PaintCare™
RECYCLING MADE EASY

Vermont Paint Stewardship Program Plan

Prepared by:
PaintCare Inc.
901 New York Avenue NW
Washington, DC 20001
(855) 724-6809
www.paintcare.org

Submitted to:
Julie Moore
Secretary
Vermont Agency of Natural Resources
1 National Life Drive, Davis 2
Montpelier, VT 05620

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1. Introduction

SECTION OVERVIEW

This section discusses:

- Introduction
- Paint stewardship in the United States
- Paint stewardship program plan
- Citations

A. INTRODUCTION

In June 2013, Governor Shumlin signed Act 58, creating the Vermont Paint Stewardship Program. Act 58 is codified in Sub-Chapter 4, Chapter 159 of Vermont Statute Title 10: Conservation and Development. Vermont's paint stewardship law requires manufacturers of architectural paint to establish a program to reduce the generation of postconsumer paint; promote reuse of leftover paint; and to collect, transport, and process postconsumer paint. The program should increase opportunities for consumers to properly manage leftover paint, reduce costs to local governments managing postconsumer paint, work to keep paint out of the waste stream, and conserve natural resources.

B. PAINT STEWARDSHIP IN THE UNITED STATES

At the urging of state environmental agencies and government household hazardous waste programs across the United States, the Paint Product Stewardship Initiative began in 2002 to bring about an industry-operated paint stewardship system in the U.S. Facilitated by the Product Stewardship Institute, the initiative involved several years of dialogue and research on paint use habits and recycling opportunities. Participants included the American Coatings Association, paint manufacturers, paint recyclers, the Environmental Protection Agency, and state and local governments across the country.

The initiative resulted in the development of a model state law to establish an economically and environmentally sustainable, industry-designed and implemented postconsumer paint management system. To date, paint stewardship legislation has been signed into law in California, Colorado, Connecticut, the District of Columbia, Maine, Minnesota, New York, Oregon, Rhode Island, Vermont, and Washington.

C. PAINT STEWARDSHIP PROGRAM PLAN

The Vermont paint stewardship law requires manufacturers of architectural paint to submit and receive approval of a paint stewardship program plan, individually or through a representative organization, from the Secretary of the Vermont Agency of Natural Resources (ANR).

PaintCare's original program plan was approved by ANR in March 2014 and several revisions have been submitted and approved since then.

Per statute, this program plan must:

(1) List participating manufacturers and brands covered by the program.

(2) Provide information on the architectural paint products covered under the program.

(3) Describe how the program will collect, transport, recycle, and process postconsumer paint for end-of-life management, including recycling, energy recovery, and disposal, using environmentally sound management practices.

(4) Describe how the program will provide for convenient and available statewide collection of postconsumer architectural paint in urban and rural areas of the state, including partnering with existing household hazardous waste collection programs and with paint retailers.

(5) Provide geographic information system modeling to determine the number and distribution of sites for collection of postconsumer architectural paint based on the following criteria: (a) at least 90 percent of Vermont residents shall have a permanent collection site within a 15-mile radius, and (b) one additional permanent site will be established for every 10,000 residents of a municipality and additional sites shall be distributed to provide convenient and reasonably equitable access for residents within each municipality, unless otherwise approved by ANR.

(6) Establish goals to reduce the generation of postconsumer paint, to promote the reuse of postconsumer paint, and for the proper management of postconsumer paint as practical based on current household hazardous waste program information. The goals may be revised by the producer or stewardship organization based on the information collected for the annual report.

(7) Describe how postconsumer paint will be managed in the most environmentally and economically sound manner, including following the waste-management hierarchy. The management of paint under the program shall use management activities that promote source reduction, reuse, recycling, energy recovery, and disposal.

(8) Describe education and outreach efforts to inform consumers of collection opportunities for postconsumer paint and to promote the source reduction and recycling of architectural paint for each of the following: consumers, contractors, and retailers.

(9) Include a budget and proposed funding mechanism under which each manufacturer remits to a stewardship organization payment of a paint stewardship assessment for each container of architectural paint it sells in Vermont. The proposed budget and assessment structure must be reviewed by a third-party auditor agreed upon by ANR, and the third-party auditor must provide a recommendation as to whether the proposed budget and assessment is cost-effective, reasonable, and limited to covering the cost of the program.

In addition to providing the information required under applicable law, this plan may discuss additional aspects of the program, which are included for informational purposes only.

D. CITATIONS

To aid the reader, each section of the plan begins with citations to laws or regulations that related to the information discussed in that section.

2. Stewardship Organization & Program Contacts

SECTION OVERVIEW

This section discusses:

- PaintCare Inc.
- Program contacts

A. PAINTCARE INC.

On behalf of participating paint manufacturers, PaintCare Inc. is pleased to submit to ANR an updated Vermont Paint Stewardship Program Plan.

PaintCare Inc. was formed in 2009 by the American Coatings Association, the primary trade association for the paint and coatings industry. PaintCare Inc. establishes a separate single-member limited liability company (LLC) as a subsidiary to serve as the representative stewardship organization for architectural paint manufacturers (also referred to as producers) in each state that passes a paint stewardship law. PaintCare Inc. is a 501(c)(3) nonprofit entity. PaintCare's corporate office is in Washington, D.C. State program staff work in the states in which PaintCare programs operate. As of the date of this plan, PaintCare Inc. is overseen by an 11-member unpaid Board of Directors representing architectural paint manufacturing companies.

PaintCare Inc. is in the process of establishing sole-member limited liability companies that are each dedicated to administering the paint stewardship program in a particular state. PaintCare intends to establish such a sole-member LLC entity to administer the Vermont paint stewardship program under the anticipated name of PaintCare Vermont LLC. PaintCare Vermont LLC will share PaintCare Inc.'s non-profit status and will meet all necessary qualifications for administering the paint stewardship program under Vermont law. PaintCare Inc. plans to transfer responsibility for management of the Vermont PaintCare program described in this program plan to PaintCare Vermont LLC. When PaintCare Inc. is ready to effectuate that transition, it will notify ANR in writing.

PaintCare representation is open to all architectural paint manufacturers who are obligated to take part in the Vermont paint stewardship program, and they may register with PaintCare at any time. PaintCare currently represents 121 paint manufacturers across its paint stewardship programs.

B. PROGRAM CONTACTS

Primary contact for the Vermont program:

John Hurd,
Maine and Vermont Program Manager
(802) 245-4821
jhurd@paint.org

The names and titles of PaintCare staff are listed on PaintCare's webpage. PaintCare will notify ANR of changes to any key state personnel.

3. Manufacturers and Program Products

STATUTORY CITATION

10 V.S.A. § 6673. PAINT STEWARDSHIP PROGRAM

(a) The plan shall address the following:

(1) Provide a list of participating producers and brands covered by the program.

(2) Provide specific information on the architectural paint products covered under the program, such as interior or exterior water- and oil-based coatings, primers, sealers, or wood coatings.

SECTION OVERVIEW

This section discusses:

- Manufacturer and brand registration
- Private label agreements
- Registration lists
- Program products

A. MANUFACTURER AND BRAND REGISTRATION

Representation by PaintCare is open to all architectural paint manufacturers who are obligated to take part in the Vermont paint stewardship program. Manufacturers register their company and brands of architectural paint with PaintCare.

PaintCare identifies potential manufacturer participants through a variety of sources, including the following:

- Registrations with PaintCare for other PaintCare programs
- American Coatings Association
- Internet research

Prior to the start of the Vermont program, manufacturers were notified about the Vermont law and program through email and notices on PaintCare's reporting website.

The list of registered manufacturers and brands is expected to change over time.

B. PRIVATE LABEL AGREEMENTS

Private label agreements (or services) represent products manufactured or distributed by one company for use under another company's label. The products are also referred to as store brands or generic brands, and the agreements are also known as tolling agreements. These agreements are often kept confidential to

protect the arrangements from competitive interests. Therefore, PaintCare typically does not specify which brands are produced by which manufacturer, unless the name of the manufacturer is included in the brand name. Instead, registered manufacturers and their registered brands are presented in separate lists to help protect the confidentiality of these agreements.

C. REGISTRATION LISTS

PaintCare posts the lists of registered manufacturers and brands on its website to make them available for retailers and distributors to learn which brands may be legally sold under the Vermont paint stewardship law.

The lists of registered manufacturers and brands as of the submission date of this plan are provided in the appendix. PaintCare intends to provide ANR with current lists monthly and post them to PaintCare's website.

D. PROGRAM PRODUCTS

The terms "program products," "PaintCare products," "architectural paint," and paint are used interchangeably in this plan and in PaintCare communications. In addition, this plan uses the common term "latex paint" to mean non-combustible or water-based program products, and "oil-based paint" to mean combustible or petroleum solvent-based program products. This plan uses the term "PaintCare fee" to refer to the fee/assessment that the Vermont paint stewardship statute requires to be added to the purchase price of program-eligible products in the state.

Program products are architectural paints in containers no larger than five gallons in size. They do not include industrial coatings, coatings used for original equipment manufacturing, and other specialty coatings. The full definition and examples of both program and non-program products are provided in the appendix. This definition is used to determine the products on which manufacturers are to apply the PaintCare fee to fund the program, as well as to determine which products are accepted by the program.

As needed, PaintCare issues product notices to explain or clarify whether and why certain types of products are a part of the program or not. PaintCare posts these product notices on its website and notifies stakeholders, as needed, when such notices are issued. Examples of these notices are also provided in the appendix.

If a new product category is to be added to the program, PaintCare will submit an amended program plan to ANR for approval before adding the product category to the program.

4. Paint Drop-Off Sites and Services

STATUTORY CITATION

10 V.S.A. § 6673. PAINT STEWARDSHIP PROGRAM

(a) The plan shall address the following:

(3) Describe how the program proposed under the plan will collect, transport, recycle, and process postconsumer paint for end-of-life management, including recycling, energy recovery, and disposal, using environmentally sound management practices.

(4) Describe the program and how it will provide for convenient and available statewide collection of postconsumer architectural paint in urban and rural areas of the State. The producer or stewardship organization shall use the existing household hazardous waste collection infrastructure when selecting collection points for postconsumer architectural paint. A paint retailer shall be authorized as a paint collection point of postconsumer architectural paint for a paint stewardship program if the paint retailer volunteers to act as a paint collection point and complies with all applicable laws and regulations.

(5) Provide geographic information modeling to determine the number and distribution of sites for collection of postconsumer architectural paint based on the following criteria: (A) at least 90 percent of Vermont residents shall have a permanent collection site within a 15-mile radius; and (B) one additional permanent site will be established for every 10,000 residents of a municipality and additional sites shall be distributed to provide convenient and reasonably equitable access for residents within each municipality, unless otherwise approved by the Secretary.

(6) Establish goals to reduce the generation of postconsumer paint, to promote the reuse of postconsumer paint, and for the proper management of postconsumer paint as practical based on current household hazardous waste program information.

SECTION OVERVIEW

This section discusses:

- Program audience
- Paint drop-off sites and services
- Convenience criteria
- Paint drop-off site operations

PaintCare uses the term paint "drop-off" site in place of paint "collection" site in this plan to denote the action of users of the program (which is to drop off paint), rather than the action of drop-off sites (which is to collect paint).

A. PROGRAM AUDIENCE

The Vermont PaintCare program will be structured to accept program products from all Vermont households, businesses, and others with leftover paint, subject to applicable legal requirements and to practical and economic feasibility. Especially in the event of any future changes to applicable law PaintCare may change the type and/or volume of materials that the program accepts from different program audiences. Any changes made to the program audience served by the program will be reported to the agency and will comply with all applicable legal requirements.

B. PAINT DROP-OFF SITES AND SERVICES

PaintCare partners with owners and operators of household hazardous waste (HHW) collection facilities and events (referred to as HHW programs in this plan) and increases paint collection by setting up new paint drop-off sites and services. The Vermont program includes the following:

- HHW programs
- Solid waste facilities (transfer stations, recycling centers and landfills)
- Retail stores
- Material reuse stores
- Direct pickup services
- PaintCare events

All eligible locations are invited to participate as paint drop-off sites if they can meet PaintCare's operational and other program requirements. For example, the bin storage space must be secure, inaccessible to the public, have an impermeable surface, and be protected from the elements.

Paint drop-off sites generally must accept all program products, have staff available to accept paint during operating hours, accept paint from households and businesses, and accept paint free of charge from participants who drop off paint. In addition, sites must be willing to be listed on the site locator on PaintCare's website and post and distribute PaintCare point-of-sale outreach materials, including a poster advertising their site as a paint drop-off site.

Some exceptions may be allowed in recognition of pre-existing restrictions on HHW programs and other non-retail sites. Current examples include:

- Non-retail sites with a limited geographical service area due to their funding source (e.g., local tax or utility) are not required to accept paint from participants outside of their service area.
- Non-retail sites that do not accept waste from businesses are not required to do so.
- Non-retail sites that accept oil-based paint but do not currently accept latex paint are not required to change their operations to accept latex paint.

- Programs that already charge a fixed amount to businesses for paint drop-off may continue this practice as long as it is clear to the customers that the charges do not relate to services funded by the PaintCare program, including paint collection bins, transportation, and processing.

For all sites, PaintCare provides and covers the cost for paint collection bins, paint transportation, and paint processing (end-of-life management). In addition, all drop-off sites other than HHW programs are offered spill kits. All sites are offered signage, training, and training materials.

B1. Household Hazardous Waste Programs

HHW programs are excellent partners because they provide their customers the convenience of dropping off other products at the same time as paint, and they often have regular customers that have used their programs for many years.

HHW programs partner with PaintCare to help reduce paint management costs, offer expanded services to their community, reduce waste, and/or increase paint recycling.

B2. Solid Waste Facilities (Transfer Stations, Recycling Centers, Landfills)

Solid waste facilities, particularly transfer stations, can be important program partners because like HHW programs, they provide their customers the convenience of dropping off other products at the same time as paint, and they may also have regular customers that have used their facilities for many years. Solid waste facilities are also beneficial, particularly in rural areas, where there might not be HHW facilities or paint retailers to be drop-off sites.

B3. Retailers

Paint retailers are valuable program partners because they are located throughout the state, are often centrally located in cities and towns, are open five or more days per week, and have staff familiar with paint products and their safe handling. In addition, their customers are likely to have some leftover paint and often ask store staff for advice on what to do with it. Retailer participation as a paint drop-off site is voluntary. Retailers are not compensated for being a drop-off site.

Material Reuse Stores

Material reuse stores, such as Habitat for Humanity ReStores, are a subset of retailers that can offer reuse in addition to serving as paint drop-off sites. When paint is dropped off at these sites, it can be screened for possible reuse and then donated or sold back to the local community. PaintCare typically compensates these sites for paint reuse. Paint that is not set aside for reuse is typically placed in paint collection bins. PaintCare has identified nine material reuse stores in the state.

B4. PaintCare Events

Paint drop-off events may be held by PaintCare, especially in areas of the state that are not within 15 miles of a paint drop-off site or have too few drop-off sites for the population of the area.

B5. Direct Pickup Services

PaintCare encourages source reduction. Accordingly, PaintCare may ask direct pickup service participants (described below) to consider if their paint is usable and, if so, to consider donating their paint to their nearest reuse location prior to arranging a pickup appointment.

Large Volume Pickup (LVP) Service

The LVP service is a free pickup service offered to painting contractors, other businesses, organizations, and households with a minimum quantity paint, currently100 gallons (measured by container volume and not liquid paint volume).

Under current practices, users of the LVP must submit an LVP request form, where they are asked to identify themselves as a household or as a business and provide specific information about their volume of leftover paint, paint type (latex or oil-based), and container sizes. Once approved for pickup, they are put in direct contact with PaintCare's transporter to arrange an appointment.

Recurring Large Volume Pickup (RLVP) Service

The RLVP service is a free service offered to painting contractors and other businesses and organizations that generate large volumes of paint on an ongoing basis. These sites are set up and trained by PaintCare staff on program requirements similar to PaintCare drop-off sites, but they may only use the program for paint from their own operations.

Users of the RLVP service are asked to provide information about the volume and type of paint they generate on a regular basis, and they must have an agreement for service with PaintCare.

B6. Additional Activities

Paint drop-off sites permitted by applicable law to conduct specific additional activities that are beneficial to the program can be compensated for their work. Examples of these activities include operating a reuse program, reprocessing latex paint, bulking oil-based paint, and providing local transportation services.

Reuse

Drop-off sites may operate reuse areas in which they place leftover paint brought to their site in good condition to be given away or sold "as is" to their customers and local community. This paint management method represents the highest, best use of paint and typically reduces program costs by avoiding the transportation and processing costs that would otherwise be required to manage the paint. To support existing paint reuse programs and to provide incentive for additional sites to do reuse, PaintCare compensates sites for conducting reuse, typically based on the quantity given away or sold.

Latex Paint Reprocessing

Latex paint reprocessing involves color sorting, combining, and mixing leftover latex paint together to make recycled-content paint. The paint is usually mixed in batches, poured off into 5-gallon containers and given away or sold locally. Reprocessing is the same thing as paint-to-paint recycling, but PaintCare uses the term reprocessing to distinguish this activity that usually occurs at HHW facilities from the activity that occurs at commercial paint recyclers. As with reuse, latex paint reprocessing typically reduces program costs by avoiding the transportation costs that would otherwise be required to manage the paint. To support existing paint reprocessing programs and to provide an incentive for additional sites to reprocess paint, PaintCare typically negotiates compensation rates for reprocessed paint that is given away or sold.

Oil-Based Paint Bulking

PaintCare makes paint management simple for paint drop-off sites by allowing them to place program products directly into paint collection bins. However, if a site chooses to bulk oil-based paint, it typically results in lower transportation costs for PaintCare. To support these sites, PaintCare negotiates compensation rates for this activity.

Transportation

Sometimes it is more cost-effective for a paint drop-off site to transport paint from one of its locations to another, or to transport paint from an event back to its facility, rather than using PaintCare's contracted transporter. This is most commonly done by HHW programs. In these cases, PaintCare negotiates compensation for the service (e.g., based on a per-event or per-bin basis).

C. CONVENIENCE CRITERIA

To determine whether the program provides adequate and convenient paint recycling opportunities throughout the state, PaintCare used ArcGIS, a mapping and analytics software, and the U.S. Census Bureau's 2020 population data to conduct convenience analysis. The distribution and density criteria set out in the Vermont law are explained further below.

Distribution Criterion

To achieve the distribution criterion in the Vermont law the program should provide at least 90% of Vermont residents a permanent paint drop-off site within 15 miles.

Density Criterion

To achieve the density criterion in the Vermont law the program should provide an additional permanent paint drop-off site for every 10,000 residents of a municipality.

The following table lists municipalities in the state with more than 10,000 residents and the target number of drop-off sites the program should provide. Municipalities are defined as either cities, towns, or villages.

TARGET NUMBER OF PAINT DROP-OFF SITES IN MUNICIPALITIES WITH MORE THAN 10,000 RESIDENTS

MUNICIPALITY	2020 POPULATION	NUMBER OF SITES NEEDED
Burlington*	44,743	4
Essex	22,094	2
South Burlington	20,292	2
Colchester	17,524	1
Rutland City	15,807	1
Bennington	15,333	1
Brattleboro	12,184	1
Milton	10,723	1
Hartford	10,686	1
Williston	10,103	1
Total		15

*ANR granted an exemption for Burlington in 2017 based on available drop-off sites in the surrounding area.

D. DROP-OFF SITE OPERATIONS

All paint drop-off sites must have an agreement in place with PaintCare, follow PaintCare's operational requirements, and operate in accordance with applicable federal, state, and local environmental laws, regulations, and permits.

D1. Drop-Off Site Training

PaintCare offers training by PaintCare staff and a training binder for all drop-off sites. PaintCare typically requires such training for retail drop-off sites and RLVP sites. The binder includes the site guidelines and a training log to be signed by all employees at the site who handle paint for the program. Examples of current training topics include:

- History and goals of paint stewardship programs
- Identification of program products
- Safe handling and storage of program products
- Spill clean-up and reporting
- Procedures for scheduling a paint pickup
- Screening for generator status to determine if a business qualifies to use the program for oil-based paint
- Recordkeeping

A current version of the site guidelines and related forms are provided in the appendix.

D2. Collection Volumes

Drop-off sites may set their own limit on the amount of paint they accept, as long as the limit is no less than five gallons per participant per day and is otherwise compliant with any applicable laws and PaintCare program policies.

D3. Paint Storage

Paint collection bins used in the program may include but are not limited to reusable plastic bins or cardboard bins with liners (approximately 1 cubic yard in size); 55-gallon metal or plastic drums; 30- and 50-gallon cardboard boxes with liners; and 20- and 30-yard roll-off containers.

Drop-off sites are required to follow PaintCare's bin storage requirements. For example, PaintCare's current practice requires sites to (1) keep paint collection bins in a secure location that does not have public access, (2) place the bins on an impermeable surface, and (3) if stored outdoors, be protected from the elements.

D4. Non-Program Products

PaintCare uses public education, signage at drop-off sites, and drop-off site training on product identification to minimize the volume of non-program products entering the program.

PaintCare's transporters and downstream processors are required to track and manage any incidental non-program products that they receive. They are instructed to notify PaintCare of incidents and identify the specific drop-off site from where the non-program products originated and the quantity and type that were found. Depending on the number of non-program products, PaintCare may do one or more of the following: (1) contact the site to let them know about the incident, (2) provide additional/refresher training on identification of program and non-program products, or (3) in extreme cases, remove the site from the program.

D5. Site Visits

PaintCare staff visit drop-off sites on a regular basis. PaintCare targets visiting retail drop-off sites about every six months and target visiting HHW facilities, solid waste facilities, and RLVP sites annually.

The purpose of these visits is to ensure compliance with program requirements, provide refresher trainings if needed, address any needs, or concerns the sites may have, check their supplies of outreach materials, and solicit feedback about the program.

5. Materials Management

STATUTORY CITATION

10 V.S.A. § 6673. PAINT STEWARDSHIP PROGRAM

(a) The plan shall address the following:

(3) Describe how the program proposed under the plan will collect, transport, recycle, and process postconsumer paint for end-of-life management, including recycling, energy recovery, and disposal, using environmentally sound management practices.

(7) Describe how postconsumer paint will be managed in the most environmentally and economically sound manner, including following the waste-management hierarchy. The management of paint under the program shall use management activities that promote source reduction, reuse, recycling, energy recovery, and disposal.

SECTION OVERVIEW

This section discusses:

- Paint transportation
- Paint processing
- Non-program products and empty containers
- Legal compliance
- Insurance and financial assurance

All descriptions in this section refer to current or typical activities as of the submission of this program plan.

A. PAINT TRANSPORTATION

A1. Transportation System

An efficient transportation system is required to move paint from a large number of paint drop-off sites to processing facilities. The transporters hired by PaintCare, which may include both private and public entities, usually have significant experience in scheduling pickups and routing to maximize efficiency – taking into account the number of stops, locations, volume of paint to be transported, and projected weight of the loads. Transporters must comply with all applicable state and federal rules and regulations and must track the paint from the point of collection to its final destination. Transporters, subsequent processors, and their records, are subject to audit by PaintCare.

PaintCare has contracted transporters to provide service to paint drop-off sites. PaintCare aims to contract with all transporters that service HHW programs within the state so that the HHW programs have the option

of having the same transporter handle program products as the HHW program uses to manage non-paint products.

PaintCare requires its transporters to provide service to paint drop-off sites on an on-call basis (e.g., sites call for pickup when their storage capacity is 50% full) or on a set schedule (e.g., every Tuesday) determined on a site-by-site basis. Transporters are required to deliver empty paint collection bins and spill kits to drop-off sites and pick up full bins in a timely manner. Transporters are typically required to provide service to drop-off sites within five days in urban areas and ten days in rural areas. The longer time period in rural areas is to maximize route efficiency and pick up from multiple locations, yet still serve the location in a reasonable amount of time. For HHW events, transporters are required to deliver empty paint collection bins prior to the start of the event and pick up full bins on the day of the event, unless other arrangements are agreed to prior to the day of the event.

All sites (rural and urban) are asked to accommodate a minimum of two paint collection bins because it is less expensive and more efficient to pick up two or more bins from one location than to serve the same location several times and pick up only one bin each time.

A2. Transporters

As of the submission of the plan, the following transporters are under contracts:

- Central Vermont Solid Waste Management District
- Chittenden Waste Management District
- Clean Harbors
- Northeast Kingdom Waste Management District
- Northwest Vermont Solid Waste Management District
- Tradebe
- US Ecology

The list of transporters utilized by the program may change over time, as needed.

B. PAINT PROCESSING

B1. Processing System

PaintCare contracts for processing and proper end-of-life management of postconsumer paint collected in the program. Prior to releasing the transportation and processing request for proposal (RFP), PaintCare makes reasonable effort to contact all known paint recyclers (both in-state and out-of-state) to inform them of the RFP and contracting process. PaintCare requires that the following hierarchy be followed when prioritizing management of paint collected through the program, subject to practical and economic feasibility in each state. The options are prioritized by highest, best use:

Latex Paint

1) Reuse
2) Recycling
3) Energy recovery
4) Disposal

Oil-Based Paint

1) Reuse
2) Recycling
3) Energy recovery
4) Incineration

The condition of postconsumer paint when it is received by the program may limit the available management options. If paint containers are not sealed well or stored improperly (e.g., exposed to extreme temperatures), the paint can dry out or be spoiled by mold, or the cans rust, making the paint no longer unusable or recyclable.

The following provides a more detailed description of the latex and oil-based paint management methods that may be utilized by the program. With regard to the above hierarchies, PaintCare determines how to classify each management method based primarily on guidance provided by the EPA and the applicable state environmental agency. Due to differing state views on how particular management methods are classified, PaintCare may classify the same management method differently in different states. For all management methods, processors are required to comply with all applicable law. Because legal requirements vary from state to state, some management methods may not be feasible in every state. Some of the processing methods described below may only be available in certain geographic areas of the country and not available in all PaintCare states or to all transporters.

B2. Latex Paint Management

Reuse

Latex paint may be managed via reuse, meaning that the collected paint is sold or given away in its original labeled container without any alteration of the container contents.

PaintCare supports reuse of latex paint through partnerships with reuse sites including HHW facilities and material reuse stores. These sites are required to document their reuse activities to receive compensation for the paint distributed to the public and are encouraged to obtain a participant waiver acknowledging that they accept the material "as is."

PaintCare may also support reuse of latex paint at PaintCare events. Latex paint collected at the event or collected before the event through PaintCare sites and services, which is deemed suitable for reuse may be made available to the public. As of 2022, PaintCare is also piloting PaintCare reuse events, where the primary activity is distribution of reusable paint collected in advance through PaintCare sites and services. There is no cost to participants for paint taken at either event type.

Paint-to-Paint Recycling

Latex paint may be used to make recycled-content latex paint. Drop-off sites (most commonly HHW facilities) that make recycled-content latex paint typically sort the paint by color, then combine and blend the leftover latex paint into a uniform color which varies from batch to batch. The recycled-content latex paint is then typically given away or sold locally. Commercial latex paint recyclers typically manufacture a color-sorted, blended, and filtered recycled-content paint that is sold domestically and/or internationally. Typically, purchasers of this product either use/re-sell it as is or use it as an input in further paint production.

Lightweight Aggregate

Latex paint may be used as a component in lightweight aggregate. The lightweight aggregate is then offered for sale as lightweight aggregate, used to produce landscape products, or used as a component in various precast concrete products.

Decorative Ground Cover

Dry latex paint may be used as the primary component in a decorative ground cover product.

Energy Recovery

Latex paint may be processed for energy recovery at a waste-to-energy facility.

Alternative Daily Landfill Cover

Latex paint may be used as a component in alternative daily landfill cover (ADC).

Disposal

Dry and solidified latex paint may be sent to landfill for disposal. Use of a permitted landfill for disposal is the least preferred management method for latex paint.

B3. Oil-Based Paint Management

Reuse

Oil-based paint may be managed via reuse, meaning that the collected paint is sold or given away in its original labeled container without any alteration of the container contents.

PaintCare supports reuse of oil-based paint through partnerships with reuse sites including HHW facilities and material reuse stores. These sites are required to document their reuse activities to receive compensation for the paint distributed to the public.

PaintCare may also support reuse of oil-based paint at PaintCare events. Oil-based paint collected at the event or collected before the event through PaintCare sites and services, which is deemed suitable for reuse may be made available to the public. As of 2022, PaintCare is also piloting PaintCare reuse events, where the primary activity is distribution of reusable paint collected in advance through PaintCare sites and services. There is no cost to participants for paint taken at either event type.

Paint-to-Paint Recycling

Oil-based paint may be used to make recycled-content oil-based paint. Commercial oil-based paint recyclers typically manufacture recycled-content oil-based paint in a variety of colors that is sold domestically and/or internationally.

Energy Recovery

Oil-based paint may be processed for energy recovery (e.g., at cement kilns or waste-to-energy facilities).

