as required by OSHA.

If required by federal, state, or local law, familiarize police, fire departments, and emergency response teams with the layout of your facility, properties of PaintCare products handled at your facility, and evacuation routes.

## Section 2. General Guidelines

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### PaintCare Provides Your Site:

- Training binder with recordkeeping logs/forms
- Signage identifying your site as a PaintCare drop-off site
- Printed educational materials for the public

### PaintCare's Transporter Provides Your Site:

- Paint collection bins and liners for cardboard/single-use collection bins
- Labels and/or markings for paint collection bins
- Spill kits (excluding HHW programs)

### General Guidelines for Drop-Off Sites

Each PaintCare drop-off site has unique logistical and operational considerations. Each drop-off site must make its own decisions and use its best judgment to operate in the safest manner possible in accordance with applicable law. To ensure the highest standards of safety for you and your staff, drop-off sites must:

- Have appropriate signage that informs the public of the hours of operation
- Accept PaintCare products from participants during your regular advertised or posted operating hours
- Display PaintCare signage to identify you as a drop-off site; signage should be posted in a highly visible area, at the entrance of your site
- Assist and supervise participants when they visit to drop off PaintCare products. Site staff should greet participants and must verify eligibility of the participant and their leftover paint products as PaintCare products
- **IMPORTANT:** Never allow a participant to open a PaintCare product container
- Have adequate space, staffing, and training to collect and store PaintCare products
- Provide a secure space for empty and full collection bins
- Place all PaintCare products immediately in collection bins approved for use by PaintCare and its transporters
- Pack only PaintCare products into collection bins
- Schedule shipments of PaintCare products from your drop-off site
- Maintain all records relating to the program
- Train staff to be familiar with the requirements and practices of this guide

# Section 3. Collection Bins and Storage Area

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## Storage Area and Collection Bin Placement

Establish a dedicated storage area for collection bins and PaintCare products.

Place collection bins on an impermeable surface (i.e., paved asphalt, concrete, or other surface) at all times.

Place collection bins away from ignition sources, storm drains, and floor drains.

Ensure there is adequate ventilation if bins are stored indoors.

If stored outdoors, protect collection bins from the elements (e.g., precipitation, temperature extremes, rain, and snow). Keep collection bins under cover to prevent exposure to precipitation to protect against temperature extremes. If you store collection bins outdoors, you may need approval from your local fire or hazardous materials oversight agency.

Comply with any local fire codes or other regulations that might pertain to your storage of collection bins at your site.

Maintain enough space around collection bins to inspect for leakage and emergency access.

Use good housekeeping standards; keep paint storage areas clean and orderly.

## Setting Up, Packing and Maintaining Collection Bins

Collection bins must be set up, used, and closed according to the manufacturer's instructions. PaintCare's transporters should set up the collection bins that they provide, unless otherwise requested by the drop-off site staff.

Ensure liners are inserted in cardboard collection bins. The liners provide secondary containment to contain liquids in the event a can leaks while in storage or transit. Reusable plastic bins that are leak-proof by design do not need liners.

Collection bins must be structurally sound. If you see any evidence of damage to bins (or liners) that may cause a leak or spill, notify PaintCare immediately.

Mark the collection bin with the date the first PaintCare product is placed in it.

Place PaintCare products in bins immediately upon receipt. Keep collection bins closed except when adding PaintCare products.

Pack 5-gallon buckets on the bottom layer of the collection bins for stability.

Pack all PaintCare products (cans, buckets) upright and as tight as possible in the collection bins to protect contents from shifting and leaking in transit.

Do not open containers to verify product.

Do not overfill collection bins; allow enough space for a lid to fit securely.

Do not take PaintCare product out of the bin.

### **Security**

Never allow "self-serve," public access to the collection bins.

The collection bin storage area must be secured and locked when not attended.

Only drop-off site staff should have access to the collection bins and storage area until the collection bins are ready for pick-up by PaintCare's transporter.

