



Washington Paint Stewardship Program Plan



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- C. Examples of Education and Outreach Materials
- D. Drop-off Site Operational Guidelines and Forms

1. Introduction

Section Overview

This section discusses:

- ◆ Introduction
- ◆ Paint stewardship in the United States
- ◆ Paint stewardship program plan
- ◆ Citations

A. Introduction

On July 28, 2019, Governor Jay Inslee signed into law Substitute House Bill 1652 – the Washington Architectural Paint Stewardship Program. This bill is codified as Chapter 70A.515, Revised Code of Washington, Architectural Paint Stewardship Program (Chapter 70A.515 RCW).

The broad goals of the law are for paint manufacturers to:

- 1) Assume responsibility for the development and implementation of a cost-effective architectural paint stewardship program;
- 2) Develop and implement strategies to reduce the generation of leftover paint;
- 3) Promote the reuse of postconsumer architectural paint; and
- 4) Collect, transport, and process postconsumer architectural paint for end-of-product-life management.

Pending approval of this plan, PaintCare intends to start the Washington program in April 2021.

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 bring about an industry-operated paint stewardship system in the U.S. Facilitated by the Product Stewardship Institute, the initiative involved several years of dialogue and research on paint use habits and recycling opportunities. Participants included the American Coatings Association, paint manufacturers, paint recyclers, the Environmental Protection Agency, and state and local governments across the country.

The initiative resulted in the development of a model state law to establish an economically and environmentally sustainable, industry-designed and implemented postconsumer paint management system. To date, paint stewardship legislation has been signed into law in California, Colorado, Connecticut, the District of Columbia, Maine, Minnesota, New York, Oregon, Rhode Island, Vermont, and Washington.

C. Paint Stewardship Program Plan

The Washington law requires a stewardship organization representing producers to submit a plan for the implementation of a paint stewardship program to the Washington State Department of Ecology (Ecology) for approval.

RCW 70A.515.040 lists the required elements of a stewardship plan, including:

A description of how the program proposed under the plan will collect, transport, recycle, and process leftover paint from covered entities for end-of-life management, including reuse, recycling, energy recovery, and disposal, using environmentally sound management practices. [RCW 70A.515.040(1)(a)]

Stewardship organization contact information and a list of participating brands and producers under the program. [RCW 70A.515.040(1)(b)]

A demonstration of sufficient funding for the architectural paint stewardship program as described in the plan. The plan must include a funding mechanism whereby each architectural paint producer remits to the stewardship organization payment of an architectural paint stewardship assessment for each container of architectural paint the producer sells in this state, unless the distributor or paint retailer has negotiated a voluntary agreement with the producer and stewardship organization to remit the architectural paint stewardship assessment directly to the stewardship organization on behalf of the producer for the producer's architectural paint sold by the distributor or paint retailer in the state. The plan must include a proposed budget and a description of the process used to determine the architectural paint stewardship assessment. [RCW 70A.515.040(1)(c)]

The establishment in the plan of a uniform architectural paint stewardship assessment for all architectural paint sold in this state, in order to ensure that the funding mechanism is equitable and sustainable. For purposes of establishing the assessment, the plan must categorize the sizes of paint containers sold at retail and determine a uniform assessment amount that applies to each category of container size. The plan must require that any surplus funds generated from the funding mechanism that exceed a reserve greater than the most recent year's operating expenditures be put back into the program to either increase and improve program services or reduce the cost of the program and the architectural paint stewardship assessment, or both. [RCW 70A.515.040(1)(d)]

A review by an independent financial auditor of the proposed architectural paint stewardship assessment to ensure that any added cost to paint sold in the state as a result of the paint stewardship program does not exceed the costs of the program. In a report to the department, the independent auditor must verify that the amount added to each unit of paint will cover the costs of the paint stewardship program. [RCW 70A.515.040(1)(e)]

Assignment to the department of responsibility for the approval of the architectural paint stewardship assessment based on the information provided in the plan and the auditor's report. [RCW 70A.515.040(1)(f)]

A description of the educational outreach strategy to reduce the generation of leftover paint, to promote the reuse and recycling of leftover paint, for the overall collection of leftover paint, and for the proper end-of-life management of leftover paint. [RCW 70A.515.040(1)(g)]

A description of the reasonably convenient and available statewide collection system, including: (i) A description of how the program will provide for reasonably convenient and available statewide collection of leftover paint from covered entities in urban and rural areas of the state, including island communities; (ii) A description of how the program will incorporate existing public and private waste collection services and facilities for activities, which may include, but is not limited to: (A) The reuse or processing of leftover architectural paint at the permanent collection site; and (B) The collection, transportation, and recycling or proper disposal of leftover architectural paint. [RCW 70A.515.040(1)(h)]

A description of how leftover paint will be managed using environmentally sound management practices, including reasonably following the paint waste management hierarchy of: Source reduction; reuse; recycling; energy recovery; and disposal. [RCW 70A.515.040(1)(i)]

A description of education and outreach efforts to promote the paint stewardship program. The education and outreach efforts must include strategies for reaching all sectors of the population and describe how the paint stewardship program will evaluate the effectiveness of its education and outreach. [RCW 70A.515.040(1)(j)]

A description of collection site procedural manuals for architectural paint products, including training procedures and electronic copies of materials that will be provided to collection sites. [RCW 70A.515.040(1)(k)]

A list of transporters that will be used to manage leftover paint collected by the stewardship organization and a list of potential processors to be used for final disposition. [RCW 70A.515.040(1)(l)]

To ensure adequate collection coverage, the plan must use geographic information modeling and the information required under subsection (1)(h) of this section to determine the number and distribution of collection sites. [RCW 70A.515.040(2)(a)]

For the portion of the population that does not have a permanent collection location within a fifteen-mile radius, the plan must provide residents a reasonable opportunity to drop off leftover paint at collection events. The stewardship organization, in consultation with the department and the local community, will determine a reasonable frequency and location of these collection events, to be held in underserved areas. Special consideration is to be made for providing opportunities to island and geographically isolated populations. [RCW 70A.515.040(2)(b)]

D. Citations

To aid the reader, each section of this plan is preceded with the relevant text of the law.

2. Stewardship Organization & Program Contacts

Statutory Citation

[RCW 70A.515.040\(1\)](#) lists the required elements of a stewardship plan, including:

[Stewardship organization contact information \[RCW 70A.515.040\(1\)\(b\)\]](#)

Section Overview

This section discusses:

- ◆ PaintCare Washington LLC
- ◆ Program contacts

A. PaintCare Washington LLC

On behalf of participating paint manufacturers, PaintCare Washington LLC is pleased to submit to Ecology the Washington paint stewardship program plan.

PaintCare Inc. was formed in 2009 by the American Coatings Association, the primary trade association for the paint and coatings industry. PaintCare Inc. now organizes a separate single-member limited liability company (LLC) as a subsidiary to serve as the representative stewardship organization for architectural paint manufacturers (also referred to as producers) in each state that passes a paint stewardship law. PaintCare Washington LLC was formed in 2019. Both organizations are 501(c)(3) non-profit entities.

PaintCare representation is open to all architectural paint manufacturers and they may register with PaintCare at any time. PaintCare currently represents 191 paint manufacturers across its paint stewardship programs.

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

PaintCare Inc. and its subsidiaries are overseen by an 11-member unpaid Board of Directors representing architectural paint manufacturing companies.

B. Program Contacts

Below is the current contact for the Washington program.

Jeremy Jones
West Coast Program Manager
415-590-0259
jjones@paint.org

The names and titles of PaintCare staff are listed on PaintCare's webpage. PaintCare will notify Ecology of changes to any key state personnel.

3. Manufacturers and Program Products

Statutory Citation

RCW 70A.515.040(1) lists the required elements of a stewardship plan, including:

A list of participating brands and producers under the program [RCW 70A.515.040(1)(b)]

Section Overview

This section discusses:

- ◆ Manufacturer and brand registration
- ◆ Private label agreements
- ◆ Use of registration lists
- ◆ Program products

A. Manufacturer and Brand Registration

PaintCare identified potential participants through a variety of sources, including the following:

- ◆ Prior registrations with PaintCare for other PaintCare programs
- ◆ American Coatings Association
- ◆ Internet research

Manufacturers register their company and brands of architectural paint products through PaintCare's website dedicated to registrations and reporting sales.

Starting in May 2019, manufacturers were notified about the Washington law and program through email and a notice on PaintCare's reporting website.

While national paint manufacturers have already registered for existing PaintCare programs, some local or regional manufacturers may still be unfamiliar with the program and may need to be contacted several times to become aware of their obligations under the law. Therefore, the identification and notification of potential manufacturers is an on-going process. If PaintCare is unable to garner participation by an architectural paint manufacturer, PaintCare will notify Ecology, as appropriate. The list of registered manufacturers and brands is expected to change as any additional manufacturers become aware of the program.

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, 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 will 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 will always be presented in separate lists to ensure the confidentiality of these agreements.

C. Use of Registration Lists

PaintCare will post the lists of registered manufacturers and brands on its website to make them available for retailers and distributors. Retailers and distributors will use the brand list to learn which brands may be legally sold in Washington upon implementation of the program. Ecology may use the manufacturer list to ensure that any manufacturer whose paint is sold in Washington is participating in the program and use the brand list to verify that only registered brands are being sold in the state.

The list of registered manufacturers and brands as of the submission date of this plan, is provided in Appendix A. PaintCare intends to provide Ecology with current lists monthly and post them to PaintCare's website.

D. Program Products

The terms program products, PaintCare products, architectural paint, and paint are used interchangeably in this plan and in PaintCare communications. In addition, this plan uses the common term latex paint to mean non-combustible or water-based program products, and oil-based paint to mean combustible or petroleum solvent-based program products.

Program products are architectural paints in containers no larger than five gallons in size. They do not include industrial coatings, coatings used for original equipment manufacturing, and other specialty coatings. The full definition and examples of both program and non-program products are provided in Appendix B. This definition is used to determine the products on which manufacturers are to apply the paint stewardship assessment (called the PaintCare fee), as well as to determine which products are accepted by the program's paint drop-off sites.

As needed, PaintCare issues product notices to explain or clarify whether and why certain types of products are a part of the program or not. Examples of these notices are also provided in Appendix B.

4. Paint Drop-Off Sites and Services

Statutory Citation

RCW 70A.515.040 lists the required elements of a stewardship plan, including:

A description of the reasonably convenient and available statewide collection system, including: (i) A description of how the program will provide for reasonably convenient and available statewide collection of leftover paint from covered entities in urban and rural areas of the state, including island communities; (ii) A description of how the program will incorporate existing public and private waste collection services and facilities for activities, which may include, but is not limited to: (A) The reuse or processing of leftover architectural paint at the permanent collection site; and (B) The collection, transportation, and recycling or proper disposal of leftover architectural paint. [RCW 70A.515.040(1)(h)]

A description of collection site procedural manuals for architectural paint products, including training procedures and electronic copies of materials that will be provided to collection sites. [RCW 70A.515.040(1)(k)]

To ensure adequate collection coverage, the plan must use geographic information modeling and the information required under subsection (1)(h) of this section to determine the number and distribution of collection sites based on the following criteria: At least ninety percent of Washington residents must have a permanent collection site within a fifteen-mile radius; and unless otherwise approved by the department, one additional permanent site must be established for every thirty thousand residents of an urbanized area and for every urban cluster of at least thirty thousand residents distributed to provide convenient and reasonably equitable access for residents within each. [RCW 70A.515.040(2)(a)]

For the portion of the population that does not have a permanent collection location within a fifteen-mile radius, the plan must provide residents a reasonable opportunity to drop off leftover paint at collection events. The stewardship organization, in consultation with the department and the local community, will determine a reasonable frequency and location of these collection events, to be held in underserved areas. Special consideration is to be made for providing opportunities to island and geographically isolated populations. [RCW 70A.515.040(2)(b)]

Nothing in subsection (2) of this section prohibits a program plan from identifying an available curbside service for a specific area or population that provides convenient and reasonably equitable access for Washington residents that is at least equivalent to the level of convenience and access that would be provided by a collection site. [RCW 70A.515.040(3)(a)]

The program plan must utilize the existing public and private waste collection services and facilities where cost-effective and mutually agreeable. [RCW 70A.515.040(4)]

The program must utilize existing paint retail stores as collection sites where cost-effective and mutually agreeable. [RCW 70A.515.040(5)]

The plan must provide the collection site name and location of each site statewide in Washington accepting architectural paint under the program. [RCW 70A.515.040(6)]

Section Overview

This section discusses:

- ◆ Program audience

- ◆ Paint drop-off sites and services
- ◆ Convenience criteria
- ◆ Paint drop-off site operations

PaintCare uses the term paint drop-off site in place of paint collection site in this plan.

A. Program Audience

The Washington PaintCare program will serve the state's residents, businesses, schools, government agencies and other entities that have leftover, unwanted paint, as described below.

A1. Households

Households may drop off any quantity of postconsumer latex or oil-based paint, subject to quantity limits set by each paint drop-off site.

A2. Very Small Quantity Generators (VSQGs)

Painting contractors, small businesses, and other small to medium-sized organizations are typical VSQGs (as described in federal rules in 40 CFR 262.14). The program will accept any quantity of postconsumer latex paint from VSQGs, and it will accept postconsumer oil-based paint at or below the limits applied to hazardous waste generation for VSQGs. To qualify as a VSQG, among other criteria, a business/organization must (1) generate no more than 100 kilograms (about 25 gallons or 220 pounds) of hazardous waste per calendar month, (2) generate no more than 1 kilogram (about 2.2 pounds) of acute hazardous waste per calendar month, and (3) accumulate no more than 1,000 kilograms (about 250 gallons or 2,200 pounds) of hazardous waste at any given time.

In Washington, the term SQG or CESQG is used to describe these very small quantity generators, and the criteria are slightly different. Please refer to the definition of "small quantity generator" in [WAC 173-303-040](#) for specific waste limits.

A3. Small Quantity Generators (SQGs) and Large Quantity Generators (LQGs)

The program will accept any quantity of postconsumer latex paint from SQGs and LQGs (as described in federal rules in 40 CFR 260.10). The program does not accept postconsumer oil-based paint from SQGs or LQGs.

In Washington, these generators are referred to as MQGs and LQGs. Please refer to the definitions of "medium quantity generator" and "large quantity generator" in [WAC 173-303-040](#) for specific waste limits.

B. Paint Drop-off Sites and Services

PaintCare partners with household hazardous waste (HHW) programs (facilities and events) that collect paint and increases paint collection by setting up new paint drop-off sites and services. The paint collection infrastructure in Washington is expected to include the following:

- ◆ Household hazardous waste programs
- ◆ Solid waste facilities (transfer stations, recycling centers and landfills)
- ◆ Retail stores and material reuse stores
- ◆ PaintCare events
- ◆ Direct pickup of large volumes

All eligible locations are invited to participate as paint drop-off sites, provided they have adequate space for at least two paint collection bins. The bin storage space must be secure, inaccessible to the public, have an impermeable surface, and be protected from the elements.

Paint drop-off sites must comply with PaintCare's operational requirements; they must accept all program products, have staff available to accept paint during operating hours, accept paint from households and businesses, and accept paint free of charge from participants who drop off paint. In addition, sites must be willing to be listed on the site locator on PaintCare's website and post and distribute PaintCare point-of-sale outreach materials, including a window poster advertising their site as a paint drop-off site. Some exceptions to these operational requirements are allowed for HHW programs and other sites, which are discussed later in this section.

For all sites, PaintCare provides and covers the cost for paint collection bins, paint transportation, and paint processing (end-of-life management). In addition, most sites are provided spill kits, signage, training and training materials.

Prior to the start of the program and on an agreed upon timeframe thereafter, PaintCare will provide Ecology with a current list of paint drop-off sites. PaintCare will contact potential sites several times prior to the start of the program to make them aware of the opportunity to be a paint drop-off site. Some may wait until after the program starts to decide to participate. The identification and recruitment of potential paint drop-off sites is an on-going process and will continue after the start of the program.

At this time, PaintCare is unaware of any waste collection programs that collect paint as part of a curbside or door-to-door service. Should such activities begin in Washington, PaintCare will consider how paint collection through a curbside and/or door-to-door service impacts access to the program by the local community.

B1. Household Hazardous Waste Programs

HHW facilities and events are excellent program sites because they provide their customers the convenience of dropping off other products at the same time as paint, and they often have regular customers that have used them for many years.

In areas of the state that do not have a permanent HHW facility but do hold collection events, PaintCare plans to partner with HHW programs for the collection of PaintCare products at those events. In areas of the state that are underserved by a permanent site, or are geographically isolated, PaintCare will hold paint-only

collection events. To determine frequency and location of such collection events, PaintCare will consult with Ecology and the local community.

HHW Program Recruitment and Outreach Activities

With assistance from Ecology and other organizations involved with waste management in Washington, PaintCare has identified and reached out to all known HHW programs in the state to learn about their services, inform them about the PaintCare program, highlight the benefits, and outline the steps to partnering with PaintCare. These benefits include cost savings, offering expanded services to their community, reducing waste, and increasing paint recycling.

PaintCare, in partnership with Ecology, held a series of stakeholder meetings for HHW programs and their service providers (on-site operators, transporters, and processors). The meetings were held in 2019 on September 9 in Union Gap, September 10 in Spokane, September 25 in Everett, September 26 in Olympia, and October 9 in Vancouver. Approximately 90 participants attended the five meetings and some of the topics covered included:

- ◆ Overview of the Washington paint stewardship law
- ◆ The role of Ecology and program oversight
- ◆ History of the PaintCare program
- ◆ Program products
- ◆ The program's funding mechanism
- ◆ Planned paint drop-off sites and services
- ◆ How HHW programs can partner with PaintCare
- ◆ How PaintCare works with transporters and paint processors
- ◆ Planned outreach and education

A fact sheet, interest form for HHW programs, and guide to contracting with PaintCare were provided at these meetings and are available on the Washington page of PaintCare's website. The current version of the fact sheet is provided in Appendix C.

Following the stakeholder meetings, PaintCare followed up with local program contacts by phone and email, visited HHW program facilities throughout the state, and attended San Juan County's solid waste advisory committee meeting. As of the submission of the plan, PaintCare received interest forms and other statements of intent from programs in 36 of Washington's 39 counties

- | | | |
|-----------------|-------------------|-------------------|
| ◆ Adams County | ◆ Clallam County | ◆ Douglas County |
| ◆ Asotin County | ◆ Clark County | ◆ Ferry County |
| ◆ Benton County | ◆ Columbia County | ◆ Franklin County |
| ◆ Chelan County | ◆ Cowlitz County | ◆ Garfield County |

- | | | |
|-----------------------|-------------------|----------------------|
| ◆ Grant County | ◆ Lewis County | ◆ Snohomish County |
| ◆ Grays Harbor County | ◆ Lincoln County | ◆ Spokane County |
| ◆ Island County | ◆ Mason County | ◆ Stevens County |
| ◆ Jefferson County | ◆ Okanogan County | ◆ Thurston County |
| ◆ King County | ◆ Pacific County | ◆ Walla Walla County |
| ◆ Kitsap County | ◆ Pierce County | ◆ Whatcom County |
| ◆ Kittitas County | ◆ San Juan County | ◆ Whitman County |
| ◆ Klickitat County | ◆ Skagit County | ◆ Yakima County |

PaintCare will continue its efforts to meet with the remaining programs and to complete the contracting process with all interested HHW programs in an effort to have their facilities and events set up as a PaintCare partner in time for the start of the Washington program.

Exceptions for HHW Programs and Solid Waste Facilities

Most paint drop-off sites and events are expected to be able to accept all program products, from all audiences. However, in recognition of restrictions on HHW and solid waste programs, some exceptions may be made. Examples include:

- ◆ Programs with a limited geographical service area due to their funding source (e.g., local tax or utility) will not be required to accept paint from participants outside of their service area.
- ◆ Programs that do not accept waste from businesses will not be required to do so.
- ◆ Programs that accept oil-based paint but do not currently accept latex paint will not be required to change their operations to accept latex paint.

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

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

PaintCare has typically observed that solid waste facilities become more interested in joining the program after retailers and HHW programs have joined. Efforts to identify and recruit both public and private solid waste facilities to be paint drop-off sites will be on-going.

A fact sheet and an interest form for solid waste facilities are available on the Washington page of PaintCare's website. The current version of the fact sheet is provided in Appendix C.

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 paint products and how to handle them safely. In addition, their customers are likely to have some leftover paint and often ask store staff for advice on what to do with it. Retailer participation as a paint drop-off site is voluntary. PaintCare will work with any retailer to become a drop-off site that meets PaintCare's criteria; where it is cost-effective and mutually agreeable. 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 paint drop-off sites. At these sites, paint can be screened for possible reuse and then donated or sold back to the local community. Paint that is not set aside for reuse will be placed in paint collection bins.

Retailer Recruitment and Outreach Activities

PaintCare has identified approximately 958 paint retailers in Washington including paint, hardware, home improvement stores, and 42 material reuse stores. These include large and small independent, co-op, chain, and corporate stores. Of these stores, approximately 701 were identified as potential drop-off sites based on PaintCare's experience in other PaintCare programs.

