# Auto Body/Collision Repair

## *Hazardous Waste Determination: On-Site Thinner/Solvent Recycler Systems*

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

Used solvent/thinner combined with paint waste is usually the largest hazardous waste stream in the auto body/collision repair sector. The waste is generated when cleaning spray guns either manually or using a partially or fully enclosed spray gun cleaning equipment.

Approximately 70-80% of the solvent/thinner can be reprocessed and reused through an on-site solvent recycling system. Shops that use on-site solvent/thinner recycling systems can save money from reduced material and waste disposal costs.

Hazardous waste determination steps on recycling sludge/paint puck waste:

1. Review environmental safety data sheets (EDS) of solvent/thinner.

2. Compare ingredients that are 10% or more on EDS to Env-Hw 402.06 Generic Industrial Process Wastes to determine the waste code. Most likely the waste code will be F003 and/or F005.

   F003: Xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl-alcohol, cyclohexanone, and methanol.

   F005: Toluene, methyl ethyl ketone (2-butanone), carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, and 2-nitropropane.

3. If the solvent/thinner contains ingredients only listed in F003 and the puck is solid (i.e., no liquid), at a minimum, the puck should be tested for hazardous waste characteristics including ignitability, metals and methyl ethyl ketone by an environmental laboratory. If the test shows the amounts are below the allowable levels, the puck can be managed as a solid waste, but shop will still pay small quantity generator fees. Save the results in files.

4. If the solvent/thinner contains ingredients listed in F005, and the puck is solid (i.e., no liquid), manage the “puck” or sludge that is created through the recycling system as an F005 hazardous waste.

5. If the solvent/thinner contains ingredients not listed in either F003 or F005, contact NHDES to provide technical assistance on the proper management of the waste puck. Most likely, the puck will need to be tested as described in #3 above.

If the generator does not wish to conduct a hazardous waste determination or test the pucks, the pucks must be managed and disposed of as a hazardous waste.

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

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