

# Disposal of cleaning water from coating equipment



Hesse Lignal  
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Given the increasing number of recent questions on this topic and the apparent uncertainties, here is some basic information:

## Avoidance of waste

The fundamental principle of waste avoidance should be paramount. How and where is it possible to prevent the use of rinse water within a company without appreciably impacting the cleaning result? For example by:

- Stipulation of rinse intervals
- Using a different means of cleaning
  - mechanical (such as pigging of pipelines, wiping, etc.)
  - chemical (cleaning additives, dispensing, frequency of use)
- Using grey water for the initial basic cleaning
- Employee training in the economical use of cleaning water. Water is certainly freely available, but it can be costly to dispose of once it is contaminated.



## Waste disposal: declaration

The company that is liable for waste is in principle responsible for the appropriate declaration of such waste. Incidental waste is subdivided into two categories:

1. waste that requires monitoring, hazardous waste, costly disposal
2. waste that does not require monitoring, non-hazardous waste, often less costly disposal

Potential declaration of "water-based lacquer and waste water" as:

| EWC no.<br>European<br>Waste<br>Catalogue | Waste type<br>(EWC)        | WCD designation<br>Waste Catalogue<br>Directive                                                 | WCD group                                                                                                                   |
|-------------------------------------------|----------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| 08 01 11                                  | Hazardous<br>waste         | Paint and lacquer<br>waste that contains<br>organic solvent or<br>other hazardous<br>substances | 08: waste from the production,<br>preparation, sale and<br>application of paints, lacquers,<br>adhesives and printing inks. |
| 08 01 12                                  | Non-<br>hazardous<br>waste | Paint and lacquer<br>waste with the<br>exception of that<br>included in 08 01 11                |                                                                                                                             |



## Disposal costs:

Your waste should where appropriate be declared as waste that does not require monitoring to keep disposal costs as low as possible:

- Waste should be as "unmixed" as possible: strict separation of solvent-based and water-based waste. Each contamination of the waste water with solvent could result in the actually "non-hazardous" waste water suddenly becoming "hazardous" waste. This would substantially increase the disposal costs.
- Material safety data sheets contain information that can assist disposers in their determination.
- In case of doubt, chemical analyses can be conducted to determine the solvent content, for example.

## Support:

We can only provide general recommendations at this juncture. You as the company liable for disposal must safeguard your position and follow the applicable laws and regulations. You need to independently verify that the manner in which you dispose of your waste is legally watertight. This includes consideration of differences in the various federal states and regions! For further information, please contact

- Your disposal company
- The relevant authorities (environmental agency, factory inspectorate, ...)
- Organizations, chambers and professional associations, such as the chambers of commerce

## Real life experience:

- Always approach more than one waste disposal company, since there can be a significant regional difference in the classification of waste.
- Coagulation and the introduction of waste water into the sewer system is not permissible in many countries and must be agreed with the authorities, as required.
- It is sometimes possible to negotiate framework agreements with disposal companies to obtain more attractive disposal rates.
- Cooperation with other companies could result in volume discounts.
- Investing in cleaning technology: in the case of very large volumes, it may be beneficial to treat and partially reuse the cleaning water using evaporation, distillation or filtration systems.
- Make use of regional funding programmes relating to the installation of water treatment technology.

And in conclusion, just the inevitable reference to the fact that the approaches set out above are merely a recommendation. Please independently verify whether their implementation is possible in your region!