Since May 2019, PaintCare staff have been contacting retailers statewide to inform them of the program and new fee that will be applied to architectural paint, answer questions, and recruit them as paint drop-off sites. A statewide mailing was sent in December 2019 to all retailers providing an update on the program timeline and planning process. A second mailing will be sent in November 2020 to confirm submission of the program plan and send samples of state-specific fact sheets developed for the program. Current versions of some of the materials included in the mailings are provided in Appendix C.

PaintCare also plans to hold several webinars for retailers to provide an overview of the program and answer any questions. PaintCare plans to conduct site visits to recruit paint retailers and material reuse stores, and to train and set-up sites volunteering as paint drop-off sites.

B4. PaintCare Events

Paint drop-off events may be held by PaintCare in areas of the state that are not within 15 miles of a paint drop-off site or have too few drop-off sites for the population of the area. Participation at PaintCare events will not be restricted by county or other geographical boundaries; participants from any place in Washington will be allowed to use the events. PaintCare will consult with Ecology and local communities on the timing and location of these events.

B5. Direct Pickup of Large Volumes

Large Volume Pickup (LVP) Service

The LVP service is free and will be offered to Washington painting contractors, other businesses, organizations, and households with large volumes of paint with a minimum quantity, currently 200 gallons.

This service allows approved users to have paint picked up at their business or home. Business generators are subject to limitations for oil-based paint, as described in Program Audience (Section 4A, page 12) of this plan.

Users of the LVP service will be asked to provide specific information about their volume of leftover paint, paint type (latex or oil-based), and container sizes. Once approved for pickup, they will be 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 paint on an on-going basis. These sites will be set up and trained by PaintCare staff on operational requirements similar to public drop-off sites, but they will only use the program for paint from their own operations.

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

B6. Additional Activities

Paint drop-off sites permitted by law to conduct specific additional activities that are beneficial to the program can 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

Sites may operate reuse areas in which they place leftover paint that was 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 paint and typically reduces program costs by avoiding the transportation and processing costs that would otherwise be required to manage the paint. To support existing paint reuse programs and to provide incentive for additional sites to do reuse, PaintCare provides compensation based on the number of gallons given away or sold.

Latex Paint Reprocessing

Latex paint reprocessing involves color sorting, combining, and mixing leftover latex paint together to make recycled-content paint that is 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 from the activity that occurs at 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 paint. To support existing paint reprocessing programs and to provide an incentive for additional sites to reprocess paint, PaintCare negotiates a per-gallon rate to compensate the site for reprocessed paint that is given away or sold.

Oil-Based Paint Bulking

PaintCare makes paint management simple for paint drop-off sites by allowing them to place program products directly into paint collection bins. However, if a permitted site chooses to bulk oil-based paint, it

results in lower transportation costs for PaintCare. To support these sites, PaintCare negotiates compensation on a per-drum basis.

Transportation

Sometimes it is more cost-effective for a paint drop-off site to transport paint from one of its locations to another, or to transport paint from an event back to its facility, rather than using PaintCare's contracted transporter. This is most commonly done by HHW programs. In these cases, PaintCare negotiates compensation for the service (e.g., on a per-event or per-bin basis).

C. Convenience Criteria

To ensure that the program provides adequate and convenient paint recycling opportunities throughout the state, PaintCare used ArcGIS, a mapping and analytics software, to determine the minimum number and optimal locations for paint drop-off sites in Washington. PaintCare recognizes that non-retail sites (e.g., HHW facilities and transfer stations) are not always available to all participants within 15 miles of the site and therefore runs its convenience models using only potential retail drop-off sites because they are available to all residents in the state. Applying the state's distribution and density criteria, PaintCare will need to provide at least 171 paint drop-off sites in Washington. The state's distribution and density criteria are explained further below.

Distribution Criterion

The distribution criterion in the paint stewardship law requires the program to provide at least 90% of Washington residents a paint drop-off site available to them within a 15-mile radius of their home. This requirement can be met with 23 optimally located sites.

Density Criterion

The density criterion in the paint stewardship law requires the program to provide a paint drop-off site for every 30,000 residents of an Urbanized Area or Urban Cluster, as defined by the United States Census Bureau. This requirement is met with 163 sites. However, because 15 of these sites are captured by the distribution criterion, only 148 additional sites are needed. These sites are shown as light blue triangles on the map. The following table lists the Urbanized Areas and Urban Clusters in Washington and the number of drop-off sites needed in each.

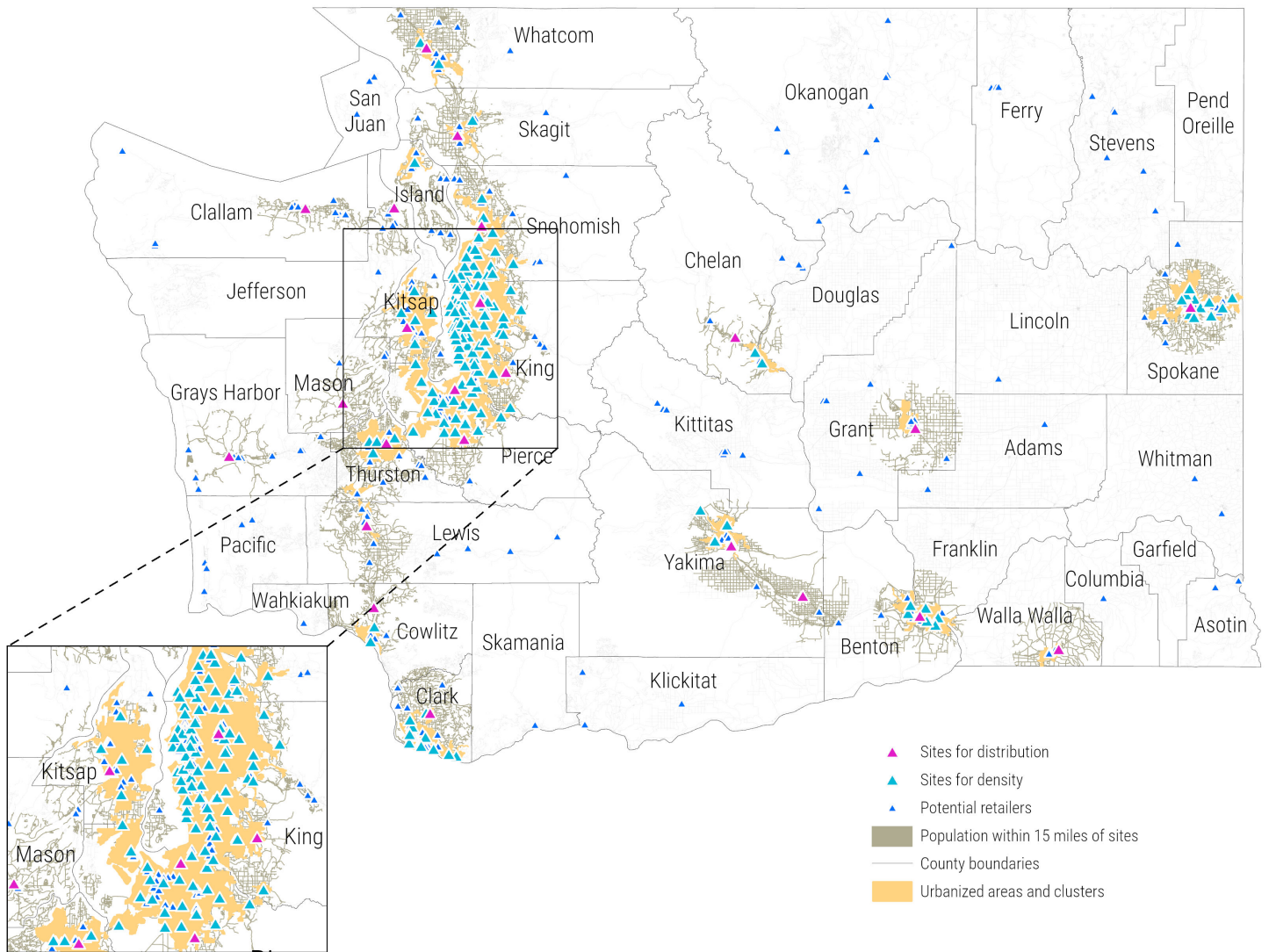
Required Number of Paint Drop-Off Sites in Urbanized Areas

Urbanized Area or Urban Cluster (Names from Census Bureau)	2010 Population (WA Only)*	Number of Sites Needed
Bellingham	114,473	3
Bremerton	198,979	6
Centralia	39,517	1
Kennewick-Pasco	210,975	7
Longview	61,598	2
Marysville	145,140	4
Moses Lake	32,978	1
Mount Vernon	62,966	2
Oak Harbor	33,004	1
Olympia-Lacey	176,617	5
Portland OR-WA	359,562	11
Seattle	3,059,393	101
Spokane	387,847	12
Walla Walla	46,980	1
Wenatchee	67,227	2
Yakima	129,534	4
Total	5,126,790	163

*An Urbanized Area or Urban Cluster may cross into an adjacent state.

As of the submission of this program plan, PaintCare has identified 206 sites that have indicated interest in becoming drop-off sites. The identification and recruitment of potential paint drop-off sites is an on-going process and will continue after the start of the program.

The following map is for illustrative purposes to provide a picture of what an optimal statewide distribution of sites looks like. It does not represent the actual types, number or distribution of sites that may end up participating as paint drop-off sites in the program, but rather the best combination of paint retail sites if PaintCare hand-selected and only used paint retailer to meet the convenience requirements of the paint stewardship law. Using this set of sites is not the only way to satisfy the convenience requirement – it can be achieved through many other configurations of sites throughout the state – but it is unlikely to be accomplished with fewer than 171 sites.



D. Paint Drop-Off Site Operations

All paint drop-off sites must have an agreement in place with PaintCare, follow PaintCare's operational requirements, and operate in accordance with applicable federal, state, and local laws, regulations and permits.

D1. Drop-Off Site Training

All drop-off sites and RLVP (recurring large volume pickup) sites will receive a training regarding site guidelines and are provided a training binder that is reviewed during the training. The binder includes the site guidelines and a training log to be signed by all employees at the site who handle paint for the program. Examples of current training topics 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 paint pickup
- ◆ Screening for generator status to determine if a business qualifies to use the program for oil-based paint
- ◆ Recordkeeping

The current version of the site guidelines is provided in Appendix D.

D2. Collection Volumes

Drop-off sites may set their own limit on the amount of paint they will accept from the public, as long as the limit is no less than five gallons per participant per day and is consistent with legal limits applicable to VSQGs (SQGs in Washington).

D3. Paint Storage

Paint collection bins used in the program 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.

Drop-off sites will be required to keep paint collection bins in a secure location that does not have public access and the bins must be on an impermeable surface and protected from the elements if stored outside.

D4. Non-Program Products

The volume of non-program products entering the program will be minimized through public education, signage at drop-off sites, and drop-off site training on product identification.

PaintCare's transporters and downstream processors will manage any incidental non-program products that they receive. This may include proper management of any non-program products that designate as dangerous waste under applicable Washington dangerous waste regulations (Chapter 173-303 WAC). They will be 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 severity of the contamination, PaintCare may do one or more of the following: (1) contact the site to let them know about the incident, (2) provide additional/refresher training on identification of program and non-program products, or (3) in extreme cases, remove the site from the program.

D5. Site Visits

Retail drop-off sites will receive site visits about every six months. HHW facilities, solid waste facilities, and RLVP sites will be visited annually. The purpose of these visits is to ensure compliance with program requirements, provide refresher trainings 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

Statutory Citation

RCW 70A.515.040 lists the required elements of a stewardship plan, including:

A description of how the program proposed under the plan will collect, transport, recycle, and process leftover paint from covered entities for end-of-life management, including reuse, recycling, energy recovery, and disposal, using environmentally sound management practices. [RCW 70A.515.040(1)(a)]

A description of how leftover paint will be managed using environmentally sound management practices, including reasonably following the paint waste management hierarchy of: source reduction; reuse; recycling; energy recovery; and disposal. [RCW 70A.515.040(1)(i)]

A list of transporters that will be used to manage leftover paint collected by the stewardship organization and a list of potential processors to be used for final disposition. [RCW 70A.515.040(1)(l)]

Section Overview

This section discusses:

- ◆ Paint transportation
- ◆ Paint processing
- ◆ Non-program products and empty containers
- ◆ Legal compliance
- ◆ Insurance and financial assurance

All descriptions in this section refer to current or typical activities as of the submission of this program plan.

A. Paint Transportation

A1. Transportation System

An efficient transportation system is required to move paint from a large number of paint 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 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 paint from the point of collection to its final destination. Transporters, subsequent processors, and their records, are subject to audit by PaintCare.

Following the bid process that began in August 2019, PaintCare selected transporters to provide service to paint drop-off sites, subject to successful negotiation of contract terms with those transporters. It is also common practice for PaintCare to try to negotiate agreements with each transporter providing service to

HHW programs so that PaintCare and each HHW program will be able to use the same transporter at each HHW facility or event.

Transporters will provide service to 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 will deliver empty paint collection bins and spill kits to drop-off sites and pick up full bins in a timely manner. Transporters are typically required to provide service to drop-off sites within five days in urban areas and ten days in rural areas. The longer time period in rural areas is to maximize route efficiency and pick up from multiple locations, yet still serve the location in a reasonable amount of time. For HHW events, transporters will deliver empty paint 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 (both rural and urban) will be asked to accommodate a minimum of two paint 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.

A2. Transporters

As of the submission of the plan, the following transporters may be utilized:

- ◆ ACTenviro
- ◆ Clean Earth
- ◆ Clean Harbors
- ◆ GreenSheen Paint
- ◆ Heritage Environmental Services

As the program grows, additional transporters may be added if needed. PaintCare will notify Ecology of any significant changes to the transportation infrastructure used by the program.

B. Paint Processing

B1. Processing System

PaintCare will contract for processing and proper end-of-life management of postconsumer paint collected in the program. Prior to releasing the transportation and processing request for proposal (RFP), PaintCare made a reasonable effort to contact all known paint recyclers (both in-state and out-of-state) to inform them of the RFP and contracting process. The following hierarchy will be followed when prioritizing management of paint collected through the program. The options are prioritized by highest, best use:

Latex Paint

- ◆ Reuse
- ◆ Paint-to-paint recycling or recycling into another product
- ◆ Energy recovery
- ◆ Disposal

Oil-Based Paint

- ◆ Reuse
- ◆ Paint-to-paint recycling
- ◆ Energy recovery or fuel incineration

The condition of postconsumer paint when it is received by the program is an important consideration in determining how it will be managed. If paint containers are not sealed well or stored properly (indoors, out of rain or freezing temperatures), latex and oil-based paint can dry out or otherwise be spoiled by mold, rusting cans, or multiple freeze/thaw cycles making some or all of the contents of an individual container of paint unusable or not recyclable. Ultimately, the method of storage and the timing of the decision to recycle leftover paint are determined by the consumer. The program encourages the return of unwanted postconsumer paint in a timely manner in order to reduce the age and improve the condition of the paint.

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.

B2. Latex Paint Management

Reuse

Reuse refers to collected paint being sold or given away in the United States in original labeled containers without any alteration of the container contents.

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

Paint-to-Paint Recycling

Latex paint may be used to make recycled-content 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 will vary from batch to batch. The recycled-content latex paint is then given

away or sold locally. Commercial latex recyclers typically manufacture color-sorted, blended, and filtered architectural paint products that are sold domestically and internationally. Typically, purchasers of these products either use/re-sell them as is or use them as an input in further paint production.

Lightweight Aggregate

Latex paint may be used as a component in the manufacturing process of lightweight aggregate. The lightweight aggregate is then either sold as-is to third-party manufacturers which use it as a component in their manufacturing process, colored and sold for various landscape applications, or is used as a component in the manufacturing process of various precast concrete products.

Decorative Ground Cover

Hardened latex paint may be used as the primary ingredient in the manufacturing of a finished product sold as decorative ground cover.

Energy Recovery

Some waste-to-energy facilities use latex-based paint as an alternative fuel source. These facilities are fully permitted to the extent necessary under federal, state, and local law for such waste management activities. These facilities recover the energy from burning waste.

Disposal

Use of a permitted landfill for disposal, including landfill disposal or alternative daily cover, 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 the United States in its original labeled containers without any alteration of the container contents.

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

Paint-to-Paint Recycling

Oil-based paint may be used to make recycled-content oil-based paint. Commercial oil-based paint recyclers typically manufacture recycled-content oil-based paint in a variety of colors that is sold internationally. As of the submission of this program plan, this method is only available in certain geographic areas in the United States but is included to allow for future possibility for the Washington program.

Energy Recovery

Oil-based paint may be used in an energy recovery process. Any facility, cement kilns and/or waste-to-energy facilities, used to manage materials through the program are required to be fully permitted for the necessary federal, state, and local requirements for such waste management.

Fuel Incineration

Oil-based paint may be incinerated. Any incinerator used to manage materials through the program are required to be fully permitted for the necessary federal, state, and local requirements for such waste management.

B4. Processors

As of the submission of the plan, the following processors may be utilized by the transporters listed in Section 5-A2:

LATEX PAINT PROCESSORS

PROCESSOR	LOCATION	PROCESS
GDB International	Auburn, WA	Recycled-Content Paint
GreenSheen Paint	Kent, WA	Recycled-Content Paint, Reuse
MetroPaint	Portland, OR	Recycled-Content Paint, Reuse
US Ecology	Grand View, ID	Disposal
Visions	Sacramento, CA	Recycled-Content Paint, Lightweight Aggregate
Waste Management	Arlington, OR	Disposal

OIL-BASED PAINT PROCESSORS

PROCESSOR	LOCATION	PROCESS
Buzzi-Unicem USA	Cape Girardeau, MO	Energy Recovery
Cadence Environmental Energy	Chanute, KS	Energy Recovery
Clean Harbors	Kimball, NE	Fuel Incineration
Clean Harbors	Grantsville, UT	Fuel Incineration
Green America	Chesterfield, MO	Energy Recovery
Rineco	Haskell, AR	Energy Recovery

As the program grows, additional processors may be added if needed.

C. Non-Program Products and Empty Containers

C1. Non-Program Products

Although drop-off sites will be 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. These products will be managed appropriately, rather than returned to a drop-off site. This may include proper management of any non-program products that designate as dangerous waste under applicable Washington dangerous waste regulations (Chapter 173-303 WAC).

C2. Empty Paint Containers

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

D. Legal Compliance

As part of their contract, all transporters, processors and their subcontractors will be 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 carriage (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

PaintCare will require all contractors – 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 the required insurance coverage (other than Workers Compensation)

Because contractors have widely different insurance policies (e.g., commercial insurance vs. self-insurance, differing limits), PaintCare will evaluate (often with the assistance of outside legal counsel) the insurance terms in each contract on a case-by-case basis to ensure that the contractor maintains insurance of the types and in the amounts appropriate for the services the 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. Education and Outreach

Statutory Citation

RCW 70A.515.040 lists the required elements of a stewardship plan, including:

A description of the educational outreach strategy to reduce the generation of leftover paint, to promote the reuse and recycling of leftover paint, for the overall collection of leftover paint, and for the proper end-of-life management of leftover paint. The strategies may be revised by a stewardship organization based on the information collected annually. [RCW 70A.515.040(1)(g)]

A description of education and outreach efforts to promote the paint stewardship program. The education and outreach efforts must include strategies for reaching all sectors of the population and describe how the paint stewardship program will evaluate the effectiveness of its education and outreach. [RCW 70A.515.040(1)(j)]

A stewardship organization shall promote a paint stewardship program and provide consumers, covered entities, and paint retailers with educational and informational materials describing collection opportunities for leftover paint statewide, the architectural paint stewardship assessment used to finance the program, and promotion of waste prevention, reuse, and recycling. [RCW 70A.515.040(7)]

Section Overview

This section discusses:

- ◆ Outreach methods
- ◆ Message platform
- ◆ Target audiences
- ◆ Phased outreach approach
- ◆ Stakeholder input from paint retailers
- ◆ 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 Washington paint stewardship program using a variety of communication methods, which include:

- ◆ Print materials (e.g., brochures, fact sheets, cards)

- ◆ Digital media (e.g., streaming audio channels, online video, website banner ads)
- ◆ Social media (e.g., organic and paid promotion on Twitter, 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 postconsumer paint and to inform the public how and where to recycle their leftover paint, PaintCare uses an instructive, paint-specific 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 paint for a job to reduce potential waste; “Use It Up” means use up leftover paint whenever possible; and “Recycle the Rest” means if you still have unwanted paint, 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 paint, 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 paint.

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 will focus appropriate messages to the following audiences:

- ◆ Households

- ◆ Businesses and organizations that generate paint (e.g., professional painters, contractors, property managers, schools and universities, hotels)
- ◆ Relevant trade groups (e.g., associations that serve professional painters, contractors, realtors, and building managers)
- ◆ Paint retailers
- ◆ HHW programs and solid waste facilities
- ◆ Non-English speakers

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

C1. Households

- ◆ Emphasize how to find a drop-off site to recycle paint, the information most often requested.
- ◆ Promote using up leftover paint to do-it-yourselfers as a primer or for creative projects.
- ◆ Educate consumers on how to buy the right amount of paint 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 Paint

- ◆ Emphasize “Recycle the Rest” as more recycling opportunities will be available than previously, and these will be available statewide.
- ◆ Promote using up leftover paint.
- ◆ Promote the LVP service so they can request a direct pickup of large quantities of leftover paint, rather than transport paint 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 paint. In addition to utilizing PaintCare’s services for leftover paint, professionals also often purchase paint on behalf of clients and can make them aware of the PaintCare program.

