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2024 Status of the Colorado Paint Stewardship Program

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COLORADO
Department of Public
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Executive summary

The Colorado Paint Stewardship program, coordinated by the non-profit PaintCare, set an all-time record in 2024 for an annual paint recovery rate of 6.2 percent, as measured by comparing the gallons of unused paint collected with the gallons of paint sold. Paint collection quantities increased by over 33,500 gallons from 2023 to 2024, while paint sales increased by over 308,000 gallons.

For the fourth year in a row, PaintCare finished with a reserve balance less than the year before at \$5.1 million, down from \$6.1 million in 2023. In 2024, the reserve balance continued its downward trend at 66 percent, a decrease from 77 percent after 2023. A [paint stewardship dashboard with data visualizations](#) is also available on the Colorado Department of Public Health and Environment website. As referenced in PaintCare's annual report, PaintCare will conduct an evaluation of the program's expenses and reserves to determine if an adjustment is required of the paint stewardship assessment funding mechanism in 2025, due to the continued decrease in reserve balance and continued increase in costs. This would be the first request by PaintCare to adjust the paint stewardship assessment since the beginning of the program in 2015.

While PaintCare has increased drop-off sites to 212 sites, an increase of seven sites from 2023, they also lost a drop-off site in Pueblo, which puts them below the geographic requirement of four sites in the Pueblo urban area. The department is working with PaintCare to ensure that Pueblo will return to their geographic requirement in 2025.

2024 highlights

- PaintCare collected 841,412 gallons of postconsumer paint.
- Consumers in Colorado bought 13.5 million gallons of paint, yielding over \$6.4 million in fee revenue.
- The program spent approximately \$7.8 million. In total, PaintCare has accumulated a surplus of approximately \$5.1 million, which equates to a 66 percent reserve balance.
- The processing cost per gallon decreased from \$9.82 in 2023 to \$9.32 in 2024.
- PaintCare serviced 65 paint collection events and provided 260 direct large-volume pick-ups.
- There are 212 year-round, permanent drop-off locations throughout Colorado.
- 96.3 percent of Coloradans live within a 15-mile radius of a permanent drop-off location.
- PaintCare supplemented the density criteria by providing 3,992 door-to-door collections in underserved urban areas (Colorado Springs and Denver Metro).
- PaintCare offered paint for reuse at most drop-off events.

Program overview

On July 1, 2015, the state of Colorado established a paint stewardship program, per Senate Bill 14-029, the Architectural Paint Stewardship Act (the Act). The Act allows for a stewardship organization to manage the end-of-life of paint.¹ PaintCare is the non-profit organization selected to manage unwanted paint in Colorado. Fees on new paint sales fund the end-of-life management of unused paint.

¹ The Act covers architectural paint, meaning interior or exterior architectural coatings sold in a container of five gallons or less. A full list of accepted items is available at: <https://www.paintcare.org/products/>

The Act specifies that PaintCare must establish convenient sites for consumers to drop off unused paint. Once paint is collected, facilities must manage paint using best environmental and economic practices, as noted in the disposal hierarchy (Figure 1).

The PaintCare program increases consumer opportunities to properly manage leftover paint. The program also provides cost savings to household hazardous waste programs. Before the start of PaintCare in 2015, household hazardous waste facilities with paint take-back programs incurred the associated costs. Now, fees from paint sales fund collection programs at household hazardous waste facilities.

The Hazardous Materials and Waste Management Division (the division), within the Colorado Department of Public Health and Environment (the department or CDPHE), ensures PaintCare follows all aspects of the Act and the approved program plan. The division develops this report annually for the Senate Health and Human Services Committee and the House Public Health Care and Human Services Committee in order to report on the program status and adherence to the Act (Senate Bill 14-029, 25-17-401 C.R.S.).

With 13.5 million gallons of new paint sold in Colorado in 2024, PaintCare collected 841,412 gallons of unwanted paint in the same time period. The division's [PaintCare data dashboard](#) shows how this unwanted latex and oil-based paint is processed (under the Paint Processing tab).

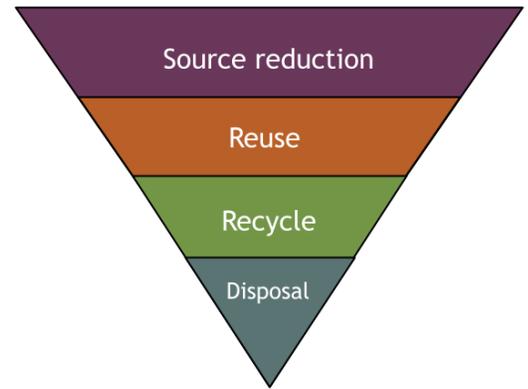


Figure 1: Disposal hierarchy



Figure 2 below illustrates the roles and responsibilities between PaintCare and the department.

