

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
SACRAMENTO, CA 95814
(916) 322-3670

June 27, 1988

Ms. Jacqueline Ayer
Acurex Corporation
Environmental Systems Division
485 Clyde Avenue
P.O. Box 7044
Mountain View, CA 94039



Dear Ms. Ayer:

Thank you for your letter dated May 26, 1988, asking for confirmation that the disposal of dry paint spray booth filters follow the same policy as for empty paint cans. The Department's nonhazardous empty paint can determination includes the following conditions: the cans are drained so that only a thin, completely dry film of paint remains, they do not emit toxic or ignitable vapors, and they are not mixed with any other hazardous materials. If these conditions are met, the empty paint cans may be disposed at municipal landfills with the approval of the Regional Water Quality Control Board. The Department has extended the nonhazardous empty paint can determination to include dried paint booth filters, again subject to the approval of the Regional Water Quality Control Board.

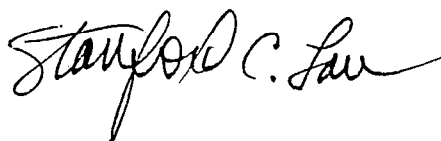
The South Coast Air Quality Management District has advised us that monitoring of emissions is not required for water-based paints which are passively dried unless the quantity is so great as to create nuisance odors. The drying operation must be passive and cannot be facilitated by any drying equipment such as ovens or lamps. The monitoring exemption does not apply to any solvent-based or oil-based paint. We recommend that you contact your local air pollution control district office for similar guidance.

We do not foresee any changes in the disposal regulations concerning empty paint cans or dried paint booth filters. If the conditions cited above are met, the Department will continue to consider empty paint cans and dried paint booth filters to be nonhazardous.

Ms. Jacqueline Ayer
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If you should have questions concerning this letter, please contact
Cindy Oshita of my staff at (916) 322-3670.

Sincerely,



Stanford C. Lau
Alternative Technology Section
Toxic Substances Control Division

cc: Dwight Hoenig, Chief
North Coast California Section
Toxic Substances Control Division
2151 Berkeley Way, Annex 7
Berkeley, CA 94704

Roger James, Executive Officer
California Regional Water Quality
Control Board
San Francisco Bay Region
1111 Jackson Street, Room 6040
Oakland, CA 94607

SCL:CO:vs



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Mr. Stan Lau
Alternative Technologies Section
State Dept. of Health Services
Toxic Substances Control Division
714744 P Street
Sacramento, Ca, 95814



May 26, 1988

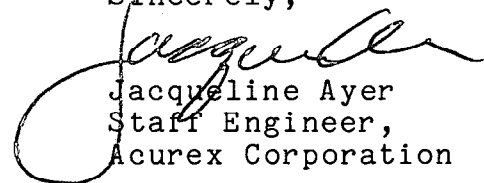
Dear Mr. Lau,

I would like to know about laws regarding the disposal of dry filter media used in the control of hazardous pollutant emissions from paint spray booths. The paints applied in the booths I am referring to require no heat curing, thus the filters are completely dry and are not emitting solvent vapors at the time of disposal.

In a recent phone conversation with DHS personell regarding this topic, I was told that there is no written rule regarding the disposal of dry filter media, but the DHS policy was to permit disposal of the filters in a municiple landfill, PROVIDED that they are bone dry. The reasoning for this policy, as it was explained to me, was that a similar rule applies to the disposal of empty paint cans. As there is little or no difference between the waste characteristics of dry filter media and empty paint cans, a similar rule should be applied to both.

I am writing to you to request a confirmation of this information in writing, and to ask if you anticipate a change in this policy in the future. Is it possible that the regulations regarding disposal of empty paint cans and filter media will become more stringent? If so, what might the new regulations entail? If you have any questions regarding this letter, please call me at (415) 961-5700 x3902, or write at the above address. I look forward to hearing from you.

Sincerely,


Jacqueline Ayer
Staff Engineer,
Acurex Corporation