Incineration

Oil-based paint may be incinerated. Some hazardous waste incinerators process oil-based paint, flammable liquids, and other hazardous wastes and industrial byproducts as a substitute fuel source because they are readily available and have a high BTU value.

B4. Processors

As of the submission of the plan, the following processors may be utilized by the transporters listed in Section A above:

LATEX PAINT PROCESSORS

PROCESSOR	LOCATION	PROCESS
Bristol Virginia Landfill	Bristol, VA	Disposal
Chittenden Waste Management District	Burlington, VT	Reuse, Paint-to-Paint Recycling
Emerald Energy	Mississauga, ON	Energy Recovery
GDB	Monmouth Junction, NJ	Paint-to-Paint Recycling
Lee County Solid Waste Facility	Bishopville, SC	Disposal
Loop	Niagara Falls, ON	Paint-to-Paint Recycling
MXI	Abingdon, VA	Paint-to-Paint Recycling

OIL-BASED PAINT PROCESSORS

PROCESSOR	LOCATION	PROCESS
Aimco Solrec	Burlington, ON	Energy Recovery
Ash Grove	Foreman, AR	Energy Recovery
Buzzi-Unicem	Cape Girardeau, MO Greencastle, IN	Energy Recovery
Chittenden Waste Management District	Burlington, VT	Reuse
Clean Harbors	El Dorado, AR	Incineration
ESSROC	Hannibal, MO	Energy Recovery
Holcim	Holly Hill, SC	Energy Recovery
Loop	Niagara Falls, ON	Paint-to-Paint Recycling

The list of processors utilized by the program may change over time, as needed.

C. NON-PROGRAM PRODUCTS AND EMPTY CONTAINERS

C1. Non-Program Products

Although drop-off sites are instructed and trained to screen for non-program products, a small number of containers of non-program products may enter the program and be screened out during the sorting process by PaintCare's transporters and processors. PaintCare requires its transporters and processors to appropriately manage such products under applicable law, rather than returning them to a drop-off site.

C2. Empty Paint Containers

To the extent feasible, empty metal and plastic paint containers are recycled. PaintCare works with the program's contracted transporters, processors, and interested recyclers to identify and utilize available opportunities for container recycling, as necessary. Unrecyclable containers are typically disposed of as solid waste.

D. LEGAL COMPLIANCE

As part of their contract, all transporters, processors and their subcontractors are required by PaintCare to have processes in place to ensure compliance with applicable federal, state, and local environmental laws, regulations, and permits. Transporters and processors must require any subcontractors they use to comply with all applicable environmental regulations and other laws relating to the services provided by those subcontractors. Under the contract terms, violations of law constitute a breach and can be grounds for termination.

PaintCare has established procedures for monitoring both transporters and processors that manage materials in connection with the PaintCare program. Such procedures include both routine monitoring of

performance by transporters and processors, as well as a vendor audit program. These procedures are designed to provide reasonable assurances that all transporters and processors comply with all applicable laws and engage in appropriate recordkeeping, tracking, and reporting of materials managed through the program.

Examples of typical audit criteria include the following: a review of applicable licenses/permits, emergency response planning, insurance coverage (including environmental insurance for vendors that transport or process hazardous materials in connection with the PaintCare program), data tracking, and reporting practices.

E. INSURANCE AND FINANCIAL ASSURANCE

PaintCare requires all contractors—drop-off sites, transporters, processors, etc.—to carry insurance appropriate to the services provided for the PaintCare program. The specific amount and terms vary from contractor to contractor and may include the following:

- Commercial General Liability Insurance
- Commercial Automobile Liability Insurance
- Workers' Compensation Insurance
- Environmental Pollution Liability Insurance
- Endorsements to name PaintCare as an additional insured on relevant insurance policies

Because contractors have widely different insurance policies (e.g., commercial insurance vs. self-insurance, differing limits), PaintCare evaluates (often with the assistance of outside legal counsel) the insurance terms in each contract on a case-by-case basis with the aim of ensuring that all contractors maintain insurance of the types and in the amounts appropriate for the services each contractor provides to the PaintCare program. PaintCare itself also carries Pollution Liability and Commercial General Liability Insurance.

PaintCare also requires all contractors to comply with all federal, state, and local laws. If financial assurance requirements are applicable to a PaintCare contractor by law, then they must be in compliance with those laws.

6. Communications

STATUTORY CITATION

10 V.S.A. § 6673. PAINT STEWARDSHIP PROGRAM

(a) The plan shall address the following:

(8) Describe education and outreach efforts to inform consumers of collection opportunities for postconsumer paint and to promote the source reduction and recycling of architectural paint for each of the following: consumers, contractors, and retailers.

SECTION OVERVIEW

This section discusses:

- Outreach methods
- Message platform
- Target audiences
- Joint outreach with local government programs
- Website and site locator
- Hotline
- Evaluation of outreach
- Examples of outreach materials

A. OUTREACH METHODS

PaintCare is committed to providing robust and effective statewide education and outreach for the Vermont paint stewardship program using a variety of communication methods, which typically include:

- Print materials (e.g., brochures, fact sheets, cards, signage)
- Digital media (e.g., streaming audio channels, online video, website banner ads)
- Social media (e.g., organic and paid promotion on social media websites like Instagram, Facebook)
- Traditional media (e.g., newspaper, radio, television)
- Earned media (e.g., articles in news outlets, TV & radio interviews, other press coverage)
- Face-to-face communications (e.g., retail site visits, presentations, tabling at conferences, expos and public events, webinars)

B. MESSAGE PLATFORM

B1. Paint Smarter – Buy Right, Use It Up, Recycle the Rest

The "Reduce, Reuse, Recycle" message platform has been used by environmental organizations and waste management programs for many years. To reduce the amount of postconsumer paint and to inform the public how and where to recycle their leftover paint, PaintCare uses an instructive, paint-specific version of Reduce, Reuse, Recycle:

- Reduce: Buy Right.
- Reuse: Use It Up. (Also: Store Right and Give It Away)
- Recycle: Recycle the Rest.

"Buy Right" means purchase the right amount of paint for a job to reduce potential waste; "Use It Up" means use up leftover paint whenever possible; and "Recycle the Rest" means if you still have unwanted paint, drop it off at a PaintCare site for management. PaintCare also promotes "Store Right" and "Give It Away" as part of Reuse. "Store Right" means that if you hold on to paint, keep it in good condition for use later, and "Give it Away" means pass it on to other households or organizations in the community in need of paint.

B2. Program Awareness

Additional messages are used to create awareness of the program and answer these questions:

- What is PaintCare and why does the program exist?
- Why was the law passed (e.g., product stewardship, potential cost savings to local government waste collection programs)?
- How much is the PaintCare fee and what is it for?
- Which products are accepted in the program and which products are not?

C. TARGET AUDIENCES

PaintCare's outreach and education strategy focuses appropriate messages to the following audiences:

- Households
- Businesses and organizations that generate paint (e.g., professional painters, contractors, property managers, schools and universities, hotels)
- Relevant trade groups (e.g., associations that serve professional painters and builders, realtors, and building managers)
- Paint retailers
- HHW programs and solid waste facilities
- Manufacturers
- Non-English speakers

The following examples illustrate how the program adjusts the emphasis of messaging in outreach materials based on target audience:

C1. Households

- Emphasize how to find a drop-off site to recycle paint, the information most often requested.
- Promote using up leftover paint to do-it-yourselfers as a primer or for creative projects.
- Educate consumers on how to buy the right amount of paint by describing factors involved (e.g., square footage of walls, surface texture, coverage rate of paint, whether surfaces have been primed) and prompting consumers to consult with paint professionals.

C2. Businesses that Generate Paint

- Emphasize how to find a drop-off site to recycle paint.
- Promote using up leftover paint.
- Promote the LVP service so they can request a direct pickup of large quantities of leftover paint, rather than transport paint to drop-off sites a little at a time.

C3. Relevant Trade Groups

Associations of painting and building contractors have proven an effective avenue for PaintCare to reach out to professional painters who use large amounts of paint. In addition to utilizing PaintCare's services for leftover paint, professionals also often purchase paint on behalf of clients and can make them aware of the PaintCare program.

PaintCare seeks out other professional associations, such as networks of realtors and building managers. Realtors can provide information to home buyers who may find paint left behind by previous owners, or they may work with contractors to paint homes being prepared for sale. Building managers often accumulate leftover paint while maintaining buildings and facilities.

C4. Paint Retailers

PaintCare has developed print materials for use by all paint retailers to educate store staff and the general public about the program, regardless of whether they are drop-off sites. PaintCare provides these materials at no charge. Examples include:

- Brochures and cards that help the public find drop-off sites and explain the program.
- Signage that promotes general awareness of the program, explains the PaintCare fee, lists accepted products, and displays how to find a paint drop-off site.
- Fact sheets designed for a variety of audiences and subjects (e.g., general information, how to become a paint drop-off site, how to use the LVP service).

Retailers are able to download or order printed materials using PaintCare's website order form or by phone. Drop-off sites also receive materials from PaintCare staff during site visits.

PaintCare sends several mailed notifications to retailers before the revised fee structure goes into effect, as well as a package of updated printed materials. The mailers include:

- Program brochures and painting contractor fact sheets to inform their customers about the revised fee structure.
- Information about the statutory requirements to include the PaintCare fee in their product price, to only sell registered products, and provide information about the program to customers.
- Information about how to request additional print materials, and how to access them online.

C5. HHW Programs and Solid Waste Facilities

PaintCare provides fact sheets and interest forms to explain how HHW programs and solid waste facilities, including transfer stations, recycling centers, and landfills, can partner as paint drop-off sites and the benefits of participating in the program.

C6. Manufacturers

PaintCare maintains a webpage tailored to manufacturers which includes the following information:

- Dedicated staff contact.
- Information on the manufacturer and brand registration process, and a link to the registration area.
- Publicly posted registration lists.
- Information on PaintCare products and product notices.
- Information on remitter agreements for manufacturers.

Changes in the program, including fee structure, are communicated to manufacturers in a variety of ways, including:

- Email newsletters.
- Alerts on PaintCare homepage and other web pages.
- Prompts in the remittal system.

C7. Non-English Speakers

PaintCare has translated its program brochure for all PaintCare programs into Amharic, Arabic, Armenian, Bengali, Chinese, Farsi, French, Haitian Creole, Hawaiian, Hindi, Hmong, Italian, Japanese, Khmer, Korean, Lao, Polish, Portuguese, Punjabi, Russian, Somali, Spanish, Tagalog, Thai, Turkish, Ukrainian, Vietnamese, and Yiddish. Two widely used fact sheets that provide information about the LVP service and guidance for

painting contractors are also available in the aforementioned 27 languages. Translated materials are available to retailers, HHW program and other stakeholders, and electronic copies are posted on PaintCare's website. PaintCare considers translating materials to other languages upon request.

F. JOINT OUTREACH WITH LOCAL GOVERNMENT PROGRAMS

PaintCare promotes HHW and other local government drop-off site partners through its outreach efforts if they wish to be promoted. PaintCare has also established a process for local governments to coordinate joint outreach projects, through which PaintCare assists them with funding and developing outreach campaigns focused on paint recycling for digital, print, radio, and other media. To initiate a project, the local government partners are asked to complete a form describing the project and budget for approval. PaintCare considers a reimbursement proportional to the amount of the campaign devoted to the PaintCare program services. For example, when staff of the Housatonic Resource Recovery Authority in Connecticut published an annual newspaper advertisement promoting its calendar of HHW events for towns in its region, they devoted half of the page to PaintCare products and information, and PaintCare funded half of the advertisement cost. Local governments may propose any project that includes a PaintCare message using any medium. The current version of the joint outreach fact sheet is provided in Appendix C.

G. WEBSITE AND SITE LOCATOR

PaintCare's website provides public access to information about all key aspects of the program. The site makes it easy for the public to find paint drop-off options, request LVPs, view accepted products, and answer questions about the program. It also provides targeted resources for retailers, manufacturers, painting contractors, and local government waste facilities. State-specific pages for each PaintCare program contain links to program plans, annual reports, laws, and other official documents. The "Paint Smarter" section educates the public about PaintCare's "Buy Right, Use It Up, Recycle the Rest" messages, including useful tips and resources. PaintCare's website is available in Spanish translation.

PaintCare strives to continually provide accurate, up-to-date information regarding paint recycling options available to the public. PaintCare has developed and maintains a national database of paint drop-off sites and makes the information available through a drop-off site locator on PaintCare's website. The locator provides a paint-specific, easy-to-use way to search for the nearest available paint drop-off site. Site-specific information explains who is eligible to use a site and what limitations apply.

The site locator resource is currently organized as follows: for PaintCare states, the locator lists only paint drop-off sites, including HHW programs, that partner with PaintCare. For non-PaintCare states, it lists HHW programs as locations where the public can bring leftover paint.

H. HOTLINE

PaintCare operates a weekday hotline to assist the public with finding the nearest drop-off site and to answer questions about the program. The hotline staff speak English and can access live language interpretation in Spanish and a number of other languages when requested.

I. EVALUATION OF OUTREACH

PaintCare typically conducts surveys to evaluate the effectiveness of the education and outreach efforts. The surveys measure awareness of paint recycling among households and painting professionals and include questions about reducing leftover paint, opportunities for reuse and recycling paint, and intention to use those options in the future. Other questions may vary from one survey to another. PaintCare typically reports on the results of each survey in annual reports.

J. EXAMPLES OF OUTREACH MATERIALS

Current versions of the following outreach materials are provided in the appendix:

- Program trifold brochure
- Fact sheet for HHW programs about becoming a PaintCare partner under the paint stewardship law
- Fact sheet for solid waste facilities about becoming a paint drop-off site under the paint stewardship law
- Fact sheet for retailers describing their responsibility and providing a program overview
- Fact sheet for retailers about becoming a paint drop-off site
- Fact sheet for painting contractors describing the PaintCare fee and services
- Fact sheet about the LVP service
- In-store informational poster
- “Recycle Here” poster for paint drop-off sites
- Fact sheet on joint outreach with local governments

7. Funding and Budget

STATUTORY CITATION

10 V.S.A. § 6673. PAINT STEWARDSHIP PROGRAM

(b) The producer or stewardship organization shall submit a budget for the program proposed under subsection (a) of this section, and for any amendment to the plan that would affect the program's costs. The budget shall include a funding mechanism under which each architectural paint producer remits to a stewardship organization payment of a paint stewardship assessment for each container of architectural paint it sells in this State. Prior to submitting the proposed budget and assessment to the Secretary, the producer or stewardship organization shall provide the budget and assessment to a third-party auditor agreed upon by the Secretary. The third-party auditor shall provide a recommendation as to whether the proposed budget and assessment is cost-effective, reasonable, and limited to covering the cost of the program. The paint stewardship assessment shall be added to the cost of all architectural paint sold in Vermont. To ensure that the funding mechanism is equitable and sustainable, a uniform paint stewardship assessment shall be established for all architectural paint sold. The paint stewardship assessment shall be approved by the Secretary and shall be sufficient to recover, but not exceed, the costs of the paint stewardship program.

SECTION OVERVIEW

This section discusses:

- Funding mechanism
- Paint sales
- Paint collection volume
- Budget description
- PaintCare fee structure
- Program budget

A. FUNDING MECHANISM

The PaintCare fee is applied to qualifying containers of architectural paint sold in Vermont. The PaintCare fee is set at a rate to cover but not exceed the cost of operating and sustaining the Vermont program. All revenue generated by the fee on Vermont paint sales is spent to support the Vermont program. The following steps describe the application of the PaintCare fee:

- Manufacturers add the PaintCare fee to containers of architectural paint sold in Vermont directly or through dealers (retailers and distributors).
- Retailers and distributors pass the PaintCare fee to their customers by including it as part of the purchase price of architectural paint they sell in Vermont. This is how retailers and distributors recoup the PaintCare fee they paid when purchasing architectural paint from their suppliers.

- When consumers buy architectural paint in Vermont, the PaintCare fee is included as part of the purchase price. Although the fee must be part of the purchase price, retailers can choose whether to list the fee as a line item on the receipt. PaintCare encourages retailers to show the fee to aid in customer education and provide consistency across the program. Most retailers choose to show the fee as a line item on receipts.
- Manufacturers report sales of architectural paint and remit to PaintCare the PaintCare fee for architectural paint they sold in Vermont in the preceding month. Manufacturers will have already recouped the PaintCare fee they pay to PaintCare because the fee is included as part of the price of their architectural paint when they sold it to their dealers. Some companies may be allowed to report sales on a less frequent schedule if their sales are minimal.

B. PAINT SALES

Architectural pain sales increased in 2020 and 2021 compared to 2019 due to pandemic driven increases in home maintenance and sales but slowed down in 2022 and are projected to remain near 2022 levels for the next few years. The following table shows architectural the paint sales from 2019 through 2022.

PAINT SOLD (GALLONS)

	2019	2020	2021	2022
Gallons Sold	975,061	1,107,685	1,053,612	932,262

C. PAINT COLLECTION VOLUME

While paint collection activities and gallons collected slowed down in 2020 compared to 2019 due to the pandemic, they increased over 2019 volumes in 2021, increased further in 2022, and are projected to remain near 2022 levels for the next few years. The following table shows paint collection volumes for calendar years 2019 through 2022.

PAINT COLLECTED (GALLONS)

	2019	2020	2021	2022
Gallons Collected	100,088	97,663	111,847	120,388

D. BUDGET DESCRIPTION

Based on anticipated paint collection volumes and paint sales, and the proposed fee structure provided in section E below, PaintCare has developed budget projections for the next four years (2023-2026). The primary elements of the budget are discussed here.

Revenue

Revenue is calculated using the current fee structure for 2023 and the revised fee structure (shown in the following subsection) for subsequent years.

Operations Expenses

Operations includes all in-state expenses (also called direct expenses) specific to operating the Vermont program. These costs are borne entirely by the Vermont program and not shared with other PaintCare programs. They are categorized as follows:

- Paint processing. This is usually the most significant expense of the program. Costs are based on vendor pricing and payments for the additional activities (e.g., reuse) at sites. A small increase is included each year to account for rising costs.
- Paint transportation. This expense includes the cost of transporting paint bins from paint drop-off sites to paint processing locations. A small increase is included each year to account for rising costs.
- Paint collection supplies and support. These expenses include the cost of paint collection bins, spill kits, PaintCare event expenses, training materials, signs, labor to pack paint at LVP sites, and other paint collection-related support. A small increase is included each year to account for rising costs.
- Communications. These expenses include advertising and educational materials to increase awareness of the program and to promote drop-off sites, events, and other services.
- Personnel, professional services, and other. These expenses include the cost of staff working directly to implement the Vermont program; legal costs for regulatory review and developing contracts; and other logistical, professional support, and office expenses. A small increase is included each year to account for rising costs.
- State agency administrative fees. This expense will be paid by PaintCare to ANR for oversight of the programs. A small increase is included each year to account for rising costs.

Corporate Expenses

Corporate expenses (also called indirect expenses) are those that are not specific to the Vermont program but support all current and future PaintCare programs. These costs include but are not limited to corporate staffing (e.g., PaintCare's president, director of operations, communications team); back-office support (e.g., information technology, legal, and accounting); company-wide auditing, insurance, outside counsel, and other

professional services; software licenses and maintenance of data management systems; occupancy; general communications; and other supplies and services that support all PaintCare programs.

Corporate expenses are allocated among all PaintCare programs based on their relative populations in the most recent census. New programs begin to pay their relative share about six months before program starts. At the time of plan submission, Vermont represents 0.7% of the combined population of the PaintCare programs (based on 2020 census data). In future years, PaintCare may update the corporate allocation based on the population estimates published annually by the Census Bureau.

In addition, as additional states pass paint stewardship legislation, those states are added to the corporate allocation formula and the share of corporate expenses decrease for each of the current programs.

Operating Reserves

Reserves represent the net assets (cash and investments) of the Vermont program. Reserves are needed to sustain the program in times of either higher-than-expected paint collection volumes resulting in higher-than-expected expenses, lower-than-expected paint sales resulting in lower-than-expected revenue, or a combination of the two. PaintCare's reserves policy establishes a target reserve as a percentage of annual expenses and sets a minimum and maximum threshold. If the reserves fall below the minimum threshold or rise beyond the maximum threshold, an evaluation of the program's expenses and revenue is performed to determine if changes are needed in operations, outreach, and/or the fee structure to bring the reserve balance within range. PaintCare currently has a target reserve of 100% of annual expenses (i.e., 12-months of operating expenses), with a minimum threshold of 75% (i.e., nine months) and a maximum threshold of 125% (i.e., 15 months).

E. PAINTCARE FEE

Based on the projected paint sales, revenue, and expenses, PaintCare proposes the following increases in the program fee structure:

SIZE	DESCRIPTION	CURRENT FEE	PROPOSED FEE
Very Small	Half pint or smaller	$ 0.00	$ 0.00
Small	Larger than half pint up to smaller than 1 gallon	$ 0.49	$ 0.65
Medium	1–2 gallons	$ 0.99	$ 1.35
Large	Larger than 2 gallon up to 5 gallons	$ 1.99	$ 2.45

Audit of the PaintCare Fee

To help ensure that the program's funding mechanism is appropriate to cover the cost of the program, the Vermont law requires the proposed PaintCare fee to be reviewed by an independent financial auditor. The audit report issued by Lyndon Fetterhoff Corydon, P.A., is provided in the appendix.

F. FINANCIAL SUMMARY

The projected budget for January 1, 2023 – December 31, 2026, is summarized in the following table. The fee increase is budgeted to take effect January 1, 2024.

REVENUE AND EXPENSES

REVENUE	2023	2024	2025	2026
Small Containers	$ 113,317	$ 150,318	$ 150,318	$ 150,318
Medium Containers	610,900	833,046	833,046	833,046
Large Containers	109,054	134,262	134,262	134,262
Total Revenue	833,271	1,117,626	1,117,626	1,117,626
EXPENSES				
Paint Processing	515,000	522,725	530,566	538,524
Paint Transportation	125,000	126,875	128,778	130,710
Paint Collection Supplies and Support	98,000	99,470	100,962	102,476
Communications	13,000	13,000	13,000	13,000
Personnel, Professional Fees, Other	73,597	75,252	76,965	78,738
State Agency Administrative Fees	15,000	15,000	15,000	15,000
Allocation of Corporate Activity	58,132	59,876	61,672	63,522
Total Expenses	897,729	912,198	926,943	941,970
Change in Net Assets	(64,458)	205,428	190,683	175,656
Net Assets, Beginning of Year	(226,386)	(290,844)	(85,415)	105,268
Net Assets, End of Year	$ (290,844)	$ (85,416)	$ 105,267	$ 280,923
Reserve as Percentage of Total Expenses	-32%	-9%	11%	30%

Appendix A

Registered Manufacturers and Brands

Registered Manufacturers

Vermont Paint Stewardship Program as of 3/1/2023

1 Ace Hardware Paint Division
2 Acrylatex Coatings & Recycling Inc.
3 Advanced Protective Products, Inc.
4 AFM Safecoat
5 Akzo Nobel Paints
6 American Formulating & Manufacturing
7 Ames Research Laboratories, Inc.
8 Amteco, Inc.
9 Anchor Paint Manufacturing Company of Denver Inc
10 Anvil Paints & Coating Inc.
11 Armstrong-Clark Company
12 ATOM Ventures, LLC
13 Backdrop Inc
14 Basic Coatings
15 Behr
16 Behr Process Corporation
17 Benjamin Moore & Co.
18 Betco Corporation LTD
19 Beyond Paint
20 Bioshield Paint
21 Bond Distributing, Ltd.
22 C&M Coatings
23 California Products Corp.
24 CBD Group
25 Chittenden Solid Waste District
26 Clare, Inc.
27 Clayton Corp
28 Clemons Concrete Coatings
29 Clinical Paints
30 Coating Development Group, Inc.
31 Coatings Alliance, LLC
32 Color Atelier
33 Complementary Coatings Corp.
34 Conklin Company, Inc.
35 Continental Products
36 Convenience Products
37 Country Chic Paint Ltd.
38 CRC Industries, Inc.

39 CrystaLac Company
40 Custom Building Products, Inc.
41 Custom Paint Product Group
42 Daly's Wood Finishes
43 Davis Paint Co.
44 DavLaur Coatings
45 Deck Source Inc.
46 Decotime, Inc.
47 DIP Color LLC
48 Dryvit Systems, Inc.
49 Duckback Products / Division of Duckback Acquisition Corp
50 Eagle IFP Company
51 Eco Safety Inc.
52 Eco Safety Products, Inc.
53 Ecobond LBP, LLC
54 ECOS Paints
55 Emiron Corporation
56 EnviroCare Corporation
57 Farrow & Ball Ltd
58 Farwest Paint Mfg. Company
59 Fine Paints Of Europe
60 Firestone Building Products LLC
61 Forrest Paint Co
62 Franklin Paint Company, Inc.
63 Gardner-Gibson
64 GDB International, Inc.
65 Gemini Coatings, Inc.
66 Gemini Industries, Inc.
67 General Finishes
68 Golden Artist Colors, Inc.
69 GoodFilla
70 GreenSheen Eco-Friendly Paint
71 H. Behlen & Bro.
72 Harrison Paint Company
73 Heartwood Corp
74 Henry Company LLC
75 Heron Paint
76 Homax Group Inc., The
77 ICP Construction

Registered Manufacturers

Vermont Paint Stewardship Program as of 3/1/2023

78 Imperial Paints LLC
79 Insl-X Products
80 Kop-Coat, Inc.
81 Laticrete International, Inc.
82 Lauzon Distinctive Hardwood Flooring
83 Loop Recycled Products Inc
84 Lowe's Home Centers, LLC
85 Lullaby Paints
86 Mad Dog Paint Products, Inc.
87 Martin Studios LLC
88 Masterchem Industries LLC
89 Messmer's Inc.
90 Mia Colore
91 Modern Masters, Inc.
92 Muralo Company, The
93 NCH Corporation
94 Old Masters
95 Old Village Paint, Ltd
96 One Time
97 Osmo USA
98 Penofin
99 Performance Coatings, Inc.
100 Perma-Chink Systems, Inc.
101 PPG Architectural Finishes, Inc.
102 Preserva Products, Ltd
103 Protek Paint LTD
104 Pure and Original
105 Quikrete
106 Rainguard International
107 Ready Seal, Inc.
108 Recolor Paints, LLC
109 Richard's Paint Manufacturing Co Inc.
110 Rodda Paint Company
111 Roman Decorating Products, LLC
112 RPM Wood Finishes Group, Inc.
113 Rudd Company, Inc.
114 Rust-Oleum Corporation
115 SamaN
116 Sansin America Incorporated

Registered Manufacturers

Vermont Paint Stewardship Program as of 3/1/2023

117 Sashco, Inc
118 SaverSystems, Inc.
119 Scotch Paint & Coatings, LLC
120 Seal-Krete
121 Seymour of Sycamore
122 Sheffield Bronze Paint Corp.
123 Sika Corporation
124 Skybryte Company
125 Sto Corp.
126 Structures Wood Care, Inc.
127 Sunnyside Corporation
128 Sutherland Welles Ltd.
129 Sydney Harbour Paint Company
130 Tex-Cote LLC
131 Texturline Decorative Products
132 The Sherwin-Williams Company
133 Timber Pro Coatings
134 True Value Manufacturing Company
135 UC Coatings LLC
136 United Gilsonite Laboratories (UGL)
137 United States Gypsum Company (USG)
138 UP Paint
139 Valspar Corporation
140 Van Sickle Paint Mfg.
141 Van Votz USA, LLC
142 Vanex, Inc.
143 Vasari Lime Plaster and Paint
144 Vasari Plaster and Stucco, LLC
145 Vermont Natural Coatings
146 Ware Products LLC
147 Waterlox Coatings Corporation
148 Weatherman Products, Inc
149 Wood Iron Wood Finishes, Inc.
150 Woodborn USA LLC
151 XIM Products Inc.
152 Yenkin-Majestic Paint Corp.