Figure 2. PaintCare and CDPHE roles and responsibilities

PaintCare	CDPHE
✓ Receives fees collected from paint sales	✓ Receives \$120,000 annually from PaintCare for oversight
✓ Arranges paint collection and processing	✓ Inspects retailers and drop-off locations for program compliance
✓ Tracks volumes collected and processed	✓ Reviews annual report and financial audit for program compliance
✓ Submits annual report to CDPHE	✓ Reports to legislature annually on program
✓ Organizes and hosts collection events	✓ Completes in-house GIS modeling to check geographic requirements
✓ Manages and acquires paint drop-off locations	✓ Addresses complaints from the public and participating facilities
✓ Provides signs and materials for the public	✓ Reviews financials and assists PaintCare with managing surplus funds
✓ Contracts with haulers and processors for paint collection and disposal	✓ Approves fee amount
✓ Proposes fee amount	✓ Approves the program plan
✓ Creates the program plan	✓ Presents on the program at local conferences

Reporting and program data

The division created a [data dashboard for stakeholders to view program performance](#). The program continues to see increases year-to-year in a number of categories, including the recovery rate, gallons collected, and number of year-round drop-off sites. At 6.2 percent, 2024 had the highest recovery rate since the beginning of the program in 2015. The increased recovery rate is due to a historic peak in paint collected, while paint sale rates have stagnated over the last few years. Paint collection reached over 841,000 gallons for the first time, while paint sales only slightly increased to about 13.5 million gallons, which is a two percent increase from 2023, but still 10 percent below 2020's unprecedented high sales. The number of year-round drop-off sites continues to see a steady increase, with seven new sites added in 2024, for a total of 212 sites.

PaintCare serviced 65 collection events, which is a three percent decrease from 2023. PaintCare also provided 260 large volume pickups, a 17 percent increase from last year.

Other highlights are illustrated in the “Paint Processing” data tab of the [data dashboard](#). Collection of latex paint has generally increased since the start of the program. In 2024, more latex paint was recycled than any other year. Since 2023, latex paint recycling increased by 6 percent, while disposal decreased 13 percent. Further, 2024 had the lowest disposal rate since 2015, the first year of the program. For oil-based paint processing, incineration decreased by four percent, while energy recovery increased by 19 percent. For the first year ever, a small amount of oil-based paint was recycled at GreenSheen, with just under 1000 gallons being donated to local organizations and artists. From 2023 to 2024, the reuse of latex and oil-based paint has increased by 23 percent and 7 percent, respectively. In recent years, PaintCare has begun offering high-quality leftover paint for reuse at a majority of their collection events at no cost, rather than transporting it to processing facilities. Not only does reusing paint sit higher on the waste-handling hierarchy (Figure 1) than recycling, it also provides an opportunity for under-resourced communities to receive free paint.

A notable change this year was the significant decrease in the surplus balance. At the end of 2024, PaintCare had an accumulated surplus of \$5,138,088, after receiving \$6,435,924 in fee revenue and spending \$7,839,218 on program expenses. PaintCare did see a decrease in spending in a few areas:

1. Communications - intentionally cut to curb program spending.
2. Personnel, professional fees, other - due to position vacancies.
3. Paint collection supplies and support - haulers began opting to reuse cardboard bins more frequently vs. charging for virgin cardboard.

Despite these decreases in spending, 2024 is the third year in a row in which the PaintCare surplus amount decreased, bringing the reserve level down to 66 percent of their annual expenses.

Final paint disposal

Paint transporters who contract with PaintCare collect paint at drop-off locations for processing and provide transportation services to PaintCare in various capacities. These include:

- ACT Enviro,
- Clean Harbors,
- GreenSheen Paint,
- Southern Colorado Services & Recycling,
- Veolia, and
- Waste Management Curbside.

Most latex paint processing and recycling occurs in Colorado. GreenSheen, in Denver, recycles a majority of the latex paint. Southern Colorado Services & Recycling, located in Pueblo, also recycles latex paint, but in smaller quantities. Unused oil-based paint primarily goes to facilities outside of Colorado, where it is used for energy recovery; a smaller percentage goes to incineration and reuse respectively.

Financial audit, reserve policy, and surplus funds

Under the Act (25-17-405(3)(VII)), PaintCare must submit an annual audit with their annual report to the department. PaintCare used Rogers & Company PLLC, an independent certified public accounting firm, to conduct this year's audit. In the firm's opinion, PaintCare has fairly presented, in all material respects, the financial position, changes in its net assets, and cash flows as of December 31, 2024.