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

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 will provide 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, explains the PaintCare fee, lists accepted products, and displays how to find a paint drop-off site.
- ◆ Fact sheets designed for a variety of audiences and subjects (e.g., general information, how to become a paint drop-off site, how to use the LVP service).

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

Retailers will receive several mailed notifications from PaintCare before the start of the program, as well as a starter pack of printed materials. The mailers will include:

- ◆ 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.
- ◆ Program brochures and LVP service fact sheets to inform their customer about the PaintCare program.
- ◆ Information about how to request additional print materials, and how to access them online.

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 paint drop-off sites and the benefits of participating in the program.

C6. Non-English Speakers

PaintCare has translated its program brochure for all PaintCare programs into Amharic, Arabic, Armenian, Chinese, Farsi, French, Hmong, Khmer, Korean, Lao, Polish, Portuguese, Russian, Spanish, Somali, Thai, Turkish, and Vietnamese. Two widely used fact sheets are available in translated versions: the fact sheet for the LVP service is available in Spanish, and the fact sheet for painting contractors is available in 11 languages other than English due to requests from PaintCare programs. Translated materials will be available to retailers, HHW program and other stakeholders, and electronic copies are posted on PaintCare's website. PaintCare will consider translating materials to other languages upon request.

D. Phased Outreach Approach

When starting a new program, PaintCare has learned that it is important to balance the need to inform the public about the new program with the need to allow new drop-off sites, retail stores in particular, time to

become familiar and comfortable with program operations. To avoid overwhelming new retail drop-off sites with paint and allow them to grow accustomed to program operations, PaintCare will phase in public outreach gradually.

At the start of the program, PaintCare plans to limit outreach activities to providing point-of-sale educational materials to all paint retailers and distributing one or more press releases about the new program. These communications will announce the new program, provide details about the PaintCare fee and products accepted, and describe the network of paint drop-off sites. PaintCare does not plan to use full multi-channel advertising campaigns during this period.

During this period, painting contractors and other consumers who frequently purchase paint will be more likely to notice the new fee than those who do not buy paint frequently. To address this group, PaintCare plans to work with contractors and their associations to inform them of the fee in advance of the start of the program and to provide fact sheets to retailers to insert in their monthly bills to regular customers and make available in the stores so that their customers will not be surprised by the fee.

In the second year of the program, as drop-off sites become comfortable with receiving paint from the public and arranging shipments with transporters, PaintCare plans to phase in a more comprehensive media strategy and advertising campaigns to increase public awareness of the program and encourage households and businesses to use paint drop-off sites. Such campaigns may include digital media such as website ads, streaming audio sponsorship, social media, and online video commercials, as well as traditional media such as print, television, and radio.

E. Stakeholder Input from Retailers

Experience in previous PaintCare state programs demonstrated that retailers were slow to adopt written materials about the PaintCare program, despite PaintCare's efforts to offer them free of charge. To address this, PaintCare worked with retail stakeholders to learn what would make them more willing or interested in utilizing PaintCare's materials and promoting the benefits of the program. PaintCare held several meetings with retailers: in California in June 2012, in Oregon in 2013, and in California and Connecticut in 2019.

At these meetings, retailers reviewed PaintCare POS materials including posters, brochures, window signage as well as ideas for new materials such as counter mats and floor decals. The retailers provided feedback about messaging, design, size, adaptability, and other elements that may factor into their willingness or ability to use the materials. Key feedback from these meetings included:

- ◆ Messages should be simple and not abstract in any way (e.g., "Recycle with PaintCare" was recommended as a clear call-to-action).
- ◆ Retailers requested a simple, small card to hand to customers to help them contact PaintCare by phone or website to find a paint drop-off site.
- ◆ Estimating the correct amount of paint to purchase is complicated. It requires knowledge about the type of paint, surface to be painted, and other factors. Retailers would not utilize or distribute

PaintCare materials addressing this subject due to concerns about an oversimplification of the purchasing process that could result in incorrect estimates. Instead, retailers suggested PaintCare educate consumers to seek advice on this topic from store staff.

- ◆ It is important for PaintCare and retailers to provide advance notice to professional painters to provide them ample time to prepare for the new fee and incorporate the fee into their bids/estimates prior to the start of the program.
- ◆ Based on historic practice, after the first year of the program, there are not many complaints about the fee and the focus is shifted more to information about drop-off sites and other recycling services, and less on the fee.
- ◆ Drop-off sites typically see a benefit to being promoted through both print and digital advertising.

Much of the input received from retailers has been incorporated into PaintCare outreach materials and strategy and PaintCare continues to solicit and encourage feedback from paint retailers and manufacturers about the program's print materials and other promotional efforts.

F. Joint Outreach with Local Government Programs

PaintCare plans to promote 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 paint recycling for digital, print, radio, and other media. To initiate a project, the local government partner will be asked to complete a form describing the project and budget for approval. PaintCare will consider a reimbursement proportional to the amount of the campaign devoted to the PaintCare program services. For example, when staff of the Housatonic Resource Recovery Authority in Connecticut published an annual newspaper advertisement promoting its calendar of HHW events for towns in its region, they devoted half of the page to PaintCare products and information, and PaintCare funded half of the 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 Appendix C.

G. 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 paint 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 paint recycling options available to the public. PaintCare has developed and maintains a national database of paint drop-off sites and

makes the information available through a drop-off site locator on PaintCare's website. The locator provides a paint-specific, easy-to-use way to search for the nearest available paint drop-off site. Site-specific information explains who is eligible to use a site and what limitations apply.

The site locator resource is currently organized as follows: for PaintCare states, the locator lists only paint 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.

H. Hotline

PaintCare operates a weekday 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.

I. 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 paint, 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.

J. Examples of Outreach Materials

Current versions of the following outreach materials are provided in Appendix C:

- ◆ Program trifold brochure (draft)
- ◆ Fact sheet for HHW programs about becoming a PaintCare partner
- ◆ Fact sheet for solid waste facilities about becoming a paint drop-off site
- ◆ Fact sheet for retailers describing their responsibility under the new law and providing a program overview
- ◆ Fact sheet for retailers about becoming a paint drop-off site
- ◆ Fact sheet for material reuse stores about becoming a paint drop-off site
- ◆ Fact sheet for painting contractors describing the PaintCare fee, paint drop-off sites, and the LVP service
- ◆ Fact sheet about the LVP service
- ◆ In-store informational poster (draft)
- ◆ "Recycle Here" poster for paint drop-off sites
- ◆ Fact sheet on joint outreach with local governments

7. Funding and Budget

Statutory Citation

RCW 70A.515.040 lists the required elements of a stewardship plan, including:

A demonstration of sufficient funding for the architectural paint stewardship program as described in the plan. The plan must include a funding mechanism whereby each architectural paint producer remits to the stewardship organization payment of an architectural paint stewardship assessment for each container of architectural paint the producer sells in this state, unless the distributor or paint retailer has negotiated a voluntary agreement with the producer and stewardship organization to remit the architectural paint stewardship assessment directly to the stewardship organization on behalf of the producer for the producer's architectural paint sold by the distributor or paint retailer in the state. The plan must include a proposed budget and a description of the process used to determine the architectural paint stewardship assessment. [RCW 70A.515.040(1)(c)]

The establishment in the plan of a uniform architectural paint stewardship assessment for all architectural paint sold in this state, in order to ensure that the funding mechanism is equitable and sustainable. For purposes of establishing the assessment, the plan must categorize the sizes of paint containers sold at retail and determine a uniform assessment amount that applies to each category of container size. The plan must require that any surplus funds generated from the funding mechanism that exceed a reserve greater than the most recent year's operating expenditures be put back into the program to either increase and improve program services or reduce the cost of the program and the architectural paint stewardship assessment, or both. [RCW 70A.515.040(1)(d)]

A review by an independent financial auditor of the proposed architectural paint stewardship assessment to ensure that any added cost to paint sold in the state as a result of the paint stewardship program does not exceed the costs of the program. In a report to the department, the independent auditor must verify that the amount added to each unit of paint will cover the costs of the paint stewardship program. [RCW 70A.515.040(1)(e)]

Section Overview

This section discusses:

- ◆ Funding mechanism
- ◆ Paint sales estimates
- ◆ Paint collection volume estimates
- ◆ Budget description
- ◆ PaintCare fee
- ◆ Financial summary

A. Funding Mechanism

The PaintCare fee will be applied to qualifying containers of architectural paint sold in Washington beginning on the program's start date. The PaintCare fee is set at a rate to cover but not exceed the cost of operating and sustaining the Washington program. All revenue generated by the fee on Washington paint sales will be spent to support the Washington program. The following steps describe the application of the PaintCare fee:

- ◆ Manufacturers will add the PaintCare fee to containers of architectural paint sold in Washington, whether it is sold directly or through dealers (retailers and distributors).
- ◆ Retailers and distributors will pass the PaintCare fee to their customers by including it in the price of architectural paint they sell in Washington. This is how retailers and distributors will recoup the PaintCare fee they paid when purchasing architectural paint from their suppliers.
- ◆ When someone buys architectural paint in Washington, the PaintCare fee will be included in the purchase price. While the fee is part of the product price, retailers have the option to list it as a line item on the receipt. In other PaintCare programs, most retailers have chosen to show the fee as a line item. As stated in the legislation, the fee may not be described as a "department recycling fee" at the point of retail.
- ◆ Manufacturers will report sales and remit to PaintCare the PaintCare fee for architectural paint they sold in Washington in the preceding month. Manufacturers will have already recouped the PaintCare fee they pay to PaintCare because the fee will be included in the price of their architectural paint when they sold it to their dealers. Some companies may be allowed to report sales on a less frequent schedule if their sales are minimal.

B. Paint Sales Estimates

Paint Sales Volume

Until PaintCare has a program in a state and requires state-based reporting, most manufacturers do not normally track all their sales based on the state where paint is ultimately sold. This is often due to distribution chains that may involve any number of distributors between the manufacturer and final point of sale. To estimate paint sales in Washington for this plan, PaintCare has contacted the companies assumed to have the highest sales in Washington and whose combined sales in other PaintCare programs are known to comprise the majority of sales in those programs, and asked them to provide their best estimate of sales in Washington for the two years 2018-2019. Using this data in combination with the same companies' sales in other PaintCare programs, relative state populations using US Census data, assumed similarities between Washington and adjacent PaintCare programs, and consultation with PaintCare's board of directors, PaintCare has projected to the best of its ability the volume of PaintCare products that will be sold in the state.

The table below shows the range of sales reported for program products for the three western states. Washington sales from 2019 appear to fall between Oregon and Colorado; Washington sales are estimated to be between 2.0 and 2.4 gallons per capita.

PER CAPITA SALES (GALLONS)

	2016	2017	2018	2019	Average
California	1.77	1.79	1.79	1.76	1.78
Oregon	2.18	2.22	2.24	2.09	2.18
Colorado	2.41	2.49	2.44	2.37	2.43

An annual increase in sales is expected to follow the estimated yearly change in state population, using data from Washington's Office of Financial Management. State population growth has proven to be strongly correlated to paint sales growth in other states.

Sales by Container Size

PaintCare has estimated the share of units sold in each of the three predominant container size categories from the data received from the manufacturers discussed above by comparison with sales data from other PaintCare programs. PaintCare has observed that a state's geographic size and region is a predictor of the relative percentages of each container size sold. The proportion of paint sold in 5-gallon containers as a percentage of overall paint sales tends to be relatively higher in geographically larger states. Knowing the container size mix is important in setting the PaintCare fee because the fee (and the resulting revenue) is lower for larger containers on a per-gallon basis.

The table below shows the container mix for four large western states, including Washington. The overall pattern suggests that the Washington container mix will be in the same range as the other western states.

2019 CONTAINER SIZE MIX (RELATIVE VOLUME OF PAINT SOLD IN EACH CONTAINER SIZE)

Size	California	Colorado	Oregon	Washington
<1 Gallon	3%	3%	3%	3%
1 Gallon to 2 Gallons	32%	32%	35%	30%
>2 to 5 Gallons	65%	65%	62%	67%

Following implementation, the program will know the actual sales volume and container size mix in Washington from manufacturer reporting. If actual sales differ significantly from the estimates, then the projected revenue and budget, and proposed PaintCare fee may need to be changed.

C. Paint Collection Volume Estimates

Paint is designed to be fully consumed through application to walls, buildings, and other surfaces. Although the amount of postconsumer paint received through collection programs is measurable, the actual quantity of postconsumer paint that is leftover, unwanted, and available for collection at any given time is unknown.

Consumers purchasing paint may decide to recycle or dispose of their unwanted paint as soon as a painting job is finished, or – because architectural paint products have a long shelf life – they may keep it for several years. These factors make it difficult to determine how much postconsumer paint is available for collection.

Collection Volume Projections

The recovery rate for postconsumer paint collected by paint stewardship programs in the U.S. and Canada varies from a low of about 4% to a high of about 12%. Recovery rate is defined as the volume of paint collected divided by volume of paint sold in the same period. The volume of paint collected depends on the state's paint collection infrastructure, extent of outreach, and age of the program. Based on its experience in other programs, PaintCare has observed a pattern showing that the recovery rate initially increases each year, with the largest increases in the first two or three years of the program. After a few years, the recovery rate stabilizes – with smaller increases, no increase, or small decreases.

To estimate collection volume, Washington was compared to Oregon using the pounds of paint collected per capita at HHW drop-off site(s) in each county. While current data reveals that Oregon HHW programs' paint collections per capita exceed Washington's, this is only because large facilities in Washington that accepted latex paint in the 1990s later changed to only accepting oil-based paint and do not currently accept latex paint. Historical data indicates that Washington will equal or surpass Oregon when HHW programs reinstate latex collections, as they are expected to do soon after the program begins.

The program will also collect an additional and substantial volume of paint from retail locations. To estimate the collection volume of retail locations, the model includes projections of the number and timing of new retail drop-off locations. This is done using (1) current Washington retailer commitments, (2) an estimate of extra sites needed to reach the convenience requirements outlined in the Washington law, and (3) recruitment patterns observed in the other PaintCare states.

The table below shows the projected recovery rate for the first three years of the Washington program.

PROJECTED GALLONS COLLECTED, SOLD, AND RECOVERY RATE

	2021 (9 MONTHS)	2022	2023
Paint Collected (gallons)	488,550	907,136	1,001,777
New Paint Sold (gallons)	12,213,751	16,493,374	16,696,276
Recovery Rate	4.0%	5.5%	6.0%

D. Budget Description

PaintCare is presenting a budget and proposed fee structure calculated to fully fund the Washington program through its first three years and allow it to accumulate an operating reserve to help ensure sustainability of the program. The budget reflects PaintCare's expected revenue and expenses based on the projected sales and recovery rates described previously.

The program has already incurred and will continue to incur additional expenses before the program starts and revenue begins to be collected. These expenses are for program planning activities. Notable examples include personnel, travel expenses, state oversight expenses, and legal costs in connection with regulatory review.

As described in the outreach and education section of this plan, PaintCare plans to take a phased-in approach in promoting the program. As outreach and public awareness increase, paint collection volumes and the related costs for paint collection, transportation, and processing are expected to also increase.

The following describes the primary elements of the budget.

Revenue. The volume of paint sales in Washington will be based on estimates of past sales and container mix as described previously.

Operations (In-State) Expenses

- ◆ **Paint processing.** This will be the most significant expense of the program. Costs will be based on vendor pricing provided through the RFP process discussed in Section 5.
- ◆ **Paint transportation.** This expense includes the cost of transporting paint bins from paint drop-off sites.
- ◆ **Paint collection supplies and support.** These will include the cost of paint collection bins, spill kits, PaintCare event expenses, training materials, signs, labor to assist LVP sites pack their paint, payments for additional activities (e.g., reuse) at sites, and other paint collection-related support.
- ◆ **Communications.** These expenses will include advertising and promotional materials to increase awareness of the program.
- ◆ **Personnel, professional services, and other.** These expenses will include the cost of staff working directly to implement the Washington program; legal costs for regulatory review and developing contracts; and other logistical, professional support, and office expenses.
- ◆ **State agency administrative fees.** This expense will be paid by PaintCare to Ecology for oversight of the paint stewardship program.
- ◆ **Loan repayment.** PaintCare has secured a loan from the American Coatings Association (ACA) to cover expenses incurred prior to the start of the program and until the program revenue is sufficient to cover program expenses. The interest rate on ACA's loan to PaintCare is equal to the rate that ACA pays to secure the funds it loans to PaintCare.

Corporate Expenses

Corporate expenses (also called indirect expenses) are those that are not specific to Washington but support all 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 and begin to be assessed about six months before program start. At the time of plan submission, Washington represents 10.3% of the combined population of the PaintCare programs. When the results of the 2020 census are published in 2021 and when New York is added to the corporate expense allocation, Washington's allocation will be revised accordingly. In future years, PaintCare may update the corporate allocation based on the population estimates published annually by the Census Bureau.

Operating Reserves

Reserves represent the net assets (cash and investments) of the Washington program. Reserves are needed to sustain the program in times of either higher than expected paint collection volumes resulting in higher than expected expenses, lower than expected paint sales 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 will be 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). Any surplus funds that exceed a reserve greater than the most recent year's operating expenditures will be put back into the program to either increase or improve program services or reduce the cost of the program and the PaintCare fee, or both.

E. PaintCare Fee

Based on the projected paint sales, revenue, and expenses, PaintCare proposes the following fee structure with different and increasing amounts for the following four size categories:

CONTAINER SIZE	FEE
Half pint or smaller	\$ 0.00
Larger than half pint up to smaller than 1 gallon	\$ 0.45
1 gallon up to 2 gallons	\$ 0.95
Larger than 2 gallons up to 5 gallons	\$ 1.95

Audit of the PaintCare Fee

The PaintCare fee has been reviewed by an independent financial auditor and the auditor's report has been submitted to Ecology. The auditor's report verified that the proposed amount added to each unit of paint will cover the costs of the paint stewardship program. Following is a summary of the projected revenue and expenses for the program for the time period reviewed and verified in the audit (6/19-12/23 with a March 2021 start date), with a one month adjustment to account for an intended April 2021 start date.

F. Financial Summary

The following table shows expenses and revenues from pre-program to 2023.

REVENUE AND EXPENSES				
REVENUE	Pre-Program (6/19-3/21)	2021 (4/21-12/21)	2022	2023
Larger than half pint up to smaller than 1 gallon		\$659,543	\$890,642	\$901,599
1 gallon to 2 gallons		4,061,072	5,484,047	5,551,511
Larger than 2 gallons up to 5 gallons		2,953,285	3,988,098	4,037,160
Pre-Program Loan	1,550,000			
Total Revenue	1,550,000	7,673,900	10,362,787	10,490,270
EXPENSES				
Paint Processing		1,889,467	3,508,347	3,874,371
Paint Transportation		635,115	1,179,276	1,302,310
Paint Collection Supplies and Support	232,360	650,993	1,208,758	1,334,867
Communications	61,054	202,500	785,399	795,061
Personnel, Professional Fees, Other	217,575	323,968	353,493	361,343
State Agency Administrative Fees	90,200	92,500	100,000	100,000
Pre-Program Loan Repayment		34,755	35,535	552,999
Allocation of Corporate Activity	338,819	462,738	407,120	419,334
Total Expenses	940,008	4,292,036	7,577,929	8,740,285

Change in Net Assets	609,992	3,381,863	2,784,858	1,749,985
Net Assets, Beginning of Year		609,992	3,991,855	6,776,714
Net Assets, End of Year	\$609,992	\$3,991,855	\$6,776,714	\$8,526,699
Reserve, as Percentage of Total Expenses		93%	89%	98%

Appendix A



Registered Manufacturers

Washington Paint Stewardship Program as of 2/1/2021

- 1 Acrylatex Coatings & Recycling Inc.
- 2 Advanced Protective Products, Inc.
- 3 Armstrong-Clark Company
- 4 Backdrop Inc
- 5 Basic Coatings
- 6 Behr Process Corporation
- 7 Benjamin Moore & Co.
- 8 Betco Corporation LTD
- 9 C&M Coatings
- 10 California Products Corp.
- 11 CBD Group
- 12 Clare, Inc.
- 13 Clinical Paints
- 14 Continental Products
- 15 Country Chic Paint Ltd.
- 16 CRC Industries, Inc.
- 17 Custom Building Products, Inc.
- 18 Custom Paint Product Group
- 19 Daly's Wood Finishes
- 20 Dryvit Systems, Inc.
- 21 Dunn-Edwards Corporation
- 22 ECOS Paints
- 23 Farrow & Ball Ltd
- 24 Farwest Paint Mfg. Company
- 25 Firestone Building Products LLC
- 26 Forrest Paint Co
- 27 Gardner-Gibson
- 28 Gemini Coatings, Inc.
- 29 Gemini Industries, Inc.
- 30 Golden Artist Colors, Inc.
- 31 H. Behlen & Bro.
- 32 Harrison Paint Company
- 33 Henry Company LLC
- 34 ICP Construction
- 35 Imperial Paints LLC
- 36 Kop-Coat, Inc.
- 37 Laticrete International, Inc.
- 38 Lullaby Paints



Registered Manufacturers

Washington Paint Stewardship Program as of 2/1/2021

- 39 Messmer's Inc.
- 40 Metro Paint
- 41 Miller Paint Company Inc
- 42 NCH Corporation
- 43 Old Masters
- 44 Penofin
- 45 Performance Coatings, Inc.
- 46 Perma-Chink Systems, Inc.
- 47 PPG Architectural Finishes, Inc.
- 48 Premier Finishes Inc.
- 49 Preserva Products, Ltd
- 50 Quikrete
- 51 Ready Seal, Inc.
- 52 Richard's Paint Manufacturing Co Inc.
- 53 Rodda Paint Company
- 54 Roman Decorating Products, LLC
- 55 RPM Wood Finishes Group, Inc.
- 56 Rudd Company, Inc.
- 57 Rust-Oleum Corporation
- 58 Sansin Corporation, The
- 59 Sashco, Inc
- 60 SaverSystems, Inc.
- 61 Sherwin-Williams
- 62 Sto Corp.
- 63 Structures Wood Care, Inc.
- 64 Sunnyside Corporation
- 65 Sutherland Welles Ltd.
- 66 Tex-Cote LLC
- 67 True Value Manufacturing Company
- 68 United Gilsonite Laboratories (UGL)
- 69 Van Sickle Paint Mfg.
- 70 Waterlox Coatings Corporation
- 71 Wood Iron Wood Finishes, Inc.
- 72 Wood Kote Products Inc.



