



**LOS ANGELES COUNTY FIRE DEPARTMENT
HEALTH HAZARDOUS MATERIALS DIVISION
UNIFIED PROGRAM AGENCY**



PAINT BOOTH FILTERS GUIDANCE DOCUMENT

GD - 1- HW - 2007

BACKGROUND

There are two types of paint booth filters (PBFs), outside and inside PBFs. Outside PBFs keep the paint booth clean by removing particulate matter from the influent “outside” air. Outside PBFs are typically not hazardous and can go to the trash. Inside PBFs, on the other hand, filter the air “inside” the paint booth and, when spent (removed), may be hazardous due to contamination by entrapped paint particles and possibly other hazardous constituents.

This guidance document provides examples of common ways that business operators handle and manage their PBFs. It also explains the implications of those methods and provides guidance on how to properly handle and manage the PBFs in each case.

Common ways that businesses handle and manage PBFs:

1. Spent inside PBFs are disposed into the municipal trash.

Implication: The business operator/generator conducted a waste determination on the PBFs, and resulted as non-hazardous, or did not conduct a waste determination and is illegally disposing the PBFs to the trash.

Guidance: The business operator/generator needs to provide waste determination of their paint filter waste using either.

- a) Knowledge of process (e.g., read specification sheets from the manufacturer, get list of metals in paint and determine if hazardous.), or
- b) Analytical testing (Take samples and have them analyzed).

2. Spent PBFs have been removed by a registered hazardous waste hauler.

Implication: The business operator/generator determined that the Inside PBFs are hazardous waste.

Guidance: Manage the PBFs in the following manner.

- a) Ensure that there is a waste container onsite and is properly labeled.
- b) Ensure container is closed and in good condition.
- c) Maintain waste manifest on file for up to 3 years.

3. Spent PBFs have never been changed.

Implication: PBFs that are never or rarely changed and have a heavy buildup of paint solids are more likely to test hazardous, even if the paint initially has low levels of heavy metals.

Guidance: A waste determination is required to determine the management and disposal method of the spent PBFs, prior to disposal.

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4. Spent PBFs are sent to Tijuana, Mexico.

Implication: This practice may constitute illegal transportation and export of a hazardous waste to a foreign country.

Guidance: Same as in #1 above.

5. A service company removed the spent PBFs.

Implication: The Inside PBFs, if hazardous, may have been illegally transported and disposed of.

Guidance:

- a) Same as in #1 above. If the PBFs are hazardous, then:
- b) Verify that the company is a registered hazardous waste hauler. If the service company is not registered, then they are illegally removing hazardous waste.
- c) Maintain receipts/manifests for disposal.

6. Spent PBFs were placed in the waste paint/lacquer thinner drums.

Implication: If the filters are incompatible (not a "like" substance) with the paint/lacquer waste stream, then hazardous waste is being illegally treated.

Guidance:

- a) If the filters are compatible with the paint/lacquer waste stream (e.g., Styrofoam filters), they may be added to the paint waste. The paint waste and dissolved Styrofoam filters are documented as one waste stream.
- b) If the filters are fibrous and determined to be a hazardous waste, they are to be disposed of as solid hazardous waste under manifest.

7. Spent PBFs are soaked in a drum of water, shaken, and disposed of to trash.

Implication: The PBFs may be hazardous waste being illegally treated.

Guidance:

- a) The drummed rinse water generated by this potentially illegal practice should be profiled (i.e., waste determination) and/or disposed of as hazardous waste.
- b) The soaking and shaking of hazardous filters is illegal treatment of hazardous waste and may require a treatment permit.

Disclaimer

This guidance document does not replace or supersede relevant statutes and regulations. It is intended for informational purposes only and may not encompass all of the statutes and regulations to this topic. More details may be found at Cal EPA Department of Toxic Substances Control (DTSC) www.dtsc.ca.gov. If further information is needed, call the County of Los Angeles CUPA at (323) 890-4045.