# Section 4. Identifying and Accepting PaintCare Products

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## What are PaintCare Products

PaintCare drop-off sites should accept only PaintCare products (architectural paint products) for management under the PaintCare program. Only those PaintCare products accepted from individuals residing in the state and businesses/organizations located in the state can be managed under the PaintCare program.

Listed below are the primary examples of architectural paint products accepted by the PaintCare program and paint or paint-related products not accepted by the PaintCare program.

Generally, PaintCare products include latex and oil-based house paint, stains, and clear coatings (varnish, shellac, etc.). The program excludes anything that is:

- In an aerosol spray can
- Intended and labeled “for industrial use only”
- Mostly used in the manufacture of equipment
- On the list of specifically excluded products for some other reason

PaintCare products are classified as either latex (water-based) or oil-based (alkyd) and the classification is important in order to decide how the product should be handled and processed. Knowing how to tell the difference between latex- and oil-based products is also important in determining which types of businesses/organizations can use the PaintCare program (if your site accepts paint from this audience).

## PaintCare Products and Non-PaintCare Products

### Acceptable products (PaintCare products)

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

## Unacceptable products (Non-PaintCare products)

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

For more information, please see [www.paintcare.org/products](http://www.paintcare.org/products)

If non-PaintCare products end up in a drop-off site's bin, such products will not be returned to the drop-off site and will be managed by PaintCare's transporter. Transporters identify non-PaintCare products and report all instances to PaintCare. PaintCare staff will notify the site of any contamination in the bins. If the problem persists, additional training may be provided.

## Acceptable Containers vs. Unacceptable Containers

Before accepting products from participants for management under the PaintCare program, drop-off site staff must (1) check the condition of the container for acceptance in the program, and (2) check the product label to verify that it contains a PaintCare product.

## Acceptable

- The PaintCare product must be in its original container
- The container is labeled as containing one of the designated PaintCare products listed above
- The container must be in good condition and not leaking
- The container must be 5 gallons in size or smaller
- The container contains dry latex paint

## Not Acceptable

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

However, drop-off sites permitted to accept household hazardous waste may accept unlabeled and leaking containers by following the procedures described below.

## Unlabeled and Leaking Containers

A drop-off site permitted to accept household hazardous waste may, at its discretion, choose to accept unlabeled and/or leaking containers if it follows the protocols below and otherwise complies with all applicable laws:

### Unlabeled Containers

A drop-off site may accept containers that do not have an original label if a staff person appropriately trained in identifying unknown wastes (1) identifies the material in the container as a PaintCare product, and (2) applies a label identifying the contents to the container before placing it in a collection bin.

### Leaking Containers

A drop-off site may accept a leaking container or a container with no lid if an appropriately trained drop-off site staff person (1) verifies that the container contains a PaintCare product, (2) places the contents of the leaking/open container into an appropriate substitute container (which can include bulking such PaintCare products into 55-gallon drums), and (3) applies an appropriate label to the substitute container.

## Refusing an Unacceptable Product or Container

Do not accept non-PaintCare products from any participant unless they are received as part of normal site operations and are not placed in PaintCare collection bins.

When refusing a material at a drop-off site, drop-off site staff must explain why the material cannot be accepted (e.g., material is not a PaintCare product, cannot accept material from non-exempt generator, etc.). If a participant tries to drop off products that your location cannot manage, refer the participant to an appropriate alternative resource, such as their local household hazardous waste disposal program, garbage transporter, environmental health agency, or public works department. Local contact information is provided at the front of the training binder.

## Paint Volume Acceptance Rules

The program accepts PaintCare products from households and businesses/organizations.

**Households.** Households may drop off any volume of PaintCare product, subject to the volume limit set by the site.

**Businesses/Organizations.** Non-households may also drop off any volume of latex PaintCare product, subject to the volume limit set by the site. Non-households may only drop off oil-based PaintCare products if they comply with federal and state hazardous waste generator rules. Please refer to the PaintCare Business Limits webpage located at: <https://www.paintcare.org/business-limits/> for specific information on exempt generator rule requirements. Painting contractors and commercial property owners typically meet these criteria.

