

ETHYL CORPORATION

INTER-OFFICE



CFM, Jr.
To E. O. Ponti

ADDRESS BRP

FROM D. E. Park

ADDRESS BRP

SUBJECT Paint Waste Disposal

DATE October 29, 1982

The following procedures are to be implemented on the Baton Rouge Plant for disposal of paint wastes, containers and residues.

1. Paint Wastes

Paint wastes containing organic solvents from cleaning equipment (brushes, sprayers, etc.) are to be collected in a designated 55 gallon drum at a central location in each area of use. After the cleaning solvent has been exhausted, or becomes too dirty for re-use, the mixture will be hazardous because of ignitability.

These wastes are to be stored in a designated hazardous waste area. Disposal will be at a commercial hazardous waste site.

2. Paint Containers

Paint containers should be empty before disposal. The definition of empty is "No more than one inch of residue on the bottom of the container or no more than 3 percent by weight of the total capacity of the container remains in the container". After being emptied, leave the can open for several days so that the solvent can evaporate, and the residue dry.

If this practice is followed, the cans may be disposed of in a dumpster for landfilling at Devil's Swamp.

3. Solidified Paint in Containers

These wastes may be disposed of using the same practice as empty cans if the paint residue is thoroughly dry and no organic solvents are present. These containers are considered not hazardous even if not empty as defined in (2) provided the residue is a dry solid having a flash point greater than 140°F.

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4. Disposal Procedures

Weathering of small amounts of solvents remaining in empty containers is an acceptable procedure. However, weathering of large quantities of solvents would be considered hazardous waste treatment or disposal which is allowed only at sites which have been permitted for this purpose.

Disposal of paints solids by burial on the plant is not permitted even in the landfill areas because we have not applied for permission to landfill drums or other such paint solids.


D. E. Park

DEP:JP:jtd

cc: Corporate Environmental Affairs Group
All Facilities
Mr. B. J. Lentz

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