Registered Brands

Washington Paint Stewardship Program as of 2/1/2021

ACR 4675 Interior Primer	Benjamin Moore Marvelux	Bin Coat Metal Paint
ACR 5514 Interior/Exterior Primer	Benjamin Moore Moorcraft Super Craft	Blacknight
ACR Stain Blocker Primer	Benjamin Moore Moorcraft Super Hide	Blue Seal
Allpro Commercial Grade Waterproofing Sealer	Benjamin Moore Muresco	BMI 100 Primer
Allpro Concrete Floor Sealer	Benjamin Moore Natura	Bruce Fresh Finish
Allpro Concrete Waterproofing Paint	Benjamin Moore Premium Exterior Stain	BrushLaq
Allpro Masonry Waterproofing Sealer	Benjamin Moore Pro Finish	Bunker Hill DIKON Barn & Fence
Allpro Multi-Surface Water Repellent	Benjamin Moore Regal Classic	C&M Coatings
Andersons	Benjamin Moore Regal Select	CAB/Acrylic Clear Topcoat
Aqua Mix Aqua Stain	Benjamin Moore Satin Impervo	CAB/Acrylic White Topcoat
Aqua Mix Enrich-n-Seal	Benjamin Moore Satin Impervo	Cabot
Aqua Mix High Gloss Sealer	Benjamin Moore Studio Finishes (except Chalkboard Paint)	Cabot "The Finish"
Aqua Mix Penetrating Sealer	Benjamin Moore Super Craft	Cabot Australian Timber Oil
Aqua Mix ProSolv	Benjamin Moore Super Spec (does not include Super Spec HP)	Cabot Cabothane
Aqua Mix Seal & Finish Low Sheen	Benjamin Moore Super Spec HP Acrylic Metal Primer	Cabot Clear solutions
Aqua Mix Sealer's Choice Gold	Benjamin Moore Super Spec HP Alkyd Metal Primer	Cabot OVT
Aqua Mix Stone Enhancer	Benjamin Moore Super Spec HP Clear Acrylic Sealer	Cabot Problem Solver
Aqua Mix UltraSolv	Benjamin Moore Super Spec HP DTM Acrylic Gloss	Cabot PROVT
Aqua Zar (All Gloss Levels)	Benjamin Moore Super Spec HP DTM Acrylic Low Lustre	California Paints Alkyd Vapor Barrier Primer Sealer & Enamel Undercoater
Architect Series	Benjamin Moore Super Spec HP DTM Alkyd Gloss	California Paints AllFlor Porch & Floor Enamel
Armstrong Stains	Benjamin Moore Super Spec HP DTM Alkyd Semi-Gloss	California Paints All Wall & Trim Primer, Sealer and Undercoater
Aspire	Benjamin Moore Super Spec HP DTM Alkyd Gloss Enamel	California Paints Aquaborne Ceramic Universal Primer
Backdrop	Benjamin Moore Super Spec HP DTM Alkyd Low Lustre	California Paints ASAP Enamel Undercoater Primer & Sealer
Bakor	Benjamin Moore Super Spec HP DTM Alkyd Semi-Gloss Enamel	California Paints California Ceiling White
Basic Coatings Hardwood Floor Refinisher Gloss	Benjamin Moore Super Spec HP Rust Converter	California Paints CalPro
Basic Coatings Hardwood Floor Refinisher Satin	Benjamin Moore Super Spec HP Shop-Coat Alkyd Metal Primer	California Paints Diamond Ceiling White
Behr	Benjamin Moore Super Spec HP Universal Metal Primer	California Paints Drywall Primer
Behr Premium Plus	Benjamin Moore Super Spec HP Urethane Alkyd Gloss Enamel	California Paints Fres-Coat
Behr Premium Plus Ultra	Benjamin Moore Sure Seal Primer	California Paints Grip Coat Bonding Primer
Behr Premium Select	Benjamin Moore Ultra Spec (does not include Ultra Spec HP)	California Paints Malibu
Behr Pro-X	Benjamin Moore Vinyl Latex Flat Paint	California Paints Muralo 268
Benjamin Moore Advance	Benjamin Moore Waterborne Ceiling Paint	California Paints Muralo 563
Benjamin Moore Alkyd Dulamel	Benjamin Moore Waterborne Satin Impervo	California Paints Nextech 2
Benjamin Moore Arborcoat	BenMate Danish Tung Oil Finish	California Paints Ox-O-Flow Cal Coater
Benjamin Moore Aura		California Paints Preference
Benjamin Moore Ben		California Paints Prime Touch Primer and Sealer
Benjamin Moore Benwood Finishes		California Paints ProPaint
Benjamin Moore Block Filler		California Paints Sand Finish
Benjamin Moore Color Samples		California Paints Texture Finish
Benjamin Moore Concepts		California Paints Trouble Shooter
Benjamin Moore Concrete Waterproof Sealer		California Paints Ultra 2010
Benjamin Moore Dry Fall		California Paints Ultra Aquaborne Ceramic
Benjamin Moore Eco Spec		
Benjamin Moore Floor and Patio		
Benjamin Moore Fresh Start Primers		
Benjamin Moore Grand Entrance		
Benjamin Moore Impervex		
Benjamin Moore Ironclad		
Benjamin Moore Kitchen and Bath		
Benjamin Moore Knockdown		



Registered Brands

Washington Paint Stewardship Program as of 2/1/2021

California Paints Ultra Ceiling White	Corotech Electrostatic Enamel Semi-Gloss	Drylok Concrete Floor Paint (all colors)
California Paints Ultra High Build Exterior Paint	Corotech Hammertone Enamel	Drylok Concrete Protector
California Paints UltraPlate Cabinet & Trim Enamel	Corotech Organic Zinc Rich Primer	Drylok E1 Floor Paint (all colors)
California Paints Verde	Corotech Pre-Cat Epoxy Eggshell	Drylok Extreme
California Paints WipeOut	Corotech Pre-Cat Epoxy Semi-Gloss	Drylok Latex Base Masonry Waterproofer (all colors)
California Paints WipeOut II	Corotech Prep All Universal Primer	Drylok Natural Look Sealer
Casual Spaces	Corotech Quick Dry Acrylic Spray DTM	Drylok Oil Base Masonry Waterproofer (all colors)
Chemsearch - Conquest	Corotech Quick Dry Enamel Gloss	Drylok Water Based 5% Silicone
Chimney Rx Masonry Chimney Water Repellent	Corotech Quick Dry Enamel Semi-Gloss	Drylok Wet Look Sealer
Clare Flat White	Corotech Rust Arrestor	Duckback
Clare Interior Eggshell	Corotech Shop Cote Primer	Dunn Edwards
Clare Interior Semi-Gloss	Country Chic Paint - Tough Coat	Dutch Boy
Clare Multipurpose Primer	Cover & Go	Dutchboy Dimensions
Clear and Clean	Crackle Lacquer Clear	Dutchboy Dirt Fighter Interior
Clinical Paints	CRC® Rust Converter	Dutchboy Maxbond®
Collection of Joy Argente	Crema	Dutchboy Refresh
Collection of Joy Oro	CrystalFin: Gloss , Semi-Gloss, Satin and Matte	Dutch Standard (all products)
Color Decor	CrystalFin Floor Finish: Gloss and Satin	Easy Care
Color Extra	CT-100	Easy Color
Color House Premium Ceiling Paint	Daly's Deck Stain	Economy
Color Made Simple	Daly's Log Oil	ECOS Paints
Color Mist ™	Daly's Semi-Transparent Exterior Stain	Enrich
Color Prime - W ™	Daly's Waterborne Deck Stain	EPIC Ceiling White
Color Prime ™	Daly's Waterborne Stain	EPIC Interior Primer
Color Wheel	Daly's Wood Stain	EPIC Premium Interior Paint and Priimer
Colour Crete	Deft Clear Wood Finishes	Essential Performance
Comex Paint	Deft Deftoil	Excesior Coatings (all products)
Conco	Deft Lacquer Sanding Sealer	E-Z Kare
Contractor's Edge	Deft Polyurethanes	Fabulon
Controlz Primers	Deft Wood Stains	Farrow & Ball Dead Flat
Coronado Aqua Plastic	Defy Clear Wood Finish	Farrow & Ball Estate Eggshell
Coronado Ceiling Paint	Defy Composite Deck Sealer	Farrow & Ball Estate Emulsion
Coronado Crylicote	Defy Deck Stain for Hardwoods	Farrow & Ball Exterior Eggshell
Coronado Elastite	Defy Epoxy Fortified Wood Stain	Farrow & Ball Full Gloss
Coronado Final Touch	Defy Extreme Wood Stain	Farrow & Ball Interior /Exterior Wood Primer & Undercoat
Coronado Gold	Defy Marine Seal	Farrow & Ball Interior Wood Primer & Undercoat
Coronado Grand	Defy Original Synthetic Wood Stain	Farrow & Ball Masonry & Plaster Stabilising Primer
Coronado Grip & Seal	Demandit®	Farrow & Ball Masonry Paint
Coronado Maxum Stains	Designer Drylok (all colors)	Farrow & Ball Metal Primer & Undercoat
Coronado Optimum Hide	Devine	Farrow & Ball Modern Eggshell
Coronado Rust Scat	DIKON Barn & Fence (Bunker Hill)	Farrow & Ball Modern Emulsion
Coronado Super Kote 1000	DIKON Dairy Enamel	Farrow & Ball Wall Ceiling Primer & Undercoat
Coronado Super Kote 3000	Dimensional Metals 2	Farrow & Ball Wood Floor Primer & Undercoat
Coronado Super Kote 5000 (does not include the dry falls)	Do It Best	
Coronado Supreme	Do-It-Best	
Coronado Texcrete	Do It Best Best Look®	
Coronado Texcrete WB	Do It Best Color Solutions®	
Coronado Tough Shield	Do-It Best Waterproofer	
Coronado Tough Tex		
Coronado Tough Walls		



Registered Brands

Washington Paint Stewardship Program as of 2/1/2021

Farrow & Ball Wood Knot & Resin Blocking Primer	FixAll Waterborne Alkyd Stain Killer	Glidden PVA Drywall Primer
Finecoat 2	FixAll WearAll	Glidden Quick Cover
Fixall (all products)	Formby's	Glidden Spred
FixAll Acrylic Floor Sealer	Forrest Paint	Glidden Vinyl Renew
FixAll Acrylic Pool Paint	Frazee	Glidden Woodpride
FixAll Acrylic Stain Killer	Fred Myers	Glitsa Gold Seal™ Finish
FixAll Adhesium Wall Covering Primer	French Lac	Glitsa Gold Seal™ Lite Scent™ Finish
FixAll Alkyd Stain Killer	Fresco 2	Glitsa Gold Seal™ Stains (various colors)
FixAll Alumithane	GacoDeck (A56, DT, & DK)	Glitsa High Performance Waterborne Finish
FixAll Aquaborne Ceramithane	Gardner-Gibson Black Jack (white elastomeric coatings only)	Glitsa Infinity II LVOC™ Finish
FixAll Chlorinated Rubber Pool Paint	Gardner-Gibson Dynamite	GlitsaMax™ Finish
FixAll Clear Waterproofing Sealer	Gardner-Gibson Eterna Kote	Glitsa Quality Seal™ Sealer
FixAll Dry Fall	Gardner-Gibson Gardner	Glitsa Wood Flour Cement™
FixAll Elastomeric Coating	Gardner-Gibson Shur-Stik	Glitza TruSeal
FixAll Epoxy Pool Paint	Gardner-Gibson Sta-Kool	GlosThane Finish
FixAll Everlife Fast Dry Alkyd Enamel	Gardner-Gibson Sta-Kool	Golden Paintworks
FixAll Everlife Urethane Enamel	Gemini Coatings Artisan Effects	GPM
FixAll Everlife Waterborne Enamel	Gemini Coatings Craftsman Collection	GS88-1 Sealer
FixAll Everlife Weatherproof Aluminum Enamel	Gemini Coatings Gem Clear	GS99-1 Sealer
FixAll Exposed Concrete Sealer	Gemini Coatings Gem Coat	Guardian Contractor Grade
FixAll Field Marking Paint RTU	Gemini Coatings Gem Cryl	Guardian Professional Quality H&C
FixAll Fix-Rite	Gemini Coatings Gem Dye	H&K Paints All Coat
FixAll Fix Rust Primer	Gemini Coatings Gem Glo	Harrison Paint (all products)
FixAll Grabber Bonding Primer	Gemini Coatings Gemini	HD® Designs
FixAll Gym Seal	Gemini Coatings Gemini Tone Stain	HDP™ Water-Repellent Paint
FixAll Kitchen & Bath Enamel	Gemini Coatings Gem Pro	Heavy Bodied Glazing Stain (Various colors)
FixAll Lacquer	Gemini Coatings Gem Tone	Hemp Shield
FixAll Lacquer Sanding Sealer	Gemini Coatings Gem Var	Henry/Bakor
FixAll Lacrylic Clear Sealer & Anti-Graffiti Coating	Gemini Coatings Gulf Synthetics - PermaBond	Henry Acryprime Recoat Primer
FixAll Latex Block Filler	Gemini Coatings Master's Magic	Henry Air Bloc 31 Brush/Spray
FixAll Mason-Cote	Gemini Coatings Storm Shield	Henry Aquaprime Primer
FixAll Masonry Conditioner	Gemini Coatings Titanium Series	Henry Aquatac Primer
FixAll Novus	Gemini Coatings Total Wood Preservative	Henry Binder/Tack Emulsion
FixAll Polyurethane	Gemini Coatings TWP	Henry Grey Elastomeric Roof Coating
FixAll PVA Drywall Primer	Gemini Coatings WFS	Henry Light Tan Roof Coating
FixAll Roof Coating	Gemini Coatings Wood Finishers Supply	Henry Metalshield Rubber Based Gray Roof Coating
FixAll RustPlate Primer	Geocel	Henry Metalshield Waterbased Elastomeric Roof Coating
FixAll Sanding Sealer	Glidden Concrete Paint	Henry Premium Elastomeric Base Coating
FixAll Semi-Transparent Interior Stain	Glidden Diamond	Henry Premium Non-Fibered Aluminum
FixAll Shop Coat Primer	Glidden Duo	Henry RTC Coat
FixAll Skid Grip	Glidden Essentials	Henry Solorflx Tan Elastomeric
FixAll Spar Varnish	Glidden EZ Track	Henry Special Color Elastomeric
FixAll Sportmans Camouflage Exterior Paint	Glidden Grab-N-Go	HGTV Home
FixAll Stain & Odor Barrier	Glidden Gripper	
FixAll Stopz	Glidden High Endurance	
FixAll Ultimate Universal Primer	Glidden High Performance	
FixAll Ultra Tred	Glidden Premium	
FixAll Varnish	Glidden Professional Devflex	
	Glidden Professional Devguard	
	Glidden Professional Devoe	



Registered Brands

Washington Paint Stewardship Program as of 2/1/2021

HGTV Weathershield by Sherwin Williams	Laticrete Paver Armor Pro™ Premium Waterproofing Natural Look Sealer	Lifeline Endure
Homax Premixed Popcorn Ceiling Texture	Laticrete Premium Stone Sealer	LifeLine Exterior
Homax Premixed Wall Texture	Laticrete Premium Stone Sealer & Enhancer	Lifeline Interior
Homax Roll-On Texture	Laticrete Saltillo Tile Sealer & Finish	Lifeline Ultra-2
Homax Tile Guard	Laticrete Semi Gloss Sealer & Finish	Lifeline Ultra-7
Homax Wet Look Cure Seal	Laticrete Stone Sealer	Liquid Stain
Homestead	Laticrete Stone Sealer & Enhancer	Long End Seal
Insl-X Aqua Lock	Laticrete StoneTech® Professional Enhancer	Lullaby Paints
Insl-X Blockout	Laticrete StoneTech® Professional Enhancer Pro™ Sealer	Maintenance One
Insl-X Cabinet Coat	Laticrete StoneTech® Professional Grout Release	Maintenance Paint (Home Depot)
Insl-X Chlorinated Rubber Pool Paint	Laticrete StoneTech® Professional Heavy Duty Exterior Sealer	Martha Stewart Living
Insl-X Field Marking	Laticrete StoneTech® Professional Heavy Duty Sealer	Martin Senour Paints
Insl-X Hot Trax Acrylic Garage Floor Paint	Laticrete StoneTech® Professional High Gloss Finishing Sealer	Marvins
Insl-X Lead Block Encapsulating Paint	Laticrete StoneTech® Professional High Gloss Lacquer	MasonrySaver #25 Floor Finish
Insl-X Odor Less	Laticrete StoneTech® Professional Impregnator Pro® Sealer	MasonrySaver Acrylic Waterproofing Sealer
Insl-X Prime Lock	Laticrete StoneTech® Professional Maximum BulletProof® Sealer	MasonrySaver All-Purpose HD Water Repellent
Insl-X Pro-Plate Enamel - Rust Preventative Coating	Laticrete StoneTech® Professional Natural Stone Countertop Sealer	MasonrySaver Decorative Concrete Sealer
Insl-X Rubber Based Pool Paint	Laticrete StoneTech® Professional Paver Sealer & Enhancer	MasonrySaver Garage Floor Sealer
Insl-X Seal Lock	Laticrete StoneTech® Professional Salt Water Resistant Sealer	MasonrySaver Paver Sealer
Insl-X Stix	Laticrete StoneTech® Professional Sealer	MasonrySaver VOV Compliant Solvent Base Water Repellent
Insl-X Sure Step	Laticrete StoneTech® Professional Semi Gloss Finishing Sealer	MasonrySaver Water Repellent for Brick
Insl-X Tough Shield	Laura Ashley	MasonrySaver Water Repellent for Split-Face Block
Insl-X Tuffcrete	Lenmar 350 VOC Polyurethane Wood Finish	Master Gel® Finish Clear
Insl-X Waterblock	Lenmar Aqua-Plastic	MBP Flat
Insl-X Waterborne Pool Paint	Lenmar Echo	McCloskey
Jel'd Poly Kote	Lenmar Evolution	McCloskey Man-O-War
Jel'd Stain	Lenmar Interior Waterborne Wiping Stain	McCloskey Multi-Use
Kool Seal	Lenmar QuickStain Waterborne Wiping Stain	McCloskey Special Effects
Krylon	Life Cycle Coatings Architectural Paint	McCloskey Stains
Krylon Commercial	Lifeline Accents	McCoy's
Kwal	Lifeline Acrylic	Messmer's Composite Deck Finish
Laticrete Granite & Marble Countertop Sealer	Lifeline Advance	Messmer's Decking Stain
Laticrete High Gloss Sealer & Finish		MetroPaint
Laticrete Paver Armor Pro™ Premium High Gloss Color Enriching Sealer		Miller 45 Minute Primer
Laticrete Paver Armor Pro™ Premium No Gloss Color Enriching Sealer		Miller Acriclear
Laticrete Paver Armor Pro™ Premium Penetrating Natural Look Sealer		Miller Acri-Glaze
Laticrete Paver Armor Pro™ Premium Salt Repelling Natural Look Sealer		Miller Acrilite
Laticrete Paver Armor Pro™ Premium Semi Gloss Color Enriching Sealer		Miller Acrimetal
		Miller Acrinamel
		Miller Acro Pure
		Miller Acrylic Satin
		Miller Acrylic Undercoat
		Miller Aluminum&Metal primer
		Miller Aluminum Paint
		Miller Aqua
		Miller Clear Varnish
		Miller Drifall Stalite
		Miller Edge Seal