Registered Brands

Vermont Paint Stewardship Program as of 3/1/2023

2201 Grabber Primer
268 Ceiling Paint
563 Enamel Undercoater
Ace Contractor Pro Paints and Primers
Ace Essence Paints
Ace Great Finishes Interior Stains & Varnishes
Ace Interior Premium Enamels
Ace Royal Finest Paint
Ace Royal Paints and Primers
Ace Rust Stop Enamels and Primers
Ace Sealtech Waterproofers
Ace Sensations Paint
Ace Simply Magic Ceiling Paint
Ace Stain
Ace Stain Halt
Ace Wood Royal Exterior Stains
ACR 4675 Interior Primer
ACR 5514 Interior/Exterior Primer
Acri-Soy Penetrating Clear Sealer
ACR Stain Blocker Primer
AFM Safecoat
Allpro Commercial Grade Waterproofing Sealer
Allpro Concrete Floor Sealer
Allpro Concrete Waterproofing Paint
Allpro Masonry Waterproofing Sealer
Allpro Multi-Surface Water Repellent
Alumify
Ames Block & Wall, acrylic
Ames Block & Wall, rubber
Ames Blue Max
Ames Clear Seal
Ames Liquid Granite
Ames Paint & Prime
Ames Reflective Paint
Ames Safe-T-Deck Granulated
Ames SafeT-Deck Smooth
Ames Super Elasto Barrier
Ames Super Primer
Ames Vapor Barrier
Amteco 3200 Satin Varn
Amteco Silicone (various colors)
Amteco TWP (various colors)
Amteco Water Based Satin Varn
Amteco White Satin Varn
Anchor 1600 Series Anco Inhibitive Primers
Anchor Environ II DTM Latex Enamel 3800 Series
Anchor Fin Seal 1109
Anchor Flexi-Coat 100% Acrylic Latex Exterior Primer 3601
Anchor Flexi-Coat 100% Acrylic Latex Exterior Satin Finish 3600 Series
Anchor Flexi-Coat Plus 100% Acrylic Latex Exterior Satin Finish CC-1805 Series
Anchor Poly U Super Spar Varnish 1170
Anchor Richwood Oil Stain 3300 Series
Anchor Satin Speed Stain 2500 Series
Anchor Signature Interior Eggshell Latex 5100 Series
Anchor Signature Interior Flat Latex 5000 Series
Anchor Sun Up Oil Based House Primer 1516
Anchor Unikote Interior Eggshell Latex P-200 Series
Anchor Unikote Interior – Exterior Semi-Gloss Latex P-300 Series
Anchor Unikote Interior Flat Latex P-100 Series
Anchor Unikote Int-Ext Gloss Oil Enamel P-600 Series
Anchor Unikote Int-Ext Semi-Gloss Oil Enamel P-400 Series
Anchor Unikote Latex Drywall Primer P1508
Anchor Unikote Porch & Deck Latex Enamel P1400 Series
Anchor Unikote Waterborne Masonry Sealer P-1122
Anchor Wood Wonder Latex Stain
Andersons
Anvil Concrete Stain
Anvil Deck-A-New
Anvil Eclipse
Anvil Gator Grip
Anvil Gorilla Grip
Anvil Tex-Wall
Anvil Ultra-Tex
Anvil Universal Latex Primer
Aqua Mix Aqua Stain
Aqua Mix Enrich-n-Seal
Aqua Mix High Gloss Sealer
Aqua Mix Penetrating Sealer
Aqua Mix ProSolv
Aqua Mix Seal & Finish Low Sheen
Aqua Mix Sealer's Choice Gold
Aqua Mix Stone Enhancer
Aqua Mix UltraSolv
Aqua Resin Floor Finish
Aqua Resin Stain Finish
Aqua Resin Trim Enamel Paint
Aqua Zar (All Gloss Levels)
Armstrong Stains
Artistic Finishes
Aspire
Backdrop
Bakor
Barn & Fence Paints
Basic Coatings
Basic Coatings Hardwood Floor Refinisher Gloss
Basic Coatings Hardwood Floor Refinisher Satin
Behr
Behr Premium Plus
Behr Premium Plus Ultra
Behr Premium Select
Behr Pro-X
Benchmark
Benjamin Moore Advance
Benjamin Moore Alkyd Dulamel
Benjamin Moore Arborcoat
Benjamin Moore Aura
Benjamin Moore Ben
Benjamin Moore Benwood Finishes
Benjamin Moore Block Filler
Benjamin Moore Color Samples
Benjamin Moore Concepts
Benjamin Moore Concrete Waterproof Sealer
Benjamin Moore Eco Spec
Benjamin Moore Floor and Patio
Benjamin Moore Fresh Start Primers
Benjamin Moore Grand Entrance
Benjamin Moore Impervex
Benjamin Moore Ironclad
Benjamin Moore Kitchen and Bath
Benjamin Moore Knockdown
Benjamin Moore Marvelux
Benjamin Moore Moorcraft Super Craft
Benjamin Moore Moorcraft Super Hide
Benjamin Moore Muresco
Benjamin Moore Natura
Benjamin Moore Premium Exterior Stain
Benjamin Moore Pro Finish
Benjamin Moore Regal Classic
Benjamin Moore Regal Select
Benjamin Moore Satin Impervo
Benjamin Moore Satin Impervo

Benjamin Moore Studio Finishes (except Chalkboard Paint)
Benjamin Moore Super Craft
Benjamin Moore Super Spec (does not include Super Spec HP)
Benjamin Moore Super Spec HP Acrylic Metal Primer
Benjamin Moore Super Spec HP Alkyd Metal Primer
Benjamin Moore Super Spec HP Clear Acrylic Sealer
Benjamin Moore Super Spec HP DTM Acrylic Gloss
Benjamin Moore Super Spec HP DTM Acrylic Low Lustre
Benjamin Moore Super Spec HP DTM Acrylic Semi-Gloss
Benjamin Moore Super Spec HP DTM Alkyd Gloss Enamel
Benjamin Moore Super Spec HP DTM Alkyd Low Lustre
Benjamin Moore Super Spec HP DTM Alkyd Semi-Gloss Enamel
Benjamin Moore Super Spec HP Rust Converter
Benjamin Moore Super Spec HP Shop-Coat Alkyd Metal Primer
Benjamin Moore Super Spec HP Universal Metal Primer
Benjamin Moore Super Spec HP Urethane Alkyd Gloss Enamel
Benjamin Moore Sure Seal Primer
Benjamin Moore Ultra Spec (does not include Ultra Spec HP)
Benjamin Moore Vinyl Latex Flat
Benjamin Moore Waterborne Ceiling Paint
Benjamin Moore Waterborne Satin Impervo
BenMate Danish Tung Oil Finish
Better Homes and Gardens
Bin Coat Metal Paint
Biocontrol Prime-n-Seal
Blacknight
Block Filler
Blue Seal
BMI 100 Primer
Breathe Safe (all products)
Bruce Fresh Finish
Bunker Hill DIKON Barn & Fence
C&M Coatings
C2 Paint
CAB/Acrylic Clear Topcoat
CAB/Acrylic White Topcoat
Cabinet, Door& Trim Paint
Cabot
Cabot "The Finish"
Cabot Australian Timber Oil
Cabot Cabothane
Cabot Clear solutions
Cabot OVT
Cabot Problem Solver
Cabot PROVT
California Paints Alkyd Vapor Barrier Primer Sealer & Enamel Undercoater
California Paints AllFlor Porch & Floor Enamel
California Paints All Wall & Trim Primer, Sealer and Undercoater
California Paints Aquaborne Ceramic Universal Primer
California Paints ASAP Enamel Undercoater Primer & Sealer
California Paints California Ceiling White
California Paints CalPro
California Paints Diamond Ceiling White
California Paints Drywall Primer
California Paints Fres-Coat
California Paints Grip Coat Bonding Primer
California Paints Malibu
California Paints Muralo 268
California Paints Muralo 563
California Paints Nextech 2
California Paints Ox-O-Flow Cal Coater
California Paints Preference
California Paints Prime Touch Primer and Sealer
California Paints ProPaint
California Paints Sand Finish
California Paints Texture Finish
California Paints Trouble Shooter
California Paints Ultra 2010
California Paints Ultra Aquaborne Ceramic
California Paints Ultra Ceiling White
California Paints Ultra High Build Exterior Paint
California Paints UltraPlate Cabinet & Trim Enamel
California Paints Verde
California Paints WipeOut
California Paints WipeOut II
Casual Spaces
Cedartone WB Penetrating Stain
Ceramic Pro House Paint (all products)
Ceramithan Clear Finish
Chemsearch - Conquest
Chimney Rx Masonry Chimney Water Repellent
Clare Flat White
Clare Interior Eggshell
Clare Interior Semi-Gloss
Clare Multipurpose Primer
Clark+Kensington Paints
Clay Paint
Clinical Paints
Collection of Joy Argente
Collection of Joy Oro
Color Atelier Bonding Primer
Color Atelier Lime Paint
Color Atelier Primer
Color Atelier Sealer (all sheens)
Color Atelier Varnish
Color Decor
Color Extra
Color House Premium Ceiling Paint
Color Made Simple
Color Mist ™
ColorPlace
Color Prime - W ™
Color Prime ™
Color Wheel
Comex Paint
Conco
Controlz Primers
Core Essentials
Coronado Aqua Plastic
Coronado Ceiling Paint
Coronado Crylicote
Coronado Elastite
Coronado Final Touch
Coronado Gold
Coronado Grand
Coronado Grip & Seal
Coronado Maxum Stains
Coronado Optimum Hide
Coronado Rust Scat
Coronado Super Kote 1000
Coronado Super Kote 3000
Coronado Super Kote 5000 (does not include the dry falls)
Coronado Supreme
Coronado Texcrete
Coronado Texcrete WB
Coronado Tough Shield
Coronado Tough Tex

Coronado Tough Walls
Corotech Electrostatic Enamel Semi-Gloss
Corotech Hammertone Enamel
Corotech Organic Zinc Rich Primer
Corotech Pre-Cat Epoxy Eggshell
Corotech Pre-Cat Epoxy Semi-Gloss
Corotech Prep All Universal Primer
Corotech Quick Dry Acrylic Spray DTM
Corotech Quick Dry Enamel Gloss
Corotech Quick Dry Enamel Semi-Gloss
Corotech Rust Arretor
Corotech Shop Cote Primer
Country Chic Paint - Tough Coat
Cover & Go
Cover-All Primer (all products)
Crackle Lacquer Clear
CRC® Rust Converter
Crema
CrystaLac PolyOxide
CrystaLac Polyurethane
CrystaLac Super Premium
CrystalFin: Gloss , Semi-Gloss, Satin and Matte
CrystalFin Floor Finish: Gloss and Satin
CT-100
CUTEK Extreme
Daly's Deck Stain
Daly's Log Oil
Daly's Semi-Transparent Exterior Stain
Daly's Waterborne Deck Stain
Daly's Waterborne Stain
Daly's Wood Stain
Deckmaster Clear Sealer
Deft Clear Wood Finishes
Deft Deftoil
Deft Lacquer Sanding Sealer
Deft Polyurethanes
Deft Wood Stains
Defy Clear Wood Finish
Defy Composite Deck Sealer
Defy Deck Stain for Hardwoods
Defy Epoxy Fortified Wood Stain
Defy Extreme Wood Stain
Defy Marine Seal
Defy Original Synthetic Wood Stain
Demandit®
Designer Drylok (all colors)
Devine
Diamond Brite
Diamond Collection
DIKON Barn & Fence (Bunker Hill)
DIKON Dairy Enamel
Dimensional Metals 2
DIP Color
Do It Best
Do-It-Best
Do It Best Best Look®
Do It Best Color Solutions®
Do-It Best Waterproofer
Drylok Concrete Floor Paint (all colors)
Drylok Concrete Protector
Drylok E1 Floor Paint (all colors)
Drylok Extreme
Drylok Latex Base Masonry Waterproofer (all colors)
Drylok Natural Look Sealer
Drylok Oil Base Masonry Waterproofer (all colors)
Drylok Water Based 5% Silicone
Drylok Wet Look Sealer
Duckback
Duckback - All Purpose Waterproofer
Duckback - Composite Deck Sealer
Duckback - Mason's Select - Concrete Clear Sealers
Duckback - Mason's Select - Epoxacryl Solid Color Concrete Stain
Duckback - Mason's Select - Transparent Concrete Stain
Duckback - Premium Translucent Finish
Duckback - SuperDeck - Clear Wood Finish
Duckback - SuperDeck - Deck & Dock Elastomeric
Duckback - SuperDeck - Exotic Hardwood Stain
Duckback - SuperDeck - Log Home Oil Finish
Duckback - SuperDeck - Oil Based Stain
Duckback - SuperDeck - Pressure Treated Stain
Duckback - SuperDeck - Semi Transparent Stain
Duckback - SuperDeck - Solid Color Stain
Duckback - SuperDeck - Transparent Stain
Duckback - SuperDeck - Waterborne Stain
DuraSoy One Paint
DuraSoy Pro Paint
Dutch Boy
Dutchboy Dimensions
Dutchboy Dirt Fighter Interior
Dutchboy Maxbond®
Dutchboy Refresh
Dutch Standard (all products)
Easy Care
Easy Color
Eco Best Deck, Fence and Siding Wood Stain
Eco Best Decorative Concrete Stain
Eco Best Gloss Finish Sealer
Ecobond LBP
EcoFlor Decorative Floor Finish
Economy
ECOS Paints
Eco-Tuff Coatings
Eco-Tuff Primers
Emmet's Good Stuff Wood Finish
Encase
Endure House Paint (all products)
Enrich
EnviroShield ES-100
EnviroShield ES-90
EPIC Ceiling White
EPIC Interior Primer
EPIC Premium Interior Paint and Priimer
Equinox
Essential Performance
Evolve
Excesior Coatings (all products)
E-Z Kare
Fabulon
Farrow & Ball Dead Flat
Farrow & Ball Estate Eggshell
Farrow & Ball Estate Emulsion
Farrow & Ball Exterior Eggshell
Farrow & Ball Full Gloss
Farrow & Ball Interior /Exterior Wood Primer & Undercoat
Farrow & Ball Interior Wood Primer & Undercoat
Farrow & Ball Masonry & Plaster Stabilising Primer
Farrow & Ball Masonry Paint
Farrow & Ball Metal Primer & Undercoat
Farrow & Ball Modern Eggshell
Farrow & Ball Modern Emulsion
Farrow & Ball Wall Ceiling Primer & Undercoat

Farrow & Ball Wood Floor Primer &Undercoat
Farrow & Ball Wood Knot & Resin Blocking Primer
Field Marking Paints
Finecoat 2
Fine Paints of Europe ECO
Fine Paints of Europe Eurolux
Fine Paints of Europe Eurothane
Fine Paints of Europe Hollandlac
Fixall (all products)
FixAll Acrylic Floor Sealer
FixAll Acrylic Pool Paint
FixAll Acrylic Stain Killer
FixAll Adhesium Wall Covering Primer
FixAll Alkyd Stain Killer
FixAll Alumithane
FixAll Aquaborne Ceramithane
FixAll Chlorinated Rubber Pool Paint
FixAll Clear Waterproofing Sealer
FixAll Elastomeric Coating
FixAll Epoxy Pool Paint
FixAll Everlife Fast Dry Alkyd Enamel
FixAll Everlife Urethane Enamel
FixAll Everlife Waterborne Enamel
FixAll Everlife Weatherproof Aluminum Enamel
FixAll Exposed Concrete Sealer
FixAll Field Marking Paint RTU
FixAll Fix-Rite
FixAll Fix Rust Primer
FixAll Grabber Bonding Primer
FixAll Gym Seal
FixAll Kitchen & Bath Enamel
FixAll Lacquer
FixAll Lacquer Sanding Sealer
FixAll Lacrylic Clear Sealer & Anti-Graffiti Coating
FixAll Latex Block Filler
FixAll Mason-Cote
FixAll Masonry Conditioner
FixAll Novus
FixAll Polyurethane
FixAll PVA Drywall Primer
FixAll Roof Coating
FixAll RustPlate Primer
FixAll Sanding Sealer
FixAll Semi-Transparent Interior Stain
FixAll Shop Coat Primer
FixAll Skid Grip
FixAll Spar Varnish
FixAll Sportmans Camouflage Exterior Paint
FixAll Stain & Odor Barrier
FixAll Stopz
FixAll Ultimate Universal Primer
FixAll Ultra Tred
FixAll Varnish
FixAll Waterborne Alkyd Stain Killer
FixAll WearAll
Formby's
Forrest Paint
Franklin Paint - Halftime
Franklin Paint - Winning Streak
Frazee
Fred Myers
French Lac
Fresco 2
GacoDeck (A56, DT, & DK)
Galvanized & Aluminum Primer
Gardner-Gibson Black Jack (white elastomeric coatings only)
Gardner-Gibson Dynamite
Gardner-Gibson Eterna Kote
Gardner-Gibson Gardner
Gardner-Gibson Shur-Stik
Gardner-Gibson Sta-Kool
Gemini Coatings Artisan Effects
Gemini Coatings Craftsman Collection
Gemini Coatings Gem Clear
Gemini Coatings Gem Coat
Gemini Coatings Gem Cryl
Gemini Coatings Gem Dye
Gemini Coatings Gem Glo
Gemini Coatings Gemini
Gemini Coatings Gemini Tone Stain
Gemini Coatings Gem Pro
Gemini Coatings Gem Tone
Gemini Coatings Gem Var
Gemini Coatings Gulf Synthetics - PermaBond
Gemini Coatings Master's Magic
Gemini Coatings Storm Shield
Gemini Coatings Titanium Series
Gemini Coatings Total Wood Preservative
Gemini Coatings TWP
Gemini Coatings WFS
Gemini Coatings Wood Finishers Supply
General Finishes Arm-R-Seal Urethane Topcoat
General Finishes Black & White Undercoat
General Finishes Brushable White Enamel
General Finishes Clear Poly Topcoat
General Finishes Enduro
General Finishes Enduro-Var
General Finishes Enduro-Var II
General Finishes Enduro-Var Polyurethane
General Finishes Exterior 450
General Finishes Exterior 450 Clear Finish & Stain
General Finishes Exterior 450 Stains
General Finishes Gel Stains
General Finishes Gel Topcoats
General Finishes GF Milk Paints
General Finishes High Performance Poly
General Finishes Industrial Dye Stains & Concentrates
General Finishes Oil Base Wood Stains
General Finishes Original Seal-A-Cell CLEAR
General Finishes Outdoor Oil
General Finishes Pigmented Poly
General Finishes PolyAcrylic
General Finishes Pre-Cat Urethane
General Finishes Pre-Stain Wood Conditioner
General Finishes Pro Image
General Finishes RTM Stains
General Finishes Sanding Sealer
General Finishes Sealer
General Finishes Stain Blocker
General Finishes Water Base Dye Stains
General Finishes Water Base Lacquer
General Finishes Water Base Wood Stains
Geocel
Glidden Concrete Paint
Glidden Diamond
Glidden Duo
Glidden Essentials
Glidden Everyday
Glidden EZ Track
Glidden Fundamentals
Glidden Grab-N-Go
Glidden Gripper
Glidden High Endurance
Glidden High Performance
Glidden Max-Flex
Glidden Premium

Glidden Professional Devflex
Glidden Professional Devguard
Glidden Professional Devoe
Glidden PVA Drywall Primer
Glidden Quick Cover
Glidden Spred
Glidden Vinyl Renew
Glidden Woodpride
Glitsa Gold Seal™ Finish
Glitsa Gold Seal™ Lite Scent™ Finish
Glitsa Gold Seal™ Stains (various colors)
Glitsa High Performance Waterborne Finish
Glitsa Infinity II LVOC™ Finish
GlitsaMax™ Finish
Glitsa Quality Seal™ Sealer
Glitsa Wood Flour Cement™
Glitza TruSeal
GlosThane Finish
Golden Paintworks
GoodFilla Stain and Paint Base
GPM
GreenSheen® (all products)
Grossman's Majic
GS88-1 Sealer
GS99-1 Sealer
Guardian Contractor Grade
Guardian Professional Quality
H&C
H&K Paints All Coat
Hammerite
Hard Oil
Harrison Paint (all products)
HD® Designs
HDP™ Water-Repellent Paint
Heavy Bodied Glazing Stain (Various colors)
Hemp Shield
Henry/Bakor
Henry Acryprime Recoat Primer
Henry Air Bloc 31 Brush/Spray
Henry Aquaprime Primer
Henry Aquatac Primer
Henry Binder/Tack Emulsion
Henry Grey Elastomeric Roof Coating
Henry Light Tan Roof Coating
Henry Metalshield Rubber Based Gray Roof Coating
Henry Metalshield Waterbased Elastomeric Roof Coating
Henry Premium Elastomeric Base Coating
Henry Premium Non-Fibered Aluminum
Henry RTC Coat
Henry Solorflx Tan Elastomeric
Henry Special Color Elastomeric
Herbal Oil
HGTV Home
HGTV Weathershield by Sherwin Williams
High Solid Floor Oil
Homax Premixed Popcorn Ceiling Texture
Homax Premixed Wall Texture
Homax Roll-On Texture
Homax Tile Guard
Homax Wet Look Cure Seal
Homestead
Insl-X Aqua Lock
Insl-X Blockout
Insl-X Cabinet Coat
Insl-X Chlorinated Rubber Pool Paint
Insl-X Field Marking
Insl-X Hot Trax Acrylic Garage Floor Paint
Insl-X Lead Block Encapsulating Paint
Insl-X Odor Less
Insl-X Prime Lock
Insl-X Pro-Plate Enamel - Rust Preventative Coating
Insl-X Rubber Based Pool Paint
Insl-X Seal Lock
Insl-X Stix
Insl-X Sure Step
Insl-X Tough Shield
Insl-X Tuffcrete
Insl-X Waterblock
Insl-X Waterborne Pool Paint
Kilz
Kilz Casual Colors
Kilz Pro-X
Kilz True Tone
Kolor Kote
Kool Seal
Krylon
Krylon Commercial
Kwal
Laticrete Granite & Marble Countertop Sealer
Laticrete High Gloss Sealer & Finish
Laticrete Paver Armor Pro™ Premium High Gloss Color Enriching Sealer
Laticrete Paver Armor Pro™ Premium No Gloss Color Enriching Sealer
Laticrete Paver Armor Pro™ Premium Penetrating Natural Look Sealer
Laticrete Paver Armor Pro™ Premium Salt Repelling Natural Look Sealer
Laticrete Paver Armor Pro™ Premium Semi Gloss Color Enriching Sealer
Laticrete Paver Armor Pro™ Premium Waterproofing Natural Look Sealer
Laticrete Premium Stone Sealer
Laticrete Premium Stone Sealer & Enhancer
Laticrete Saltillo Tile Sealer & Finish
Laticrete Semi Gloss Sealer & Finish
Laticrete Stone Sealer
Laticrete Stone Sealer & Enhancer
Laticrete StoneTech® Professional Enhancer
Laticrete StoneTech® Professional Enhancer Pro™ Sealer
Laticrete StoneTech® Professional Grout Release
Laticrete StoneTech® Professional Heavy Duty Exterior Sealer
Laticrete StoneTech® Professional Heavy Duty Sealer
Laticrete StoneTech® Professional High Gloss Finishing Sealer
Laticrete StoneTech® Professional High Gloss Lacquer
Laticrete StoneTech® Professional Impregnator Pro® Sealer
Laticrete StoneTech® Professional Maximum BulletProof® Sealer
Laticrete StoneTech® Professional Natural Stone Countertop Sealer
Laticrete StoneTech® Professional Paver Sealer & Enhancer
Laticrete StoneTech® Professional Salt Water Resistant Sealer
Laticrete StoneTech® Professional Sealer
Laticrete StoneTech® Professional Semi Gloss Finishing Sealer
Laura Ashley
Lauzon wood Clear Finish

Lauzon wood stain
Lenmar 350 VOC Polyurethane Wood Finish
Lenmar Aqua-Plastic
Lenmar Echo
Lenmar Evolution
Lenmar Interior Waterborne Wiping Stain
Lenmar QuickStain Waterborne Wiping Stain
Lenmar Spar Varnish
Life Cycle Coatings Architectural Paint
Lifeline Accents
Lifeline Acrylic
Lifeline Advance
Lifeline Endure
LifeLine Exterior
Lifeline Interior
Lifeline Ultra-2
Lifeline Ultra-7
Local Color Recycled Latex Paint
Long End Seal
Loop Premium Recycled Paint
Lullaby Paints
Lumber Jacket Stains (all products)
Mad Dog Crack Fix (MDCF)
Mad Dog Deck Fix (MDDF)
Mad Dog Primer (MDP)
Mad Dog Primer 2 (MDP 2)
Mad Dog Primer Smooth (MDPSM)
Magnolia Home Paint by Kilz
Maintenance One
Maintenance Paint (Home Depot)
Majic Aluminum Paint
Majic Barn & Fence Paint
Majic Barricade
Majic Basement Paint
Majic Concrete Sealer
Majic Diamond Hard Enamel
Majic Diamond Hard Paint
Majic Easy Spread
Majic Exterior/Interior Paint
Majic Fence Paint
Majic Field Marking Paint
Majic Floor Enamel
Majic Floor Paint
Majic House & Deck Stain
Majic Kitchen & Bath Paint
Majic Latex Enamel
Majic Lifestyle
Majic Pride
Majic Primer & Paint
Majic Professional
Majic Rust Kill Coating
Majic Stain Blocking Primer Sealer
Majic Town & Country
Majic Waterproofing Sealer
Majic Water Sealer
Majic Wood Stain
Majic Wood Varnish
Mark's Paint
Martha Stewart Living
Martin Senour Paints
Marvins
MasonrySaver #25 Floor Finish
MasonrySaver Acrylic Waterproofing Sealer
MasonrySaver All-Purpose HD Water Repellent
MasonrySaver Decorative Concrete Sealer
MasonrySaver Garage Floor Sealer
MasonrySaver Paver Sealer
MasonrySaver VOV Compliant Solvent Base Water Repellent
MasonrySaver Water Repellent for Brick
MasonrySaver Water Repellent for Split-Face Block
Masonry Shield
Masterchem
Master Gel® Finish Clear
Master Guard Oil and Spot Primer
Master Guard Sealer
Master Guard Wood Sealer
MaxLife
MBP Flat
McCloskey
McCloskey Man-O-War
McCloskey Multi-Use
McCloskey Special Effects
McCloskey Stains
McCoy's
Messmer's Composite Deck Finish
Messmer's Decking Stain
Metallic Finishes
Metal Ready Universal
Minwax Color Wash
Minwax Lacquer (all types)
Minwax Polycrylic
Minwax PolyShades
Minwax Polyurethane (all types)
Minwax Stain (all types)
Minwax Tung Oil
Minwax Urethane
Minwax Varnish
Minwax Wipe-On Poly
Minwax Wood Effects
Minwax Wood Finish
Miracle Sealants 511 Anti-Slip
Miracle Sealants 511 Glass Tile & Shower Door Sealer
Miracle Sealants 511 H2O Plus
Miracle Sealants 511 Impregnator
Miracle Sealants 511 Porcelain & Ceramic Tile Sealer
Miracle Sealants 511 Porous Plus
Miracle Sealants 511 Quartz Counter Top Sealer
Miracle Sealants 511 Seal & Enhance
Miracle Sealants High Gloss Finish Sealer
Miracle Sealants Matte Finish Sealer
Miracle Sealants Mira Matte
Miracle Sealants Tile, Stone & Grout Sealer
ML Campbell
Moldex Sealant
Mono II
Mono II EXT
Montage Architectural Paint
Multi-Mist Products - Pro Seal Ultra
Multi-Mist Products - Qurox
Multiplex
Muralo Quick Tred (various colors)
Muralo Quick Tred Tex (various colors)
Muralo Specialty Coatings
Murex Primer
MX Primer
NanoKote (all products)
Nautica
NuDeck
Odds N Ends
Old Masters Brushing Lacquer
Old Masters Exterior Water-based Spar Urethane
Old Masters Fast Dry Stain
Old Masters Gel Stain
Old Masters Graining Base
Old Masters H2O Wood Stain
Old Masters Oil Based Gel Polyurethane
Old Masters Oil Based Polyurethane
Old Masters Oil Based Quick-Dry Varnish
Old Masters Oil Based Sending Sealer
Old Masters Oil Based Spar Marine Varnish

