

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

John J. Kearns, Interim Director



October 3, 1991

Mr. James L. Sanseverino
Marketing Manager
Safety-Kleen
Paint Refinishing
777 Big Timber Road
Elgin, IL 60123



Dear Mr. Sanseverino:

DISPOSAL OF SANDBLAST DUST AND USED PAINT FILTERS

Thank you for your letter of April 9, 1991 addressed to the Director of the Department of Toxic Substances Control (Department). Your letter was referred to me for response and I apologize for the delay in responding to your request. In your correspondence, you requested information regarding the proper disposal of collected airborne dust from paint sanding operations and paint filters from paint spray booths. The specific requirements for the disposal of these wastes are dictated by the determination on whether they are hazardous wastes.

The Department regulates the handling of hazardous wastes which are listed or meet criteria contained in Chapter 11, Title 22, California Code of Regulations (22 CCR). Pursuant to Section 66262.11, 22 CCR, it is the generator's responsibility to determine if their waste is hazardous or nonhazardous by testing representative samples of the waste using the methods set forth in Chapter 11, 22 CCR and/or applying knowledge of the hazardous characteristics of the waste in light of the materials or processes used to generate the waste. The criteria for which the wastes must be tested include the characteristics of toxicity, ignitability, corrosivity, and reactivity. If the waste exhibits any of these characteristics, it is classified as a hazardous waste and must be managed as such. In addition, irrespective of the classification of the waste(s), its disposal is subject to the requirements of the appropriate regional water quality control board and local agencies.

The Department reevaluated its position on the classification of dry paint filters and declared its revised position in a memorandum to its Regional Administrators on July 26, 1990 (copy enclosed). If sandblast grit or a paint filter is contaminated with paints which contain chromium, copper, lead or other persistent or bioaccumulative substances, particular attention should be given to the regulatory thresholds established for these compounds in Section 66261.24(a)(1) and (a)(2), 22 CCR.



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Generators may self-classify the waste pursuant to Section 66260.200(c), 22 CCR and manage it in accordance with that classification without notification to the Department. A generator may also formally request the Department to concur with their classification pursuant to Section 66260.200(d), 22 CCR. To obtain a departmental concurrence, the generator must submit information to the Department which includes a description of the waste, sampling methods utilized, testing laboratory information, and analytical results. For such a concurrence, the State Board of Equalization will assess a fee (the current charge is \$8,317). While a concurrence request is being evaluated by the Department, the waste must be managed as hazardous per Section 66260.200(d), 22 CCR.

I hope this information assists you. If you have any further questions, please contact me at the letterhead address or telephone me at (916) 322-3670.

Sincerely,



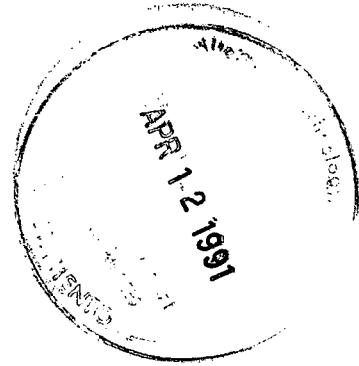
Christopher J. Marxen
Alternative Technology Division

Enclosure

cc: Mr. Don Johnson
Surveillance and Enforcement
Department of Toxic Substances Control
P.O. Box 806
Sacramento, CA 95812-0806

Mr. Ronald Pilorin
Alternative Technology Division
Department of Toxic Substances Control
P.O. Box 806
Sacramento, CA 95812-0806

CJM/cjm:al



April 9, 1991

Toxic Substances Control Division
Department of Health Services
P. O. Box 942732
400 P Street
Sacramento CA 95814


Dear Director:

Safety-Kleen, as you may already know, currently services Automotive Body Shops with various services, including a paint gun cleaner which reduces solvent use and emissions. We also offer removal of hazardous waste, including solvents and paint wastes.

We are considering offering additional services to the auto body repair industry. One of these is a system to collect and remove airborne dust from paint sanding operations. The other is a service to remove and replace the filters used to remove airborne paint in the spray booths.

We are looking to you to provide us with information concerning the proper disposal of the collected airborne dust and also the proper disposal of the used paint filters. Would you please send your stance on the proper disposal of these materials to my attention by May 15, 1991. Thank you in advance for your cooperation.

Sincerely,


James L. Sanseverino
Marketing Manager
Paint Refinishing

JLS:gd