Registered Brands

Washington Paint Stewardship Program as of 2/1/2021

Miller Enamel Undercoat	Miracle Sealants Mira Matte	Penofin Wood Finishes
Miller Equipment Enamel	Miracle Sealants Tile, Stone & Grout Sealer	Permax 108 Acrylic Coating
Miller Evolution	ML Campbell	Permax 115 Acrylic Coating
Miller Floor&Porch Enamel	Mono II	Permax 120 Acrylic Coating
Miller Gym Coat	Mono II EXT	Pittsburgh Paints and Stains
Miller HB Opaque Stain	Montage Architectural Paint	Plastek
Miller Kril	Multi-Mist Products - Pro Seal Ultra	Plastek EXT
Miller Metal Primer	Multi-Mist Products - Qurox	Plastic Kote
Miller Milastic	Multiplex	Plasti-Kote
Miller Millerseal	MX Primer	Pore-O-Pac™ Grain Filler (various colors)
Miller Modern Wood Stain	Nautica	Pore-O-Pac™ Grain Filler Reducer
Miller NW Weathergard'	NuDeck	PPG Accent Color Base
Miller Penetrating Conditioner	Odds N Ends	PPG Bar-Ox
Miller Performance	Old Masters Brushing Lacquer	PPG Break-Through
Miller Polyurethane Varnish	Old Masters Exterior Water-based Spar Urethane	PPG Builder Performance
Miller Premium	Old Masters Fast Dry Stain	PPG Diamond 350
Miller Premium Enamel	Old Masters Gel Stain	PPG Flood
Miller Pure Paint	Old Masters Graining Base	PPG Flood Pro
Miller Rust Control Primer	Old Masters H2O Wood Stain	PPG Floor & Porch
Miller Spar Enamel	Old Masters Oil Based Gel Polyurethane	PPG Fortis 350
Miller Spar Varnish	Old Masters Oil Based Polyurethane	PPG Fortis 450
Miller Speed Enamel	Old Masters Oil Based Quick-Dry Varnish	PPG Hi-Hide
Miller Stain Blocking Primer	Old Masters Oil Based Sending Sealer	PPG Kilstain
Miller Super Color	Old Masters Oil Based Spar Marine Varnish	PPG Maintenance Paint
Miller Super Seal	Old Masters Oil Based Super Varnish	PPG Manor Hall
Miller Tuff Tread	Old Masters Penetrating Sealer	PPG Metallic Tones
Miller Vapor-Lok	Old Masters Penetrating Stain	PPG Monarch
Minwax Color Wash	Old Masters Tung Oil Varnish	PPG Mopako
Minwax Lacquer (all types)	Old Masters Water-based Clear Finish	PPG Multi-Pro Maintenance
Minwax Polycrylic	Old Masters Water-based Polyurethane	PPG Paramount
Minwax PolyShades	Old Masters Water-based Sanding Sealer	PPG Perma-Crete
Minwax Polyurethane (all types)	Old Masters Wiping Stain	PPG Pitt-Cryl Plus
Minwax Stain (all types)	Old Masters Wood Conditioner	PPG Pitt-Glaze
Minwax Tung Oil	Old Masters Woodgrain Filler	PPG Plex-Seal
Minwax Urethane	Old World Stain	PPG Porter Paints Acri-Pro
Minwax Varnish	Olympic Paint	PPG Porter Paints Acri-Shield Paint
Minwax Wipe-On Poly	Olympic Stain	PPG Porter Paints Acri-Shield Stains
Minwax Wood Effects	Optimus	PPG Porter Paints Advantage 900
Minwax Wood Finish	Orgill	PPG Porter Paints Blankit
Miracle Sealants 511 Anti-Slip	PAF Primer	PPG Porter Paints Glyptex
Miracle Sealants 511 Glass Tile & Shower Door Sealer	Painter's Select	PPG Porter Paints Permanizer
Miracle Sealants 511 H2O Plus	Pantone	PPG Porter Paints Portersept
Miracle Sealants 511 Impregnator	Parks Pro Finisher	PPG Porter Pro-Master 2000
Miracle Sealants 511 Porcelain & Ceramic Tile Sealer	PD Stain	PPG Primatite
Miracle Sealants 511 Porous Plus	Penofin Concrete & Masonry Stain	PPG Proluxe Sikkens
Miracle Sealants 511 Quartz Counter Top Sealer		PPG Pure Performance
Miracle Sealants 511 Seal & Enhance		PPG Regency
Miracle Sealants High Gloss Finish Sealer		PPG Seal Grip
Miracle Sealants Matte Finish Sealer		PPG Silken Touch
		PPG Speed Cryl
		PPG Speedhide
		PPG Sun Roof
		PPG Synteko



Registered Brands

Washington Paint Stewardship Program as of 2/1/2021

PPG Timeless	Quikrete Concrete & Masonry Waterproofing Sealer	Rodda Control Primer
PPG Ultra-hide 150	Quikrete Masonry Waterproofing	Rodda Crystal Clear
PPG Wallhide	Quikrete Penetrating Concrete Stain	Rodda EZEE Coat
PPG Wall Supreme	Quikrete Textured Acrylic Concrete	Rodda Fast Dry Floor Finish
PPG Weather King	Quikrete Translucent Concrete Stain	Rodda First Coat
PPG Wonder Hide	Ralph Lauren	Rodda Horizon
PPG Wonder Pro	Ramuc	Rodda Interior Performance
PPG Wonder Pure	Ready Seal (all products)	Rodda Lasyn
PPG Wonder Shield	Reflectit™	Rodda Mar Resist
PPG Wonder Tones	Reserve	Rodda Master Painter
PPG ZoneMark	Restoration Hardware	Rodda Metal Master
PPI™ Waterborne Finish	Restore-X	Rodda Modern Wood Stain
Pratt & Lambert®	Revyvit®	Rodda Multi Master
Pratt & Lambert Accolade®	Richard's Paint Barricade	Rodda MultiPrime
Pratt & Lambert RedSeal®	Richard's Paint Bondcrete	Rodda pHlextite
Pratt & Lambert RedSeal® Zero VOC	Richard's Paint Bungalow 47	Rodda Ply-Coat
Pratt & Lambert STAINShield®	Richard's Paint Deck Guard	Rodda PMC 300
Prelude	Richard's Paint Driveway and Floor Coating	Rodda Porsalite
Premier Aluminum Roof Coating Fibered	Richard's Paint Eternity	Rodda Roseal
Premier Finishes ProKote High Performance Specialty Coating	Richard's Paint Floor-Tite	Rodda Rural Manor
Premier Finishes SuperPrep Interior PrepCoat	Richard's Paint H2O Fusion	Rodda Scotseal
Premier Finishes Tuff-Kote High Performance Restoration Primer	Richard's Paint Holzon	Rodda Speed Primer
Premier Finishes Tuff-Kote Interior HP Restoration SemiGloss	Richard's Paint Holzout	Rodda SR Ultra
Premium	Richard's Paint Holzite	Rodda Super Reflex
Premium Decor	Richard's Paint Painter's Pride	Rodda Surfbond
Preserva Wood	Richard's Paint Paverseal	Rodda Terra
Pre-Stain Clear Wood Stain	Richard's Paint Pliolite	Rodda Tuff Deck
Prestige	Richard's Paint PPS	Rodda Ultimate II
Prime 1	Richard's Paint Rich Air Zero VOC	Rodda Unique II
Prime Choice (all products)	Richard's Paint Rich Classic	Rodda Vapor Block
Primer	Richard's Paint Rich Flex	Rodda Vapor Shield
Primer with Sand™	Richard's Paint Rich Pro	Rodda Weather Performance
Pro Best	Richard's Paint Rich Shield	Rodda Wood Master
Professional Coatings	Richard's Paint Rich Tex	Roman ECO-988 Pigmented Primer
Profin:Gloss and Satin	Richard's Paint Rich Wall	Roman Golden Harvest PRO-988
Pro Good	Richard's Paint Richwood	Roman PRO-909 Vinyl Prep
Pro Grade	Richard's Paint Roof Shield	Roman PRO-935 R-35
Prymit®	Richard's Paint Rust Sheild	Roman PRO-977 Ultra Prime
Qualalacq™ Lacquer Gloss	Richard's Paint Shields All	Roman Pro-999 Rx-35
Qualalacq™ Lacquer Reducer	Richard's Paint Signature Ceramic	Roofers Choice
Qualalacq™ Lacquer Satin	Richard's Paint Signature Series	Room & Board by Valspar
Qualalacq™ Sanding Sealer	Richard's Paint Signature Series Plus	Royal Conditioner™
Qualarenu™ #1	Richard's Paint Thor	RPM Water Based Grain Filler (various colors)
Qualasole™	Richard's Paint Wall Guard	RPM Wood -15 Minute Wood Stain (various colors)
Quick Dry Zar Sanding Sealer (Gloss/Satin)	Rodda Accent Primer	RPM Wood-8x Wipe On Water Base Urethane Satin
Quik Hide	Rodda AC Line	RPM Wood -Polyurethane Satin
Quikrete Concrete & Masonry High Gloss Sealer	Rodda All Purpose Equipment Enamel	RPM Wood- Vinyl Sealer
	Rodda Aqua Master	RPM Wood Waterborne Urethane Finish Satin
	Rodda Cat-A-Lac	Rubberizeit Dura-Rubber
	Rodda Color Base	Rubberizeit Primer



Rudd Acryl Fin™ Finish	Rudd Nu-wave™ Stains (various colors)	Rustoleum Restore
Rudd Aerodry™ (various colors)	Rudd On-site™ Lacquer	Rustoleum Restorz
Rudd Basetoner™ (various colors)	Rudd Plastiprime™ (various colors)	Rustoleum Shimmer Stone
Rudd Catalast™ Lacquer (various colors)	Rudd Primer Undercoater (various colors)	Rustoleum Shizen
Rudd Chromacat™ Lacquer (various colors)	Rudd Prism™ Waterborne Stains (various colors)	Rustoleum Skim Stone
Rudd Chromawipe NVO™ Wiping Stain (various colors)	Rudd Problend 350 VOC™ Spray/Wiping Stains (various colors)	Rustoleum Stop Rust
Rudd Chromawipe™ Wiping Stain (various colors)	Rudd Problend TC™ Spray/Wiping Stains (various colors)	Rustoleum Texture Effects
Rudd Colorplex™ Lacquer (various colors)	Rudd Problend™ Spray/Wiping Stains (various colors)	Rustoleum Theme Paint
Rudd Colorplex™ Undercoaters (various colors)	Rudd Pro-Hibuild™ Lacquer	Rustoleum Trim Magic
Rudd Colortools™ LH Spray Stain (various colors)	Rudd Pro-Hibuild™ Sealer	Rustoleum Varathane
Rudd Colortools™ Wiping Stain (various colors)	Rudd Pro-Hibuild™ Undercoater (various colors)	Rustoleum Watco Exterior Wood Finish
Rudd Duracat-V 550 VOC Lacquer	Rudd Prothane™	Rustoleum Watco Lacquer + Color Tint
Rudd Duracat-V 550 VOC Sealer	Rudd Pro™ Lacquer	Rustoleum Watco Lacquer Clear Wood Finish
Rudd Duracat-V Plus™ Lacquer	Rudd Pro™ Sealer	Rustoleum Watco Wipe-On Poly
Rudd Duracat-V™ Lacquer (various colors)	Rudd Quickstack™ (various colors)	Rustoleum Wolman
Rudd Duracat-V™ Sealer (various colors)	Rudd Terraset™ Stain Concentrates (various colors)	Rustoleum X-Out Plus
Rudd Durafill™ Wood Filler	RUST DESTROYER	Rustoleum X-Seal
Rudd Duralac™ Lacquers (various colors)	RUST DESTROYER FAST DRY	Rustoleum Zehrung
Rudd Excelite™ Lacquer (various colors)	RUST DESTROYER HIGH HEAT	Rustoleum Zinsser
Rudd Fastwipe™ Wiping Stain (various colors)	RUST KNOCKOUT	Sansin Boracol 20-2
Rudd Glaze Stain	Rustoleum 360 Grey	Sansin Classic
Rudd Hi-build™ Fast Dry Finish	Rustoleum 360 Primer	Sansin DEC
Rudd Hycryl™ Waterborne Finish	Rustoleum 900 Clear Coat	Sansin ENS
Rudd Hycryl™ Waterborne Sealer	Rustoleum Advanced Technology UMA	Sansin Foundation RTU
Rudd Hyplex™ Lacquer (various colors)	Rustoleum American Accents	Sansin MDF Primer
Rudd ISC™ Stains (various colors)	Rustoleum Bellezza	Sansin Precision Coat
Rudd ISS LH™ Spray Stains (various colors)	Rustoleum BIN	Sansin Purity Interior
Rudd ISS™ Spray Stains (various colors)	Rustoleum Bulls Eye	Sansin Roof Tec
Rudd IWS™ Wiping Stains (various colors)	Rustoleum Colorfast	Sansin SDF
Rudd Natuseal™ Stains (various colors)	Rustoleum Decorative Painter's Products	Sansin Timber Tec
Rudd Nulustre™ Lacquer	Rustoleum Elastomeric Roof Coating	Sashco Capture® Log Stain
Rudd Nu-wave™ Lacquer (various colors)	Rustoleum Epoxy Shield	Sashco Cascade® Clear Coat
Rudd Nu-wave™ Sealers (various colors)	Rustoleum Flash Bond 400	Sashco Symphony® Interior Clear Coat
	Rustoleum MasterClear Supreme	Sashco Transformation Stain® Deck & Fence
	Rustoleum Metallic Paint Collection	Sashco Transformation Stain® Log and Timber
	Rustoleum Multispec	Sashco Transformation Stain® Siding & Trim
	Rustoleum OKON	Satin Thane Finish
	Rustoleum Painter's Touch	SeaFin AquaSpar Gloss and Satin
	Rustoleum Peel-Bond	SeaFin Filler/Stain
	Rustoleum Perma White	SeaFin Ship n'Shore Sealer
	Rustoleum Plastic And Vinyl NT	SeaFin Super Spar Varnish
	Rustoleum Platinum Products	Seal-Krete Clear-Seal
	Rustoleum Prime Start	Seal-Krete Concrete Colors Low Lustre Sealer
		Seal-Krete Concrete Colors Semi-Transparent Stain



Registered Brands

Washington Paint Stewardship Program as of 2/1/2021

Seal-Krete DampLock Concrete Waterproofing Paint	Sherwin Williams Enviropure	Sherwin Williams Twist & Try
Seal-Krete Epoxy-Seal Concrete Paint	Sherwin Williams EverLast	Sherwin Williams UltraCrete
Seal-Krete Epoxy-Seal Low VOC Paint	Sherwin Williams Faux Impressions®	Sherwin Williams Ultra Deluxe
Seal-Krete Floor-Tex	Sherwin Williams Flex Bon	Sherwin Williams Ultra Guard
Seal-Krete GraniteFX	Sherwin Williams Fresh Kote	Sherwin Williams WithSTAND®
Seal-Krete GraniTex	Sherwin Williams Harmony	Sherwin Williams Wood Classics
Seal-Krete Heavy Duty Waterproof	Sherwin Williams Impressions	Sherwin Williams WoodScapes
Seal-Krete Lock-Down Epoxy Bonding Floor Primer	Sherwin Williams Infinity®	Simply Glaze
Seal-Krete Multi-Surface Water Repellent	Sherwin Williams Lok-Tite	SkimStone® Protective Sealer
Seal-Krete Original Waterproofing Sealer	Sherwin Williams Loxon	SkimStone® Select Finish
Seal-Krete Stucco Guard	Sherwin Williams Luxury Living	Snow Roof
Sears	Sherwin Williams Maintenance Pro	Solar-Lux™ Stain (various colors)
Serena&Lily	Sherwin Williams Masterline	Solar-Lux™ Waterborne Dye Stain (various colors)
Severe Weather Contractor Finish	Sherwin Williams Master Painters	Solar-Lux™ Waterborne Glaze (various colors)
Shading/Glazing Stain (various colors)	Sherwin Williams Master Touch	Solar-Lux™ Waterborne Wiping Stains (various colors)
Shake Shield	Sherwin Williams Maxflex™	Spar Restoration Varnish
Sherwin Williams	Sherwin Williams Maxwood®	SprayLaq
Sherwin Williams A-100	Sherwin Williams Modac	SprayLaq 680A Sealer
Sherwin Williams Blok-Tite™	Sherwin Williams Optima Formula 360	Spraytek I
Sherwin Williams Bright Life	Sherwin Williams Painters Edge	Spraytek II
Sherwin Williams Builders Masterpiece	Sherwin Williams PalGard®	Spraytek III
Sherwin Williams Builders Solution Int.	Sherwin Williams Platinum	Start Right
Sherwin Williams Cashmere Interior	Sherwin Williams Ply-Mastic	StoCoat Acryl
Sherwin Williams Classic 99 Int	Sherwin Williams Ply-Thane	StoCoat Acryl Plus
Sherwin Williams Classic Cote	Sherwin Williams Ply-Tile	StoCoat Color
Sherwin Williams ColorAccents Interior Alkyd	Sherwin Williams Porcelain®	StoCoat Color Sand
Sherwin Williams ColorPlace®	Sherwin Williams PrepRite	StoCoat DTM Sand
Sherwin Williams ConFlex XL	Sherwin Williams ProBlock	StoCoat DTM Acrylic
Sherwin Williams DeckScapes Ext	Sherwin Williams ProClassic	StoCoat DTM Metal-Primer
Sherwin Williams Design Accents	Sherwin Williams ProGreen 200	StoCoat Lotusan
Sherwin Williams Design Basics Interior	Sherwin Williams Pro-Hide® Gold	StoCoat Lotusan Low VOC
Sherwin Williams Drywall Primer	Sherwin Williams Pro-Hide® Green	StoCoat Metallic
Sherwin Williams Dura Clad	Sherwin Williams Pro-Hide® Silver	StoCoat Texture Coarse
Sherwin Williams DuraCraft Acrylic Latex	Sherwin Williams Pro Kote	StoCoat Texture Fine
Sherwin Williams Duraseal	Sherwin Williams ProLine Supreme	StoCoat Texture Medium
Sherwin Williams Duration	Sherwin Williams ProMar 200	Sto Hot Prime
Sherwin Williams Duron	Sherwin Williams ProMar 400	Stolastic Sand
Sherwin Williams EasyLiving®	Sherwin Williams ProMar 700	Stolastic Smooth
Sherwin Williams EcoSelect® Zero VOC	Sherwin Williams Property Solution	Stone Mason
Sherwin Williams Emerald	Sherwin Williams Red Devil	Stone Mason Ultra Gloss Water Based
Sherwin Williams Eminence®	Sherwin Williams Resilience	Sto Primer Creativ
	Sherwin Williams Rich Lux	Sto Primer Sand
	Sherwin Williams Rust-O-Lastic	Sto Primer Smooth
	Sherwin Williams Sea Shore	Storm Systems (all products)
	Sherwin Williams Shellac Primer	StoSilco Lastic
	Sherwin Williams Sher-Crete	StoTique
	Sherwin Williams SherStripe	Structures Wood Care NatureColor®
	Sherwin Williams Signature Select	Structures Wood Care NatureOne®
	Sherwin Williams Skylight®	Sunnyside Waterproof
	Sherwin Williams Solo 100% Acrylic	Sunnyside Wood Protectant
	Sherwin Williams SuperBond	Sure Shine
	Sherwin Williams SuperPaint	
	Sherwin Williams Terminator™	



Registered Brands

Washington Paint Stewardship Program as of 2/1/2021

Surmax	TileLab SurfaceGard	Walmart
Sutherland Welles Ltd. Marine Spar Varnish	Timberflex	Waterlox 350 VOC Satin Finish
Sutherland Welles Ltd. Murdoch's Line 500 Floor Finish	Timberflex II	Waterlox 350 VOC Sealer/Finish
Sutherland Welles Ltd. Murdoch's Line Hard Oil	Timberflex Pro	Waterlox 450 VOC Satin Finish
Sutherland Welles Ltd. Murdoch's Line Hard Sealer	Top Choice	Waterlox Original High Gloss Finish
Sutherland Welles Ltd. Murdoch's Line Table Top	Tru Seal	Waterlox Original Satin Finish
Sutherland Welles Ltd. Wiping Varnish (Sealer, Low, Medium, High Lustre)	Tuscan Glaze™	Waterlox Original Sealer/Finish
Tag-Out Graffiti Paint	Two Minute Repair Liquid	Waterlox XL88 Gloss Urethane
Tempproof 1200 Stove paint	UGL Pro Finish (all Gloss Levels)	Waterlox XL89 Satin Urethane
Tex-Cote 300	Ultra-Fill	Weather All
Tex-Cote 400	Ultra Flagship	Weathercoat™
Tex-Cote 600	Ultra Zar Plus (Gloss/Satin)	Weatherlastic®
Tex-Cote Aluma-Cool®	Undercoat	Weatherprime®
Tex-Cote Clear-Seal™	Underhill Paints	WeatherSeal
Tex-Cote Color Cote™	Uniflex	White Pickling Stain
Tex-Cote Color Tex®	UV Plus	Wipe on Zar (Semi Gloss/Satin)
Tex-Cote Cool-Tec®	UV Plus for Hardwoods	Wonder Guard
Tex-Cote Cool-Tex®	Valspar	Wood Iron Deck, Fence & Siding Stain
Tex-Cote Coolwall®	Valspar Anti-Rust	Wood Iron Doors & More Finish
Tex-Cote Epo-TeX™	Valspar Climate Zone	Wood Iron Exterior Oil Finish
Tex-Cote Flex-On®	Valspar Color Style	Wood Iron Generations Water-Based Stain
Tex-Cote Graffiti Gard®	Valspar Decorator	Wood Iron Top Coat Finish
Tex-Cote Kenitex®	Valspar Duramax	Wood Shield
Tex-Cote Metal-Prime™	Valspar Elan	Woodsmen
Tex-Cote Primer 27™	Valspar Integrity	Woodturners Finish
Tex-Cote Rainstopper®	Valspar Medallion	X-O Rust
Tex-Cote Reflect-Tec®	Valspar Medallion Primers	ZAP Primers
Tex-Cote Stone-TeX®	Valspar Prep-Step Primers	Zar Classic (all Gloss Levels)
Tex-Cote Strata Grip	Valspar Pro 2000 Interior Contractor Finish	Zar Clear Wood Sealer
Tex-Cote Tex-Dri®	Valspar Professional	Zar Clear Wood Sealer Toner Base
Tex-Cote Tex-Gard®	Valspar Professional Bonding Primer	Zar Deck&Siding Stains Solid and Semi-Transparent (all colors)
Tex-Cote Tex-Tura®	Valspar Professional Exterior	Zar Exterior Polyurethane (Gloss/Satin)
Tex-Cote Top-Cote™	Valspar Professional Exterior Primer	Zar Exterior Water Base Polyurethane (Gloss/Satin)
Tex-Cote Trim-Cote®	Valspar Professional Interior	Zar Interior Polyurethane (all Gloss Levels)
Tex-Cote Ty-Cote™	Valspar Professional New Construction Primer	Zar Ultra Exterior Polyurethane (all gloss Levels)
Tex-Cote Ultra-TeX™	Valspar Professional PVA Primer	Zar Ultra Interior Polyurethane (all Gloss Levels)
Tex-Cote XL70®	Valspar Restoration Series	Zar Ultra Max OMU (all gloss Levels)
Texturecoat	Valspar Signature Colors	Zar Ultra Max Rejuvenator
The Freshaire Choice	Valspar Tractor & Implement	Zar Ultra Max Sanding Sealer
The Paint Drop™	Valspar Ultra	Zar Ultra Max Wipe On
Thick Husky Primer	Valspar Ultra Premium	Zar Ultra Max Wood Stains (all colors)
Thompson's Water Seal	Valspar Weathercoat	Zar Wood Stains (all colors)
TileLab Gloss Sealer & Finish	Value	
TileLab Matte Sealer & Finish	Van Sickle Barn and Outbuilding Paints	
TileLab Sealer/Cleaner/Resealer Combo Pack	Van Sickle Exterior Latex (Economy, Premium or Super Premium)	
TileLab Stone Enhancer	Van Sickle Exterior Stains	
	Van Sickle Floor Enamel	
	Van Sickle Interior Latex (Economy, Premium or Super Premium)	
	Van Sickle Multi Purpose Enamel	

Appendix B



Defining Architectural Paint Products for the Purposes of the Assessment

UPDATED—JANUARY 2020

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.