Old Masters Oil Based Super Varnish
Old Masters Penetrating Sealer
Old Masters Penetrating Stain
Old Masters Tung Oil Varnish
Old Masters Water-based Clear Finish
Old Masters Water-based Polyurethane
Old Masters Water-based Sanding Sealer
Old Masters Wiping Stain
Old Masters Wood Conditioner
Old Masters Woodgrain Filler
Old Village Paint
Old World Stain
Ollie's Town & Country
Olympic Paint
Olympic Stain
One Time Wood Preservative (various colors)
Optimus
Orgill
Osmo Anti-Slip Decking Oil
Osmo Decking Oil
Osmo Natural Woodstain Oil Effect
Osmo One Coat Only
Osmo Polyx-Oil
Osmo Polyx-Oil Raw
Osmo Spray-Polyx
Osmo Top Oil
Osmo UV-Protection Oil
Osmo Wood Wax Finish
Ospho (rust inhibiter)
PAF Primer
Painter's Select
Pantone
Parks Pro Finisher
PD Stain
Penetrating Oil Sealer
Penofin Concrete & Masonry Stain
Penofin Wood Finishes
Permax 108 Acrylic Coating
Permax 115 Acrylic Coating
Permax 120 Acrylic Coating
Pittsburgh Paints and Stains
Pittsburgh Paints and Stains Revolution
Plastek
Plastek EXT
Plastic Kote
Plasti-Kote
Poly-Soy Top Coat
Polyurethane Primer (all products)
Polyurethane Rust Preventative
PolyWhey
PolyWhey Exterior (various colors)
PolyWhey Floor
PolyWhey MVP Sport Floor Finish
PolyWhey MVP Sport Floor Sealer
PolyWhey Series 1000 Infusion Wood Modifier
PolyWhey Series 2000 Stain Base
PolyWhey Series 3500 Wood Floor finish
PolyWhey Series 3500 Wood Floor Sealer
PolyWhey Wood Cleaner
Pore-O-Pac™ Grain Filler (various colors)
Pore-O-Pac™ Grain Filler Reducer
Power Hide (all products)
PPG Accent Color Base
PPG Bar-Ox
PPG Break-Through
PPG Builder Performance
PPG Diamond 350
PPG Flood
PPG Flood Pro
PPG Floor & Porch
PPG Fortis 350
PPG Fortis 450
PPG Hi-Hide
PPG Kilstain
PPG Maintenance Paint
PPG Manor Hall
PPG Metallic Tones
PPG Monarch
PPG Mopako
PPG Multi-Pro Maintenance
PPG Paramount
PPG Performance
PPG Perma-Crete
PPG Pitt-Cryl Plus
PPG Pitt-Glaze
PPG Plex-Seal
PPG Porter Paints Acri-Pro
PPG Porter Paints Acri-Shield Paint
PPG Porter Paints Acri-Shield Stains
PPG Porter Paints Advantage 900
PPG Porter Paints Blankit
PPG Porter Paints Glyptex
PPG Porter Paints Permanizer
PPG Porter Paints Portersept
PPG Porter Pro-Master 2000
PPG Primatite
PPG Proluxe Sikkens
PPG Pure Performance
PPG Regency
PPG Seal Grip
PPG Silken Touch
PPG Speed Cryl
PPG Speedhide (except Dry Fog)
PPG Sun Proof
PPG Synteko
PPG Timeless
PPG Ultra-hide 150
PPG Ultralast
PPG Wallhide
PPG Wall Supreme
PPG Weather King
PPG Wonder Hide
PPG Wonder Pro
PPG Wonder Pure
PPG Wonder Shield
PPG Wonder Tones
PPG ZoneMark
PPI™ Waterborne Finish
Pratt & Lambert®
Pratt & Lambert Accolade®
Pratt & Lambert RedSeal®
Pratt & Lambert RedSeal® Zero VOC
Pratt & Lambert STAINShield®
Prelude
Premier Aluminum Roof Coating Fibered
Premium
Premium Decor
Pre-Stain Clear Wood Stain
Prestige
Prime 1
Prime Choice (all products)
Prime-n-Seal
Primer
Primer with Sand ™
Prime Time
Prime Time Plus
Pro Best
Professional Coatings
Profin:Gloss and Satin
Pro Good
Pro Grade
Prymit ®
Puma
Puma-XL
Qualalacq™ Lacquer Gloss
Qualalacq™ Lacquer Reducer
Qualalacq™ Lacquer Satin
Qualalacq™ Sanding Sealer
Qualarenu™ #1
Qualasole™
Quart testers (all products)

Quick Dry Zar Sanding Sealer (Gloss/Satin)
Quik Hide
Quikrete Concrete & Masonry High Gloss Sealer
Quikrete Concrete & Masonry Waterproofing Sealer
Quikrete Masonry Waterproofer
Quikrete Penetrating Concrete Stain
Quikrete Textured Acrylic Concrete
Quikrete Transluscent Concrete Stain
Quik-Tred Floor Enamel
Radcon (various colors)
Rainguard Advanced Waterproofer 10 year
Rainguard Blok-Lok Water Repellent Concentrate
Rainguard Blok-Lok Water Repellent Ready to Use
Rainguard Clear-Seal 1 part High Gloss Acrylic Urethane Sealer
Rainguard Clear-Seal 1 part Low Gloss Acrylic Urethane Sealer
Rainguard Color-Lok Solid Color Silicone Stain ATB
Rainguard Color-Lok Solid Color Silicone Stain DTB
Rainguard Color-Lok Solid Color Silicone Stain WTB
Rainguard Floor-Lok Sealer Concentrate
Rainguard Micro-Seal Water Repellent Concentrate
Rainguard Micro-Seal Water Repellent Ready to Use
Rainguard Plugger Acrylic Sealer 10% Solids
Rainguard Plugger Acrylic Sealer 25% Solids
Rainguard Satin-Lok Water Base Medium Gloss Repellent
Rainguard Super Stucco Primer Sealer Concentrate
Rainguard Vandl-GuardFinish Coat Graffiti Barrier
Rainguard Vandl-GuardFIVE Permanent Anti-Graffiti Coating
Rainguard Vandl-GuardONE Permanent Anti-Graffiti Coating
Rainguard Vandl-Guard Permanent Anti-Graffiti Coating
Rainguard Vandl-GuardTEN Permanent Anti-Graffiti Coating
Rainguard Vandl-Top Sacrificial Anti-Graffiti Coating
Rainguard Waterproofer 7 year
Rainguard Wet Look Sealer Wood &Masonry
Ralph Lauren
Ramuc
Rapid Roof HV
Rapid Roof III
Ready Seal (all products)
ReColor™ (All Products)
Reflectit™
Reserve
Resin & Oil Stain Finish
Restoration Hardware
Restore-X
Revyvit ®
Richard's Paint Barricade
Richard's Paint Bondcrete
Richard's Paint Bungalow 47
Richard's Paint Deck Guard
Richard's Paint Driveway and Floor Coating
Richard's Paint Eternity
Richard's Paint Floor-Tite
Richard's Paint H2O Fusion
Richard's Paint Holzon
Richard's Paint Holzout
Richard's Paint Holztite
Richard's Paint Painter's Pride
Richard's Paint Paverseal
Richard's Paint Pliolite
Richard's Paint PPS
Richard's Paint Rich Air Zero VOC
Richard's Paint Rich Classic
Richard's Paint Rich Flex
Richard's Paint Rich Pro
Richard's Paint Rich Shield
Richard's Paint Rich Tex
Richard's Paint Rich Wall
Richard's Paint Richwood
Richard's Paint Roof Shield
Richard's Paint Rust Sheild
Richard's Paint Shields All
Richard's Paint Signature Ceramic
Richard's Paint Signature Series
Richard's Paint Signature Series Plus
Richard's Paint Thor
Richard's Paint Wall Guard
Rodda Accent Primer
Rodda AC Line
Rodda All Purpose Equipment Enamel
Rodda Aqua Master
Rodda Cat-A-Lac
Rodda Color Base
Rodda Control Primer
Rodda Crystal Clear
Rodda EZEE Coat
Rodda Fast Dry Floor Finish
Rodda First Coat
Rodda Horizon
Rodda Interior Performance
Rodda Lasyn
Rodda Mar Resist
Rodda Master Painter
Rodda Metal Master
Rodda Modern Wood Stain
Rodda Multi Master
Rodda MultiPrime
Rodda pHlextite
Rodda Ply-Coat
Rodda PMC 300
Rodda Porsalite
Rodda Roseal
Rodda Rural Manor
Rodda Scotseal
Rodda Speed Primer
Rodda SR Ultra
Rodda Super Roflex
Rodda Surfbond
Rodda Terra
Rodda Tuff Deck
Rodda Ultimate II
Rodda Unique II
Rodda Vapor Block
Rodda Vapor Shield
Rodda Weather Performance
Rodda Wood Master
Roman ECO-988 Pigmented Primer
Roman Golden Harvest PRO-988
Roman PRO-909 Vinyl Prep
Roman PRO-935 R-35
Roman PRO-977 Ultra Prime
Roman Pro-999 Rx-35
Roofers Choice
Room & Board by Valspar
Royal Conditioner ™
RPM Water Based Grain Filler (various colors)
RPM Wood -15 Minute Wood Stain (various colors)
RPM Wood-8x Wipe On Water Base Urethane Satin
RPM Wood -Polyurethane Satin
RPM Wood- Vinyl Sealer
RPM Wood Waterborne Urethane Finish Satin

Rudd Acryl Fin™ Finish
Rudd Aerodry™ (various colors)
Rudd Basetoner™ (various colors)
Rudd Catalast™ Lacquer (various colors)
Rudd Chromacat™ Lacquer (various colors)
Rudd Chromawipe NVO™ Wiping Stain (various colors)
Rudd Chromawipe™ Wiping Stain (various colors)
Rudd Colorplex™ Lacquer (various colors)
Rudd Colorplex™ Undercoaters (various colors)
Rudd Colortools™ LH Spray Stain (various colors)
Rudd Colortools™ Wiping Stain (various colors)
Rudd Duracat-V 550 VOC Lacquer
Rudd Duracat-V 550 VOC Sealer
Rudd Duracat-V Plus™ Lacquer
Rudd Duracat-V™ Lacquer (various colors)
Rudd Duracat-V™ Sealer (various colors)
Rudd Durafill™ Wood Filler
Rudd Duralac™ Lacquers (various colors)
Rudd Excelite™ Lacquer (various colors)
Rudd Fastwipe™ Wiping Stain (various colors)
Rudd Glaze Stain
Rudd Hi-build™ Fast Dry Finish
Rudd Hycryl™ Waterborne Finish
Rudd Hycryl™ Waterborne Sealer
Rudd Hyplex™ Lacquer (various colors)
Rudd ISC™ Stains (various colors)
Rudd ISS LH™ Spray Stains (various colors)
Rudd ISS™ Spray Stains (various colors)
Rudd IWS™ Wiping Stains (various colors)
Rudd Natuseal™ Stains (various colors)
Rudd Nulustre™ Lacquer
Rudd Nu-wave™ Lacquer (various colors)
Rudd Nu-wave™ Sealers (various colors)
Rudd Nu-wave™ Stains (various colors)
Rudd On-site™ Lacquer
Rudd Plastiprime™ (various colors)
Rudd Primer Undercoater (various colors)
Rudd Prism™ Waterborne Stains (various colors)
Rudd Problend 350 VOC™ Spray/Wiping Stains (various colors)
Rudd Problend TC™ Spray/Wiping Stains (various colors)
Rudd Problend™ Spray/Wiping Stains (various colors)
Rudd Pro-Hibuild™ Lacquer
Rudd Pro-Hibuild™ Sealer
Rudd Pro-Hibuild™ Undercoater (various colors)
Rudd Prothane™
Rudd Pro™ Lacquer
Rudd Pro™ Sealer
Rudd Quickstack™ (various colors)
Rudd Terraset™ Stain Concentrates (various colors)
RUST DESTROYER
RUST DESTROYER FAST DRY
RUST DESTROYER HIGH HEAT
Rusticide (rust remover)
RUST KNOCKOUT
Rustoleum 360 Grey
Rustoleum 360 Primer
Rustoleum 900 Clear Coat
Rustoleum Advanced Technology UMA
Rustoleum American Accents
Rustoleum BIN
Rustoleum Bulls Eye
Rustoleum Colorfast
Rustoleum Decorative Painter's Products
Rustoleum Elastomeric Roof Coating
Rustoleum Epoxy Shield
Rustoleum Flash Bond 400
Rustoleum Home
Rustoleum MasterClear Supreme
Rustoleum Metallic Paint Collection
Rustoleum Multispec
Rustoleum OKON
Rustoleum Painter's Touch
Rustoleum Peel-Bond
Rustoleum Perma White
Rustoleum Plastic And Vinyl NT
Rustoleum Prime Start
Rustoleum Restore
Rustoleum Restorz
Rustoleum Simply Home
Rustoleum Stop Rust
Rustoleum Studio Color
Rustoleum Sure Color
Rustoleum Theme Paint
Rustoleum Trim Magic
Rustoleum Varathane
Rustoleum Watco Danish Oil
Rustoleum Watco Exterior Wood Finish
Rustoleum Watco Lacquer + Color Tint
Rustoleum Watco Lacquer Clear Wood Finish
Rustoleum Watco Teak Oil + Stain
Rustoleum Watco Tung Oil
Rustoleum Watco Wipe-On Poly
Rustoleum Wolman
Rustoleum X-Seal
Rustoleum Zehrung
Rustoleum Zinsser
SafeChoice
Safecoat
Safecoat Naturals
Saman hybrid based varnish
Saman hybrid stain
Saman water based stain
Saman water based varnish
Sand Finish
Sansin Boracol 20-2
Sansin Classic
Sansin DEC
Sansin ENS
Sansin Foundation RTU
Sansin MDF Primer
Sansin Precision Coat
Sansin Purity Interior
Sansin Roof Tec
Sansin SDF
Sansin Timber Tec
Sashco Capture® Log Stain
Sashco Cascade® Clear Coat
Sashco Symphony® Interior Clear Coat
Sashco Transformation Stain® Deck & Fence
Sashco Transformation Stain® Log and Timber
Sashco Transformation Stain® Siding & Trim
Satin Thane Finish
Scotch Acry-Flex

Scotch Acrylic Stain
Scotch Acry-Namel
Scotch Acry-Sheen
Scotch Bus Stop
Scotch Draw-Tite
Scotch Elast-A-Crylic
Scotch Elast-O-Bond
Scotch Ever-Gloss
Scotch Kid-Proof
Scotch Latex Enamel Undercoat
Scotch Loc-Prime Hi-Build Undercoat
Scotch Prime Choice
Scotch PVA Sealer
Scotch Selz
Scotch Tex-Dura
Scotch Vinyl-Acrylic Ceiling White
SeaFin AquaSpar Gloss and Satin
SeaFin Filler/Stain
SeaFin Ship n'Shore Sealer
SeaFin Super Spar Varnish
Seal-Krete Clear-Seal
Seal-Krete Clear-Seal High Gloss Sealer
Seal-Krete Clear-Seal Low Gloss Sealer
Seal-Krete Clear-Seal Premium High Gloss Sealer
Seal-Krete Clear-Seal Premium High Gloss Sealer Low VOC
Seal-Krete Clear-Seal Satin Sealer
Seal-Krete Concrete Colors Low Lustre Sealer
Seal-Krete Concrete Colors Low Lustre Sealer
Seal-Krete Concrete Colors Semi-Transparent Stain
Seal-Krete Concrete Colors Semi-Transparent Stain #300 Tint Base
Seal-Krete Concrete Colors Semi-Transparent Stain #310 Terra Cotta
Seal-Krete Concrete Colors Semi-Transparent Stain #320 Brownstone
Seal-Krete DampLock Concrete Waterproofing Paint
Seal-Krete Epoxy-Seal Concrete Paint
Seal-Krete Epoxy-Seal Concrete Paint #920 White Base
Seal-Krete Epoxy-Seal Concrete Paint #921 Armor Gray
Seal-Krete Epoxy-Seal Concrete Paint #922 Slate Gray
Seal-Krete Epoxy-Seal Concrete Paint #940 Deep Base
Seal-Krete Epoxy-Seal Low VOC Paint
Seal-Krete Epoxy-Seal Low VOC Paint #960 White Base
Seal-Krete Epoxy-Seal Low VOC Paint #961 Armor Gray
Seal-Krete Epoxy-Seal Low VOC Paint #962 Slate Gray
Seal-Krete Epoxy-Seal Low VOC Paint #970 Deep Base
Seal-Krete Floor-Tex
Seal-Krete Floor-Tex Non-Slip Textured Coating
Seal-Krete Floor-Tex Tintable #440 White Base
Seal-Krete Floor-Tex Tintable #450 Deep Base
Seal-Krete Floor-Tex Tintable Low VOC #460 White Base
Seal-Krete Floor-Tex Tintable Low VOC #470 Deep Base
Seal-Krete Floor-Tex Topcoat
Seal-Krete GraniteFX
Seal-Krete GraniteFX Brush & Roll Decorative Concrete Coating - Gulfshore
Seal-Krete GraniteFX Brush & Roll Decorative Concrete Coating - Keystone
Seal-Krete GraniteFX Brush & Roll Decorative Concrete Coating - Monterey
Seal-Krete GraniteFX Brush & Roll Decorative Concrete Coating - Sedona
Seal-Krete GraniteFX Professional Grade Decorative Natural Stone Finish - DesertStone
Seal-Krete GraniteFX Uniforming Primer - Gray
Seal-Krete GraniteFX Uniforming Primer - Tan
Seal-Krete GraniTex
Seal-Krete GraniTex Decorative Natural Stone Contractor Kit - DesertStone
Seal-Krete GraniTex Decorative Natural Stone Contractor Kit - EarthStone
Seal-Krete GraniTex Decorative Natural Stone Contractor Kit - GrayStone
Seal-Krete GraniTex Decorative Natural Stone Contractor Kit - SandStone
Seal-Krete GraniTex Decorative Natural Stone Finish - DesertStone
Seal-Krete GraniTex Decorative Natural Stone Finish - EarthStone
Seal-Krete GraniTex Decorative Natural Stone Finish - GrayStone
Seal-Krete GraniTex Decorative Natural Stone Finish - SandStone
Seal-Krete Heavy Duty Waterproofer
Seal-Krete Lock-Down Epoxy Bonding Floor Primer
Seal-Krete Multi-Surface Water Repellent
Seal-Krete Original Waterproofing Sealer
Seal-Krete Stucco Guard
Sears
Serena&Lily
Severe Weather Contractor Finish
Shading/Glazing Stain (various colors)
Shake Shield
Sheffield Durex
Sheffleld Gold Leaf Finish
Sherwin Williams
Sherwin Williams A-100
Sherwin Williams Blok-Tite™
Sherwin Williams Bright Life
Sherwin Williams Builders Masterpiece
Sherwin Williams Builders Solution Int.
Sherwin Williams Cashmere Interior
Sherwin Williams Classic 99 Int
Sherwin Williams Classic Cote
Sherwin Williams ColorAccents Interior Alkyd
Sherwin Williams ColorPlace®
Sherwin Williams ConFlex XL
Sherwin Williams DeckScapes Ext
Sherwin Williams Design Accents
Sherwin Williams Design Basics Interior
Sherwin Williams Drywall Primer
Sherwin Williams Dura Clad
Sherwin Williams DuraCraft Acrylic Latex
Sherwin Williams Duraseal
Sherwin Williams Duration
Sherwin Williams Duron

Sherwin Williams EasyLiving®
Sherwin Williams EcoSelect® Zero VOC
Sherwin Williams Emerald
Sherwin Williams Eminence®
Sherwin Williams Enviropure
Sherwin Williams EverLast
Sherwin Williams Faux Impressions®
Sherwin Williams Flex Bon
Sherwin Williams Fresh Kote
Sherwin Williams Harmony
Sherwin Williams Impressions
Sherwin Williams Infinity®
Sherwin Williams Lok-Tite
Sherwin Williams Loxon
Sherwin Williams Luxury Living
Sherwin Williams Maintenance Pro
Sherwin Williams Masterline
Sherwin Williams Master Painters
Sherwin Williams Master Touch
Sherwin Williams Maxflex™
Sherwin Williams Maxwood®
Sherwin Williams Modac
Sherwin Williams Optima Formula 360
Sherwin Williams Painters Edge
Sherwin Williams PalGard®
Sherwin Williams Platinum
Sherwin Williams Ply-Mastic
Sherwin Williams Ply-Thane
Sherwin Williams Ply-Tile
Sherwin Williams Porcelain®
Sherwin Williams PrepRite
Sherwin Williams ProBlock
Sherwin Williams ProClassic
Sherwin Williams ProGreen 200
Sherwin Williams Pro-Hide® Gold
Sherwin Williams Pro-Hide® Green
Sherwin Williams Pro-Hide® Silver
Sherwin Williams Pro Kote
Sherwin Williams ProLine Supreme
Sherwin Williams ProMar 200
Sherwin Williams ProMar 400
Sherwin Williams ProMar 700
Sherwin Williams Property Solution
Sherwin Williams Red Devil
Sherwin Williams Resilience
Sherwin Williams Rich Lux
Sherwin Williams Rust-O-Lastic
Sherwin Williams Sea Shore
Sherwin Williams Shellac Primer
Sherwin Williams Sher-Crete
Sherwin Williams SherStripe
Sherwin Williams Signature Select
Sherwin Williams Skylight®
Sherwin Williams Solo 100% Acrylic
Sherwin Williams SuperBond
Sherwin Williams SuperPaint
Sherwin Williams Terminator™
Sherwin Williams Twist & Try
Sherwin Williams UltraCrete
Sherwin Williams Ultra Deluxe
Sherwin Williams Ultra Guard
Sherwin Williams WithSTAND®
Sherwin Williams Wood Classics
Sherwin Williams WoodScapes
Show Kote
Sikagard® 510
Sikagard® 550W Elastocolor
Sikagard® 552W Primer
Sikagard® 570
Sikagard® Elastic Base Coat Smooth
Sikagard® Elastic Base Coat Textured
Silox Seal "A" Side
Simply Glaze
SkimStone® Protective Sealer
SkimStone® Select Finish
Skylight
Snow Roof
Solar-Lux™ Stain (various colors)
Solar-Lux™ Waterborne Dye Stain (various colors)
Solar-Lux™ Waterborne Glaze (various colors)
Solar-Lux™ Waterborne Wiping Stains (various colors)
SoyCrete Architectural Concret Stain
Spar Restoration Varnish
Spraytek I
Spraytek II
Spraytek III
StainMaster
Stanley Steemer
Start Right
StoCoat Acryl
StoCoat Acryl Plus
StoCoat Color
StoCoat Color Sand
StoCoat DTM Acrylic
StoCoat DTM Metal-Primer
StoCoat Lotusan
StoCoat Lotusan Low VOC
StoCoat Metallic
StoCoat Texture Coarse
StoCoat Texture Fine
StoCoat Texture Medium
Sto Hot Prime
Stolastic Sand
Stolastic Smooth
Stone & Masonry Conditioner
Stone Mason
Stone Mason Ultra Gloss Water Based
Sto Primer Creativ
Sto Primer Sand
Sto Primer Smooth
Storm Systems (all products)
StoSilco Lastic
StoTique
Structures Wood Care NatureColor®
Structures Wood Care NatureOne®
Stucco, Masonry & Brick Paint
Sunnyside Waterproofer
Sunnyside Wood Protectant
Superfinish (all products)
Super-Tred Industrial Enamel (all products)
Sure Shine
Surmax
Sutherland Welles Ltd. Marine Spar Varnish
Sutherland Welles Ltd. Murdoch's Line 500 Floor Finish
Sutherland Welles Ltd. Murdoch's Line Hard Oil
Sutherland Welles Ltd. Murdoch's Line Hard Sealer
Sutherland Welles Ltd. Murdoch's Line Table Top
Sutherland Welles Ltd. Wiping Varnish (Sealer, Low, Medium, High Lustre)
Sydney Harbour Alchemy Liquid Gold
Sydney Harbour Aqua Enamel
Sydney Harbour Clearcoat
Sydney Harbour Duchess Satin
Sydney Harbour Eggshell Acrylic
Sydney Harbour Industrial Lustre
Sydney Harbour Instant Rust Clear Sealer
Sydney Harbour Interno Lime Wash
Sydney Harbour Limeproof Undercoat Sealer
Sydney Harbour Liquid Copper & Patina Green
Sydney Harbour Liquid Iron & Instant Rust
Sydney Harbour Liquid Tin
Sydney Harbour Low Sheen Acrylic
Sydney Harbour Matt Wall Sealer

Sydney Harbour Original Lime Wash
Sydney Harbour Palm Beach Black
Sydney Harbour Stone Paint
Sydney Harbour Ultra Flat Acrylic
Sydney Harbour Universal Primer
Sydney Harbour Wood Wash
Tack Coat
Tag-Out Graffiti Paint
Temproof 1200 Stove paint
Tex-Cote 300
Tex-Cote 400
Tex-Cote 600
Tex-Cote Aluma-Cool®
Tex-Cote Clear-Seal™
Tex-Cote Color Cote™
Tex-Cote Color Tex®
Tex-Cote Cool-Tec®
Tex-Cote Cool-Tex®
Tex-Cote Coolwall®
Tex-Cote Epo-Tex™
Tex-Cote Flex-On®
Tex-Cote Graffiti Gard®
Tex-Cote Kenitex®
Tex-Cote Metal-Prime™
Tex-Cote Primer 27™
Tex-Cote Rainstopper®
Tex-Cote Reflect-Tec®
Tex-Cote Stone-Tex®
Tex-Cote Strata Grip
Tex-Cote Tex-Dri®
Tex-Cote Tex-Gard®
Tex-Cote Tex-Tura®
Tex-Cote Top-Cote™
Tex-Cote Trim-Cote®
Tex-Cote Ty-Cote™
Tex-Cote Ultra-Tex™
Tex-Cote XL70®
Texturecoat
Texture Paint
The Freshaire Choice
The Paint Drop™
Thick Husky Primer
Thompson's WaterSeal
TileLab Gloss Sealer & Finish
TileLab Matte Sealer & Finish
TileLab Sealer/Cleaner/Resealer Combo Pack
TileLab Stone Enhancer
TileLab SurfaceGard
Timberflex
Timberflex II
Timberflex Pro
Timber Pro UV Crystal Urethane
Timber Pro UV Deck & Fence Formula
Timber Pro UV Internal Concrete Sealer
Timber Pro UV Internal Wood Stabilizer
Timber Pro UV Log & Siding Formula
Timber Pro UV Masonry Top Sealer
TimberSoy Penetrating Natural Wood Stain
Tite Waterproofing Paint
Top Choice
Tru Seal
Tuscan Glaze ™
Two Minute Repair Liquid
TWP Mildew Sealer
UGL Pro Finish (all Gloss Levels)
Ultimate House Paint (all products)
Ultra (all products)
Ultra-Fill
Ultra-Tred Epoxy (all products)
Ultra XT
Ultra Zar Plus (Gloss/Satin)
Undercoat
Underhill Paints
Uniflex
Universal Stain Killing Primer
Up Paint
Ura-Floor Gloss WB Urethane
UV Plus
UV Plus for Hardwoods
Valspar
Valspar Anti-Rust
Valspar Climate Zone
Valspar Color Style
Valspar Decorator
Valspar Duramax
Valspar Elan
Valspar Integrity
Valspar Medallion
Valspar Medallion Primers
Valspar Prep-Step Primers
Valspar Pro 2000 Interior Contractor Finish
Valspar Professional
Valspar Professional Bonding Primer
Valspar Professional Exterior
Valspar Professional Exterior Primer
Valspar Professional Interior
Valspar Professional New Construction Primer
Valspar Professional PVA Primer
Valspar Restoration Series
Valspar Signature Colors
Valspar Tractor & Implement
Valspar Ultra
Valspar Ultra Premium
Valspar Weathercoat
Value
Van Sickle Barn and Outbuilding Paints
Van Sickle Exterior Latex (Economy, Premium or Super Premium)
Van Sickle Exterior Stains
Van Sickle Floor Enamel
Van Sickle Interior Latex (Economy, Premium or Super Premium)
Van Sickle Multi Purpose Enamel
Van Votz Hi-Tech Waterproofer
Vasari Lime Paint
Vasari Mineral Primer
Vogue Deep Colors
Vogue from Muralo Deep Color finishes
Wall Kote
Wall Paint
Wall-Up
Walmart
Waterlox 350 VOC Satin Finish
Waterlox 350 VOC Sealer/Finish
Waterlox 450 VOC Satin Finish
Waterlox Original High Gloss Finish
Waterlox Original Satin Finish
Waterlox Original Sealer/Finish
Waterlox XL88 Gloss Urethane
Waterlox XL89 Satin Urethane
Weather All
Weathercoat ™
Weatherlastic®
Weatherprime ®
Wet Wood Stain
White Pickling Stain
Wipe on Zar (Semi Gloss/Satin)
Wonder Guard
Wood Iron Deck, Fence & Siding Stain
Wood Iron Doors & More Finish
Wood Iron Exterior Oil Finish
Wood Iron Generations Water-Based Stain
Wood Iron Top Coat Finish
Wood Shield
Woodsman
Woodtone Series (various colors)
Woodturners Finish
X-200 Primer (all products)
X-O Rust
Yenkin Majestic Start To Finish

ZAP Primers
Zar Classic (all Gloss Levels)
Zar Clear Wood Sealer
Zar Clear Wood Sealer Toner Base
Zar Deck&Siding Stains Solid and Semi-Transparent (all colors)
Zar Exterior Polyurethane (Gloss/Satin)
Zar Exterior Water Base Polyurethane (Gloss/Satin)
Zar Interior Polyurethane (all Gloss Levels)
Zar Ultra Exterior Polyurethane (all gloss Levels)
Zar Ultra Interior Polyurethane (all Gloss Levels)
Zar Ultra Max OMU (all gloss Levels)
Zar Ultra Max Rejuvenator
Zar Ultra Max Sanding Sealer
Zar Ultra Max Wipe On
Zar Ultra Max Wood Stains (all colors)
Zar Wood Stains (all colors)
Zinsser SmartCoat
Zone Marking Paints

Appendix B

Definition of Program Products and Sample Product Notices

DEFINITION OF PROGRAM PRODUCTS

Defining Architectural Paint Products for the Purposes of the Assessment

Updated — January 2020

Architectural paint is defined under the Paint Stewardship Program as:

> *Interior and exterior architectural coatings sold in containers of five gallons or less.*

Architectural paint does not include:

> *Industrial maintenance (IM), original equipment manufacturer (OEM) or specialty coatings.*

In order to distinguish between what is an architectural coating for the purpose of the assessment and what coatings should not be assessed the fee, we are using definitions and terminology from the U.S. Environmental Protection Agency, California Air Resources Board and other state and local Architectural and Industrial Maintenance (AIM) rules.