Each business or organization is responsible for determining its own generator status under applicable law.

When a business/organization has oil-based PaintCare products to drop off at your site, it must sign the Paint Drop-Off Log or form included in the training binder to verify that it qualifies to use the program for oil-based paint. If a business/organization has only latex paint, it does not need to sign the log/form.

Once a business/organization signs the Paint Drop-Off Log or form, you may accept oil-based paint from that business/organization. (HHW sites and other waste collection programs may need a permit and/or to meet additional legal requirements in order to collect oil-based paint from businesses.) To help ensure legal compliance, unless you're specifically permitted to accept more, you should not accept more than 25 gallons of oil-based paint per calendar month from a qualifying business. Paint Drop-Off Log or forms may be reviewed by PaintCare or government agencies and compared with a list of registered hazardous waste generators to verify that only qualified businesses/organizations are using the program for their oil-based paint.

## Transporter/Recycler Drop-Off Sites

### Maintaining Paint Drop-Off Logs for All Participants

Drop-off sites operated by a PaintCare-contracted transporter and/or recycler must keep and maintain separate drop-off logs to record both latex and oil-based paint volumes from both businesses/organizations and households. While PaintCare offers template logs, an alternative may be used if approved by PaintCare.

# Section 5. Participant Paint Volume

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## How Much Paint to Accept from Participants

While the PaintCare program intends to collect as many PaintCare products as possible, we recognize that your drop-off site may have storage limitations. PaintCare drop-off sites, in agreement with PaintCare, may limit the amount of PaintCare products they accept per participant, however, drop-off sites must accept up to 5 gallons at a minimum per participant.

## What if Bins are Full?

If your collection bins are completely full, inform the participant that you are temporarily unable to accept PaintCare products and redirect them to the nearest alternative PaintCare drop-off site. Refer them to the site locator at [www.paintcare.org](http://www.paintcare.org) or the **PaintCare hotline at 855-724-6809**, or ask them to come back at a later date. Contact the PaintCare transporter immediately to have collection bins picked up and replaced.

If a participant has a significant amount of PaintCare products that your location cannot manage, ask the participant to contact PaintCare directly for additional assistance. PaintCare may direct the participant to another drop-off site or offer our Large Volume Pickup service.

## Large Volume Pickup (LVP) Service

PaintCare offers a free pick-up service to painting contractors, property managers, households, and others with a large quantity of leftover PaintCare products. Typically, a minimum of 100 gallons (by container size) is required to qualify for the LVP service.

To refer a participant to the LVP service:

- Provide the participant a LVP fact sheet
- Ask the participant to request a pick-up using the online LVP form
- The LVP fact sheet and online form are available at [www.paintcare.org](http://www.paintcare.org) (select the “Request a Pickup” button on the homepage)
- For additional questions, refer the participant to PaintCare for assistance

## Section 6. Working with Transporters

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PaintCare contracts with transporters for the delivery of supplies, delivery of empty collection bins, and pick-up of full collection bins.

### **Scheduling the Transporter to Pick Up Collection Bins**

When you anticipate your collection bins will be full within your site's pick-up timeframe (generally 5 business days in urban areas, 10 business days in rural areas), call your transporter to schedule a pickup, or use their online order system if they have one. The name and contact information of your transporter is provided at the front of the training binder.

When establishing an appointment for pick-up, please indicate:

- Your site is a PaintCare drop-off site
- Name of drop-off site and address
- Your name
- Your phone number
- Number of full collection bins to be picked up
- Number of empty collection bins needed for replacement

### **Preparing Collection Bins for Pickup**

On the scheduled pickup day, collection bins and the loading area must be readily accessible to the transporter for quick and efficient loading. Complete the following steps:

- Identify which bins are full and ready for pickup
- Make sure the path between your bins and the transporter's vehicle is clear and at least 4 feet wide to accommodate movement of bins
- Sign and keep copies of any shipping documents for your records

The transporter is responsible for labeling, loading/off-loading collection bins, and preparing shipping documents.

