



Wood Finishing Industry

Hazardous and Solid Waste

Wood finishing facilities generate waste from a number of points in the production process. Examples of typical hazardous wastes are spent cleaning solvents, used rags and disposable spray booth filters.

Facilities will need to perform a hazardous waste determination on each type of waste generated to determine whether or not it is a hazardous waste. Some waste could be classified as a “listed” waste, “characteristic” waste, or solid waste as outlined in the New Hampshire [Hazardous Waste Rules](#). All [waste determinations](#) must be documented.

Through pollution prevention and compliance assistance, the Small Business Technical Assistance Program (SBTAP) can help wood finishers reduce the generation of waste and encourage compliance with environmental requirements to create a healthier environment for workers and the state overall.

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

[Hazardous Waste Notification](#)

All wood finishers who use stain or oil-based paints and coatings, and clean their spray guns or brushes with solvents, are most likely hazardous waste generators. Facilities must notify with the New Hampshire Department of Environmental Services (NHDES) before generating hazardous waste.

Spray Gun and Brush Cleaning Solvent

Hazardous waste is generated by cleaning spray guns and brushes with solvents/thinners. This waste stream is often an ignitable hazardous waste and a “listed” hazardous waste depending on the type of solvent that is used. Wood finishing solvents typically contain toluene, xylene or methyl ethyl ketone. Review the environmental data sheet to verify the solvent that is used.

Paint or Varnish Stripping

Solvents are often used to strip paint or stains. The spent solvents with paint chips and stains are usually hazardous waste due to ignitability and may contain listed solvents. Solvents can be reused prior to disposal. Allow the solids to settle, then pour off and reuse the solvent. The solids would be managed as hazardous waste.

If water-based products are used to strip paint or stains, a hazardous waste determination must be completed prior to disposal. Shops should not dispose of wastewater to a septic system and must receive permission prior to discharging the wastewater to local wastewater treatment facilities.

Waste Stains and Coatings

Solvent-based stains and oil-based coatings are considered products until the time they have been determined to be waste. Once the stain and coating has been considered no longer useful to the facility, the stain and coating should most likely be managed as hazardous waste.

Exhaust Booth Filters

Waste filters can be managed as a solid waste, as long as the stains and coatings do not contain any heavy metals and nothing was intentionally sprayed into the exhaust booth filters such as waste paint, waste clear coat, waste gun cleaning solvents or any other coating or thinner.

[Aerosol Spray Cans](#)

Aerosol containers are considered to be “empty,” and thus exempt from the New Hampshire Hazardous Waste Rules, under the following conditions:

- When the pressure inside the aerosol container approaches atmospheric pressure (*i.e.*, when the propellant gas is unable to spray any more material from the aerosol can).
- When all waste (*i.e.*, paint) has been removed by using the product for its intended use.

Often facilities must dispose of aerosol containers that do not satisfy the “empty” container requirements. Such containers may contain residual propellants that render the containers “reactive” hazardous wastes. The cans may also contain residual waste contents which may be a “characteristic” hazardous waste, and/or a “listed” hazardous waste. Once generated, waste aerosol containers that contain hazardous waste and/or residual propellants, must be disposed of as hazardous waste.

Reusable Wipes

Solvent-contaminated reusable wipes that are sent for cleaning and reuse are not hazardous waste, provided conditions of the exemption are met and the wipes were not used to absorb free liquids that could otherwise be collected. Those exemptions include the type of solvent, storage, labeling, accumulation time limits, record-keeping, no free liquids, and if they are sent to a commercial, regulated laundry facility or dry cleaner.

Disposable Wipes

Solvent-contaminated disposable wipes that are sent for disposal are not hazardous wastes, provided the conditions of the exemption are met and the wipes were not used to absorb free liquids that could otherwise be collected. Those exemptions include the type of solvent, storage, labeling, accumulation time limits, record-keeping, and must be disposed at an out-of-state combustor or landfill, or New Hampshire solid waste combustor regulated under section 129 of the Clean Air Act. Often these exemptions are unable to be met, and the disposable wipes must be managed as hazardous waste, unless the wipes were only hazardous for the “F003” listing and are not an ignitable solid when no longer of use.

[Fluorescent Lamps](#)

Fluorescent lamps should be managed and recycled as “universal waste.” Under the Universal Waste Rules, lamps must be stored to prevent breakage, be labelled as “waste lamps,” and the facility must follow record-keeping requirements.

Local Authority (Or Town/City Authority)

There may be additional local requirements that may apply, such as zoning, site plan reviews, or local fire and safety regulations. Please contact the town offices to determine those requirements.

To increase your awareness of current and proposed environmental regulations, sign up for [E-News](#). This free service will provide press releases on workshop opportunities, notices of rule changes and other environmental topics.

This guidance document is intended as an overview only and should not be used without consulting the NHDES Hazardous Waste Rules.

Contact SBTAP for environmental assistance at [\(603\) 271-1379](tel:6032711379) or by [email](#).

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