In order to determine the products on which the fee is assessed, and the products on which the fee is not assessed, a company should follow these steps:

A. Start with the type of coating. If the coating is an architectural coating, go to B. If the coating is not an architectural coating, it is not assessed a fee.

B. If the coating meets the definition of architectural coatings (see below), does not meet the definition of Industrial Maintenance Coatings (also below), and is not specifically excluded, it is assessed a fee.

I. Architectural Coatings

Architectural coating means a coating recommended for application to stationary structures and their appurtenances, portable buildings, pavements, curbs, fields and lawns. This definition excludes adhesives, aerosols and coatings recommended by the manufacturer or importer solely for shop applications or solely for application to non-stationary structures, such as airplanes, ships, boats, and railcars.

II. Industrial Maintenance Coatings

Industrial Maintenance (IM) coating means a high performance architectural coating, including primers, sealers, undercoaters, intermediate coats, and topcoats formulated and recommended for application to substrates exposed to one or more of the following extreme environmental conditions in an industrial, commercial, or institutional setting:

1. Immersion in water, wastewater, or chemical solutions (aqueous and non-aqueous solutions), or chronic exposure of interior surfaces to moisture condensation;
2. Acute or chronic exposure to corrosive, caustic, or acidic agents, or to chemicals, chemical fumes, or chemical mixtures or solutions;
3. Repeated exposure to temperatures above 120 °C (250 °F);
4. Repeated (frequent) heavy abrasion, including mechanical wear and repeated (frequent) scrubbing with industrial solvents, cleansers, or scouring agents; or
5. Exterior exposure of metal structures and structural components.

One of the primary ways AIM rules distinguish IM coatings from other architectural coatings is the manufacturer's recommendation for restricted usage. IM coatings must be labeled under the rules as:

1. "For industrial use only."
2. "For professional use only."
3. "Not for residential use" or "Not intended for residential use."

Thus, if the product is not intended for and not labeled as an IM coating, it should be deemed a covered architectural coating and the fee should be assessed, unless it is specifically excluded (see next page).

III. Original Equipment Manufacturer (OEM) Coatings

Shop application means that a coating is applied to a product or a component of a product in a factory, shop, or other structure as part of a manufacturing, production, finishing or repairing process (e.g., original equipment manufacturing coatings).

Since OEM (shop application) coatings may be intended but not labeled for industrial or professional use, and may be sold in containers of 5 gallons or less, if a company can clearly document that the coating was sold exclusively for OEM use, the fee should not be assessed. However, if this coating can be sold to a consumer or contractor for other than shop application and/or the use cannot be distinguished via the method of sale, the fee should be assessed.

IV. Specialty Coatings

Lastly, in order to identify Specialty or Special Purpose Coatings, we have used the definition from the Federated Society of Coating Technology's Coatings Encyclopedic (since AIM rules don't have a definition), which states that these coatings include arts and crafts, and automotive refinish coatings. These products should be easier to distinguish, however, as they are clearly called out as non-assessed products on the list below. The fee should not be assessed for these coatings.

Assessed Products (maximum container size of 5 gallons)

- Interior and exterior architectural paints: latex, acrylic, water-based, alkyd, oil-based, enamel (including textured coatings)
- Deck coatings, floor paints (including elastomeric)
- Primers, sealers, undercoaters
- Stains
- Shellacs, lacquers, varnishes, urethanes (single component)
- Waterproofing concrete/masonry/wood sealers and repellents (not tar or bitumen-based)
- Metal coatings, rust preventatives
- Field and lawn paints

Non-Assessed Products (regardless of container size)

- Paint thinners, mineral spirits, solvents
- Aerosol paints (spray cans)
- Auto and marine paints
- Art and craft paints
- Caulking compounds, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
- Original Equipment Manufacturer (OEM) (shop application) paints and finishes

PRODUCT NOTICE #1

Drywall Primer-Surfacers

Updated — June 2012

PaintCare™
RECYCLING MADE EASY

Purpose

The purpose of this notice is to clarify that "Drywall Primer-Surfacers" are covered by the PaintCare program. As part of the program, manufacturers of these products must register with PaintCare and collect and remit the Assessment (PaintCare fee) as with other architectural paints in states with active paint stewardship programs.

Background

In order to assist companies with determining what coatings were architectural coatings subject to the PaintCare fee and what coatings were not, PaintCare developed a fact sheet detailing what factors should be taken into consideration when making these determinations. In addition, the fact sheet listed examples of PaintCare products and examples of non-PaintCare products (products that should not be assessed the fee). PaintCare, however, relies on individual manufacturers to determine what products are part of the program and what products are not, depending on their specific product lines. In some cases, PaintCare helps with this determination based on individual calls with manufacturers. In the case of Drywall Primer-Surfacers, based on these calls, it has come to our attention that some manufacturers were assessing the fee believing they were program products and some were not assessing the fee believing that they were non-program products. It appears that confusion arose when trying to distinguish drywall primer from drywall compound.

In order to ensure that all manufacturers are on a level playing field and the PaintCare fee is indeed placed on all products subject to the assessment, PaintCare herein clarifies that Drywall Primer-Surfacer is considered a PaintCare product and the PaintCare fee must be assessed and remitted by all manufacturers of Drywall Primer-Surfacers. The reason for including this category under the architectural coatings that are subject to the program is as follows:

- The Drywall Primer-Surfacer products are primers. Primers are considered architectural coatings.
- MSDS sheets, either in their title and or elsewhere in the product description, for these products indicate that they are paint or primers.
- MSDS sheets indicate that they contain some type of binder or resin.
- Marketing information published by manufacturers for their own products indicate that they are vapor barriers or coatings.
- Information published by manufacturers for their own products indicate that they are vinyl, acrylic, and/or latex-based.
- Competitors have reported that they make and sell equivalent products that are not excluded by PaintCare.
- Consumers with leftover/unwanted Drywall Primer-Surfacers may bring them to a PaintCare collection site for proper recycling/disposal.

Action

Starting August 1, 2012, manufacturers of "Drywall Primer-Surfacers" need to ensure that these products are registered with PaintCare and add the PaintCare fee to the wholesale price of these products to all distributors and retailers. Manufacturers are not required to pay the fee on past sales because the fees were not charged to distributors, retailers, or consumers.

More Information

For more information about the PaintCare program and the responsibilities of manufacturers, please visit www.paintcare.org or contact:

Taujuana Davis
Registration Coordinator for Manufacturers
tdavis@paint.org
(202) 232-2733

PaintCare
901 New York Ave NW Suite 300 West
Washington, DC 20001
www.paintcare.org

PRODUCT NOTICE #3

Masonry and Concrete Sealers Labeled "For Professional Use Only"

Updated — January 2013

Purpose

The purpose of this notice is to clarify that masonry and concrete sealers that are labeled "for professional use only" are excluded from the PaintCare program. Manufacturers of these products are not required to register with PaintCare and they are not required to collect and remit the Assessment ("PaintCare fee") in states with active paint stewardship programs operated by PaintCare.

Background

In order to assist companies with determining what products are architectural coatings subject to the PaintCare fee and what products are not, PaintCare developed a definition of architectural paint detailing what factors should be taken into consideration when making these determinations. In addition, the definition lists examples of PaintCare products and examples of non-PaintCare products (products that should not be assessed the fee). PaintCare relies on individual manufacturers to determine which, if any, of their products are part of the program. In some cases, PaintCare helps with this determination based on individual calls with manufacturers. In the case of products used as sealers for masonry and concrete —based on inquiries from many industry representatives and manufacturers of these products—it has come to our attention that manufacturers of these sealers desire clarification on whether their products are considered architectural coatings for the purposes of active and future state PaintCare programs.

In order to ensure that all manufacturers are on a level playing field and the PaintCare fee is placed on all products subject to the assessment, PaintCare herein clarifies that masonry and concrete sealers labeled for professional use are not considered PaintCare products and the PaintCare fee is not required to be assessed and remitted by manufacturers of these products. Excluding these products from the definition of architectural coatings is based on the following:

- Originally PaintCare's definition excluded products that are both (1) Industrial Maintenance Coatings and (2) labeled "for professional use only." [Other acceptable phrases are (a) for industrial use only, (b) not for residential use, and (c) not intended for residential use.]
- The definition of an IM coating varies somewhat from one state to another and from one regulatory air district to another. Generally, determining if a coating meets the criteria for IM is based on the manufacturers recommended use for the product and whether it meets any one of certain criteria (simply put these criteria are: regular exposure to heat, chemicals, moisture, or abrasion). Masonry sealers are intended to act as waterproofing agents and are applied where water exposure is anticipated. Thus, as a category they can generally be considered by manufacturers to be IM coatings and therefore meet the first criteria.
- Some manufacturers label these products for professional use. Others do not label them for professional use. There is no prohibition on a manufacturer from labeling a product for professional use. Therefore, if a manufacturer chooses to change the product label on a product that they consider IM in order to also comply with the second criteria above (in the first bullet), they may do so in order have these products excluded from the PaintCare program. The manufacturer may change their regular container label or use an additional sticker.
- If PaintCare finds that manufacturers start to change their labels on other products that are clearly not for professional use or industrial maintenance coatings (e.g. house paint), the professional use labeling will not exclude such products.
- An important purpose of the paint stewardship programs is to collect and recycle unused paint, stains, and coatings that are normally managed through government-sponsored household hazardous waste (HHW) programs. Sealers for masonry and concrete are not known to be a problem at HHW programs.

Conclusion

Concrete and masonry sealers that are IM coatings and labeled for professional use using one of the phrases indicated above are categorically exempt from PaintCare.

More Information

For more information about the PaintCare program and the responsibilities of manufacturers, please visit www.paintcare.org or contact:

Taujuana Davis
Registration Coordinator for Manufacturers
tdavis@paint.org
(202) 232-2733

PaintCare
901 New York Ave NW Suite 300 West
Washington, DC 20001
www.paintcare.org

PRODUCT NOTICE #5

Shop Application and OEM

Updated — May 2014

Purpose

This notice is to clarify that architectural paint products are excluded from the PaintCare program when they are used in Shop Application or Original Equipment Manufacturing (OEM). Retailers of these products may remove the Assessment (PaintCare fee) from the purchase price of architectural paint (i.e., PaintCare products) in states with active PaintCare programs.

Background

In order to assist companies with determining what products are architectural coatings subject to the PaintCare fee and what products are not, PaintCare developed a definition of architectural paint detailing what factors should be taken into consideration when making these determinations. In addition, the definition lists examples of PaintCare products and examples of non-PaintCare products (products that should not be assessed the fee). PaintCare relies on individual manufacturers to determine which, if any, of their products are part of the program. In some cases, PaintCare helps with this determination based on inquiries from a manufacturer. In the case of products used in a shop setting or for the manufacturing of goods or equipment, it has come to our attention that manufacturers and retailers of these products desire clarification on when the fees may be removed and how to keep records.

In order to ensure that all manufacturers and retailers are on a level playing field and the PaintCare fee is placed on all products subject to the assessment, PaintCare herein clarifies that products used in Shop Application and OEM are not considered PaintCare products and the PaintCare fee is not required to be assessed and remitted by manufacturers of these products. Products used "in the field" are not excluded.

EXAMPLES: EXCLUDED (FEES MAY BE REMOVED)

- A furniture shop stains and applies lacquer to furniture at the shop. The stain and lacquer are excluded because they are used in the shop.
- A tool manufacturer paints all of its tools in a factory. The paint is excluded because it is applied in the factory.
- A kitchen cabinet company builds and paints cabinets at their shop. The paint used to finish the cabinets is excluded because it is applied in the shop.
- A company builds pre-fabricated houses and paints the houses at their manufacturing facility. The paints used at the plant are excluded because they are applied at the plant.

EXAMPLES: NOT EXCLUDED (FEES ARE TO BE APPLIED)

- A kitchen cabinet company builds cabinets at the shop, and then the cabinets are installed and finished in a residence. The paint used to finish the cabinets in the field is not excluded because it is applied in the field.
- A pre-fab house is assembled at the final building site. The company that built the house sends a few gallons of paint (known as "loose-ships.") to the final building site for touchups and final painting after the house is assembled. The loose-ship products are not excluded because they are applied in the field.

Record-Keeping

Manufacturers and retailers may exclude the PaintCare fee from products for Shop Application and OEM provided they keep records, subject to audit, to demonstrate that the fees were not charged for a valid reason, e.g., a regular customer is known to be a furniture builder. PaintCare does not have specific requirements about how these records are to be kept and leaves it up to the retailer and manufacturer to develop their own system. PaintCare suggests retailers and manufacturers work together to develop their own record keeping system, and that retailers at a minimum keep a file with copies of invoices showing products sold without the fee and notes regarding their customers.

Credits on Fees Already Paid

Retailers that pay fees on their wholesale invoices may request credits from their suppliers. Suppliers that remit to PaintCare may in turn apply the same credit to a future payment. These credits are also subject to audit.

More Information

For more information about the PaintCare program and the responsibilities of manufacturers and retailers, please visit www.paintcare.org or contact:

Taujuana Davis
Registration Coordinator for Manufacturers
tdavis@paint.org
(202) 232-2733

PaintCare
901 New York Ave NW Suite 300 West
Washington, DC 20001
www.paintcare.org

Appendix C

Examples of Education and Outreach Materials

A Program to Manage Leftover Paint

Each year about 800 million gallons of architectural paint are sold in the United States. Did you know that about 10 percent goes unused and is available for recycling?

Vermont's paint stewardship law requires the paint manufacturing industry to develop a financially sustainable and environmentally responsible program to manage postconsumer (leftover) architectural paint. Paint manufacturers established PaintCare, a nonprofit organization, to run paint stewardship programs in states with applicable laws.

The program includes education about buying the right amount of paint, tips for using up remaining paint, and setting up convenient recycling locations throughout the state.

PaintCare Products

These products have a fee when you buy them and are accepted for drop-off at no additional cost:

- Interior and exterior architectural paints: latex, acrylic, water-based, alkyd, oil-based, enamel (including textured coatings)
- Deck coatings, floor paints (including elastomeric)
- Primers, sealers, undercoaters
- Stains
- Shellacs, lacquers, varnishes, urethanes (single component)
- Waterproofing concrete/masonry/wood sealers and repellents (not tar or bitumen-based)
- Metal coatings, rust preventatives
- Field and lawn paints

Leaking, unlabeled, and empty containers are not accepted at drop-off sites.

Non-PaintCare Products

- Paint thinners, mineral spirits, solvents
- Aerosol paints (spray cans)
- Auto and marine paints
- Art and craft paints
- Caulk, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar, and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
- Original Equipment Manufacturer (OEM) (shop application) paints and finishes

For information about recycling and proper disposal of non-PaintCare products, please contact your garbage hauler, local environmental health agency, household hazardous waste program, or public works department.

VT-BREN-0122

VERMONT

PaintCare™
RECYCLING MADE EASY

Recycle WITH PaintCare

Places to Take Leftover Paint

Paint recycling is more convenient with PaintCare. We set up paint drop-off sites throughout the state. To find your nearest drop-off site, use PaintCare's search tool at www.paintcare.org or call our hotline at (855) PAINT09.

How to Recycle

PaintCare sites accept all brands of leftover house paint, stain, and varnish, whether recently used or many years old. Containers must be five gallons or smaller, and some types of paint are not accepted. See back panel for a list of what PaintCare accepts for recycling.

All PaintCare drop-off sites accept up to five gallons of paint per visit. Some sites accept more. Please call sites in advance to make sure they can accept the amount of paint you would like to recycle.

Make sure all paint containers have lids and original labels, and load them securely in your vehicle. Take them to a drop-off site during their regular business hours. We'll take it from there.

What Happens to the Paint?

PaintCare makes sure that your leftover paint is remixed into recycled paint, used as a fuel, made into other products, or is properly disposed if no other beneficial use for it can be found.

Who Can Use the Program?

Households may drop off as much latex or oil-based paint as the site is willing to accept.

Businesses may drop off any amount of latex-based paint the site is willing to accept.To use the PaintCare program for oil-based paint, a business must qualify as an exempt generator under federal and any analogous state hazardous waste generator rules. Please visit www.paintcare.org/VSQG for more information on exempt generator rules. If your business does not qualify as an exempt generator, it will not be able to use the program for oil-based paint, but it can still use the program for latex products.

Do You Accept Large Volumes of Paint?

If you have at least 100 gallons of paint to recycle at your business or home, ask about our free large volume pickup service. Please visit www.paintcare.org for more details or to request a pickup.

PaintCare Fee

PaintCare is funded by a fee paid by paint manufacturers for each can of paint sold in the state. Manufacturers pass the fee to retailers, who then apply it to the price of paint. Retailers are encouraged to show the fee on customer receipts. The fee is based on the size of the container as follows:

$ 0.00	Half pint or smaller
$ 0.49	Larger than half pint up to smaller than 1 gallon
$ 0.99	1 gallon up to 2 gallons
$ 1.99	Larger than 2 gallons up to 5 gallons

Not a Deposit

The fee is not a deposit—it is part of the purchase price. The fee is used to fund the costs of running the program, including recycling, public education, staffing, and other expenses.

Contact Us

To learn more or find a drop-off site, please visit www.paintcare.org or call (855) PAINT09.

PaintCare™

RECYCLING MADE EASY

It's easy to recycle your leftover paint, stain, and varnish.

Find a drop-off site near you:

(855) PAINT09 | paintcare.org

Paint Smarter

Scan the code above with your smart phone or visit **paintcare.org/paint-smarter** to get tips on how to buy the right amount of paint, use up what's left, and recycle the rest with PaintCare.

A nonprofit organization created by paint manufacturers, PaintCare is committed to making it easy and convenient to recycle leftover paint in states with paint stewardship laws.

xx-mcen-0522

Mini Card

PaintCare™

RECYCLING MADE EASY

About the Paint Recycling Program

Paint manufacturers created PaintCare, a nonprofit organization, to provide convenient places for households and businesses to recycle leftover paint. PaintCare sets up paint drop-off sites throughout states that pass paint stewardship laws.

PAINTCARE PRODUCTS

These products have a fee when you buy them and are accepted for drop-off at no additional cost:

- Interior and exterior architectural paints: latex, acrylic, water-based, alkyd, oil-based, enamel (including textured coatings)
- Deck coatings, floor paints (including elastomeric)
- Primers, sealers, undercoaters
- Stains
- Shellacs, lacquers, varnishes, urethanes (single component)
- Waterproofing concrete/masonry/wood sealers and repellents (not tar or bitumen-based)
- Metal coatings, rust preventatives
- Field and lawn paints

Leaking, unlabeled, and empty containers are not accepted at drop-off sites.

PAINTCARE FEE

The PaintCare fee is applied to the purchase price of architectural paint as required by law. The fee funds collection, transportation, and processing costs. The fee is based on container size as follows:

$0.00	Half pint or smaller
$0.49	Larger than half pint up to smaller than 1 gallon
$0.99	1 gallon up to 2 gallons
$1.99	Larger than 2 gallons up to 5 gallons

For more information or to find a place to take your unwanted paint for recycling, please ask for the PaintCare brochure, visit **paintcare.org**, or call **(855) PAINT09**.

NON-PAINTCARE PRODUCTS

- Paint thinners, mineral spirits, solvents
- Aerosol paints (spray cans)
- Auto and marine paints
- Art and craft paints
- Caulk, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar, and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
- Original Equipment Manufacturer (OEM) (shop application) paints and finishes

Counter Mat

Recycle with PaintCare!

Buy Right: Consult with painting professionals and retailers to buy the right amount of paint and reduce potential waste.

Use It Up: Use up leftover paint on the surface you are painting, on additional painting projects around the house, or give it to someone else in your community.

Recycle the Rest: When you can't use up leftover paint, drop it off with PaintCare to get it recycled!

Visit **www.paintcare.org** to find a year-round paint drop-off site near you or schedule a large volume pickup.

PaintCare™
RECYCLING MADE EASY

What types of paint products can be recycled with PaintCare?

PAINTCARE PRODUCTS

The following are products included in the program. When purchased, the PaintCare fee is applied. These products are accepted at no additional cost when dropped off at PaintCare's participating drop-off sites.

- Interior and exterior architectural paints: latex, acrylic, water-based, alkyd, oil-based
- Deck coatings, floor paints (including textured coatings)
- Primers, sealers, undercoaters
- Stains
- Shellacs, lacquers, varnishes, urethanes (single component)
- Waterproofing concrete/masonry/wood sealers and repellents (not tar or bitumen-based)
- Metal coatings, rust preventatives
- Field and lawn paints

NON-PAINTCARE PRODUCTS

The following are non-PaintCare products and are not included in the program. When purchased, the PaintCare fee is not applied. They are not accepted at PaintCare's participating drop-off sites.

- Paint thinners, mineral spirits, solvents
- Aerosol paints (spray cans)
- Auto and marine paints
- Art and craft paints
- Caulk, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar, and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
- Original Equipment Manufacturing (OEM) (shop application) paints and finishes
- Containers that are leaking or empty, and containers without the original printed manufacturer's label are not accepted at retail drop-off sites

PROGRAM FUNDING

The PaintCare fee is applied to the purchase price of architectural paint sold in Vermont as required by law. The fee is based on container size:

Half pint or smaller	$0.00
Larger than half pint up to smaller than 1 gallon	$0.49
1 gallon up to 2 gallons	$0.99
Larger than 2 gallons up to 5 gallons	$1.99

VT-CMWI-0122

Recycle Paint at This Store

PAINTCARE PRODUCTS

Paint must be in sealed, original container with original manufacturer label.

- House paint and primers (latex or oil-based)
- Stains
- Deck and concrete sealers
- Clear finishes (e.g., varnishes, shellac)

NON-PAINTCARE PRODUCTS

- No leaking, unlabeled, or empty containers
- No aerosol spray paints
- No drums or containers larger than 5 gallons
- We cannot accept other hazardous waste or chemicals such as paint thinner, solvents, motor oil, spackle, glue, adhesive, roofing tar, pesticides, cleaning chemicals

Paint is accepted during business hours only. Staff will check all products before accepting.

For a complete list of PaintCare Products, please ask for the PaintCare brochure, visit **www.paintcare.org**, or call **(855) PAINT09**.

PaintCare™
RECYCLING MADE EASY

XX-WDSM-0621

PaintCare™

RECYCLING MADE EASY

We are a PaintCare Partner

The fee on the sale of paint in Colorado funds our program.

Recycle with PaintCare

To learn more, visit **paintcare.org** or call **(855) PAINT09**.

PaintCare™

RECYCLING MADE EASY

PaintCare Products

These products have a fee when you buy them and are accepted for drop-off at no additional cost:

- Interior and exterior architectural paints: latex, acrylic, water-based, alkyd, oil-based, enamel (including textured coatings)
- Deck coatings, floor paints (including elastomeric)
- Primers, sealers, undercoaters
- Stains
- Shellacs, lacquers, varnishes, urethanes (single component)
- Waterproofing concrete/masonry/wood sealers and repellents (not tar or bitumen-based)
- Metal coatings, rust preventatives
- Field and lawn paints

Products must be in original containers with original labels.
Latex paint that is dried out and "rock hard" is also acceptable.

Non-PaintCare Products

These products do not have a fee when purchased and are not accepted at drop-off sites:

- Paint thinners, mineral spirits, solvents
- Aerosol paints (spray cans)
- Auto and marine paints
- Arts and crafts paints
- Caulk, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar, and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
- Original Equipment Manufacturer (OEM) (shop application) paints and finishes

Leaking, unlabeled, and empty containers are not accepted at drop-off sites.

To learn more, please call **(855) PAINT09** or visit **www.paintcare.org**

XX-PPSM-0521

See a staff member for assistance before dropping off paint for recycling.

PaintCare

RECYCLING MADE EASY

XX-WAEN-0621

NO DUMPING

STOP!
IT'S ILLEGAL
to dump or abandon Paint, Oil, or other Hazardous Waste

THIS AREA MAY BE UNDER VIDEO SURVEILLANCE

Violators Will Be Prosecuted

PAINT STEWARDSHIP PROGRAMS IN THE U.S.

Large Volume Pickup (LVP) Service

Updated — November 2022

PaintCare™
RECYCLING MADE EASY

PaintCare offers a free pickup service to painting contractors, property managers, and others with large amounts of leftover architectural paint.

Who Is PaintCare?

PaintCare is a nonprofit organization established by the American Coatings Association to operate paint stewardship programs on behalf of paint manufacturers in states that pass paint stewardship laws.

In states with a paint stewardship program (see www.paintcare.org/states), PaintCare's primary effort is to set up conveniently located drop-off sites—places where households and businesses may take their unwanted paint for no charge. Sites set their own limits on the volume of paint they accept from customers per visit, usually from 5 to 20 gallons. To find a drop-off site near you, visit www.paintcare.org/drop-off-sites or call (855) PAINT09.

Large Volume Pickups

In states where PaintCare operates, those who have accumulated a large volume of paint may be eligible for PaintCare's large volume pickup service (LVP). Large volume means 100 or more gallons, measured by container size, not liquid volume. On a case-by-case basis, PaintCare may approve a pickup for less than 100 gallons. After two or three pickups, you may be switched to a recurring pickup service (see next page).

Drums and Bulked Paint Are Not Accepted

PaintCare only accepts paint in containers that are 5 gallons or smaller in size. Leave paint in original cans with original labels; do not combine or bulk paint from small cans into larger ones. If you have unwanted paint in drums or containers larger than 5 gallons, please contact a paint recycling company or a hazardous waste transportation company to assist you.

HOW TO REQUEST AN LVP

1. Sort and count your paint
   Tally the number of each container size and the type of products you have, sorted into two categories: (1) water-based paints and stains, and (2) oil-based paints and stains and any other program products (sealers and clear top-coat products, such as varnish and shellac).

2. Fill out the request form
   Fill out the Large Volume Pickup Request Form on our website at www.paintcare.org/pickup.
   Call PaintCare at (855) PAINT09 if you have any difficulty using the web form.

Scheduling

After reviewing your form, PaintCare staff will either approve your site for a pickup or inform you of the best place to take your paint if you do not meet the requirements. Once approved, you will be put in contact with our licensed transporter to schedule a pickup. It may be several weeks before your pickup occurs.

On the Day of Your Pickup

Sort your products into the two categories as noted above and store them in an area that has easy access for the transporter. If the paint is far from where the transporter parks, the path between should be at least four feet wide to accommodate movement of the paint collection bins.

The transporter is responsible for packing the paint into the bins. Once your paint is properly packed and loaded onto the transporter's truck, you will sign a shipping document and receive a copy for your records. Your paint will then be taken to a state authorized processing facility for recycling.

Recurring Service for LVPs

For those that generate large volumes of leftover paint on a regular basis, a service for recurring pickups is available. With this service, you will be provided with collection bins and can request a pickup when at least three bins are filled. Your full bins will be swapped with empty bins each time a pickup occurs. You will be required to sign a contract with PaintCare, and PaintCare will provide onsite training on how to properly pack the paint.

Business Limits

To use the PaintCare program for oil-based paint, a business must qualify as an exempt generator under federal and any analogous state hazardous waste generator rules. Please visit www.paintcare.org/VSQG for more information on exempt generator rules. If your business does not qualify as an exempt generator, it will not be able to use the program for oil-based paint, but it can still use the program for latex products. (Non-exempt generators may use the pickup service in New York. Contact PaintCare for details.)

If You Have Products We Don't Accept

PaintCare does not accept certain paint products (such as aerosols and automotive finishes) or other hazardous waste. If you have solvents, thinners, pesticides, or any non-PaintCare products (see list to right for examples), we recommend that households contact their local household hazardous waste (HHW) program. Some HHW programs also allow businesses to use their program for a modest fee. Otherwise, businesses should contact a licensed hazardous waste transportation company.

What Products Are Covered?

The products accepted by the PaintCare program are the same products that have a fee when they are sold. PaintCare products include interior and exterior architectural coatings sold in container sizes of five gallons or less. They do not include aerosol products (spray cans), industrial maintenance (IM), original equipment manufacturer (OEM), or specialty coatings.

PAINTCARE PRODUCTS

- Interior and exterior architectural paints: latex, acrylic, water-based, alkyd, oil-based, enamel (including textured coatings)
- Deck coatings, floor paints
- Primers, sealers, undercoaters
- Stains
- Shellacs, lacquers, varnishes, urethanes
- Waterproofing concrete/masonry/wood sealers and repellents (not tar or bitumen-based)
- Metal coatings, rust preventatives
- Field and lawn paints

NON-PAINTCARE PRODUCTS

- Paint thinners, mineral spirits, solvents
- Aerosol paints (spray cans)
- Auto and marine paints
- Art and craft paints
- Caulking compounds, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar, and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
- Original Equipment Manufacturer (OEM) (shop application) paints and finishes

PAINT STEWARDSHIP LAWS IN THE U.S.