# Section 7. Spill Response

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## Spills

The information in this section will assist with spills from damaged or leaking program containers. It is important that all drop-off site staff understand corrective actions to minimize exposure to people and the environment.

## Reporting

Report spills as required by law, summarized in the state-specific guidelines. Contact PaintCare within 24 hours of making such a report.

## Spill Response Procedures

Always follow all applicable spill response procedures set forth in your operating permit or as otherwise required by applicable law.

If a spill is small enough to be managed by drop-off site staff, follow these steps:

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

# Section 8. Inspections and Records

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## Inspections and Record Keeping

Drop-off site staff are responsible for regularly inspecting collection bins and spill kits to ensure that such materials are in proper working order and include any necessary labeling. Please report any damaged bins or other problems to PaintCare immediately so PaintCare may arrange for prompt replacement or repair.

Maintain the following records for a minimum of 3 years:

- Internal and external inspection records (if applicable)
- Paint Drop-Off Log or forms (copy provided in the training binder)
- Paint Waivers (copy provided in the training binder; only for sites that do reuse)
- Employee training logs (copy provided in the training binder)
- Shipping documents and/or other documentation required by applicable law for outgoing shipments of PaintCare products

## Section 9. Direct Reuse

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Direct reuse is an additional service permitted for certain site types, e.g., HHW programs, material reuse stores, and solid waste management facilities. PaintCare may compensate sites for this service. Please see the terms of your PaintCare agreement or contact PaintCare if you need assistance determining if direct reuse is an authorized additional service at your site.

### Requirements for Direct Reuse

PaintCare encourages reuse of leftover paint through direct reuse. Reuse sites return good quality unused paint to the local community at low or no cost.

Products offered for reuse to the public must be in their original container, have an original label, and be in good physical and aesthetic condition. Contents must be liquid and relatively new. The container must be closed securely before placing it in the reuse storage area. Containers must never be opened by customers at the drop-off site. Reuse products must be displayed by drop-off site in an area separate from the PaintCare collection bins.

An individual customer may not take more than twenty-five (25) gallons of reuse product per day. If you have a customer that would like to take more paint, let your PaintCare contact know in advance.

### Paint Waiver

Customers taking reuse paint from a drop-off site must sign the Paint Waiver included in the training binder (or an approved equivalent thereof). The waiver explains that the material is taken “as-is” with no guarantee of quality or contents and the customer accepts the risks and liability for the materials.

The customer must read the waiver, fill in the date and name fields, and sign their name. Site staff must verify what has been taken by the customer, record on the log the gallons of latex and gallons of oil-based products taken, and add their initials.

When a paint waiver is full or when a site wants to invoice PaintCare, the latex and oil-based columns should be totaled at the bottom of the form. PaintCare does not require the submission of the waiver to PaintCare, but they must be kept by the site for at least three years and made available for review by PaintCare staff upon request.

Drop-off sites may use their own version of the waiver, but it must be approved by PaintCare in advance.

### Invoicing Procedures

Drop-off sites should invoice for reuse on a monthly basis by filling out and submitting the Invoice for Direct Reuse at [paintcare.org/invoices](https://paintcare.org/invoices). This is an online form and is submitted directly on PaintCare’s website. If you’re unable to submit an online form, contact your PaintCare contact.

## Training Log for Drop-Off Site Staff



Training for drop-off site personnel is based on the PaintCare drop-off site guidelines and other materials provided to drop-off sites as part of their training requirement. Training includes information on the following:

- Training and safety
- General guidelines
- Collection bins and storage area
- Identifying and accepting PaintCare products
- Participant paint volume
- Working with transporters
- Spill response
- Inspections and records

DATE

TRAINEE NAME AND SIGNATURE

TRAINER INITIALS

DATE	TRAINEE NAME AND SIGNATURE	TRAINER INITIALS

