



Auto Body/Collision Repair

Hazardous Waste Determination: Waste Clear Coat

Hazardous waste determinations of all wastes are the responsibility of the generator.

1. Review environmental data sheets (EDS) of clear coat, catalyst, hardener or anything that is added to the clear coat.
2. Compare ingredients on EDS to Env-Hw 403.06 Toxicity Characteristics, sometimes called the D-list TCLP.
3. If none of the ingredients on the EDS matches a contaminant from the toxicity characteristics list and you determine that your waste is non-hazardous, you should:
 - a. Document how you determined that the waste clear coat is non-hazardous waste, including signature and date.
 - b. Save the document in your files.
 - c. Manage the waste clear coat as solid waste (trash).
4. If an ingredient on the EDS matches a contaminant for the toxicity characteristics, the waste clear coat can be managed as hazardous waste or be tested to determine if it is hazardous. For example, some auto body clear coat products contain methyl ethyl ketone, also known as MEK.
 - a. Request a TCLP test for the metal or organic ingredient from an environmental laboratory. Call a couple of labs for a quote. A list of labs is available at http://des.nh.gov/organization/divisions/waste/hwcb/documents/labs_hw.pdf.
 - b. Only test the waste clear coat. Do not test the clear coat product in its original liquid state.
 - c. Compare the test results to the maximum concentration/regulatory level in Env-Hw 403.06.
 - i. If the results are at or greater than the regulatory limit, the waste clear coat must be managed as a hazardous waste.
 - ii. If the results are less than the regulatory limit, the waste clear coat can be managed as a solid waste.
 - d. Save the test results in your files.

Additional testing may be needed depending if the waste clear coat is mixed or comes into contact with other hazardous waste. If the generator changes product lines or if the product formula changes, the hazardous waste determination must be completed again.

For questions on hazardous waste determinations, contact the Hazardous Waste Compliance Bureau at (603) 271-2942 or hwcomp@des.nh.gov.

For more information:

Visit: www.des.nh.gov on the A to Z list “Auto Body Shop Assistance”