

Architectural paint for Very Small Quantity Generators

What is architectural paint?

Architectural paint in Minnesota means interior and exterior architectural coating products in original containers of five gallons or less, including both latex and oil or solvent-based paint. The Minnesota Pollution Control Agency (MPCA) and the Metropolitan Counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington (Metro Counties) regulate the management of waste architectural paint.

Architectural paint	Not architectural paint
Acrylic paint intended for walls, ceilings, floors, and trim	Additive, colorant, tint, and resin
Alkyd paint intended for walls, ceilings, floors, and trim	Aerosol paint
Deck and floor coating, including elastomeric	Art and craft paint
Enamel paint intended for walls, ceilings, floors, and trim	Automotive and marine paint
Field and lawn paint	Caulk, epoxy, glue, and adhesive
Lacquer and shellac	Deck cleaner
Latex paint intended for walls, ceilings, floors, and trim	Equipment and industrial coatings
Metal coating, including rust preventative	Roof patch and repair
Oil-base paint & stain intended for walls, ceilings, floors, and trim	Tar and bitumen-based product
Primer, sealer, and undercoat	Thinner, stripper, and solvent
Varnish and urethane	Traffic and road marking paint
Water-proofer, sealer, and water repeller	Wood preservative containing pesticide

Free architectural paint collection for Very Small Quantity Generators

Any *Very Small Quantity Generator (VSQG)* in Minnesota may dispose of their waste architectural paint for free at a Licensed Paint Collection Site (LPCS), including many paint and hardware stores. The architectural paint collection program in Minnesota is operated by an organization called PaintCare™.

Locate an LPCS using the PaintCare Drop-off Site Locator tool at: <https://www.paintcare.org>

Your site must:

1. **Be a VSQG.** Most oil and solvent-based coatings are hazardous wastes when discarded; most latex and water-based coatings are non-hazardous. For help identifying hazardous wastes, see MPCA fact sheet #w-hw1-01, Evaluate waste, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf>
A site that is a VSQG generates 220 pounds or less (about 22 gallons of oil-based paint) per month of all hazardous wastes. A VSQG may, however, accumulate up to 2200 pounds (about 220 gallons) of hazardous waste and dispose of it at one time and still be a VSQG. For more information about determining a site's generator size, see MPCA fact sheet #w-hw1-02, Determine generator size, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-02.pdf>
2. **Obtain an HWID.** Ensure your site has a *Hazardous Waste Identification Number (HWID)*, also known as an *EPA ID#*) before you take any hazardous waste architectural paint to an LPCS. Check whether your site has an HWID using the MPCA's What's in my neighborhood tool at: <https://www.pca.state.mn.us/about-mPCA/whats-in-my-neighborhood>
If your site does not have an HWID, follow the instructions in MPCA fact sheet #w-hw5-12, Notification of Regulated Waste Activity, at: <https://www.pca.state.mn.us/sites/default/files/w-hw5-12.pdf>
3. **Obtain a receipt and keep disposal records.** You must obtain a receipt for and keep records of hazardous waste architectural paints you take to an LPCS. See MPCA fact sheet #w-hw1-10, Keep hazardous waste records, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-10.pdf>

How must hazardous waste architectural paint be accumulated?

Keep hazardous waste architectural paint in closed, original, labeled containers. Make sure you also meet all other applicable hazardous waste accumulation requirements. See MPCA fact sheet #w-hw1-05, Accumulate hazardous waste, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf>

What about wastes that are not architectural paints?

Hazardous wastes that are not architectural paints, such as art and craft paint, automotive paint, and thinners and solvents, must be managed as fully regulated hazardous wastes. For more information on hazardous waste management options, see MPCA fact sheet #w-hw1-06, Treat or dispose of hazardous waste, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-06.pdf>

Often the cheapest hazardous waste management option for VSQGs is a VSQG Collection Program. To find your regional VSQG Collection Program, see MPCA fact sheet #w-hw2-51, Very Small Quantity Generator Collection Programs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw2-51.pdf>

Waste aerosols, including paint, solvents, and cleaners, may also be managed as *universal wastes* under reduced requirements. For more information, see MPCA fact sheet #w-hw4-62, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-62.pdf>

More information

Guidance and requirements in this fact sheet were compiled from Minnesota Statutes, Chapter 115A, and Minnesota Rules, Chapter 7045, and incorporate regulatory interpretation decisions made by the MPCA on February 28, 2014; April 15, 2014; June 18, 2014; and February 17, 2016. To review Minnesota Statutes and Rules, visit the Office of the Revisor of Statutes at: <https://www.revisor.mn.gov>

The MPCA's Small Business Environmental Assistance Program can provide free, confidential regulatory compliance assistance. The Minnesota Technical Assistance Program can help you reduce your hazardous waste generation and risk. Immediately report all hazardous waste incidents to the Minnesota Duty Officer.

Metro County Hazardous Waste Offices

Anoka	763-324-4260
.....	https://www.anokacountymn.gov
Carver	952-361-1800
.....	https://www.carvercountymn.gov
Dakota	952-891-7557
.....	https://www.co.dakota.mn.us
Hennepin	612-348-3777
.....	https://www.hennepin.us
Ramsey	651-266-1199
.....	https://www.ramseycountymn.gov
Scott	952-496-8477
.....	https://www.scottcountymn.gov
Washington	651-430-6655
.....	https://www.washingtoncountymn.gov

Minnesota Pollution Control Agency

Toll free (all offices)	1-800-657-3864
All offices.....	651-296-6300

Small Business Environmental Assistance

Toll free	1-800-657-3938
Metro	651-282-6143

Minnesota Technical Assistance Program

Toll free	1-800-247-0015
Metro	612-624-1300

Minnesota Duty Officer

Toll free	1-800-422-0798
Metro	651-649-5451