In order to distinguish between what is an architectural coating for the purpose of the assessment and what coatings should not be assessed the fee, we are using 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.

In order to determine the products on which the fee is assessed, and the products on which the fee is not assessed, a company should 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, aerosols 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

Lastly, in order to identify Specialty or Special Purpose Coatings, we have used the definition from the Federated Society of Coating Technology's Coatings Encyclopedic (since AIM rules don't have a definition), which states that these coatings include arts and crafts, and automotive refinish coatings. These products should be easier to distinguish, however, as they are clearly called out 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 paints (spray cans)
- Auto and marine paints
- Art and craft paints
- Caulking compounds, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
- Original Equipment Manufacturer (OEM) (shop application) paints and finishes



Drywall Primer-Surfacers

June 2012

Purpose

The purpose of this notice is to clarify that “Drywall Primer-Surfacers” are included in the PaintCare program. As part of the program, manufacturers of these products must register with PaintCare and collect and remit the Assessment (“PaintCare Fee”) as with other architectural paints in states with active paint stewardship programs.

Background

In order to assist companies with determining what coatings were architectural coatings subject to the PaintCare Fee and what coatings were not, PaintCare developed a factsheet detailing what factors should be taken into consideration when making these determinations. In addition, the factsheet listed examples of PaintCare products and examples of non-PaintCare products (products that should not be assessed the fee). PaintCare, however, relies on individual manufacturers to determine what products are part of the program and what products are not, depending on their specific product lines. In some cases, PaintCare helps with this determination based on individual calls with manufacturers. In the case of Drywall Primer-Surfacers, based on these calls, it has come to our attention that some manufacturers were assessing the fee believing they were program products and some were not assessing the fee believing that they were non-program products. It appears that confusion arose when trying to distinguish drywall primer from drywall compound.

In order to ensure that all manufacturers are on a level playing field and the PaintCare Fee is indeed placed on all products subject to the assessment, PaintCare herein clarifies that Drywall Primer-Surfacer is considered a PaintCare product and the PaintCare Fee must be assessed and remitted by all manufacturers of Drywall Primer-Surfacers. The reason for including this category under the architectural coatings that are subject to the program is as follows:

- The Drywall Primer-Surfacer products are primers. Primers are considered architectural coatings.
- MSDS sheets, either in their title and or elsewhere in the product description, for these products indicate that they are paint or primers.
- MSDS sheets indicate that they contain some type of binder or resin.
- Marketing information published by manufacturers for their own products indicate that they are vapor barriers or coatings.

- Information published by manufacturers for their own products indicate that they are vinyl, acrylic, and/or latex-based.
- Competitors have reported that they make and sell equivalent products that are not excluded by PaintCare.
- Consumers with leftover/unwanted Drywall Primer-Surfacers may bring them to a PaintCare collection site for proper recycling/disposal.

Action

Starting August 1, 2012, manufacturers of “Drywall Primer-Surfacers” need to ensure that these products are registered with PaintCare and add the PaintCare Fee to the wholesale price of these products to all distributors and retailers. Manufacturers are not required to pay the fee on past sales because the fees were not charged to distributors, retailers, or consumers.

More Information

For more information about the PaintCare program and the responsibilities of manufacturers, please visit PaintCare.org or contact:

Taujuana Davis, Registration Coordinator for Manufacturers
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(202) 232-2733

Marjaneh Zarrehparvar, Executive Director
mzarrehparvar@paint.org
(855) 724-6809

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Masonry and Concrete Sealers labeled “For Professional Use Only”

Purpose

The purpose of this notice is to clarify that masonry and concrete sealers that are labeled “for professional use only” are excluded from the PaintCare program. Manufacturers of these products are not required to register with PaintCare and they are not required to collect and remit the Assessment (“PaintCare Fee”) in states with active paint stewardship programs operated by PaintCare.

Background

In order to assist companies with determining what products are architectural coatings subject to the PaintCare Fee and what products are not, PaintCare developed a definition of architectural paint detailing what factors should be taken into consideration when making these determinations. In addition, the definition lists examples of PaintCare products and examples of non-PaintCare products (products that should not be assessed the fee). PaintCare relies on individual manufacturers to determine which, if any, of their products are part of the program. In some cases, PaintCare helps with this determination based on individual calls with manufacturers. In the case of products used as sealers for masonry and concrete —based on inquiries from many industry representatives and manufacturers of these products — it has come to our attention that manufacturers of these sealers desire clarification on whether their products are considered architectural coatings for the purposes of active and future state PaintCare programs.

In order to ensure that all manufacturers are on a level playing field and the PaintCare Fee is placed on all products subject to the assessment, PaintCare herein clarifies that masonry and concrete sealers labeled for professional use are not considered PaintCare products and the PaintCare Fee is not required to be assessed and remitted by manufacturers of these products. Excluding these products from the definition of architectural coatings is based on the following:

- Originally PaintCare’s definition excluded products that are both (1) Industrial Maintenance Coatings and (2) labeled “for professional use only.” [Other acceptable phrases are (a) for industrial use only, (b) not for residential use, and (c) not intended for residential use].
- The definition of an IM coating varies somewhat from one state to another and from one regulatory air district to another. Generally, determining if a coating meets the criteria for IM is based on the manufacturers recommended use for the product and whether it meets any one of

certain criteria (simply put these criteria are: regular exposure to heat, chemicals, moisture, or abrasion). Masonry sealers are intended to act as waterproofing agents and are applied where water exposure is anticipated. Thus as a category they can generally be considered by manufacturers to be IM coatings and therefore meet the first criteria.

- Some manufacturers label these products for professional use. Others do not label them for professional use. There is no prohibition on a manufacturer from labeling a product for professional use. Therefore if a manufacturer chooses to change the product label on a product that they consider IM in order to also comply with the second criteria above (in the first bullet), they may do so in order have these products excluded from the PaintCare program. The manufacturer may change their regular container label or use an additional sticker.
- If PaintCare finds that manufacturers start to change their labels on other products that are clearly not for professional use or industrial maintenance coatings (e.g. house paint), the professional use labeling will not exclude such products.
- An important purpose of the paint stewardship programs is to collect and recycle unused paint, stains, and coatings that are normally managed through government-sponsored household hazardous waste (HHW) programs. Sealers for masonry and concrete are not known to be a problem at HHW programs.

Conclusion

Concrete and masonry sealers that are IM coatings and labeled for professional use using one of the phrases indicated above are categorically exempt from PaintCare.

More Information

For more information about the PaintCare program and the responsibilities of manufacturers, please visit PaintCare.org or contact:

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Marjaneh Zarrehparvar
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Shop Application and OEM

Purpose

This notice is to clarify that architectural paint products are excluded from the PaintCare program when they are used in Shop Application or Original Equipment Manufacturing (OEM). Retailers of these products may remove the Assessment ("PaintCare Fee") from the purchase price of architectural paint (i.e., PaintCare products) in states with active PaintCare programs.

Background

In order to assist companies with determining what products are architectural coatings subject to the PaintCare Fee and what products are not, PaintCare developed a definition of architectural paint detailing what factors should be taken into consideration when making these determinations. In addition, the definition lists examples of PaintCare products and examples of non-PaintCare products (products that should not be assessed the fee). PaintCare relies on individual manufacturers to determine which, if any, of their products are part of the program. In some cases, PaintCare helps with this determination based on inquiries from a manufacturer. In the case of products used in a shop setting or for the manufacturing of goods or equipment, it has come to our attention that manufacturers and retailers of these products desire clarification on when the fees may be removed and how to keep records.

In order to ensure that all manufacturers and retailers are on a level playing field and the PaintCare Fee is placed on all products subject to the assessment, PaintCare herein clarifies that products used in Shop Application and OEM are not considered PaintCare products and the PaintCare Fee is not required to be assessed and remitted by manufacturers of these products. Products used "in the field" are not excluded.

Examples: Excluded (fees may be removed)

- A furniture shop stains and applies lacquer to furniture at the shop. The stain and lacquer are excluded because they are used in the shop.
- A tool manufacturer paints all of its tools in a factory. The paint is excluded because it is applied in the factory.
- A kitchen cabinet company builds and paints cabinets at their shop. The paint used to finish the cabinets is excluded because it is applied in the shop.
- A company builds pre-fabricated houses and paints the houses at their manufacturing facility. The paints used at the plant are excluded because they are applied at the plant.

Examples: Not Excluded (fees are to be applied)

- A kitchen cabinet company builds cabinets at the shop, and then the cabinets are installed and finished in a residence. The paint used to finish the cabinets in the field is not excluded because it is applied in the field.
- A pre-fab house is assembled at the final building site. The company that built the house sends a few gallons of paint (known as “loose-ships.”) to the final building site for touchups and final painting after the house is assembled. The loose-ship products are not excluded because they are applied in the field.

Record-Keeping

Manufacturers and retailers may exclude the PaintCare Fee from products for Shop Application and OEM provided they keep records, subject to audit, to demonstrate that the fees were not charged for a valid reason, e.g., a regular customer is known to be a furniture builder. PaintCare does not have specific requirements about how these records are to be kept, and leaves it up to the retailer and manufacturer to develop their own system. PaintCare suggests retailers and manufacturers work together to develop their own record keeping system, and that retailers at a minimum keep a file with copies of invoices showing products sold without the fee and notes regarding their customers.

Credits on Fees Already Paid

Retailers that pay fees on their wholesale invoices may request credits from their suppliers. Suppliers that remit to PaintCare may in turn apply the same credit to a future payment. These credits are also subject to audit.

More Information

For more information about the PaintCare program and the responsibilities of manufacturers and retailers, please visit PaintCare.org or contact:

Taujuana Davis
Registration Coordinator for Manufacturers
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(202) 232-2733

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Appendix C



Washington Paint Stewardship Program

Each year about 800 million gallons of architectural paint is sold in the United States. Did you know that about 10 percent goes unused and is available for recycling?

Washington's paint stewardship law requires the paint manufacturing industry to develop a financially sustainable and environmentally responsible program to manage postconsumer architectural paint.

The program includes education about buying the right amount of paint, tips for using up remaining paint, and setting up convenient recycling locations throughout the state.

Paint manufacturers established PaintCare, a nonprofit organization, to run paint stewardship programs in states with applicable laws.

PaintCare Products

These products have a fee when you buy them and are accepted for free at drop-off sites:

- 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.

⊘ Non-PaintCare Products

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

For information about recycling and proper disposal of non-PaintCare products, please contact your garbage hauler, local environmental health agency, household hazardous waste program, or public works department.

WA-BREN-1220



Recycle

with PaintCare



WASHINGTON

Places to Take Leftover Paint

Paint recycling is more convenient with PaintCare. We set up paint drop-off sites throughout the state. To find your nearest drop-off site, use PaintCare's site locator at www.paintcare.org or call our hotline at (855) PAINT09.

How to Recycle

PaintCare sites accept all brands of leftover house paint, stain, and varnish, whether recently used or many years old. Containers must be five gallons or smaller, and some types of paint are not accepted. See back panel for a list of what PaintCare accepts for recycling.

All PaintCare drop-off sites accept up to five gallons of paint per visit. Some sites accept more. Please call sites in advance to make sure they can accept the amount of paint you would like to recycle.

Make sure all containers of paint have lids and original labels, and load them securely in your vehicle. Take them to a drop-off site during their regular business hours. We'll take it from there.



What Happens to the Paint?

PaintCare makes sure that your leftover paint is remixed into recycled paint, used as a fuel, made into other products, or is properly disposed if no other beneficial use for it can be found.

Who Can Use the Program?

Households can bring as much latex or oil-based paint as the site is willing to accept.

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/VSQG 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.

Large Volume Pickup

If you have at least 200 gallons of paint to recycle at your business or home, ask about our free pickup service. Please visit paintcare.org or call for more details or to request an appointment.

PaintCare Fee

PaintCare is funded by a fee paid by paint manufacturers for each can of paint they sell in the state. Manufacturers pass the fee to retailers, who then apply it to the price of paint. Stores can choose whether or not to show the fee on their receipts. The fee is based on the size of the container as follows:

- \$ 0.00 Half pint or smaller
- \$ 0.45 Larger than half pint up to smaller than 1 gallon
- \$ 0.95 1 gallon up to 2 gallons
- \$ 1.95 Larger than 2 gallons up to 5 gallons

Not a Deposit

The fee is not a deposit — it is part of the purchase price. The fee is used to fund the costs of running the program, including recycling, public education, staffing, and other expenses.

Contact Us

To learn more or find a drop-off site, please visit www.paintcare.org or call (855) PAINT09.



Information for HHW Programs

UPDATED – OCTOBER 2020

Washington's paint stewardship law benefits household hazardous waste programs.

START DATE: April 1, 2021 (PENDING APPROVAL)

A state law passed in May 2019 requires paint manufacturers to set up and operate a paint stewardship program in Washington. Program funding comes from a paint stewardship fee (PaintCare fee) applied to each container of architectural paint sold in Washington when the program begins in April 2021. Household hazardous waste (HHW) programs that participate as leftover paint drop-off sites can save money on paint management costs.

Paint Stewardship

PaintCare is a nonprofit organization established by the American Coatings Association to implement state-mandated paint stewardship programs on behalf of paint manufacturers in states that pass paint stewardship laws. PaintCare currently operates programs in California, Colorado, Connecticut, District of Columbia, Maine, Minnesota, Oregon, Rhode Island, and Vermont, and is developing programs for New York and Washington. The Washington program is required by state law, but it is designed and operated by the paint manufacturing industry through PaintCare.

Designing a Program for Washington

The law requires PaintCare, on behalf of paint manufacturers, to submit a comprehensive program plan to the Washington State Department of Ecology. PaintCare held a series of public meetings beginning in September 2019 to present the goals and design of the program and to receive input from HHW programs and other stakeholders.

Become a Drop-Off Site

Facilities (including events) that would like to become a drop-off site can fill out the interest form available in the Waste Facilities section of www.paintcare.org/WA

Water-Based (Latex) Paint is a Resource

An important goal of PaintCare is to conserve resources and increase the amount of paint that is recycled. In areas where HHW programs do not accept water-based paint, households and businesses are often instructed to let water-based paint dry out and then dispose of the dry paint in the trash. Through the PaintCare program, all paint—including latex paint—is recycled to the maximum extent possible.

Paint Drop-Off Sites

The primary requirement of paint stewardship laws is for paint manufacturers to set up paint drop-off sites at retailers and other locations where households and businesses are able to take leftover architectural paint, free of charge. PaintCare has established more than 1,800 paint drop-off sites across its programs. While most sites are paint retailers, solid waste facilities including transfer stations, recycling centers, and landfills, as well as household hazardous waste (HHW) facilities, may also volunteer to be paint drop-off sites and have their paint transportation and recycling costs paid by PaintCare.



Benefits of Partnering with PaintCare

- ◆ Save on paint management (supplies, transportation, and recycling) and public outreach
- ◆ Conserve resources and keep paint out of the solid waste stream
- ◆ Make recycling of leftover paint more convenient for your community

PaintCare Partners Receive

- ◆ Staff training at your site
- ◆ Paint collection bins
- ◆ Free paint transportation and processing services
- ◆ Site signage
- ◆ Compensation for additional services including paint reuse programs, bulking of oil-based paint, and other optional services
- ◆ Publicity of HHW site or event (optional)

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

How do billing and payments work?

- ◆ In the most common scenario, when your site ships out PaintCare products, the hauler sends PaintCare an invoice directly. This avoids the need for reimbursement.
- ◆ If your site also contracts with PaintCare for additional services such as paint reuse, your city/county sends an invoice to PaintCare for reimbursement.

Will PaintCare Require Operational Changes?

- ◆ If your program does not currently accept latex paint, PaintCare will not require you to do so. If you wish to start accepting latex, PaintCare will cover the transportation and processing costs.
- ◆ If your program does not currently accept paint from businesses, PaintCare will not require you to do so. If you wish to start accepting paint from businesses, PaintCare will cover the transportation and processing costs.
- ◆ HHW programs may continue to put restrictions on who can use their programs, e.g., to residents of certain towns or cities. (PaintCare retail drop-off sites accept paint from anyone in the state, and from both households and businesses.)

Our Program Would Like to Partner with PaintCare, What Are Our Next Steps?

- ◆ Contact PaintCare to begin contracting discussions as early as possible
- ◆ Analyze your current operations so you can describe them in detail to PaintCare to help determine the most appropriate type of contracting approach for your program
- ◆ Reach out internally to those who will be involved with the contracting process to understand their needs and time constraints
- ◆ Consult with staff involved with paint management operations to ensure they understand how partnership with PaintCare works and to address any questions and concerns with PaintCare staff
- ◆ Review the fact sheet Contracting with PaintCare for Waste Facilities for more details on contract types and other considerations as you prepare. Get a copy by contacting PaintCare or find the fact sheet in the Waste Facilities section of www.paintcare.org/WA.

Contact

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West Coast Program Manager
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jjones@paint.org



Information for Solid Waste Facilities Including Transfer Stations, Recycling Facilities, and Landfills

UPDATED — JANUARY 2020

PaintCare supports paint collection activities at solid waste facilities in states with paint stewardship laws. Funding for the program comes from a fee applied to the price of architectural paint sold in these states.

Paint Stewardship

PaintCare is a nonprofit organization established by the American Coatings Association to implement state-mandated paint stewardship programs on behalf of paint manufacturers in states that pass paint stewardship laws. PaintCare currently operates programs in California, Colorado, Connecticut, District of Columbia, Maine, Minnesota, Oregon, Rhode Island, and Vermont, and is developing programs for New York and Washington. The main goal of the programs is to decrease paint waste and recycle more postconsumer (leftover) paint.

Paint Drop-Off Sites

The primary requirement of paint stewardship laws is for paint manufacturers to set up paint drop-off sites at retailers and other locations where households and businesses are able to take leftover architectural paint, free of charge. PaintCare has established more than 1,800 paint drop-off sites across its programs. While most sites are paint retailers, solid waste facilities including transfer stations, recycling centers, and landfills, as well as municipal household hazardous waste (HHW) facilities, may also volunteer to be paint drop-off sites.

Become a Drop-Off Site

Facilities interested in becoming paint drop-off sites can fill out the Interest Form available in your state's Waste Facilities section of www.paintcare.org.

Benefits of PaintCare to Solid Waste Facilities

Solid waste facilities that generate leftover paint but are not PaintCare drop-off sites can still participate in the PaintCare program.