Information for Painting Contractors

Updated — February 2023

PaintCare™
RECYCLING MADE EASY

How do paint stewardship laws affect painting contractors?

PaintCare

PaintCare is a nonprofit organization established by the American Coatings Association to implement manufacturer-led paint stewardship programs in states that pass paint stewardship laws. PaintCare currently operates programs in California, Colorado, Connecticut, District of Columbia, Maine, Minnesota, New York, Oregon, Rhode Island, Vermont, and Washington.

Paint Drop-Off Sites

The primary requirement of paint stewardship laws is for paint manufacturers to set up paint drop-off sites at retailers and other locations where households and businesses can take postconsumer (leftover) architectural paint, free of charge. Most drop-off sites are paint and hardware stores; others are waste transfer stations, recycling centers, landfills, and household hazardous waste (HHW) facilities. Participation as a drop-off site is voluntary. There are more than 2,400 drop-off sites across all PaintCare programs. To find a drop-off location, visit paintcare.org/drop-off-sites.

Fee and Funding

As required by laws in PaintCare jurisdictions, the program is funded by a fee (known as the PaintCare fee) that must be added by manufacturers to the wholesale price of all architectural paint sold in the state, including paint sold in stores and online. This fee is paid by manufacturers to PaintCare to fund program operations including paint collection and recycling, consumer education, and program administration. Displaying the fee on receipts is optional for retailers; however, PaintCare encourages retailers to show the fee to inform consumers about the program. (See reverse for complete listing of fees by state.)

Recommendations for Contractors

Preparing Estimates

When estimating jobs, contractors should take the PaintCare fee into account by checking with suppliers to make sure their quotes for paint products include the fee.

Pass Fee to Customers

PaintCare suggests that painting contractors pass on the fee to customers in order to recoup the fee they pay. Tell customers that quotes include the PaintCare fee and that the fee funds a statewide paint recycling program.

Convenient Paint Drop-Off Sites

With paint drop-off sites conveniently located throughout PaintCare states, anyone can drop off their leftover paint year-round. Many contractors report clearing out their storage spaces and no longer stockpiling paint. Contractors now have an answer for customers who ask what to do with old paint they no longer want; they can recommend that they use PaintCare drop-off sites too.

Most drop-off sites take 5 gallons per customer per trip, though some take more. All retail drop-off sites take paint from businesses, although some transfer stations and household hazardous waste programs only serve households. Always call a drop-off site ahead of visiting to make sure they have space for your volume and to confirm they take paint from businesses.

Pickup Service for Large Volumes

Painting contractors with at least 100 gallons of leftover paint to recycle may qualify to have their paint picked up by PaintCare for free. To learn more about this service or to request an appointment, visit www.paintcare.org/pickup or call (855) PAINT09.

Business Limits

To use the PaintCare program for oil-based paint, a business must qualify as an exempt generator under federal and any analogous state hazardous waste generator rules. Please visit www.paintcare.org/VSQG for more information on exempt generator rules. If your business does not qualify as an exempt generator, it will not be able to use the program for oil-based paint, but it can still use the program for latex products. (Non-exempt generators may use the pickup service in New York. Contact PaintCare for details.)

What Are the Fee Amounts?

The PaintCare fee is based on container size and varies from one program to another:

	Half pint or smaller	Larger than half pint up to smaller than 1 gallon	1 gallon up to 2 gallons	Larger than 2 gallons up to 5 gallons
California	$0.00	$0.30	$0.65	$1.50
Colorado	$0.00	$0.35	$0.75	$1.60
Connecticut	$0.00	$0.35	$0.75	$1.60
District of Columbia	$0.00	$0.30	$0.70	$1.60
Maine	$0.00	$0.35	$0.75	$1.60
Minnesota	$0.00	$0.49	$0.99	$1.99
New York	$0.00	$0.45	$0.95	$1.95
Oregon	$0.00	$0.45	$0.95	$1.95
Rhode Island	$0.00	$0.35	$0.75	$1.60
Vermont	$0.00	$0.49	$0.99	$1.99
Washington	$0.00	$0.45	$0.95	$1.95

What Products Are Covered?

The products accepted by the PaintCare program are the same products that have a fee when they are sold. PaintCare products include interior and exterior architectural coatings sold in containers of five gallons or less. They do not include aerosol products (spray cans), industrial maintenance (IM), original equipment manufacturer (OEM), or specialty coatings.

PAINTCARE PRODUCTS

- Interior and exterior architectural paints: latex, acrylic, water-based, alkyd, oil-based, enamel (including textured coatings)
- Deck coatings, floor paints
- Primers, sealers, undercoaters
- Stains
- Shellacs, lacquers, varnishes, urethanes
- Waterproofing concrete/masonry/wood sealers and repellents (not tar or bitumen-based)
- Metal coatings, rust preventatives
- Field and lawn paints

NON-PAINTCARE PRODUCTS

- Paint thinners, mineral spirits, solvents
- Aerosol paints (spray cans)
- Auto and marine paints
- Art and craft paints
- Caulking compounds, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar, and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
- Original Equipment Manufacturer (OEM) (shop application) paints and finishes

PAINT STEWARDSHIP PROGRAMS IN THE U.S.

Become a Retail Drop-Off Site for Paint

Updated — January 2023

PaintCare™
RECYCLING MADE EASY

PaintCare makes it easy for paint retailers to provide a convenient and valuable service for their community. Funding for the program comes from a fee applied to the price of architectural paint sold in states with paint stewardship laws.

PaintCare is a nonprofit organization established by the American Coatings Association to implement manufacturer-led paint stewardship programs in states that pass paint stewardship laws. PaintCare currently operates programs in California, Colorado, Connecticut, District of Columbia, Maine, Minnesota, New York, Oregon, Rhode Island, Vermont, and Washington.

Paint Drop-Off Sites

The primary requirement of paint stewardship laws is for paint manufacturers to set up paint drop-off sites at retailers and other locations where households and businesses can take postconsumer (leftover) architectural paint, free of charge.

Most drop-off sites are paint and hardware stores; others are waste transfer stations, recycling centers, landfills, and household hazardous waste (HHW) facilities. Participation as a drop-off site is voluntary. There are more than 2,400 drop-off sites across all PaintCare programs.

All retailers in active PaintCare states should 1) be aware of the program, 2) that the PaintCare fee is applied to the price of architectural paint products, and 3) that drop-off sites are available throughout the state.

Benefits to Retailers and Their Customers

There are many benefits to becoming a paint drop-off site. As a participating retailer, you will:

- Make recycling of leftover paint more convenient for your customers
- Support the paint industry's effort to lead the way in being responsible for end-of-life management of its products
- Keep leftover paint out of landfills and put to a beneficial use
- Promote your store's environmental responsibility
- Increase customer foot traffic and sales opportunities
- Help relieve local government of their cost of managing leftover paint
- Be advertised by PaintCare on their website and in consumer outreach efforts
- Help your state conserve resources, keep paint out of the waste stream, and prevent the improper disposal of paint in your community

Become a Paint Drop-Off Site

Retailers interested in becoming drop-off sites can fill out the Interest Form available at www.paintcare.org/drop-off-site-interest-form/.

PaintCare Drop-Off Sites Receive Free of Charge

- Reusable bins for storing collected PaintCare products
- Transportation and recycling of the collected PaintCare products
- Training materials and staff training at your site
- Program brochures, signage, and customer education materials
- Paint spill kits
- Listing of your store as a drop-off site on our website and in advertisements and promotional materials

Drop-Off Site Responsibilities

- Provide secure storage area for reusable paint collection bins
- Accept all brands of leftover PaintCare products from the public during regular business hours
- Place only PaintCare products in reusable collection bins, taking care not to open containers
- Keep bins neat and properly packed
- Complete minimal paperwork related to tracking outgoing paint shipments
- Ensure all staff maintain training on PaintCare program guidelines and operating procedures
- Display "drop-off site" signs in store window and provide consumers education materials about the program

What Products Are Covered?

The products accepted by the PaintCare program are the same products that have a fee when they are sold. PaintCare products include interior and exterior architectural coatings sold in container sizes of five gallons or less. They do not include aerosol products (spray cans), industrial maintenance (IM), original equipment manufacturer (OEM), or specialty coatings.

PAINTCARE PRODUCTS

- Interior and exterior architectural paints: latex, acrylic, water-based, alkyd, oil-based, enamel (including textured coatings)
- Deck coatings, floor paints
- Primers, sealers, undercoaters
- Stains
- Shellacs, lacquers, varnishes, urethanes
- Waterproofing concrete/masonry/wood sealers and repellents (not tar or bitumen-based)
- Metal coatings, rust preventatives
- Field and lawn paints

NON-PAINTCARE PRODUCTS

- Paint thinners, mineral spirits, solvents
- Aerosol paints (spray cans)
- Auto and marine paints
- Art and craft paints
- Caulking compounds, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar, and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
  Original Equipment Manufacturer (OEM) (shop application) paints and finishes

VERMONT PAINT STEWARDSHIP PROGRAM

How Does the Vermont Paint Stewardship Program Affect Paint Retailers?

Updated — January 2023

Vermont's paint stewardship law requires paint manufacturers to set up and operate a paint stewardship program in the state. Funding for the program comes from a fee applied to the price of architectural paint sold in Vermont. The program started in May 2014.

PaintCare

PaintCare is a nonprofit organization established by the American Coatings Association to implement manufacturer-led paint stewardship programs in states that pass paint stewardship laws. PaintCare currently operates programs in California, Colorado, Connecticut, District of Columbia, Maine, Minnesota, New York, Oregon, Rhode Island, Vermont, and Washington. The Vermont program is required by state law, but it is designed and operated by the paint manufacturing industry through PaintCare.

Paint Drop-Off Sites

The primary requirement of paint stewardship laws is for paint manufacturers to set up paint drop-off sites at retailers and other locations where households and businesses can take postconsumer (leftover) architectural paint, free of charge. PaintCare has established more than 2,400 paint drop-off sites across its programs. While most sites are paint and hardware stores, solid waste facilities including transfer stations, recycling centers, and landfills, as well as household hazardous waste (HHW) facilities, may participate as paint drop-off sites.

Participation as a Drop-Off Site is Voluntary

Paint retailers that would like to be drop-off sites can participate if they have space for paint collection bins and can provide minimal staff time to accept paint from the public. By doing so, retailers can increase foot traffic and provide an environmental service for their community. They make it convenient for their customers to recycle leftover paint and help provide relief to local government programs that manage leftover paint. PaintCare provides everything the store will need, including paint collection bins, site training, and other support. PaintCare pays for paint transportation and recycling and promotes sites to the local community.

Retailers interested in becoming drop-off sites can fill out the Interest Form available at https://www.paintcare.org/drop-off-site-interest-form/.

REQUIREMENTS OF RETAILERS

1. Check Registered Manufacturers and Brands

Retailers may not sell architectural paints in Vermont that are not registered. Paint manufacturers must register their company with PaintCare, and they must register all architectural paint brands they sell in the state. PaintCare publishes lists of registered brands and manufacturers on its website so retailers can check to make sure that the products they sell are registered. Please visit www.paintcare.org/manufacturers for current registration lists.

2. Pass on the PaintCare Fee

State law requires that a stewardship fee (PaintCare fee) be applied by manufacturers to the wholesale price of architectural paint sold in store and online in Vermont. This fee pays for all aspects of running the program.

The fee is paid by manufacturers to PaintCare and then passed to their dealers. Retailers should see the PaintCare fee on invoices from suppliers. The law also requires that retailers and distributors apply the fee to the price of architectural paint they sell. The fee paid by the customers to the retailers offsets the fee charged to the retailers. This ensures a level playing field for all parties.

3. Provide Information to Customers

Paint retailers in Vermont are required by law to provide customers with information regarding the program and how paint is managed. The requirement to provide paint stewardship information at the time of purchase applies to both in store paint retail and online paint retail. PaintCare has developed educational materials that meet state requirements, and provides them free of charge to all paint retailers and others wishing to distribute them.

COMMON QUESTIONS

How much is the fee?

The fee is by container size, as follows:

$0.00 — Half pint or less

$0.49 — More than half pint up to less than 1 gallon

$0.99 — 1 gallon up to 2 gallons

$1.99 — More than 2 gallons up to 5 gallons

How was the fee initially calculated?

When a new program starts, the fee is set to cover the cost of a fully operating program. PaintCare estimates the annual sales of architectural paint in each state and divides the estimated annual expenses of the program by the estimated number of containers to be sold, adjusts for container size, and determines a fee per container size that will provide the revenue needed to fund the program.

When the Vermont program started in May 2014, the fee was lower. Since then, the fee was increased to cover expenses. PaintCare is a nonprofit organization and operates programs on a state-by-state basis, so the fee may increase or decrease and is different from state to state.

Is the fee a deposit to be returned to customers?

The fee is not a deposit. The fee is used entirely to cover the expenses of running the program. The fee is not given back as a deposit for dropping off PaintCare products or empty paint cans (empty cans are not accepted by the PaintCare program at all).

Are we required to show the fee on receipts?

No, this is not required, but most stores do show the fee in order to explain the price increase to their customers. PaintCare encourages retailers to show the fee to increase awareness of the program.

Do we refund the fee if a product is returned?

Yes, the fee should be returned because it is part of the purchase price.

Is sales tax applied to the fee itself?

Yes, the fee is part of the purchase price; therefore, sales tax is collected on the fee.

How does the public know about the fee?

PaintCare provides brochures and other printed materials for retailers to distribute to the public to help explain the purpose of the fee, how the program works, and how to find paint drop-off sites. Additional materials can be ordered at any time for free.

What products are covered?

Architectural paints include most house paints, stains, and clear coatings (e.g., varnish and shellac). For a definition of architectural paint for the purposes of this program or for examples of PaintCare and non-PaintCare products, please contact PaintCare or visit www.paintcare.org.

Contact

John Hurd
Program Manager (Maine and Vermont)
(802) 245-4821
jhurd@paint.org

PAINT STEWARDSHIP PROGRAMS IN THE U.S.

About the PaintCare Fee

Updated — February 2023

PaintCare™
RECYCLING MADE EASY

Paint stewardship laws require retailers to add a fee to architectural paint products and make sure they are not selling unregistered brands of architectural paint.

PaintCare

PaintCare is a nonprofit organization established by the American Coatings Association to implement manufacturer-led paint stewardship programs in states that pass paint stewardship laws. PaintCare currently operates programs in California, Colorado, Connecticut, District of Columbia, Maine, Minnesota, New York, Oregon, Rhode Island, Vermont, and Washington. The main goal of PaintCare is to decrease paint waste and recycle more postconsumer paint by setting up convenient drop-off sites in each state.

What is the recovery fee and how does it work?

The PaintCare program is funded through a paint stewardship fee called the PaintCare fee. The PaintCare fee is applied to the purchase price of architectural paint. The fee funds collection, transportation, and processing of unused postconsumer (leftover) architectural paint, public education about proper paint management, and administrative costs. The fee is paid to PaintCare by paint manufacturers. This fee is then added to the wholesale and retail purchase price of paint, passing the cost of managing postconsumer paint to everyone who purchases paint. This reduces local and state government costs for paint management and provides a funding source for a more convenient, statewide paint management program.

Do retailers have to pass on the fee?

Yes, each state or jurisdiction's law requires retailers to pass on the fee to consumers, ensuring a level playing field for all parties. This requirement includes paint sold online on any e-commerce websites.

Recommendations for Contractors

Preparing Estimates

When estimating jobs, contractors should take the PaintCare fee into account by checking with suppliers to make sure their quotes for paint products include the fee.

Pass Fee to Customers

PaintCare suggests that painting contractors pass on the fee to customers in order to recoup the fee they pay. Tell customers that quotes include the PaintCare fee and that the fee funds a statewide paint recycling program.

How much is the fee?

The PaintCare fee is based on container size and varies from one program to another:

	Half pint or smaller	Larger than half pint up to smaller than 1 gallon	1 gallon up to 2 gallons	Larger than 2 gallons up to 5 gallons
California	$0.00	$0.30	$0.65	$1.50
Colorado	$0.00	$0.35	$0.75	$1.60
Connecticut	$0.00	$0.35	$0.75	$1.60
District of Columbia	$0.00	$0.30	$0.70	$1.60
Maine	$0.00	$0.35	$0.75	$1.60
Minnesota	$0.00	$0.49	$0.99	$1.99
New York	$0.00	$0.45	$0.95	$1.95
Oregon	$0.00	$0.45	$0.95	$1.95
Rhode Island	$0.00	$0.35	$0.75	$1.60
Vermont	$0.00	$0.49	$0.99	$1.99
Washington	$0.00	$0.45	$0.95	$1.95

How is the fee initially calculated?

When a new program starts, the fee is set to cover the cost of a fully implemented program. PaintCare estimates annual sales of paint in each state and then divides the cost of the program in that state by the number of containers sold in that state. Next, the fee is adjusted based on container size by taking into consideration the typical percentage of unused paint for each size (e.g., the percentage of unused paint from one 5 gallon container is typically less than from five 1 gallon containers).

PaintCare is a nonprofit organization, so the fee may be decreased if set at a level beyond what is needed to cover program expenses. Likewise, the fee may be increased if PaintCare does not collect enough revenue to cover the costs to operate the state program.

Are retailers required to show the fee on receipts?

While it's not required, PaintCare encourages retailers to list the PaintCare fee on purchase receipts to aid in consumer education, and most stores do so.

Is the fee taxable?

Yes, the fee is part of the purchase price of paint. Sales tax is collected on the fee in most cases, except in Oregon, a state that does not have a sales tax, and Maine, per supplemental legislation.

Is the fee to be applied to paint sold to customers who are exempt from sales tax?

Yes, government agencies and other organizations that are exempt from sales tax in PaintCare States must still pay the fee, because it is part of the price of paint. However, the fee, like the rest of the product price, should not be taxed for sales tax-exempt organizations.

Is the fee a deposit that is returned to customers when they bring paint to a drop-off site?

No, the fee is not a deposit. The fee is used entirely to cover the cost of running the program.

Do retailers return the fee if someone returns a product?

Yes. The fee should be returned as part of the purchase price.

How does the public know about the fee?

PaintCare provides public education materials to retailers. These materials explain the purpose of the fee, where to take paint for recycling, and other information about the program. When a new state program begins, PaintCare mails a package of materials to retailers. As needed, retailers may order additional free materials from PaintCare at any time. In addition to retailer information, PaintCare works with contractor associations to provide information to trade painters and conducts general outreach including newspaper, radio, television, and online advertising.

How do we as retailers know what products to put the fee on?

Suppliers' invoices should indicate that you are being charged the fee, so you simply pass on the fee for those items. Additionally, PaintCare and each state's oversight agency list all architectural paint manufacturers and brands that are registered for the program on their websites. Retailers may not sell brands that are not registered with the program. If your store sells architectural coatings that are not on the list of registered products, please notify PaintCare so we can contact the manufacturer to get them registered.

What products are covered?

The products accepted at PaintCare drop-off sites are the same products that have a fee when they are sold. PaintCare Products include interior and exterior architectural coatings sold in container sizes of five gallons or less. They do not include aerosol products (spray cans), industrial maintenance (IM), original equipment manufacturer (OEM), or specialty coatings. For a detailed list of PaintCare and non-PaintCare products, please visit www.paintcare.org/products-we-accept.

FOR NEW PROGRAMS

Do we apply the fee to sales on the first day of the program for inventory purchased before the first day of the program, even though we didn't pay a fee for the product to the distributor or manufacturer?

Yes, retailers must add the fee on all covered products sold on or after the first day of the program, regardless of when (before or after program launch) they were purchased from the distributor or manufacturer.

PAINT STEWARDSHIP PROGRAM IN THE U.S.

Information for HHW Programs

Updated — January 2023

PaintCare™
RECYCLING MADE EASY

Paint stewardship laws benefit household hazardous waste (HHW) programs.

PaintCare

PaintCare is a nonprofit organization established by the American Coatings Association to implement manufacturer-led paint stewardship programs in states that pass paint stewardship laws. PaintCare currently operates programs in California, Colorado, Connecticut, District of Columbia, Maine, Minnesota, New York, Oregon, Rhode Island, Vermont, and Washington. The main goal of the programs is to decrease paint waste and recycle more postconsumer (leftover) paint.

Paint Drop-Off Sites

The primary requirement of paint stewardship laws is for paint manufacturers to set up paint drop-off sites at retailers and other locations where households and businesses can take leftover architectural paint free of charge. PaintCare has established more than 2,400 paint drop-off sites across its programs. While most sites are paint and hardware stores, solid waste facilities including transfer stations, recycling centers, and landfills, as well as household hazardous waste collection programs are also important partners and may participate as paint drop-off sites and have their paint transportation and recycling costs paid by PaintCare.

Become a Drop-Off Site

HHW programs that would like their facilities and/or events to become paint drop-off sites can fill out fill out the interest form available at www.paintcare.org/drop-off-site-interest-form/.

Benefits of Partnering with PaintCare

There are many benefits to becoming a paint drop-off site. The cost of transportation and recycling of products accepted by PaintCare (e.g., paint, stain, varnish) will be paid by PaintCare. As a participating drop-off site, you will:

- Save on paint management (supplies, transportation, and recycling) and public outreach
- Help your state conserve resources, keep paint out of the solid waste stream, and prevent the improper disposal of paint in your community
- Make recycling of leftover paint more convenient for your community

Water-Based (Latex) Paint is a Resource

An important goal of PaintCare is to conserve resources and increase the amount of paint that is recycled. In areas where HHW programs do not accept water-based paint, households and businesses are often instructed to let water-based paint dry out and then dispose of the dry paint in the trash. Through the PaintCare program, all paint—including latex paint—is recycled to the maximum extent possible.

PaintCare Drop-Off Sites Receive Free of Charge

- Staff training at your site
- Reusable paint collection bins
- Paint transportation and processing services
- Site signage
- Compensation for value-added services including paint reuse programs, bulking of oil-based paint, and other optional services
- Publicity of HHW site or event (optional)

Drop-Off Site Responsibilities

- Provide secure storage area for reusable paint collection bins
- Accept all brands of leftover PaintCare products from the public during operating hours
- Place only PaintCare products in bins
- Keep bins neat and properly packed
- Complete minimal paperwork related to tracking outgoing paint shipments
- Ensure all staff maintain training on PaintCare program guidelines and operating procedures

How do billing and payments work?

- In the most common scenario, when your site ships out PaintCare products, the hauler sends PaintCare an invoice directly. This avoids the need for reimbursement.
- If your site also contracts with PaintCare for value-added services such as paint reuse, your program sends an invoice to PaintCare for reimbursement.

Will PaintCare Require Operational Changes?

- If your program does not currently accept latex paint, PaintCare will not require you to do so. If you wish to start accepting latex, PaintCare will cover the transportation and processing costs.
- If your program does not currently accept paint from businesses, PaintCare will not require you to do so. If you wish to start accepting paint from businesses, PaintCare will cover the transportation and processing costs.
- HHW programs may continue to put restrictions on who can use their programs, e.g., to residents of certain towns or cities. (PaintCare retail drop-off sites accept paint from anyone in the state, and from both households and businesses.)

Our Program Would Like to Partner with PaintCare, What Are Our Next Steps?

- Contact PaintCare to begin contracting discussions as early as possible
- Analyze your current operations so you can describe them in detail to PaintCare to help determine the most appropriate type of contracting approach for your program
- Reach out internally to those who will be involved with the contracting process to understand their needs and time constraints
- Consult with staff involved with paint management operations to ensure they understand how partnership with PaintCare works and to address any questions and concerns with PaintCare staff
- Review the Fact Sheet: Contracting with PaintCare for more details on contract types and other considerations as you prepare. Get a copy by contacting PaintCare or find the fact sheet in the Waste Facilities section of www.paintcare.org.

PAINT STEWARDSHIP PROGRAMS IN THE U.S.

Information for Solid Waste Facilities Including Transfer Stations, Recycling Centers, and Landfills

Updated — January 2023

PaintCare supports paint collection activities at solid waste facilities in states with paint stewardship laws. Funding for the program comes from a fee applied to the price of architectural paint sold in these states.

PaintCare

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Paint Drop-Off Sites

The primary requirement of paint stewardship laws is for paint manufacturers to set up paint drop-off sites at retailers and other locations where households and businesses can take postconsumer (leftover) architectural paint, free of charge. PaintCare has established more than 2,400 paint drop-off sites across its programs. While most sites are paint and hardware stores, solid waste facilities including transfer stations, recycling centers, and landfills, as well as household hazardous waste (HHW) facilities, may participate as paint drop-off sites.

Become a Drop-off Site

Solid Waste Facilities that would like to become a drop-off site can fill out the interest form available at www.paintcare.org/drop-off-site-interest-form/.

Benefits to Solid Waste Facilities and Their Customers of Becoming a PaintCare Drop-Off Site

There are many benefits to becoming a paint drop-off site. The cost of transportation and recycling of PaintCare accepted products (e.g., paint, stain, varnish) will be paid by PaintCare. As a participating drop-off site, you will:

- Make recycling of leftover paint more convenient for your customers
- Help relieve local government of their cost of managing leftover paint
- Help your state conserve resources, keep paint out of the solid waste stream, and prevent the improper disposal of paint in your community
- Optional: offer paint in good condition collected at your site to the public for reuse and receive a reimbursement of $1.60 per gallon. See our fact sheet, Reuse Program – Compensation and Reporting, for more information.

PaintCare Drop-Off Sites Receive Free of Charge

- Bins for storing collected PaintCare products
- Transportation and recycling of the collected PaintCare products
- Training materials and staff training at your site
- Program brochures, signage, and customer education materials
- Optional: listing your drop-off site on PaintCare website and in ads and promotional materials

Drop-Off Site Responsibilities

- Provide secure storage area for paint collection bins
- Accept all brands of leftover PaintCare products from the public during operating hours
- Place only PaintCare products in paint collection bins, taking care not to open containers
- Keep paint collection bins neat and properly packed
- Complete minimal paperwork related to tracking outgoing paint shipments
- Ensure all staff maintain training on PaintCare drop-off site guidelines and operating procedures

Water-Based (Latex) Paint is a Resource

An important goal of PaintCare is to conserve resources and increase the amount of paint that is recycled. In areas where HHW programs do not accept water-based paint, households and businesses are often instructed to let water-based paint dry out and then dispose of the dry paint in the trash. Through the PaintCare program, all paint—including latex paint—is recycled to the maximum extent possible.

Will Becoming a PaintCare Drop-Off Site Require Operational Changes?

No. Your facility may continue to put restrictions on who can access the paint collection program at your site. If your facility only services a specific geographic region (e.g., specific towns, cities, or counties), you will not be required to service customers that live outside of your service area. Similarly, if your facility is not permitted to take business waste, you will not be required to do so. (PaintCare retail sites accept paint from anyone in the state and from both households and businesses.)

Benefits of PaintCare to Solid Waste Facilities

Solid waste facilities that generate leftover paint but are not PaintCare drop-off sites can still participate in the PaintCare program.

- Solid waste facilities, like other entities, can drop off leftover paint at PaintCare sites. All PaintCare drop-off sites accept up to 5 gallons of paint, but some PaintCare sites accept more. Visit paintcare.org/drop-off-locations to find a site.
- PaintCare offers a free pickup service for households, businesses, and organizations that have accumulated 100+ gallons of paint measured by container size (not volume). Learn more about this in our fact sheet titled Large Volume Pickup (LVP) Service or at paintcare.org/pickup.
- For entities that generate large volumes of unwanted paint on a regular basis, a service for recurring direct pickups is available. Contact PaintCare for additional information.

What Products Are Covered?

The products accepted by the PaintCare program are the same products that have a fee when they are sold. PaintCare products include interior and exterior architectural coatings sold in container sizes of five gallons or less. They do not include aerosol products (spray cans), industrial maintenance (IM), original equipment manufacturer (OEM), or specialty coatings.

PAINTCARE PRODUCTS

- Interior and exterior architectural paints: latex, acrylic, water-based, alkyd, oil-based, enamel (including textured coatings)
- Deck coatings, floor paints
- Primers, sealers, undercoaters
- Stains
- Shellacs, lacquers, varnishes, urethanes
- Waterproofing concrete/masonry/wood sealers and repellents (not tar or bitumen-based)
- Metal coatings, rust preventatives
- Field and lawn paints

NON-PAINTCARE PRODUCTS

- Paint thinners, mineral spirits, solvents
- Aerosol paints (spray cans)
- Auto and marine paints
- Art and craft paints
- Caulking compounds, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar, and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
- Original Equipment Manufacturer (OEM) (shop application) paints and finishes

FOR GOVERNMENT AGENCIES PARTNERING WITH PAINTCARE

Joint Outreach Projects

Updated — January 2022

PaintCare™
RECYCLING MADE EASY

Introduction

If you are a local government that has partnered with PaintCare, we offer limited funding support for outreach activities that promote the PaintCare program. We are most interested in partnering with you when setting up new PaintCare sites, where participation is low, or to promote one-day household hazardous waste events to boost the amount of paint collected. We support radio, newspaper, social media, and direct mail, and will consider other media.

