

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
P.O. BOX 942732
SACRAMENTO, CA 94234-7320

(916) 322-3670

December 8, 1989

Mr. A.G. Riess
Director of Engineering and Housing
Environmental Management Division
Department of the Army
Sierra Army Depot
Herlong, CA 96113-5171

Dear Mr. Riess:

CURRENT POLICY ON PROPER DISPOSAL OF EMPTY PAINT CONTAINERS

Thank you for your September 28, 1989 letter requesting the Department's policy on the proper disposal of empty aerosol and non-aerosol paint containers.

The Department considers emptied non-aerosol paint containers, regardless of size, as nonhazardous waste provided all of the following conditions are met:

- o Containers are drained so that only a thin film of paint remains.
- o The thin film of paint is completely dried.
- o Containers do not contain any toxic or ignitable vapors.
- o Containers do not hold any other extraneous hazardous materials.

Emptied non-aerosol paint containers that meet the above conditions may be managed as nonhazardous waste; however, the containers remain subject to any requirements imposed by the Regional Water Quality Control Board and local regulatory agencies.

Aerosol paint containers present a different situation. Not only may the contents remaining in the container be hazardous, but also the aerosol container itself may be hazardous. Aerosol containers may exhibit the characteristic of reactivity pursuant to Section 66705(a)(6), Title 22, California Code of Regulations and Section 261.23(a)(6), Title 40, Code of Federal Regulations which states ... " (it) is capable of detonation or explosive reaction if it is subjected to a strong initiating source or if heated under confinement." Therefore, unless the aerosol paint containers meet the conditions outlined above for emptied non-aerosol containers

Mr. A.G. Riess
Page 2

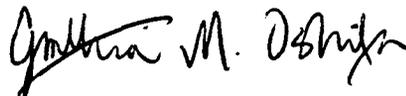
December 8, 1989

and in addition, were rendered non-reactive, they should be managed as hazardous waste.

I hope this letter is helpful to you.

If you have questions concerning this letter, you may contact me at the letterhead address or telephone number,

Sincerely,



Cynthia M. Oshita
Alternative Technology Division
Toxic Substances Control Program

CO:db



DEPARTMENT OF THE ARMY
SIERRA ARMY DEPOT
HERLONG, CALIFORNIA

96113-5171

September 28, 1989

REPLY TO
ATTENTION OF:

Environmental Management
Division

State of California
Department of Health Services
Toxic Substances Control Division
Waste Evaluation Unit
~~4250 Power Inn Road~~
Sacramento, California 95826

Gentlemen:

Please provide a current policy on proper disposal of "empty" paint containers. Guidance is needed to address both aerosol and non-aerosol containers.

If you have any questions or comments, contact Mr. James M. Ryan at (916) 827-4600.

Sincerely,

A handwritten signature in cursive script, appearing to read "A.G. Riess".

A. G. Riess
Director of Engineering
and Housing