- ◆ Solid waste facilities, like other entities, can drop off leftover paint at PaintCare sites. All PaintCare drop-off sites accept up to 5 gallons of paint, but some PaintCare sites accept more. Visit paintcare.org/drop-off-locations to find a drop-off site.
- ◆ PaintCare offers a pickup service for businesses and organizations that have accumulated more than 200 gallons of paint measured by container size (not volume). Learn more about this in our fact sheet titled Large Volume Pickup (LVP) Service or at paintcare.org/pickup/.
- ◆ For entities that generate large volumes of unwanted paint on a regular basis, a service for recurring direct pickups is available. Contact PaintCare for additional information.

Benefits to Solid Waste Facilities and Their Customers of Becoming a PaintCare Drop-Off Site

There are many benefits to becoming a paint drop-off site. The cost of transportation and recycling of PaintCare accepted products (e.g., paint, stain, varnish) will be paid by PaintCare. As a participating drop-off site, you will:

- ◆ Make recycling of leftover paint more convenient for your customers
- ◆ Help relieve local government of their cost of managing leftover paint
- ◆ Help your state conserve resources, keep paint out of the stream, and prevent the improper disposal of paint in your community
- ◆ Optional: Offer paint in good condition collected at your site to the public for reuse and receive a reimbursement of \$1.60 per gallon. See our fact sheet, Reuse Program – Compensation and Reporting, for more information.

PaintCare Drop-Off Sites Receive

- ◆ Bins for storing collected PaintCare products
- ◆ Transportation and recycling of the collected PaintCare products
- ◆ Training materials and staff training at your site
- ◆ Program brochures, signage, and customer education materials
- ◆ Optional: listing your drop-off site on PaintCare website and in ads and promotional materials

Drop-Off Site Responsibilities

- ◆ Provide secure storage area for PaintCare product storage bins
- ◆ Accept all brands of leftover PaintCare products from the public during operating hours
- ◆ Place only PaintCare products in storage bins, taking care not to open containers
- ◆ Keep storage 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

Water-Based (Latex) Paint is a Resource

An important goal of PaintCare is to conserve resources and increase the amount of paint that is recycled. In areas where HHW programs do not accept water-based paint, households and businesses are often instructed to let water-based paint dry out and then dispose of the dry paint in the trash. Through the PaintCare program, all paint—including latex paint—is recycled to the maximum extent possible.

Will Becoming a PaintCare Drop-Off Site Require Operational Changes?

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

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 products include interior and exterior architectural coatings sold in containers that are no larger than 5 gallons. They do not include aerosol products (spray cans), industrial maintenance (IM), original equipment manufacturer (OEM), or specialty coatings.

PAINTCARE PRODUCTS

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

NON-PAINTCARE PRODUCTS

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



How Does the Washington Paint Stewardship Program Affect Paint Retailers?

UPDATED – OCTOBER 2020

Washington's paint stewardship law requires paint manufacturers to set up and operate a paint stewardship program in the state. Funding for the program comes from a fee applied to the price of architectural paint sold in Washington.

START DATE: April 1, 2021 (PENDING APPROVAL)

Paint Stewardship

PaintCare is a nonprofit organization established by the American Coatings Association to implement paint stewardship programs on behalf of coatings manufacturers in states that pass paint stewardship laws. PaintCare currently operates programs in California, Colorado, Connecticut, District of Columbia, Maine, Minnesota, Oregon, Rhode Island, and Vermont, and is developing programs for New York and Washington.

Paint Drop-Off Sites

The primary requirement of paint stewardship laws is for paint manufacturers to set up paint drop-off sites at retailers and other locations where households and businesses are able to take leftover architectural paint, free of charge.

PaintCare has established more than 1,800 paint drop-off sites across its programs. While most sites are paint retailers, solid waste facilities including transfer stations, recycling centers, and landfills, as well as household hazardous waste (HHW) facilities, may also volunteer to be paint drop-off sites.

Participation as a Drop-Off Site is Voluntary

Paint retailers that would like to be drop-off sites can participate if they have space for paint collection bins and can provide minimal staff time to accept paint from the public. By doing so, retailers can increase foot traffic and provide an environmental service for their community. They make it convenient for their customers to recycle leftover paint and help provide relief to local government programs that manage leftover paint. PaintCare provides everything the store will need, including paint collection bins, site training, and support. PaintCare pays for paint transportation and recycling and promotes sites to the local community.

Retailers interested in becoming drop-off sites can fill out the Interest Form available at www.paintcare.org/retailer-interest-form.



REQUIREMENTS OF RETAILERS

1. Check Registered Manufacturers and Brands

Once the program starts, retailers may not sell architectural paints in Washington that are not registered. Paint manufacturers must register their company with PaintCare, and they must register all architectural paint brands they sell in the state. PaintCare publishes lists of registered manufacturers and brands so that retailers can check to see that the products they sell are registered. Please visit www.paintcare.org/lists for registration lists.

2. Pass on the PaintCare fee

State law requires that a stewardship fee (PaintCare fee) is applied by manufacturers to the wholesale price of all architectural paint sold in Washington. 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 by adding it to the wholesale price of products included in the program. Retailers should see the PaintCare fee on invoices from suppliers. The law also requires that retailers and distributors include the fee in the price of architectural paint they sell. The fee paid by the customers to the retailers offsets the fee charged to the retailers by their suppliers. This ensures a level playing field for all parties.

3. Provide Information to Customers

Paint retailers in Washington must provide customers with information regarding the program and the available options for end-of-life paint management. 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 the materials, ensured they meet state requirements, and provides them free of charge to all paint retailers and others wishing to distribute them.

COMMON QUESTIONS

How much is the fee?

The following fee structure for Washington has been proposed, subject to approval by the Washington State Department of Ecology. The fee is based on container size:

- ◆ \$0.00: Half pint or smaller
- ◆ \$0.45: Larger than half pint up to smaller than 1 gallon
- ◆ \$0.95: 1 gallon up to 2 gallons
- ◆ \$1.95: Larger than 2 gallons up to 5 gallons

When will the fee structure for Washington be known?

The Department of Ecology review of the fee structure is expected to be completed in December 2020. Retailers will be notified when the fee structure is approved (or if it changes).

How is the fee structure calculated?

The fee structure is set to cover the cost of a fully operating program. PaintCare estimates the annual sales of architectural paint in each state and divides the estimated annual expenses of the program by the estimated number of containers to be sold, adjusts for container size, and determines a fee per container size 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 per container size may increase or decrease and is different from state to state.

Is the fee a deposit to be returned to customers?

The PaintCare fee is not a deposit. The fee is used entirely to cover the expenses of running the program, and is not given back as a deposit for the return of paint or empty paint cans — a common misunderstanding.

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.**

Must we show the fee on receipts?

Showing the fee on receipts is not required, but most stores show the fee in order to explain the price increase to their customers. PaintCare encourages retailers to display the fee to increase awareness of the program.

Do we refund the fee if a product is returned?

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

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 weren't billed the fee by our supplier?

Yes, retail stores 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 supplier.

How does the public know about the fee?

PaintCare will provide 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. Before the program starts, PaintCare provides a "starter pack" of brochures and other information to all paint retailers. Additional materials can be ordered as needed for no charge. In addition to retailer information, PaintCare will work with contractor associations to get information to professional painting contractors, and will conduct general outreach campaigns that may include digital and online advertising, newspaper, radio, and television.

Contact

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West Coast Program Manager
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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 products include interior and exterior architectural coatings sold in containers that are no larger than 5 gallons. They do not include aerosol products (spray cans), industrial maintenance (IM), original equipment manufacturer (OEM), or specialty coatings.

PAINTCARE PRODUCTS

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

NON-PAINTCARE PRODUCTS

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



Become a Retail Drop-Off Site for Paint

UPDATED — JULY 2020

PaintCare makes it easy for paint retailers to provide a convenient and valuable service for their community. Funding for the program comes from a fee applied to the price of architectural paint sold in these states.

PaintCare is a nonprofit organization established by the American Coatings Association to implement state-mandated paint stewardship programs on behalf of paint manufacturers in states that pass paint stewardship laws. PaintCare currently operates programs in California, Colorado, Connecticut, District of Columbia, Maine, Minnesota, Oregon, Rhode Island, and Vermont, and is developing programs for New York and Washington. The main goal of the programs is to decrease paint waste and recycle more postconsumer (leftover) paint.

Paint Drop-Off Sites

The primary requirement of paint stewardship laws is for paint manufacturers to set up paint drop-off sites at retailers and other locations where households and businesses are able to take leftover architectural paint, free of charge.

Most drop-off sites are paint and hardware stores; others are waste transfer stations, recycling centers, and household hazardous waste facilities. Participation as a drop-off site is voluntary. There are more than 1,800 drop-off sites across all PaintCare programs.

All retailers in PaintCare states should be aware of the program, that the PaintCare fee is applied to the price of architectural paint products, and that drop-off sites are available throughout the state.

Benefits to Retailers and Their Customers

There are many benefits to becoming a paint drop-off site. As a participating retailer, you will:

- ◆ 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
- ◆ Promote your store as environmentally responsible
- ◆ Increase customer foot traffic and sales
- ◆ Help relieve local government of their cost of managing leftover paint
- ◆ Help your state conserve resources, keep paint out of the waste stream, and prevent the improper disposal of paint in your community

Become a Drop-Off Site

Retailers interested in becoming drop-off sites can fill out the Interest Form available at www.paintcare.org/retailer-interest-form.



PaintCare Drop-Off Sites Receive

- ◆ Bins for storing collected PaintCare products
- ◆ Transportation and recycling of the collected PaintCare products
- ◆ 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



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 products include interior and exterior architectural coatings sold in containers that are no larger than 5 gallons. They do not include aerosol products (spray cans), industrial maintenance (IM), original equipment manufacturer (OEM), or specialty coatings.

PAINTCARE PRODUCTS

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

NON-PAINTCARE PRODUCTS

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



How Does the Washington Paint Stewardship Program Affect Reuse Stores?

UPDATED – OCTOBER 2020

Washington's paint stewardship law requires that a fee be applied to all new paint sold, including recycled-content paint. Reuse stores may volunteer to be a drop-off site and can be compensated by PaintCare for operating a paint reuse program.

START DATE: April 1, 2021 (PENDING APPROVAL)

Paint Stewardship

PaintCare is a nonprofit organization established by the American Coatings Association to implement paint stewardship programs on behalf of coatings manufacturers in states that pass paint stewardship laws. PaintCare currently operates programs in California, Colorado, Connecticut, District of Columbia, Maine, Minnesota, Oregon, Rhode Island, and Vermont, and is developing programs for New York and Washington.

Paint Drop-Off Sites

The primary requirement of paint stewardship laws is for paint manufacturers to set up paint drop-off sites at retailers and other locations where households and businesses are able to take leftover architectural paint, free of charge.

PaintCare has established more than 1,800 paint drop-off sites across its programs. Sites include paint retailers as well as solid waste facilities such as transfer stations, recycling centers, and landfills, and household hazardous waste (HHW) facilities. Reuse stores are also encouraged to volunteer to be paint drop-off sites.

Become a Paint Drop-Off Site

Reuse stores interested in becoming drop-off sites can fill out the Interest Form available at www.paintcare.org/retailer-interest-form.

Paint Reuse

Reuse is a preferred method of managing leftover paint. PaintCare encourages reuse stores to operate paint reuse programs. PaintCare will compensate paint drop-off sites operating a paint reuse program under a contract with PaintCare.

BENEFITS TO REUSE STORES AND THEIR CUSTOMERS

There are many benefits to becoming a paint drop-off site and offering paint for reuse. As a participating reuse store, you will:

- ◆ Make recycling of leftover paint more convenient for your customers
- ◆ Add paint recycling to your environmental sustainability mission
- ◆ Increase customer foot traffic and sales
- ◆ Help relieve local government of their cost of managing leftover paint
- ◆ Help your state conserve resources, keep paint out of the waste stream, and prevent the improper disposal of paint in your community
- ◆ Receive compensation for operating a paint reuse program (see the fact sheet Reuse Programs – Compensation & Reporting for more information)

REQUIREMENTS OF REUSE STORES THAT SELL PAINT

1. Check Registered Manufacturers and Brands

Once the Washington paint stewardship program begins, retailers, including reuse stores may not sell architectural paints, including recycled-content paints that are not

registered. Paint manufacturers must register their company with PaintCare, and they must register all architectural paint brands they sell in the state. PaintCare publishes lists of registered manufacturers and brands so that retailers can check to see that the products they sell are registered. Please visit www.paintcare.org/lists for registration lists. This requirement does not apply to reuse paint.

2. Pass on the PaintCare fee

State law requires that a stewardship fee (PaintCare fee) is applied by manufacturers to the wholesale price of all architectural paint sold in Washington. This fee pays for all aspects of running the PaintCare program. This requirement does not apply to reuse paint.

Architectural paint is defined under the paint stewardship program as interior and exterior architectural coatings sold in containers of five gallons or less. Fees apply to new paint products **and new, recycled-content paint products** sold. Fees do not apply to reuse paint (partial or full cans of leftover paint sold “as-is”).

The fee is remitted by manufacturers to PaintCare. Manufacturers then pass the fee to their dealers and retailers by adding it to the wholesale price of program products. Retailers, including reuse stores, should see the PaintCare fee on invoices from suppliers. The law also requires that retailers and distributors include the fee in the price of architectural paint they sell. The fee paid by the customers to the retailers offsets the fee charged to the retailers by their suppliers. This ensures a level playing field for all parties.

3. Provide Information to Customers

Paint retailers in Washington must provide customers with information regarding the program and the available options for end-of-life paint management. 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 the materials, ensured they meet state requirements, and provides them

free of charge to all paint retailers and others wishing to distribute them.

COMMON QUESTIONS

How much is the fee?

The following fee structure for Washington has been proposed, subject to approval by the Washington State Department of Ecology. The fee is based on container size:

- ◆ \$0.00: Half pint or smaller
- ◆ \$0.45: Larger than half pint up to smaller than 1 gallon
- ◆ \$0.95: 1 gallon up to 2 gallons
- ◆ \$1.95: Larger than 2 gallons up to 5 gallons

When will the fee structure for Washington be known?

The Department of Ecology review of the fee structure is expected to be completed in December 2020. Retailers will be notified when the fee structure is approved (or if it changes).

How is the fee structure calculated?

The fee structure is set to cover the cost of a fully operating program. PaintCare estimates the annual sales of architectural paint in each state and divides the estimated annual expenses of the program by the estimated number of containers to be sold, adjusts for container size, and determines a fee per container size 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 per container size may increase or decrease 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 the return of paint or empty paint cans — a common misunderstanding.

Must we show the fee on receipts?

Showing the fee on receipts is not required, but most stores show the fee in order to explain the price increase to their customers. If a reuse store sells architectural paint, PaintCare encourages them to display the fee to increase awareness of the program.

Do we refund the fee if a product is returned?

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

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, retail and reuse stores 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 supplier.

How does the public know about the fee?

PaintCare will provide materials for retail and reuse stores 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. Before the program starts, PaintCare provides a “starter pack” of brochures and other information to all paint retailers. Additional materials can be ordered as needed for no charge. In addition to retailer information, PaintCare will work with contractor associations to get information to professional painting contractors and will conduct general outreach campaigns that may include digital and online advertising, newspaper, radio, and television.

Contact

Jeremy Jones
West Coast Program Manager
(415) 590-0259
jjones@paint.org

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 products include interior and exterior architectural coatings sold in containers that are no larger than 5 gallons. They do not include aerosol products (spray cans), industrial maintenance (IM), original equipment manufacturer (OEM), or specialty coatings.

PAINTCARE PRODUCTS

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

NON-PAINTCARE PRODUCTS

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



Information for Painting Contractors

UPDATED — SEPTEMBER 2020

How do paint stewardship laws affect painting contractors?

Paint Recycling Made Easy

PaintCare is a nonprofit organization established by the American Coatings Association to implement state-mandated paint stewardship programs on behalf of paint manufacturers in states that pass paint stewardship laws. PaintCare currently operates programs in California, Colorado, Connecticut, District of Columbia, Maine, Minnesota, Oregon, Rhode Island, and Vermont, and is developing programs for New York and Washington. The main goal of the programs is to decrease paint waste and recycle more postconsumer (leftover) paint.

Paint Drop-Off Sites

The primary requirement of paint stewardship laws is for paint manufacturers to set up paint drop-off sites at retailers and other locations where households and businesses are able to take leftover architectural paint, free of charge.

Most drop-off sites are paint and hardware stores; others are waste transfer stations, recycling centers, and household hazardous waste facilities. Participation as a drop-off site is voluntary. There are more than 1,800 drop-off sites across all PaintCare programs. To find a drop-off location, visit www.paintcare.org.

Fee and Funding

As required by laws in PaintCare jurisdictions, the program is funded by a fee (known as the PaintCare fee) that must be added by manufacturers to the wholesale price of all architectural paint sold in the state, including paint sold in stores and online. This fee is paid by manufacturers to PaintCare to fund program operations including paint collection and recycling, consumer education, and program administration. Displaying the fee on receipts is optional for retailers; however, PaintCare asks retailers to show the fee to inform consumers about the program.

The PaintCare fee is based on container size and varies from one program to another:

California, Colorado, Connecticut, Maine, Rhode Island

\$ 0.00 — Half pint or smaller

\$ 0.35 — Larger than half pint up to smaller than 1 gallon

\$ 0.75 — 1 gallon

\$ 1.60 — Larger than 1 gallon up to 5 gallons

District of Columbia, Oregon, Washington (proposed)

\$ 0.00 — Half pint or smaller

\$ 0.45 — Larger than half pint up to smaller than 1 gallon

\$ 0.95 — 1 gallon up to 2 gallons

\$ 1.95 — Larger than 2 gallons up to 5 gallons

Minnesota

\$ 0.00 — Half pint or smaller

\$ 0.49 — Larger than half pint up to smaller than 1 gallon

\$ 0.99 — 1 gallon up to 2 gallons

\$ 1.99 — Larger than 2 gallons up to 5 gallons

Vermont

\$ 0.00 — Half pint or smaller

\$ 0.49 — Larger than half pint up to smaller than 1 gallon

\$ 0.99 — 1 gallon

\$ 1.99 — Larger than 1 gallon up to 5 gallons

New York

The fee structure for New York is not yet known. PaintCare will propose a fee structure in the program plan for New York, and it will be based on the anticipated costs to run the state program. The PaintCare fee must be approved by the state oversight agency. Visit www.paintcare.org for updates.

RECOMMENDATIONS FOR CONTRACTORS

Preparing Estimates

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.

Pass Fee to Customers

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 PaintCare fee and that the fee funds a statewide paint recycling program.

Convenient Paint Drop-Off Sites

With paint drop-off sites conveniently located throughout PaintCare states, anyone can drop off their leftover paint year round. Many contractors report clearing out their storage spaces and no longer stockpiling paint. And contractors now have an answer for customers who ask what to do with old paint they no longer want; they can recommend that they use PaintCare drop-off sites too.

Most drop-off sites take 5 gallons per customer per trip, though some take more. All retail drop-off sites take paint from businesses, although some transfer stations and household hazardous waste programs only serve households. Always call a drop-off site ahead of time to make sure they have space for your volume and to confirm they take paint from businesses.

Pickup Service for Large Volumes

Painting contractors, property managers, and others with at least 200 gallons of postconsumer paint to recycle may qualify to have their paint picked up by PaintCare for free. To learn more about this service or to request an appointment, visit www.paintcare.org/pickup or call (855) PAINT09.

Business Limits

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/VSQG 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.

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 products include interior and exterior architectural coatings sold in containers of five gallons or less. They do not include aerosol products (spray cans), industrial maintenance (IM), original equipment manufacturer (OEM), or specialty coatings.

PAINTCARE PRODUCTS

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

NON-PAINTCARE PRODUCTS

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



Large Volume Pickup (LVP) Service

UPDATED — MAY 2020

PaintCare offers a free pickup service to painting contractors, property managers, and others with large amounts of leftover architectural paint.

Who is PaintCare?

PaintCare is a nonprofit organization established by the American Coatings Association to operate paint stewardship programs on behalf of paint manufacturers in states that pass paint stewardship laws.

Paint Drop-Off Sites

In states with a paint stewardship program, PaintCare's primary effort is to set up conveniently located drop-off sites—places where residents and businesses may take their unwanted paint for no charge. Sites set their own limits on the volume of paint they accept from customers per visit (usually from 5 to 20 gallons). To find a drop-off site near you, please use PaintCare's site locator at www.paintcare.org or call (855) PAINT09.

Large Volume Pickups

For those who have accumulated a large volume of paint, PaintCare also offers a pickup service. Large volume means at least 200 gallons, measured by container size (not volume). On a case-by-case basis, PaintCare may approve a pickup for less than 200 gallons if there are no drop-off sites in your area. After two or three pickups, you may be switched to a repeat pickup service (see next page).

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. If you have unwanted paint in drums or containers larger than 5 gallons, please contact a paint recycling company or a hazardous waste transportation company to assist you.

HOW TO REQUEST A LARGE VOLUME PICKUP

1) Sort and count your paint

Tally the number of each container size and the type of products you have, sorted into two categories: (1) water-based paints and stains, and (2) oil-based paint and stains and any other program products (sealers and clear top-coat products, such as varnish and shellac).