REVIEW AND APPROVAL

Project budgets and all creative work must be reviewed and pre-approved by PaintCare. Creative work includes text, images, and scripts. All projects must include PaintCare's website address and logo and mention that other PaintCare drop-off sites can be found at www.paintcare.org.

PROPOSAL FORM

Please complete our Proposal Form for Joint Outreach Projects on the Waste Facilities page at www.paintcare.org/joint-outreach/, or email brodgers@paint.org with questions.

IMAGES

We have artwork and photos you can borrow for creating drafts at www.flickr.com/photos/paintcare/, but please be sure to request permission to use them in your final design.

Your Responsibilities

At the start of each project, we request that you provide PaintCare with draft text, dimensions and/or specs, and due dates for the materials.

PRINT (BROCHURES, POSTCARDS, ETC.)

You are responsible for sending artwork files to your printer, coordinating mailings, and distribution. After the project is completed, we request a description of how, when, and where the piece was distributed and an electronic copy of the final piece.

NEWSPAPER

You are responsible for scheduling and sending artwork files to the newspaper. After the project is completed, we request a list of run dates for each newspaper and a scan of each ad.

RADIO

You are responsible for providing the pre-approved scripts to the stations and handling scheduling. After the project is completed, we request you provide text of the final script with a list of run dates and times.

DIGITAL MEDIA & OTHER

We are open to other types of projects such as digital advertising and social media campaigns, as well as other forms of outreach. Please coordinate details in advance and send PaintCare supporting documentation along with your invoice so we have a record of the projects and examples to show others.

Design Assistance

PaintCare can provide assistance with basic layout and graphic design for print and digital projects. When we provide this type of assistance, we will provide electronic files for you to send for printing or ad placement. Other than editing and commenting on scripts, we do not provide in-house assistance with audio or video production.

Please allow plenty of time for project planning, approvals, and editing. Depending on the time of year, this may take 4–8 weeks.

Reimbursement

PaintCare provides reimbursements for pre-approved projects only. We do not provide money up front, pay vendors directly, or accept requests for reimbursements on projects that have already been completed. Generally, PaintCare will reimburse costs for pre-approved projects proportional to the amount of the project dedicated to PaintCare information. Funding amounts may also differ depending on budgets available and our other outreach taking place in your area.

To be reimbursed after the project is completed, send an invoice from your government agency, samples of final pieces, and copies of invoices from your vendors to paintcare@bill.com and copy Brett Rodgers at

brodgers@paint.org. The "To:" space on the invoice should be addressed to PaintCare Inc., 901 New York Ave NW, Suite 300 West, Washington DC, 20001. In the space for purchase orders please write "6369 Communications: Other, Joint Projects." See sample invoice below.

{SAMPLE INVOICE}

Environmental Services Program

Washington County
123 Government Way
Anytown, State 55776

June 24, 2021

Invoice: 2452187

Purchase Order: 6369 Communications: Other, Joint Projects

Outreach Department
PaintCare Inc.
901 New York Ave NW #300W
Washington DC, 20005

Description:

- Newspaper ad promoting one day event held in Anytown on May 1, 2021
- Three 5x5 ads ran on April 13, 2021 in the County Journal
- Total invoices from newspapers: $1,487.00
- Invoice and copy of one ad are attached
- Per prior discussion, PaintCare agreed to reimburse county for $750
- Contact person: Marie Chen, 202-555-1212

Invoice Amount: $750.00

Remit to:

Environmental Services Program
Washington County
123 Government Way
Anytown, State 55776

FACT SHEET FOR OFFERING A REUSE PROGRAM

Reuse Programs - Compensation & Reporting

Updated — May 2021

PaintCare™
RECYCLING MADE EASY

PaintCare encourages household hazardous waste programs, reuse stores, and others to operate paint reuse programs (i.e., swap shops or exchanges). Reuse programs return good quality, unused paint to the local community at low or no cost. Reuse is a preferred method of waste management.

To encourage reuse, PaintCare will compensate paint drop-off sites operating a reuse program under a contract with PaintCare.

Operating a Reuse Program

Any PaintCare products (qualifying paint, stain, and varnish as defined by PaintCare – please see www.paintcare.org/products-we-accept) that are distributed through reuse programs must be in their original container, have an original label, and be in good physical and aesthetic condition. Contents must be liquid and relatively new. Containers should be closed securely before being placed in the reuse storage area.

Customers must sign a waiver form explaining that the paint is taken "as is" with no guarantee of quality or contents. The customer is required to read, complete, and sign the form, and site staff members are required to verify and record what has been taken by the customer. If a reuse facility does not use a waiver form, the facility accepts the liability for the materials. The staff must record the number of containers taken by each participant and the total estimated volume on the log.

Reuse room at the Household Hazardous Waste Facility at the Yolo County Central Landfill in Woodland, CA.

Track and Report by Volume (gallons)

- Containers may contain any amount of paint in them
- The site must determine and report the total gallons of latex paint and the total gallons of oil-based paint distributed for reuse
- Compensation is provided at $1.60 per gallon

The site must track and report the actual volume of paint in the containers using an internal methodology (e.g., weigh the cans on a scale, estimate weight by hand, do visual inspection). The methodology must be provided to PaintCare upon request.

Appendix D

Drop-Off Site Guidelines and Forms

PaintCare™
RECYCLING MADE EASY

Transporter and PaintCare Contact Information

Transporter Name:	Clean Harbors
To order bin pick-up via online order system:	www.cleanharbors.com Username: Password: (provided by Clean Harbors Welcome Email) See attached instructions
To order bin pick-up via phone:	Alecia Kennedy-Aguilar (888) 932-2730 kennedy.alecia@cleanharbors.com
PaintCare Contacts:	John Hurd (802) 245-4821 jhurd@paint.org
PaintCare Hotline for Customers:	(855) 724-6809
Where to Refer Customers w/ Non-Program Products:	

Vermont Specific Guidelines

Storage Time Limit: 1 year

Spill Reporting: Document the date, location, amount, and type of PaintCare product spilled. Report any spill or release of two (2) gallons or more of oil-based paint to the environment to:

- VT Agency of Natural Resources, Waste Management and Prevention Division.
  - Regular business hours: (802) 828-1138
  - Vermont Emergency Management 24/7: (800) 641-5005
- PaintCare within 24 hours of any report

Basic Local Emergency Contacts

Facility Emergency Coordinator (name/phone):	
Alternate Emergency Coordinator (name/phone):	
Fire Department Phone Number	911
Police Phone Number	911
Hospital Phone Number	

These State-Specific Guidelines are not intended to replace or supersede the requirements that Drop-Off Sites must follow pursuant to their state-issued permits, registrations, or other applicable law. Applicable laws and regulations take precedence if there is a conflict with these State-Specific Guidelines

Drop Off Site Guidelines

This document contains detailed information on PaintCare's program guidelines and operational procedures. In combination with the state-specific guidelines, it is designed to be used by new staff for self-training and for site refresher training without PaintCare staff present.

Note: The supplemental training slides included in the training binder summarize only the most important information from these Drop-Off Site Guidelines. The slides are used during training by PaintCare staff and can also be used to supplement refresher training.

Adherence to these guidelines is critical for drop-off sites participating in the PaintCare program. Exceptions to these guidelines can be made only with PaintCare's express written permission. If your site is unable to comply with any of these guidelines, please contact your PaintCare representative so that we may try to find a solution that works for your site but still achieves compliance with applicable legal and operational requirements.

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Section 1. Training and Safety

Training

For the safety of the program and your staff, all employees handling PaintCare products must receive training in product identification, acceptance, handling, packaging, inspection, and emergency response procedures before collecting PaintCare products or engaging in any PaintCare program activities.

Training helps ensure that employees conduct PaintCare product collection activities in a safe manner that protects workers and the environment.

Ensure that drop-off site employees are equipped for and understand hazards associated with PaintCare products.

Maintain training plans and records for each employee. Record staff training by filling in the log included in the training binder.

Safety

Store personal protective equipment (PPE) and spill response equipment in an accessible location adjacent to the collection bins. Ensure those materials are protected from impacts of weather.

The drop-off site must be equipped with appropriate emergency response equipment including a fire extinguisher, spill kit, and PPE. Monthly inspections of equipment are recommended.

PaintCare product collection activities need to follow general safety practices including proper lifting techniques.

Post emergency procedures and emergency contact numbers including police, fire department, and emergency services near a phone and in close proximity to the collection bins, if possible.

If applicable, develop and maintain an emergency action plan as required by OSHA.

If required by federal, state, or local law, familiarize police, fire departments, and emergency response teams with the layout of your facility, properties of PaintCare products handled at your facility, and evacuation routes.

Section 2. General Guidelines

PaintCare Provides Your Site:

- Training binder with recordkeeping logs/forms
- Signage identifying your site as a PaintCare drop-off site
- Printed educational materials for the public

PaintCare's Transporter Provides Your Site:

- Paint collection bins and liners for cardboard/single-use collection bins
- Labels and/or markings for paint collection bins
- Spill kits (excluding HHW programs)

General Guidelines for Drop-Off Sites

Each PaintCare drop-off site has unique logistical and operational considerations. Each drop-off site must make its own decisions and use its best judgment to operate in the safest manner possible in accordance with applicable law. To ensure the highest standards of safety for you and your staff, drop-off sites must:

- Have appropriate signage that informs the public of the hours of operation
- Accept PaintCare products from participants during your regular advertised or posted operating hours
- Display PaintCare signage to identify you as a drop-off site; signage should be posted in a highly visible area, at the entrance of your site
- Assist and supervise participants when they visit to drop off PaintCare products. Site staff should greet participants and must verify eligibility of the participant and their leftover paint products as PaintCare products
- IMPORTANT: Never allow a participant to open a PaintCare product container
- Have adequate space, staffing, and training to collect and store PaintCare products
- Provide a secure space for empty and full collection bins
- Place all PaintCare products immediately in collection bins approved for use by PaintCare and its transporters
- Pack only PaintCare products into collection bins
- Schedule shipments of PaintCare products from your drop-off site
- Maintain all records relating to the program
- Train staff to be familiar with the requirements and practices of this guide

Section 3. Collection Bins and Storage Area

Storage Area and Collection Bin Placement

Establish a dedicated storage area for collection bins and PaintCare products.

Place collection bins on an impermeable surface (i.e., paved asphalt, concrete, or other surface) at all times.

Place collection bins away from ignition sources, storm drains, and floor drains.

Ensure there is adequate ventilation if bins are stored indoors.

If stored outdoors, protect collection bins from the elements (e.g., precipitation, temperature extremes, rain, and snow). Keep collection bins under cover to prevent exposure to precipitation and to protect against temperature extremes. If you store collection bins outdoors, you may need approval from your local fire or hazardous materials oversight agency.

Comply with any local fire codes or other regulations that might pertain to your storage of collection bins at your site.

Maintain enough space around collection bins to inspect for leakage and emergency access.

Use good housekeeping standards; keep paint storage areas clean and orderly.

Setting Up, Packing and Maintaining Collection Bins

Collection bins must be set up, used, and closed according to the manufacturer's instructions. PaintCare's transporters should set up the collection bins that they provide, unless otherwise requested by the drop-off site staff.

Ensure liners are inserted in cardboard collection bins. The liners provide secondary containment to contain liquids in the event a can leaks while in storage or transit. Reusable plastic bins that are leak-proof by design do not need liners.

Collection bins must be structurally sound. If you see any evidence of damage to bins (or liners) that may cause a leak or spill, notify PaintCare immediately.

Mark the collection bin with the date on which the first PaintCare product is placed inside it.

Place PaintCare products in bins immediately upon receipt. Keep collection bins closed except when adding PaintCare products.

Pack 5-gallon buckets on the bottom layer of the collection bins for stability.

Do not overfill collection bins; allow enough space for a lid to fit securely.

Pack all PaintCare products (cans, buckets) upright and as tight as possible in the collection bins to protect contents from shifting and leaking in transit.

Do not open containers to verify product contents.

Do not take PaintCare product out of the bin.

Security

Never allow “self-serve,” public access to the collection bins.

The collection bin storage area must be secured and locked when not attended.

Only drop-off site staff should have access to the collection bins and storage area until the collection bins are ready for pick-up by PaintCare’s transporter.

Section 4. Identifying and Accepting PaintCare Products

What are PaintCare Products

PaintCare drop-off sites should accept only PaintCare products (architectural paint products) for management under the PaintCare program. Only those PaintCare products accepted from individuals residing in the state and businesses/organizations located in the state can be managed under the PaintCare program.

Listed below are the primary examples of architectural paint products accepted by the PaintCare program and paint or paint-related products not accepted by the PaintCare program.

Generally, PaintCare products include latex and oil-based house paints, stains, and clear coatings (varnish, shellac, etc.). The program excludes anything that is:

- In an aerosol spray can
- Intended and labeled "for industrial use only"
- Mostly used in the manufacture of equipment
- On the list of specifically excluded products for some other reason

PaintCare products are classified as either latex (water-based) or oil-based (alkyd) and the classification is important in order to decide how the product should be handled and processed. Knowing how to tell the difference between latex- and oil-based products is also important in determining which types of businesses/organizations can use the PaintCare program (if your site accepts paint from this audience).

PaintCare Products and Non-PaintCare Products

Acceptable products (PaintCare products)

- Interior and exterior paints: latex, acrylic, water-based, alkyd, oil-based, enamel (including textured coatings)
- Deck coatings and floor paints (including elastomeric)
- Primers, sealers, undercoaters
- Stains
- Shellacs, lacquers, varnishes, urethanes (single component)
- Waterproofing concrete/masonry/wood sealers and repellents (not tar or bitumen-based)
- Metal coatings, rust preventatives
- Field and lawn paints

Unacceptable products (Non-PaintCare products)

- Paint thinner, mineral spirits, solvents
- Aerosol paints (spray cans)
- Auto and marine paints
- Art and craft paints
- Caulking compounds, epoxies, glues, adhesives
- Paint additives, colorants, tints, resins
- Wood preservatives (containing pesticides)
- Roof patch and repair
- Asphalt, tar, and bitumen-based products
- 2-component coatings
- Deck cleaners
- Traffic and road marking paints
- Industrial Maintenance (IM) coatings
- Original Equipment Manufacturer (OEM) (shop application) paints and finishes

For more information, please see www.paintcare.org/products

If non-PaintCare products end up in a drop-off site's bin, such products will not be returned to the drop-off site and will be managed by PaintCare's transporter. Transporters identify non-PaintCare products and report all instances to PaintCare. PaintCare staff will notify the site of any contamination in the bins. If the problem persists, additional training may be provided.

Acceptable Containers vs. Unacceptable Containers

Before accepting products from participants for management under the PaintCare program, drop-off site staff must (1) check the condition of the container for acceptance in the program, and (2) check the product label to verify that it contains a PaintCare product.

Acceptable

- The PaintCare product must be in its original container*
- The container is labeled as containing one of the designated PaintCare products listed above*
- The container must be in good condition and not leaking*
- The container must be 5 gallons in size or smaller
- The container contains dry latex paint

Not Acceptable

- The container is not original (e.g., paint was transferred into a jar)*
- The container does not have an original label*
- The container is leaking or has no lid*
- The container is larger than 5 gallons
- The container is empty

*Drop-off sites permitted to accept household hazardous waste may accept unlabeled and leaking containers by following the procedures described below.

Unlabeled and Leaking Containers

A drop-off site permitted to accept household hazardous waste may, at its discretion, choose to accept unlabeled and/or leaking containers if it follows the protocols below and otherwise complies with all applicable laws:

Unlabeled Containers

A drop-off site may accept containers that do not have an original label if a staff person appropriately trained in identifying unknown wastes (1) identifies the material in the container as a PaintCare product, and (2) applies a label identifying the contents to the container before placing it in a collection bin.

Leaking Containers

A drop-off site may accept a leaking container or a container with no lid if an appropriately trained drop-off site staff person (1) verifies that the container contains a PaintCare product, (2) places the contents of the leaking/open container into an appropriate substitute container (which can include bulking such PaintCare products into 55-gallon drums), and (3) applies an appropriate label to the substitute container.

Refusing an Unacceptable Product or Container

Do not accept non-PaintCare products from any participant unless they are received as part of normal site operations and are not placed in PaintCare collection bins.

When refusing a PaintCare product, drop-off site staff must explain why the PaintCare product cannot be accepted (e.g., material is not part of the program, cannot accept material from non-exempt generator, etc.). If a participant tries to drop off products that your location cannot manage, refer the participant to an appropriate alternative resource, such as their local household hazardous waste disposal program, garbage transporter, environmental health agency, or public works department. Local contact information is provided at the front of the training binder.

Paint Volume Acceptance Rules

The program accepts PaintCare products from households and businesses/organizations.

Households. Households may drop off any volume of PaintCare product, subject to the volume limit set by the site.

Businesses/Organizations. Non-households may also drop off any volume of latex PaintCare product, subject to the volume limit set by the site. Non-households may only drop off oil-based PaintCare products if they comply with federal and state hazardous waste generator rules that, among other criteria, require that the business/organization (1) generates no more than 100 kilograms (about 25 gallons or 220 pounds) of hazardous waste per calendar month, and (2) does not accumulate more than 1,000 kg (about 250 gallons or 2,200 pounds) of hazardous waste at any time. Painting contractors and commercial property owners typically meet these criteria. For more information about these criteria, please visit www.paintcare.org/vsqg

Each business or organization is responsible for determining its own generator status under applicable law.

When a business/organization has oil-based PaintCare products to drop off at your site, it must sign the Paint Drop-Off Log or form included in the training binder to verify that it qualifies to use the program for oil-based paint. The log/form includes an explanation of the requirements. If a business/organization has only latex paint, it does not need to sign the log/form.

Once a business/organization signs the Paint Drop-Off Log or form you may accept oil-based paint from that business/organization. (HHW sites and other waste collection programs may need a permit and/or to meet additional legal requirements in order to collect oil-based paint from businesses.) To help ensure legal compliance, unless you're specifically permitted to accept more, you should not accept more than 25 gallons of oil-based paint per calendar month from a qualifying business. The Paint Drop-Off Log or form may be reviewed by PaintCare or government agencies and compared with a list of registered hazardous waste generators to verify that only qualified businesses/organizations are using the program for their oil-based paint.

Transporter/Recycler Contracted Drop-Off Sites

Maintaining Paint Drop-Off Logs for All Participants

Drop-off sites operated by a PaintCare-contracted transporter and/or recycler must keep and maintain separate paint drop-off logs to record both latex and oil-based paint volumes from both businesses/organizations and households. While PaintCare offers template logs, an alternative may be used if approved by PaintCare.

Section 5. Participant Paint Volume

How Much Paint to Accept from Participants

While the PaintCare program intends to collect as many PaintCare products as possible, we recognize that your drop-off site may have storage limitations. PaintCare drop-off sites, in agreement with PaintCare, may limit the amount of PaintCare products they accept per participant, however, drop-off sites must accept up to 5 gallons at a minimum per participant.

What if Bins are Full?

If your collection bins are completely full, inform the participant that you are temporarily unable to accept PaintCare products and redirect them to the nearest alternative PaintCare drop-off site. Refer them to the site locator at www.paintcare.org or the PaintCare hotline at 855-724-6809, or ask them to come back at a later date. Contact the PaintCare transporter immediately to have collection bins picked up and replaced.

If a participant has a significant amount of PaintCare products that your location cannot manage, ask the participant to contact PaintCare directly for additional assistance. PaintCare may direct the participant to another drop-off site or offer our Large Volume Pickup service.

Large Volume Pickup (LVP) Service

PaintCare offers a free pick-up service to painting contractors, property managers, households, and others with a large quantity of leftover PaintCare products. Typically, a minimum of 100 gallons (by container size) is required to qualify for the LVP service.

To refer a participant to the LVP service:

- Provide the participant a LVP fact sheet
- Ask the participant to request a pick-up using the online LVP form
- The LVP fact sheet and online form are available at www.paintcare.org (select the “Request a Pickup” button on the homepage)
- For additional questions, refer the participant to PaintCare for assistance

Section 6. Working with Transporters

PaintCare contracts with transporters for the delivery of supplies, delivery of empty collection bins, and pick-up of full collection bins.

Scheduling the Transporter to Pick Up Collection Bins

When you anticipate your collection bins will be full within your site's pick-up timeframe (generally 5 business days in urban areas, 10 business days in rural areas), call your transporter to schedule a pickup or use their online order system if they have one. The name and contact information of your transporter is provided at the front of the training binder.

When establishing an appointment for pick-up, please indicate:

- Your site is a PaintCare drop-off site
- Name of drop-off site and address
- Your name
- Your phone number
- Number of full collection bins to be picked up
- Number of empty collection bins needed for replacement

Preparing Collection Bins for Pickup

On the scheduled pickup day, collection bins and the loading area must be readily accessible to the transporter for quick and efficient loading. Complete the following steps:

- Identify which bins are full and ready for pickup
- Make sure the path between your bins and the transporter's vehicle is clear and at least 4 feet wide to accommodate movement of bins
- Sign and keep copies of any shipping documents for your records

The transporter is responsible for labeling, loading/off-loading collection bins, and preparing shipping documents.

Section 7. Spill Response

Spills

The information in this section will assist with spills from damaged or leaking program containers. It is important that all drop-off site staff understand corrective actions to minimize exposure to people and the environment.

Reporting

Report spills as required by law, summarized in the state-specific guidelines. Contact PaintCare within 24 hours of making such a report.

Spill Response Procedures

Always follow all applicable spill response procedures set forth in your operating permit or as otherwise required by applicable law.

If a spill is small enough to be managed by drop-off site staff, follow these steps:

- Isolate the area and restrict access to the spill
- Ensure personal safety, put on protective gear (glasses and gloves) provided in the spill kit
- Stop the movement of paint by placing the leaking container upright or in a position where the least amount will spill, and place leaking container in plastic bags provided in spill kit, or into the spill kit container
- Contain the spill by placing absorbent pads or granular absorbent around and on the spill – if outdoors, place barriers around storm drains to prevent a release to the environment
- Collect the contaminated absorbent and place it in plastic bag(s) or spill kit container, along with the leaking container and contaminated PPE, seal the bag(s), label it and place in the collection bin
- Remove any clothing that may be contaminated, wash thoroughly to remove spilled material from your hands or body
- Document the date, location, and amount and type of material spilled
- Replace any used spill control supplies as soon as possible

Section 8. Inspections and Records

Inspections and Record Keeping

Drop-off site staff are responsible for regularly inspecting collection bins and spill kits to ensure that such materials are in proper working order and include any necessary labeling. Please report any damaged bins or other problems to PaintCare immediately so PaintCare may arrange for prompt replacement or repair.

Maintain the following records for a minimum of 3 years:

- Internal and external inspection records (if applicable)
- Paint Drop-Off Log or forms (copy provided in the training binder)
- Paint Waivers (copy provided in the training binder; only for sites that do reuse)
- Employee training logs (copy provided in the training binder)
- Shipping documents and/or other documentation required by applicable law for outgoing shipments of PaintCare products

PAINT STEWARDSHIP PROGRAM IN THE U.S.

Training Log for Drop-Off Site Staff

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RECYCLING MADE EASY

Training for drop-off site personnel is based on the PaintCare drop-off site guidelines and other materials provided to drop-off sites as part of their training requirement. Training includes information on the following:

- Training and safety
- General guidelines
- Collection bins and storage area
- Identifying and accepting PaintCare products
- Participant paint volume
- Working with transporters
- Spill response
- Inspections and records

DATE	TRAINEE NAME AND SIGNATURE	TRAINER INITIALS

PAINT DROP-OFF LOG (for businesses and organizations)

Eligibility: A business or organization may use PaintCare drop-off sites and events to manage program-eligible hazardous waste products (e.g., unwanted oil- based paint, varnishes, solvents) only if it provides the information below and certifies that all hazardous waste it provides to the PaintCare program qualifies as exempt under federal (40 CFR § 262.14) and analogous state/local hazardous waste generator rules for very small quantity generators. Among other criteria, each business/organization responsible for generating waste at a site must, at that site, (1) generate no more than 100 kilograms (about 25 gallons or 220 pounds) of hazardous waste per calendar month, (2) generate no more than 1 kilogram (about 2.2 pounds) of acute hazardous waste per calendar month, and (3) accumulate no more than 1,000 kilograms of hazardous waste at any given time.

Because generator status can vary from month to month, your organization must sign and date this log sheet each time that it seeks to manage hazardous waste through the PaintCare program.

Certification Statement: By signing this document, I certify that all hazardous waste being provided to the PaintCare program qualifies as exempt waste under applicable federal and state/local laws. My organization releases and holds harmless the entity accepting this waste, as well as PaintCare Inc., its sole member and related companies, and their agents, employees, member companies, officers, directors, successors, and assigns from any liability, claim, injury, losses, or damages arising from my organization's provision of any materials to the PaintCare program.

[This log sheet may be provided to state agencies upon their request.]

Date	Oil-Based Paint Gallons	Name of Business/Organization	Address of Business/Organization	Name of Person Dropping Off Paint	Signature	Phone Number

Appendix E

Independent Audit of the Proposed PaintCare Fee

PAINTCARE VERMONT DIVISION

FORECASTED SUMMARY SCHEDULE OF ACTUAL AND
BUDGETED REVENUES, EXPENSES (COSTS) AND
FINANCIAL RESERVE (DEFICIT) FUND
AND
CALCULATED AVERAGE UNITIZED PAINT STEWARDSHIP FEE
FOR THE VERMONT AGENCY OF NATURAL RESOURCES

For the Actual Period from July 1, 2018 through July 31, 2022, Projected Period from August 1, 2022 through December 31, 2022, and
Forecasted Periods Covering January 1, 2023 through December 31, 2025

PAINTCARE VERMONT DIVISION

NOTES TO FORECASTED FINANCIAL INFORMATION
For the Actual Period from July 1, 2018 through July 31, 2022,
Projected Period from August 1, 2022 through December 31, 2022, and
Forecasted Periods Covering January 1, 2023 through December 31, 2025

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(A) Includes the actual period from July 1,2018 through July 31, 2022, projected period from August 1, 2022 through December 31, 2022 and forecasted period covering January 1, 2023 through December 31, 2025.

LYDON FETTEROLF CORYDON, P.A.
Certified Public Accountants • Management Consultants

INDEPENDENT ACCOUNTANT'S STEWARDSHIP FEE EXAMINATION REPORT

Marjaneh Zarrehparvar, Manager
PaintCare Vermont Division

Pursuant to PaintCare Vermont Division's (PCVT) engagement letter dated on August 11, 2022, we have examined the accompanying forecasted summary of budgeted revenues, expenses (costs), and financial reserve fund prepared by the management of PCVT with regard to operating a paint recycling program required by the Statute 6673, Sub-Chapter 4, Chapter 159 of Vermont Statute Title 10: Conservation and Development ("Vermont Paint Stewardship Law"), and the calculated average unitized paint stewardship fee that PCVT has proposed to fund the program for the multi-year operational period covering January 1, 2023 through December 31, 2025, including actual costs that PCVT has incurred from July 1, 2018 through July 30, 2022 and projected costs from August 1, 2022 through December 31, 2022, (collectively the forecasted budget), based on the guidelines for the presentation of a forecast established by the American Institute of Certified Public Accountants (AICPA). PCVT's management is responsible for preparing and presenting the forecasted budget in accordance with guidelines for the presentation of a forecast established by the AICPA. The forecasted budget was prepared for the purpose of complying with the Vermont Paint Stewardship Law. Our responsibility under the Vermont Paint Stewardship Law is to express an opinion on the forecasted budget statement based on our examination.

Our examination was conducted in accordance with attestation standards established by the AICPA. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the forecast is presented in accordance with the guidelines for the presentation of a forecast established by the AICPA, in all material respects. An examination involves performing procedures to obtain evidence about the forecast. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of the forecast, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements related to the engagement.

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INDEPENDENT ACCOUNTANT'S STEWARDSHIP FEE EXAMINATION REPORT (continued)

In our opinion, the accompanying forecasted budget is presented, in accordance with the guidelines for presentation of a forecast established by the AICPA, and the underlying assumptions are suitably supported and provide a reasonable basis for PCVT's forecasted budget, in all material respects. Also, in our opinion the PCVT's proposed uniform paint stewardship assessment fee of $0.00 and $0.00 (half pint or smaller), $0.49 and $0.65 (larger than half pint to smaller than 1 gallon), $0.99 and $1.35 (1 gallon up to 2 gallons) and $1.99 and $2.45 (larger than 2 gallons up to 5 gallons by each container size charged on all paint containers sold at retail to Vermont State consumers effective January 1, 2023 and January 1, 2024, respectively, is reasonable, within the meaning of the Vermont Paint Stewardship Law, to cover the expenses (costs) of operating the architectural paint stewardship program that is sufficient to operate said program over the multi- year period from January 1, 2023 through December 31, 2025 and create a positive reserve balance by the year ended December 31, 2025.