2) Fill out the LVP Request Form

Fill out the Large Volume Pickup Request Form on our website. Upon request, the form is also available as a PDF and can be returned to PaintCare by email, fax, or regular mail. Visit www.paintcare.org/pickup or call PaintCare for the form.

Scheduling

After reviewing your form, 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, you will be put in contact with our licensed hauler to schedule a pickup. It may be several weeks before your pickup occurs.

On the Day of Your Pickup

Sort your products into the two categories noted above and store them in an area that has easy access for the hauler. If the paint is far from where the hauler parks, the path between should be at least four feet wide to accommodate movement of the boxes.



The hauler is responsible to pack the paint into the shipping containers. Once your paint is properly packed and loaded onto the hauler's truck, you will sign a shipping document and receive a copy for your records. Your paint will then be taken to an authorized processing facility for recycling.

Repeat Service for Large Volume Pickups

For businesses that generate large volumes of unwanted paint on a regular basis, a service for recurring direct pickups is available. With this service, you will be provided with empty bins and can request a pickup when at least three bins are filled. Your full bins will be swapped with empty bins each time a pickup occurs. You will be required to sign a contract with PaintCare, and PaintCare will provide onsite training how to properly pack the paint.

Limits on Businesses

To use the program for oil-based products, your waste must qualify as exempt under federal (40 CFR § 262.14) and state/local hazardous waste generator rules. Most notably, these rules require that your business (a) generates no more than 220 pounds (about 20–30 gallons, depending on product type) of hazardous waste per month, and (b) accumulates no more than 2,200 pounds (approximately 220 gallons) of hazardous waste at any given time. If your business does not qualify as an exempt generator, it will not be able to use the program for oil-based products, but can still use the program for water-based products. For more information on federal hazardous generator rules, please go to www.paintcare.org/limits.

Note: When calculating how much hazardous waste you generate in a month, do not count latex paint.

If You Have Products We Don't Accept

PaintCare does not accept all paints (such as aerosols and automotive finishes) or other hazardous waste. If you have solvents, thinners, pesticides, or any non-PaintCare products (see list to right for examples), we recommend that residents contact their local household hazardous waste (HHW) program. Some HHW programs also allow businesses to use their program for a modest fee. Otherwise, businesses should contact a licensed hazardous waste transportation company.

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 products include interior and exterior architectural coatings sold in containers that are no larger than 5 gallons. They do not include aerosol products (spray cans), industrial maintenance (IM), original equipment manufacturer (OEM), or specialty coatings.

PAINTCARE PRODUCTS

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

NON-PAINTCARE PRODUCTS

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



Paint Recycling Program

About the Washington PaintCare Program

PAINTCARE

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

✓ PAINTCARE PRODUCTS

These products have a fee when purchased and will be accepted for free at PaintCare drop-off sites:

- Latex house paints (acrylic, water-based)
- Oil-based house paints (alkyd)
- Stains
- Primers and undercoaters
- Shellacs, lacquers, varnishes, urethanes
- Deck and floor paints
- Sealers and waterproofing coatings for wood, concrete, and masonry

✗ NON-PAINTCARE PRODUCTS

- Paint thinners and solvents
- Aerosol paints (spray cans)
- Auto and marine paints
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Asphalt, tar and bitumen-based products
- 2-component coatings
- Coatings used for Original Equipment Manufacturing or shop application
- Any non-coatings (caulk, spackle, cleaners, etc.)

PAINTCARE FEE

The PaintCare fee is applied to the purchase price of architectural paint sold in the state as required by state law. The fee is applied to each container and varies by the size of the container as follows:

Half pint or smaller	\$0.00
Larger than half pint up to smaller than 1 gallon	\$0.45
1 gallon up to 2 gallons	\$0.95
Larger than 2 gallons up to 5 gallons	\$1.95

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



Recycle with PaintCare

WA-PIEN-1220

Recycle here.



ACCEPTABLE

- ✓ Latex house paint
- ✓ Oil based house paint
- ✓ Primer
- ✓ Stains and sealers
- ✓ Varnish and shellac
- ✓ All brands

NOT ACCEPTABLE

- ✗ Paint thinner
- ✗ Two component paints
- ✗ Aerosols
- ✗ Other chemicals
- ✗ Leaking or empty containers
- ✗ Containers without original labels

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



For a complete list of acceptable products, please ask for the PaintCare brochure, call (855) 724-6809 or visit www.paintcare.org.



Joint Outreach Projects

UPDATED — JANUARY 2020

THE BASICS

If you are a local government that has partnered with PaintCare, we offer limited funding support for outreach activities that involve PaintCare. 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 we can collect at one time. We have supported radio, newspaper, and direct mail advertising and will consider other media.

Review and Approval

Project budgets and all creative work must be reviewed and pre-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 paintcare.org.

Proposal Form

Please complete our Proposal Form for Joint Outreach Projects and email it to brodgers@paint.org or your local PaintCare staff person. Download the form in the Waste Facilities section of each state's page at www.paintcare.org.

Images

We have artwork and photos you can borrow for creating drafts at www.flickr.com/photos/paintcare/, but please be sure to request permission to use them in your final design.

WHAT WE ASK OF YOU

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.

Print (brochures, postcards, etc.)

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 provide assistance with basic layout and graphic design using in-house staff. 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 pre-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 pre-approved projects proportional to the amount of the project dedicated to PaintCare information. Funding amounts may also differ depending on budgets available 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 Brett Rodgers at brodgers@paint.org and copy paintcare@bill.com. The "To:" space on the invoice should be addressed to PaintCare Inc., 901 New York Ave NW, Suite 300 West, Washington DC, 20001. In the space for purchase orders please write "5839-OTJ." See sample invoice below.

{Sample Invoice}

Environmental Services Program
Washington County
123 Government Way
Anytown, State 55776

June 24, 2017

Invoice: 2452187

Purchase Order: 5839-OTJ

Outreach Department
PaintCare Inc.
901 New York Ave NW #300W
Washington DC, 20005

Description:

- Newspaper ad promoting one day event held in Anytown on May 1, 2017
- Three 5x5 ads ran on April 13, 2017 in the County Journal
- Total invoices from newspapers: \$1,487.00
- Invoice and copy of one ad are attached
- Per prior discussion, PaintCare agreed to reimburse county for \$750
- Contact person: Marie Chen, 202-555-1212

Invoice Amount: \$750.00

Remit to: Environmental Services Program
Washington County
123 Government Way
Anytown, State 55776

Appendix D



Washington Specific Guidelines

Storage Time Limit: 180 days

Fee Structure:

Container Size	Fee
Half pint or smaller	\$0.00
Larger than half pint up to smaller than 1 gallon	\$0.45
1 gallon up to 2 gallons	\$0.95
Larger than 2 gallons up to 5 gallons	\$1.95

Spill Reporting: Document the date, location, amount, and type of program product spilled. Report program product spills of more than 10 gallons and release of any quantity through a storm drain, waterway, or into soil to the Department of Ecology and the local Health Department.

For more details, please consult <https://ecology.wa.gov/About-us/Get-involved/Report-an-environmental-issue>.

Any such spill or release must be reported to the appropriate local agencies immediately and to PaintCare within 24 hours. MRW facilities must use spill response procedures outlined in their operations plan. MRW permits require notification of spills to the environment to the Department of Ecology and the local Health Department.

General Guidelines: For additional information on state law regarding collection of the PaintCare products, visit the Department of Ecology website. <https://ecology.wa.gov/Waste-Toxics/Reducing-recycling-waste/Paint-stewardship>

Exempt generators are referred to as "Small quantity generators" (SQG) in Washington. SQG means a dangerous waste generator who generates less than or equal to the following amounts in a calendar month:

- 220 lb (100 kg) of dangerous waste that is not acute hazardous waste and/or WT01 EHW;
- 2.2 lb (1 kg) of acute hazardous waste and/or WT01 EHW; and
- 220 lb (100 kg) of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous waste and/or WT01 EHW.

Approval from the local jurisdictional health department or the Department of Ecology may be required if you store collection bins outdoors.

State regulations require 30 inches of aisle space between rows of containers. A row of containers must be no more than two wide and allow for unobstructed inspection of each container. Regular self-inspections of collection bins and emergency response equipment are required and must be documented. For assistance with inspection protocols, please contact your regional Ecology office.

Collection bins must be labeled "Program Paint"



Washington Specific Guidelines

Department of Ecology regional offices:

Southwest Regional Office

Counties: Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, and Wahkiakum

Email: swroerts@ecy.wa.gov

Phone: 360-407-6300

Northwest Regional Office

Counties: Island, King, Kitsap, San Juan, Skagit, Snohomish, and Whatcom

Email: nwroerts@ecy.wa.gov

Phone: 425-649-7000

Central Regional Office

Counties: Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, and Yakima

Email: croerts@ecy.wa.gov

Phone: 509-575-2490

Eastern Regional Office

Counties: Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, and Whitman

Email: eroertscoordinator@ecy.wa.gov

Phone: 509-329-3400

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



Drop-Off Site Guidelines

This document contains detailed information of PaintCare's program guidelines and operations procedures. In combination with the state-specific guidelines, this comprehensive document can be used for self-training yourself and your staff without PaintCare staff. The training slides that precede this document summarize the most important information of this Drop-Off Site Guidelines document in a concise manner. The training slides are used during training by PaintCare staff and can be used as a supplement for self-training.

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Section 1. Training and Safety

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.

Ensure that drop-off site employees are equipped for and understand hazards associated with PaintCare products.

Maintain training plans and records for each employee. Record staff training using the form included in the PaintCare 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 the 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 – in close proximity to the drop-off site area, 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 product(s) handled at your facility, and evacuation routes.

For your convenience, a form for recording emergency contacts is included in the PaintCare binder.

Section 2. General Guidelines

PaintCare Provides Your Site

- ◆ Operations binder with recordkeeping forms/logs
- ◆ Signage identifying your site as a PaintCare drop-off site
- ◆ Educational print materials for the public

PaintCare's Hauler Provides Your Site

- ◆ Paint collection bins
- ◆ Labels and/or markings for paint collection bins

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 participant when they come to drop off PaintCare products. Drop-off site staff should greet participants and must verify eligibility of the participant and their leftover paint products as PaintCare products (see Section 5 for a description of 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
- ◆ Except for PaintCare products that you choose to manage on-site (e.g., via direct reuse), place all PaintCare products immediately in collection bins approved for use by PaintCare and provided by its contractors
- ◆ Pack only PaintCare products into collection bins
- ◆ Schedule shipments of PaintCare products from your drop-off site
- ◆ Maintain all records relating to the program (see Section 9)
- ◆ Train staff to be familiar with the requirements and practices of this guide
- ◆ Follow state-specific guidelines (located in this binder, following the cover page)

Section 3. Collection Bins and Storage Area

Storage Area and Collection Bin Placement

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

Place collection bins on an impermeable surface (e.g., sealed wood floor) at all times.

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

Ensure there is adequate ventilation if stored indoors.

Protect collection bins from precipitation and temperature extremes. If stored outdoors, keep collection bins under cover (to prevent exposure to precipitation) and move indoors at times 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 closure instructions. PaintCare's haulers should set up the collection bins that they provide, unless otherwise requested by the drop-off site staff.

Ensure cardboard bins have liners. 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 don't need liners. PaintCare's haulers are responsible for including secondary containment with all collection bins they provide to the drop-off site staff.

Collection bins must be structurally sound. If you see any evidence of damage 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 paint containers in bins immediately. 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

The drop-off site and collection bin storage area must be secured and locked when closed or 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 hauler. Never allow "self-serve," public access to the collection bins.

Section 4. Accepting PaintCare Products

What are PaintCare Products

PaintCare drop-off sites should accept only PaintCare products (architectural paint products) for management 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 paints (spray cans)
- ◆ Auto and marine paints
- ◆ Art and craft paints
- ◆ Caulking compounds, epoxies, glues, adhesives
- ◆ Paint additives, colorants, tints, resins
- ◆ Wood preservatives (containing pesticides)
- ◆ Roof patch and repair
- ◆ Asphalt, tar, and bitumen-based products
- ◆ 2-component coatings
- ◆ Deck cleaners

- ◆ Traffic and road marking paints
- ◆ Industrial Maintenance (IM) coatings
- ◆ Original Equipment Manufacturer (OEM) (shop application) paints and finishes

For more information, please see www.paintcare.org/products-we-accept.

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 hauler. Haulers 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.

Who Can Drop Off PaintCare Products

The program accepts PaintCare products from the following:

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 that, among other criteria, require that the business/organization (1) generates no more than 100 kilograms (about 25 gallons or 220 pounds) of hazardous waste per calendar month, and (2) does not accumulate more than 1,000 kg of hazardous waste at any time. Painting contractors and commercial property owners typically meet these criteria. For more information about these criteria, please see: <http://www.paintcare.org/vsqq>

How to Know If a Business/Organization Qualifies

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

When a business/organization has oil-based PaintCare product to drop off at your site, it must sign the Paint Drop-Off Log included in this binder to verify that it qualifies to use the program for oil-based paint. The log includes an explanation of the requirements. (If a business/organization has only latex paint, it does not need to sign the log.)

Once a business/organization signs the Paint Drop-Off Log, you may accept oil-based paint from that business/organization to the extent permissible under applicable law. Paint Drop-Off Logs 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.

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

*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 accepted as part of normal site operations and are not placed in PaintCare collection bins. Do not accept into the PaintCare program any PaintCare products in unacceptable containers unless your site is permitted to manage household hazardous waste as described on the previous page.

When refusing a PaintCare product, drop-off site staff must explain why the PaintCare product cannot be accepted (e.g., material is not part of the program, cannot accept material from non-exempt generator). If you have a participant with products that your location cannot manage, refer the participant to their local

hazardous waste disposal program, garbage hauler, environmental health agency, or public works department. Local contact information is provided following the cover page of the binder.

Section 5. Limit per Participant

How to Handle Storage Limitations

While the PaintCare program intends to collect as much PaintCare product 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.

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 to the site locator at www.paintcare.org or contact PaintCare hotline at 855-724-6809) or ask them to come back at a later date. Contact the PaintCare hauler immediately to have your collection bins picked up and replaced.

If you have a participant with a significant amount of PaintCare products that your location cannot manage, ask the participant to contact PaintCare directly for additional assistance. We may direct the participant to another PaintCare drop-off site that can manage the large load or offer a direct pickup.

Large Volume Pickups (LVP)

PaintCare offers a free pick-up service to painting contractors, property managers, households and others with a large volume of leftover PaintCare products. Typically, a minimum of 200 gallons (by container size) is required to qualify for the LVP service.

To refer a participant to the LVP service:

- Provide the participant an 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 (select the “Large Volume Pickup” button on the homepage)
- For additional questions, refer the participant to PaintCare for assistance

Section 6. Working with Haulers

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

Scheduling the Hauler 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 hauler to schedule a pickup, or use their online order system if they have one. The name and contact information of your hauler is provided at the front of your 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 your loading area must be readily accessible to the hauler for quick and efficient loading.

- ◆ Identify which bins are full and ready for pickup
- ◆ Make sure the path between your bins and the hauler's vehicle is clear and at least 4 feet wide to accommodate movement of bins

The hauler will bring the necessary shipping documents and labels for the collection bins. The hauler is responsible for labeling, loading and off-loading collection bins, and will provide a copy of the shipping documents to the drop-off site. Sign and keep a copy of the shipping documents for your records.

Section 7. Spill Response

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.

Collection bins must be kept in a clean, accessible area. Clean up any spill or release of PaintCare product immediately and place spill residue in a sealed container, label it and place sealed container in a collection bin. Contact the hauler or PaintCare to replenish spill kit materials as needed.

Reporting

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

Prominently post emergency contact numbers including police, fire department, and emergency services.

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 material and place it in plastic bag(s) or spill kit container, along with the leaking container and contaminated PPE, seal the bag(s) and place in the collection bin
- ◆ Remove any clothing that may be contaminated, wash thoroughly to remove spilled material from your hands or body
- ◆ Replace any used spill control supplies
- ◆ Document the date, location, and amount and type of material spilled

Section 8. Inspections and Records

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, include any necessary labeling, etc. Please report any damaged materials 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
- ◆ Paint Drop-Off Logs (provided in PaintCare training binder)
- ◆ Direct Reuse and Reprocessed Paint Waivers (provided in PaintCare training binder)
- ◆ Employee training records (provided in PaintCare training binder) – discussed in Section 1
- ◆ Bills of lading and/or other documentation required by applicable law for outgoing shipments of PaintCare products

Section 9. Direct Reuse and Paint Reprocessing

Direct reuse is an additional service permitted for certain site types. These guidelines only apply to sites with a contract with PaintCare to engage in direct reuse. Paint retailers are not direct reuse sites.

Requirements for Direct Reuse

PaintCare encourages reuse of leftover paint through direct reuse (also known as a “paint exchange” or “swap shop”). Reuse sites return good quality unused paint to the local community at low or no cost.

When selecting products to place in the direct reuse area, products 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 participants at the drop-off site. Direct reuse products must be displayed by drop-off site staff in a storage area separate from the PaintCare collection bins.

Requirements for Paint Reprocessing

PaintCare also encourages on-site latex paint reprocessing. On average, 30-60% of latex paint brought to the site is reprocessed back into usable paint available for return to the community. Containers of reprocessed paint offered to the public at a drop-off site must not display any unauthorized third-party branding; generally new containers are used to pack reprocessed paint.

A household hazardous waste facility permitted to conduct paint reprocessing must have and follow its own procedures for sorting and reprocessing paint. At a minimum, these procedures will include:

- ◆ Open each container to visually inspect the contents
- ◆ Determine if the contents are latex, oil-based, or other paint
- ◆ Determine if the condition of the paint is suitable for recycling (e.g., not moldy, rusty, etc.)
- ◆ Sort containers according to type, quality, and color

For containers of products suitable for paint reprocessing:

- ◆ Bulk contents into larger container (e.g. drum) for mixing
- ◆ Mix paint until homogenous
- ◆ Repackage paint into 5-gallon or smaller containers
- ◆ Label as reprocessed paint

For containers of products unsuitable for reprocessing, either:

- ◆ Close container and pack in a collection bin (must be completely resealed and not leaking)
- ◆ Sort and bulk the contents into a drum

Participant Waiver

Participants taking paint from a drop-off site must sign the Direct Reuse and Reprocessed Paint Waiver log included in the training binder (or an approved equivalent thereof) explaining that the paint is taken “as-is” with no guarantee of quality or contents. The participant must read, complete, and sign the form and the staff must verify what has been taken by the participant. The staff must record on the log the volume taken by each participant and the total volume.

Paint Drop-Off Log (for businesses and organizations)

Eligibility: A business or organization may use the PaintCare program to manage program-eligible hazardous waste products (e.g., unwanted oil-based paint, varnishes, solvents) only if it provides the information below and certifies that all hazardous waste it provides to the PaintCare program qualifies as exempt under federal (40 CFR § 262.14) and analogous state/local hazardous waste generator rules for very small quantity generators. Among other criteria, each business/organization responsible for generating waste at a site must, at that site, (1) generate no more than 100 kilograms (about 25 gallons or 220 pounds) of hazardous waste per calendar month, (2) generate no more than 1 kilogram (about 2.2 pounds) of acute hazardous waste per calendar month, and (3) accumulate no more than 1,000 kilograms of hazardous waste at any given time.

Because generator status can vary from month to month, your organization must sign and date this log sheet each time that it seeks to manage hazardous waste through the PaintCare program.

Certification Statement: By signing this document, I certify that all hazardous waste being provided to the PaintCare program qualifies as exempt waste under applicable federal and state/local laws. My organization releases and holds harmless the entity accepting this waste, as well as PaintCare Inc., its sole member and related companies, and their agents, employees, member companies, officers, directors, successors, and assigns from any liability, claim, injury, losses or damages arising from my organization's provision of any materials to the PaintCare program.

[This log sheet may be provided to government agencies upon their request.]

[illegible]

PAINTCARE PROGRAM: DIRECT REUSE AND REPROCESSED PAINT WAIVER

By signing below, I waive, release and hold harmless the Drop-Off Site, PaintCare Inc., PaintCare Inc.'s sole member, and all of their agents, employees, member companies, officers, directors, successors, and assigns from any liability, claim, injury, losses, damages, or cause of action of any kind whatsoever, whether based on contract, tort, statute, common law, or strict liability, which are claimed in any way to result from, arise out of, or are connected with the handling, receipt, use, storage, treatment, disposal (including spilling and leaking) or release of reuse materials obtained through the PaintCare Program. For all materials that I obtain from the PaintCare Program, I accept with full understanding and appreciation of the actual or potential dangers stemming from the proper or improper use. I accept all risk related to my handling receipt, use, storage, treatment, disposal (including spilling and leaking) or release of such materials.

All materials that I obtain from the PaintCare Program, I accept as-is, with no warranties. I recognize that neither PaintCare nor the Drop-Off Site warrant that any materials obtained from the Drop-Off Site are merchantable or fit for any particular use. PaintCare and this Drop-Off Site are not responsible for any liability or damages stemming from the use of any material obtained from this Drop-Off Site.

DATE	PRINT NAME	SIGNATURE	LATEX* (GALLONS)	OIL- BASED* (GALLONS)	STAFF INITIALS
TOTALS					

*Estimate the actual gallons of liquid, not container volume (e.g., 4 one-gallon cans that are half full equals 2 gallons.)