Emphasis of Matter:
The forecasted reserve balance as of December 31, 2025 is forecasted to be below management's internal reserve policy. See Note **H** to the examination report for further discussion.

There will usually be differences between forecasted and actual results because events and circumstances frequently do not occur as expected and those differences may be material. We have no responsibility to update this report for events and circumstances occurring after the date of this report.

The accompanying forecasted budget statement and our report are intended solely for the information and use of the Vermont Agency of Natural Resources and management of the PCVT, and are not intended to be used and should not be used by anyone other than these specified parties.

Lydon Fratoroff Conyson, P.A.

March 1, 2023

PAINTCARE VERMONT DIVISION

FORECASTED SUMMARY SCHEDULE OF ACTUAL AND BUDGETED REVENUES, EXPENSES (COSTS) AND FINANCIAL RESERVE (DEFICIT) FUND
FOR THE VERMONT AGENCY OF NATURAL RESOURCES
For the Actual Period from July 1, 2018 through July 31, 2022,
and Projected Period from August 1, 2022 through December 31, 2022,
and Forecasted Periods Covering January 1, 2023 through December 31, 2025

FORECASTED REVENUES		
Paint stewardship (recycling) fee - NOTE B	$ 7,167,676	(1)
TOTAL REVENUES	7,167,676	
FORECASTED EXPENSES		
Collection, transportation and processing - NOTE C	$ 5,415,177	
Communications - NOTE D	85,070	
Corporate overhead allocation - NOTE E	395,084	
Salaries and benefits, state agency administrative fees, travel and administrative - NOTE F	593,419	
TOTAL EXPENSES	6,488,750	(2)
CHANGE IN FORECASTED RESERVE (DEFICIT) BALANCE, BEFORE NET GAINS/LOSSSES FROM INVESTMENT ACTIVITY - NOTE G	678,926	
NET INVESTMENT ACTIVITY ALLOCATION - NOTE G	(50,456)	
INCREASE IN NET RESERVE BALANCE FOR THE PERIOD COVERING JULY 1, 2018 THROUGH DECEMBER 31, 2025 - NOTE H	628,470	
BEGINNING RESERVE (DEFICIT) BALANCE AT JUNE 30, 2018	(523,202)	(3)
FORECASTED RESERVE BALANCE AT DECEMBER 31, 2025	$ 105,268	

(1) ***Calculation based upon retailers collecting a $0.00 fee for each paint container half a pint up or smaller, $0.49 fee for each paint container larger than half a pint up to smaller than one gallon, $0.99 fee for each paint container one gallon up to two gallons sold, and $1.99 fee for each paint container larger than two gallons up to five gallons sold in Vermont through December 31, 2023. Effective January 1, 2024 the proposed fee is as follows: $0.00 fee for each paint container half a pint up or smaller, $0.65 fee for each paint container larger than half a pint up to smaller than one gallon, $1.35 fee for each paint container one gallon up to two gallons sold, and $2.45 fee for each paint container larger than two gallons up to five gallons sold in Vermont .***

(2) ***Includes the actual period from July 1, 2018 through July 31, 2022, projected period from August 1, 2022 through December 31, 2022 and forecasted period expenses covering January 1, 2023 through December 31, 2025.***

(3) ***Beginning reserve (deficit) balance includes the cumulative deficit for the program from its inception in 2014 through June 30, 2018 and including pre-operational costs incurred prior to the program's implementation.***

CONTAINS CONFIDENTIAL PROPRIETARY BUSINESS DATA WHICH IS RESTRICTED FOR USE BY PAINTCARE AND THE VERMONT AGENCY OF NATURAL RESOURCES

See Notes to Forecasted Financial Information and Accountant's Report

PAINTCARE VERMONT DIVISION

FORECASTED DETAIL SCHEDULE OF ACTUAL AND BUDGETED REVENUES, EXPENSES
(COSTS) AND FINANCIAL RESERVE (DEFECIT) FUND
FOR THE VERMONT AGENCY OF NATURAL RESOURCES
For the Actual Period from July 1, 2018 through July 31, 2022,
and Projected Period from August 1, 2022 through December 31, 2022,
and Forecasted Periods Covering January 1, 2023 through December 31, 2025

	Actual Period from July 1, 2018 through July 31, 2022	Projected Period Covering August 1, 2022 through December 31, 2022	Forecasted Periods covering January 1, 2023 through December 31, 2025	Total
FORECASTED REVENUES				
Paint stewardship (recycling) fee - NOTE B				
Larger than half a pint to smaller than a gallon	$ 537,649	$ 50,925	$ 413,954	$ 1,002,528
One to two gallons	2,750,914	246,581	2,276,992	5,274,487
Larger than two gallons to five gallons	469,549	43,533	377,579	890,661
TOTAL REVENUES	3,758,112	341,039	3,068,525	7,167,676 **(1)**
FORECASTED EXPENSES				
Collection, transportation and processing - NOTE C	2,813,403	354,398	2,247,376	5,415,177
Communications - NOTE D	44,403	1,667	39,000	85,070
Corporate overhead allocation - NOTE E	195,806	19,598	179,680	395,084
Salaries and benefits, state agency administrative fees, travel and administrative - NOTE F	261,348	61,256	270,815	593,419
TOTAL EXPENSES	3,314,960	436,919	2,736,871	6,488,750 **(2)**
TOTAL FORECASTED SURPLUS/(DEFICIT) BEFORE NET GAINS/LOSSES FROM INVESTEMENT ACTIVITY	$ 443,152	$ (95,880)	$ 331,654	$ 678,926
NET INVESTMENT ACTIVITY ALLOCATION- NOTE G	(57,560)	7,104	0	(50,456)
CHANGE IN RESERVE (DEFICIT) BALANCE	$ 385,592	$ (88,776)	$ 331,654	$ 628,470
BEGINNING RESERVE (DEFICIT) BALANCE AT JUNE 30, 2018 (3)				(523,202) **(3)**
FORECASTED RESERVE BALANCE AT DECEMBER 31, 2025				$ 105,268

(1) ***Calculation based upon retailers collecting a $0.00 fee for each paint container half a pint up or smaller, $0.49 fee for each paint container larger than half a pint up to smaller than one gallon, $0.99 fee for each paint container one gallon up to two gallons sold, and $1.99 fee for each paint container larger than two gallons up to five gallons sold in Vermont through December 31, 2023. Effective January 1, 2024 the proposed fee is as follows: $0.00 fee for each paint container half a pint up or smaller, $0.65 fee for each paint container larger than half a pint up to smaller than one gallon, $1.35 fee for each paint container one gallon up to two gallons sold, and $2.45 fee for each paint container larger than two gallons up to five gallons sold in Vermont .***

(2) ***Includes the actual period from July 1, 2018 through July 31, 2022, projected period from August 1, 2022 through December 31, 2022 and forecasted period expenses covering January 1, 2023 through December 31, 2025.***

(3) ***Beginning reserve (deficit) balance includes the cumulative deficit for the program from its inception in 2014 through June 30, 2018 and including pre-operational costs incurred prior to the program's implementation.***

CONTAINS CONFIDENTIAL PROPRIETARY BUSINESS DATA WHICH IS RESTRICTED FOR USE BY PAINTCARE AND THE VERMONT AGENCY OF NATURAL RESOURCES

PAINTCARE VERMONT DIVISION

CALCULATED AVERAGE UNITIZED PAINT STEWARDSHIP FEE
FOR THE VERMONT AGENCY OF NATURAL RESOURCES
For the Actual Period from July 1, 2018 through July 31, 2022,
and Projected Period from August 1, 2022 through December 31, 2022,
and Forecasted Periods Covering January 1, 2023 through December 31, 2025

FORECASTED CALCULATED AVERAGE UNITIZED PAINT STEWARDSHIP FEE

	Proposed Unit Fee - though December 31, 2023 (1)	Forecasted Units Sold (2)	Actual Period from July 1, 2018 through July 31, 2022	Projected Period from August 1, 2022 through December 31, 2022	Forecasted Period Covering January 1, 2023 through December 31, 2023	Total Forecasted Revenue
REVENUE						
Larger than half a pint to smaller than a gallon	**$ 0.49**	1,432,431	$ 537,649	$ 50,925	$ 113,317	$ 701,891
One to two gallons	**0.99**	3,644,843	2,750,914	246,581	610,900	3,608,395
Larger than two gallons to five gallons	**1.99**	312,631	469,548	43,533	109,055	622,136
			3,758,111	341,039	833,272	4,932,422

	Proposed Unit Fee - Effective January 1, 2024 (1)	Forecasted Units Sold (3)			Forecasted Period Covering January 1, 2024 through December 31, 2025	
REVENUE						
Larger than half a pint to smaller than a gallon	**$ 0.65**	462,518	0	0	300,637	300,637
One to two gallons	**1.35**	1,234,142	0	0	1,666,092	1,666,092
Larger than two gallons to five gallons	**2.45**	109,602	0	0	268,525	268,525
			0	0	2,235,254	2,235,254
TOTAL REVENUES			3,758,111	341,039	3,068,526	7,167,676
LESS: EXPENSES			(3,314,960)	(436,919)	(2,736,871)	(6,488,750)
CHANGE IN RESERVE (DEFICIT) BALANCE BEFORE NET INVESTMENT ACTIVITY ALLOCATION			443,151	(95,880)	331,655	678,926
NET INVESTMENT ACTIVITY ALLOCATION - NOTE G			(57,560)	7,104	0	(50,456)
CHANGE IN RESERVE BALANCE			$ 385,591	$ (88,776)	$ 331,655	628,470
BEGINNING RESERVE (DEFICIT) BALANCE AT JUNE 30, 2018						(523,202) (5)
FORECASTED RESERVE BALANCE AT DECEMBER 31, 2025						$ 105,268

(1) ***Calculation based upon retailers collecting a $0.00 fee for each paint container half a pint up or smaller, $0.49 fee for each paint container larger than half a pint up to smaller than one gallon, $0.99 fee for each paint container one gallon up to two gallons sold, and $1.99 fee for each paint container larger than two gallons up to five gallons sold in Vermont through December 31, 2023. Effective January 1, 2024 the proposed fee is as follows: $0.00 fee for each paint container half a pint up or smaller, $0.65 fee for each paint container larger than half a pint up to smaller than one gallon, $1.35 fee for each paint container one gallon up to two gallons sold, and $2.45 fee for each paint container larger than two gallons up to five gallons sold in Vermont .***

(2) ***Actual unit sales for the period July 1, 2018 through July 31, 2022, projected unit sales for the period August 1, 2022 through December 31, 2022, and forecasted unit sales for the period covering January 1, 2023 through December 31, 2023.***

(3) ***Forecasted unit sales for the period covering January 1, 2024 through December 31, 2025.***

(4) ***Beginning reserve balance includes the cumulative reserve for the program from its inception in 2014 through June 30, 2018 and including pre-operational costs incurred prior to the program's implementation.***

(5) ***Beginning reserve (deficit) balance includes the cumulative deficit for the program from its inception in 2014 through June 30, 2018 and including pre-operational costs incurred prior to the program's implementation.***

CONTAINS CONFIDENTIAL PROPRIETARY BUSINESS DATA WHICH IS RESTRICTED FOR USE BY PAINTCARE AND THE VERMONT AGENCY OF NATURAL RESOURCES

NOTE A – SUMMARY OF SIGNIFICANT ASSUMPTIONS AND ACCOUNTING POLICIES

PaintCare Vermont Division (PCVT) is a division of PaintCare, Inc. The accompanying forecasted summary schedules of budgeted revenues, expenses (costs) and financial reserve fund and calculated average unitized paint stewardship fee for the Vermont Agency of Natural Resources presents, to the best of management's knowledge and belief, the PaintCare Vermont Division's (PCVT) expected budgeted revenues, expenses (costs) and financial reserve fund and calculated average unitized paint stewardship fee for the Vermont Agency of Natural Resources for the forecasted period. The forecast reflects the actual costs to set up and implement and expected costs to operate a paint stewardship (recycling) program required by Statute 6673, Sub-Chapter 4, Chapter 159 of Vermont Statute Title 10: Conservation and Development ("Vermont Paint Stewardship Law") , and the calculation of the average unitized paint stewardship fee per container size sold at retail that PCVT has proposed to fund the program, The actual operating revenue and expenses (costs) that PCVT has incurred from July 1, 2018 through July 30, 2022 (actual period), and projected operating revenue and expenses (costs) from August 1, 2022 through December 31, 2025 (projected period), and forecasted operating revenues and expenses (costs) from January 1, 2023 through December 31, 2025 (forecasted period), (collectively the financial information). Accordingly, the forecast reflects management's assumptions as of March 1, 2023, the date of this forecast, of the actual and forecasted expenses of operation of the program, and the proposed unitized paint stewardship fee per container size sold at retail that would be needed to cover these expenses including establishing and maintain a financial reserve. The forecast is designed to provide information to the Vermont Agency of Natural Resources regarding the calculation of the paint stewardship fee and whether it is a reasonable amount to cover the expenses of the program and to establish a positive reserve fund for program expenses as of December 31, 2025. Accordingly, this presentation should not be used for any other purposes. The assumptions disclosed herein are those that management believes are significant to the forecast. The forecasted revenues and expenses are presented on an accrual basis, and there will usually be differences between the forecasted and actual results because events and circumstances frequently do not occur as expected, and those differences may be material.

CONTAINS DATA WHICH IS RESTRICTED FOR USE BY PAINTCARE, INC. AND THE VERMONT AGENCY OF NATRUAL RESOURCES

NOTE B – PAINT STEWARDSHIP (RECYCLING) FEE REVENUE

The Paint Stewardship (Recycling) Fee collected will provide the revenue to fund the expenses for the paint stewardship (recycling) program. Based on the recalculation of the fee required, retailers will collect a $0.00 fee for each half pint or smaller paint container unit sold, $0.49 fee for each larger than half pint up to smaller than one gallon paint container unit sold, $0.99 fee for each one gallon up to two gallons paint container unit sold, and $1.99 fee for each larger than two gallons up to five gallons paint container unit sold through December 31, 2023.

Effective January 1, 2024 the fees per container size will change to the following: $0.00 fee for each half pint or smaller paint container unit sold, $0.65 fee for each larger than half pint up to smaller than one gallon paint container unit sold, $1.35 fee for each one gallon up to two gallons paint container unit sold, and $2.45 fee for each larger than two gallons up to five gallons paint container unit sold.

PCVT is funded by a fee paid by paint manufacturers for each can of paint they sell in the state. Manufacturers pass the fee to retailers, who then apply it to the price of paint. Stores can choose whether or not to show the fee on their receipts. The fee will be based on the size of the container as follows:

Container Size	**Fee Through December 31, 2023**	**Fee Effective January 1, 2024**
Half pint or smaller	$0.00	$0.00
Larger than half pint up to smaller than 1 gallon	$0.45	$0.65
1 gallon up to 2 gallons	$0.95	$1.35
Larger than 2 gallons up to 5 gallons	$1.95	$2.45

Management estimated the stewardship fee revenue for the forecasted period by making certain assumptions. The significant assumptions made by management include per capita paint sales and paint container size purchasing trends in the state of Vermont. Management also considered current and estimated future economic conditions and its impact on forecasted paint sales. Management estimates paint container size purchasing trends will remain stable and have little impact on forecasted paint sales. Forecasted paint sales for 2023 through 2025 were modeled after the most recent "typical" year, 2019. COVID-19 had a positive impact on the sale of architectural paint in FY2020, stewardship fee revenue increased in FY2020 by 9% over FY2019. This trend continued into 2021, fee revenue

CONTAINS DATA WHICH IS RESTRICTED FOR USE BY PAINTCARE, INC. AND THE VERMONT AGENCY OF NATRUAL RESOURCES

NOTE B – PAINT STEWARDSHIP (RECYCLING) FEE REVENUE (continued)

increased an additional 1.5% in CY2021 from FY2020. The forecasted period beginning in CY2023, however, is modeled, in part, after the results of FY2019, the most recent typical "pre-COVID-19" year. The current and estimated economic conditions were considered in preparing the forecast. Management considered the effect on forecasted paint sales if a recession is to occur during the forecasted period from 2023 through 2025 and reduced the forecasted fees to allow for a possible negative impact to paint sales resulting from a possible recession.

Revenue from the paint stewardship fee for the total period is estimated to be $7,167,676 for the combined actual and forecasted periods.

NOTE C – COLLECTION, TRANSPORTATION, AND PROCESSING EXPENSES

Units collected and collection expenses:

Program products are architectural paints in containers no larger than five gallons in size. They do not include industrial coatings, coatings used for original equipment manufacturing, and other specialty coatings.

In the development of management's paint collection infrastructure expense model for the State of Vermont for 2023 through 2025 management considered actual costs of running the program from 2018 through 2022 and the following factors and assumptions:

- Household hazardous waste (HHW) facilities and events:
  HHW facilities and events provide their residents the convenience of dropping off other products at the same time as paint, and they often have regular customers that have used their programs for many years. During 2021 there were 56 collection events, a similar number of collection events in the forecasted period are expected, all of which are conducted and/or coordinated by state-authorized and locally run household hazardous waste programs.

- Solid waste facilities (transfer stations, recycling centers, and landfills):
  Solid waste facilities provide their customers the convenience of dropping off other products at the same time as paint, and they also have regular customers that have used their facilities for many years.

CONTAINS DATA WHICH IS RESTRICTED FOR USE BY PAINTCARE, INC. AND THE VERMONT AGENCY OF NATRUAL RESOURCES

NOTE C – COLLECTION, TRANSPORTATION, AND PROCESSING EXPENSES (continued)

- Retail stores:
  Retailer participation as a paint drop-off site is voluntary. Retailers are not compensated for being a drop-off site. PCVT has identified approximately 159 paint retailers in Vermont, of which approximately 140 stores were identified as potential drop-off sites. As of December 31, 2022, 75 of these retailers were participating as drop off sites. The forecast estimates that his number of drop off sites will remain stable through 2025.

- Material reuse stores:
  Sites may operate reuse areas in which they place leftover paint that was brought to their site in good condition to be given away or sold "as is" to their customers and local community. This paint management method represents the highest, best use of paint and typically reduces program costs by avoiding the transportation and processing costs that would otherwise be required to manage the paint.

- Direct pick-up or large volumes:
  Large Volume Pick-up (LVP): Service is free to the customer and will be offered to Vermont painting contractors, other businesses, organizations, and households with large volumes of paint within a minimum quantity, currently 200 gallons. The service allows approved users to have paint picked up at their business or home.

- Recurring Large Volume Pick-up (RLVP): Service is a free service also offered to painting contractors and other businesses and organizations that generate large volumes of paint on an on-going basis.

- PaintCare events:
  Paint drop-off events may be held by PCVT in areas of the state that are not within 15 miles of a paint drop-off site or have too few drop-off sites for the population of the area, and participants from any place in Vermont will be allowed to use the events.

CONTAINS DATA WHICH IS RESTRICTED FOR USE BY PAINTCARE, INC. AND THE VERMONT AGENCY OF NATRUAL RESOURCES

NOTE C – COLLECTION, TRANSPORTATION, AND PROCESSING EXPENSES (continued)

Collection expenses:

Expenses to operate the program and various key assumptions include:

a. Paint processing: This is the most significant expense of the program, approximately 60% of total forecasted expenses. PCVT contracts for processing and proper end-of-life management of postconsumer paint collected in the program. Expenses are forecasted based upon signed vendor agreements for processing paint. See further details on transportation expenses below.

b. Paint transportation: These expenses include the cost of transporting paint bins from paint drop off sites. See further details on transportation expenses below.

a. Collection supplies and support: These expenses include the cost of paint collection bins, spill kits, PaintCare event expenses, labor to assist LVP sites to pack their paint, and payments for additional activities at sites (reuse). As of December 31 2022, there were 86 drop off sites, no additional drop off sites per year are projected to be added during the forecasted period. The number of bins at each drop off site will vary depending on the relative capacity of the stores.

Transportation and processing expenses:

Transportation and processing costs include fees paid to vendors to (1) transport discarded paint container units from drop-off sites to the recycler's processing facility, and (2) processing those units for recycling and proper end-of-life management. As of the date of this audit report, PCVT has engaged four transporters, this provides management reasonable estimates of transportation and processing expense. Under the terms of these agreements transportation costs are computed based on processing costs computed by weight, these estimates were used for projecting this expense over the forecasted period.

Management has made certain assumptions to develop the forecasted collection, transportation and processing (C, T, P) expenses. The actual C, T P expense for 2021 increased from 2020 by 6%, then increasing 11% in 2022 due to rising inflation. The forecasted collection and transportation costs for 2023 are projected to increase by 1% from the actual costs of 2022, then increasing by 1.5% for 2024 and 2025. PCVT does not, however, control the timing, frequency or magnitude of CTP price changes for HHW programs. Management made the assumption that the forecasted volume of paint collected to be processed will be consistent with the historical volumes of approximately 100,000 gallons per year.

CONTAINS DATA WHICH IS RESTRICTED FOR USE BY PAINTCARE, INC. AND THE VERMONT AGENCY OF NATRUAL RESOURCES

NOTE C – COLLECTION, TRANSPORTATION, AND PROCESSING EXPENSES (continued)

The total collection, transportation and processing costs for the combined actual and forecasted periods is estimated to be $5,415,177.

NOTE D – COMMUNICATIONS EXPENSES

Communications :

These expenses include advertising and promotional materials to increase awareness of program, with PCVT performing education and outreach efforts to promote the paint stewardship program in Vermont. PCVT will utilize various outreach methods, including print materials, digital materials, and social media to promote the Vermont paint recycling program to a widespread audience and increase overall awareness of the program. During 2021, PCVT collaborated with other stewardship organizations to produce a television advertising campaign. Costs also include expenses incurred to obtain third-party products and services such as advertising space, public education, point of sale marketing outreach, website maintenance, conferences and events, and customer service.

The forecasted communications expense is calculated using a model based on the actual historical communication costs incurred by PCVT. The total communications expenses for the combined actual and forecasted periods is estimated to be $85,070.

NOTE E – CORPORATE OVERHEAD ALLOCATION

Overhead expenses are those that are not specific to Vermont but support all current and future PaintCare state stewardship programs. These costs include:

a. Corporate staffing, such as PaintCare's president, director of operations, and communications team.
b. Back-office support, such as information technology, legal, and accounting
c. Company-wide auditing and insurance policies.
d. Outside counsel and other professional services.
e. Software licenses and maintenance of data management systems.
f. Occupancy, general communications, and other supplies and services that support all PaintCare programs.

CONTAINS DATA WHICH IS RESTRICTED FOR USE BY PAINTCARE, INC. AND THE VERMONT AGENCY OF NATRUAL RESOURCES

NOTE E – CORPORATE OVERHEAD ALLOCATION (continued)

Corporate expenses are allocated among all PaintCare state stewardship programs based on their relative populations in the most recent census and began to be assessed in Vermont about six months before the program starts. Vermont represents 0.7% of the combined population of all states participating in the PaintCare programs. Total corporate overhead costs allocated to the states is expected to increase approximately 3% per year. The portion of overhead costs allocated to Vermont are estimated to be $395,084 for the combined actual and forecasted periods.

NOTE F – SALARIES, TRAVEL, ADMINISTRATIVE AND STATE ADMINISTRATION

Total actual and forecasted salaries, state administration, travel, administration (including legal costs), include costs required to develop and run the paint stewardship program from the period June 1, 2018 through December 31, 2025 and include the following:

Direct expenses are allocated to Vermont's paint stewardship program based upon direct effort where they can be specifically identified. These costs include:

a. Personnel: These expenses include the cost of staff working directly to implement and subsequently run the management of the program. Management assumes the forecast period will include approximately 1/3rd of the salary and benefits of one full time employee. Salary and benefits for the combined actual and forecasted periods are estimated to be $333,111.
b. Travel: Management has developed forecasted travel expense with the assumption that the program manager will each visit approximately 40% of the stores twice per year. The program manager will travel to hold paint collection events and participate in conferences and meetings throughout the year. The travel costs associated with these activities will include lodging, mileage and meals, and are estimated to be $43,387 for the combined actual and forecasted periods.
c. Professional services: These expenses include the legal costs for regulatory review and developing contracts, and other logistical, professional support. Included in the forecasted period (2023–2025) are $11,000 per year for government affairs activities that directly benefit the VT paint stewardship program. No costs related to government affairs are included in the actual or projected periods (2022 and prior). Management modeled forecasted professional fees on the actual costs of other state programs. Costs for professional services are estimated to be $73,678 for the combined actual and forecasted periods.

CONTAINS DATA WHICH IS RESTRICTED FOR USE BY PAINTCARE, INC. AND THE VERMONT AGENCY OF NATRUAL RESOURCES

NOTE F – SALARIES, TRAVEL, ADMINISTRATIVE AND STATE ADMINISTRATION (continued)

d. Administration: These expenses include supplies, printing, subscriptions and other general expenses that are forecasted based on other state programs. Costs for administrative expenses are estimated to be $23,243 for the combined actual and forecasted periods.
e. State Administrative Fee: This expense is paid by PaintCare to the Vermont Agency of Natural Resources for oversight of the paint stewardship program. Vermont state reporting fees are $15,000 per year. The estimated state oversight costs are $120,000 for the combined actual and forecasted periods.

The total actual and forecasted salaries, state administration, salaries, administration, and legal expenses for the for the combined actual and forecasted periods are estimated to be $593,419.

NOTE G – INVESTMENT ACTIVITY ALLOCATION

PaintCare invests a portion of its accumulated surplus in a single financial portfolio. The objective of the portfolio is to earn a return equal to the rate of inflation to preserve the purchasing power of its capital. Interest, dividends, changes in market value, and other investment activities are allocated to each state program based on the relative net assets of each state program. Because PCVT's reserve is in a deficit, the allocation of investment earnings is allocated to PCVT as a loss, and allocations of investment loss is allocated to PCVT as investment earnings. The allocation to the Vermont division was ($57,560) during the actual period of July 1, 2018 through July 31, 2022. PCVT elected to exclude investment income in the projected (August 1, 2022 through December 31, 2022) and forecasted periods (January 1, 2023 through December 31, 2025).

CONTAINS DATA WHICH IS RESTRICTED FOR USE BY PAINTCARE, INC. AND THE VERMONT AGENCY OF NATRUAL RESOURCES

NOTE H – OPERATING (FINANCIAL) RESERVE FUND

The PCVT financial policies require an operating (financial) reserve to sustain the program in times of either higher than expected paint collection volumes resulting in higher expenses, lower than expected paint sales resulting in less revenues, or a combination of the two. PCVT management and staff use prudent financial management in allocating net asset funds between unrestricted (necessary for working capital needs and current operations) versus board-designated financial reserves (necessary for the long-term viability of the recycling program). We also note that unlike a governmental entity, PCVT cannot bridge cash flow shortfalls by accessing additional working capital (cash) or other financing from other governmental sources. Therefore, PCVT has taken the position that having operating cash on hand, as well as a reserve, is fiscally responsible. PCVT's reserves policy establishes a target reserve as a percentage of annual expenses and sets a minimum and maximum threshold. PCVT currently has a target reserve of 100% of annual expenses twelve-months of operating expenses), with a minimum threshold of 75% (nine-months) and a maximum threshold of 125% (fifteen-months).

Management estimated that the forecasted paint stewardship (recycling) fee of $0.00 for each half pint or smaller paint container unit sold, $0.49 for each larger than half pint up to smaller than one gallon paint container unit sold, $0.99 for each one gallon up to two gallons paint container unit sold, and $1.99 for each larger than two gallons up to five gallons paint container unit sold, through December 31, 2023, then effective January 1, 2024 $0.00 fee for each half pint or smaller paint container unit sold, $0.65 fee for each larger than half pint up to smaller than one gallon paint container unit sold, $1.35 fee for each one gallon up to two gallons paint container unit sold, and $2.45 fee for each larger than two gallons up to five gallons paint container unit sold will allow the net reserve fund to achieve a surplus of $105,268 by December 31, 2025. The forecasted reserve of $105,268 is 11% of twelve-month's of 2025 operating expenses of $926,944 by December 31, 2025 and is below PCVT's minimum threshold of 75% of twelve months of operating expenses.

Therefore, the forecasted net reserve of $105,268 at December 31, 2025 will not be within the target reserve threshold of a minimum of 75% and maximum of 125% of operating expenses.

CONTAINS DATA WHICH IS RESTRICTED FOR USE BY PAINTCARE, INC. AND THE VERMONT AGENCY OF NATRUAL RESOURCES