Each year, PaintCare places surplus funds in reserves for future use. The Board of Directors for PaintCare sets their own reserve policy, with a minimum and maximum surplus amount. PaintCare currently has a target reserve of 100 percent of annual expenses, with a lower and upper threshold of 75 and 125 percent, respectively. PaintCare has increased this target reserve and range since 2015. Originally, the program had a target reserve of 50 percent, with a range of 16 to 75 percent. The reserve allows PaintCare to continue operations during times of either higher-than-expected paint collection or lower-than-expected paint sales. As noted, PaintCare ended 2024 with a 66 percent reserve balance, down from 77 percent in 2023. PaintCare has stated the housing market is a good indicator for paint sales (i.e. higher interest rates mean less paint being sold).

A few factors contributed to the reserve balance decrease, including but not limited to:

- Historically-high paint collection rates and stagnated paint sales that have yet to return to pre-pandemic levels
- Increased program costs, including transportation and paint processing, to their highest levels in history of the program due to higher collection volumes, increased number of sites, and vendor price increases
- Increased general and administrative costs.

PaintCare's three-year projections estimate the reserve level will continue to decline each year, reaching 22 percent in 2027. This is including a decreased communications spending by \$150k for both years 2026 and 2027. In 2024, PaintCare began talks with the division regarding a fee increase to bring annual costs back into alignment with annual revenue. If a fee increase were to be approved, this would be the first fee increase since the start of the program, even though costs have continually increased since 2015. The division is in continued discussions with PaintCare on their plans to propose a fee increase, their justification for fee increase, and the timeline for the request.

PaintCare Nationwide

PaintCare operates programs in 10 states and Washington D.C. Additionally, Illinois will launch their program in 2025 and Maryland in 2026, which will bring that number to 12 states plus Washington D.C. PaintCare programs vary from state to state, as displayed in the [data dashboard in the "State comparison" tabs](#). Colorado is in step with national trends in a variety of areas: slight increase in gallons sold (CT, DC, MN, RI, VT and WA), increase in recovery rate and gallons collected (CT, MN, OR, and WA), as well as a reserve level decrease (CT, DC, MN and OR).

In addition to these trends, there are three programs that have approved or are currently requesting a paint stewardship assessment increase. These states include: WA, ME, and OR.

Outreach

PaintCare’s outreach targets retailers, painting contractors, municipal agencies, and the general public. PaintCare does this through advertising and direct contact. Examples of outreach materials are available at [PaintCare.org](https://www.paintcare.org). Due to 2023’s reserve decrease and increased expenses, PaintCare decreased 2024 spending on communications and outreach by approximately \$535k in order to curb spending. Spending on outreach acts as one of the primary methods that PaintCare can use to impact the amount of paint collected. If a paint stewardship assessment increase were to occur, PaintCare states that they will rebound their communications budget back to \$750k.

In 2024, PaintCare conducted 4,096 surveys in 10 states and Washington D.C, with 261 surveys completed in Colorado. The survey results indicate that 41 percent of Coloradan respondents knew that paint can be recycled, eight points higher than in 2023, and six points higher than all state programs. PaintCare’s annual consumer survey can be found in Appendix D (page 135) of the [2024 PaintCare report on PaintCare's official documents page](#).

Geographic requirements

To ensure equitable collection opportunities, the Act names three geographic requirements for PaintCare:

1. There must be a permanent (i.e. year-round) drop-off site within a 15-mile radius of at least 90 percent of Colorado residents.
2. For urban areas², an additional permanent drop-off site must be provided for every 30,000 residents.
3. PaintCare must provide paint collection events for residents who live outside the 15-mile radius of permanent collection sites at least once a year.

Currently, 96.3 percent of residents live within 15 miles of a permanent drop-off site, exceeding the 90 percent requirement. When including supplemental sites, the number increases to 97.5 percent. To meet the second requirement pertaining to urban areas, Colorado Springs needs six more sites, which has stayed the same since 2023. The Denver-Aurora metro area needs 23 sites, which is a decrease of one site since 2023. To address this disparity for the past three years, PaintCare has provided a supplementary door-to-door pick up for residents that have 10 or more gallons of paint, at no cost to residents in the Denver Metro area and El Paso/Teller Counties. In 2024, the service provided 3,992 door-to-door pickups, an increase from 3,817 pickups in 2023. In addition to the geographic disparities in Denver-Aurora and El Paso/Teller, PaintCare also lost a drop-off site in Pueblo, which puts them below the geographic requirement of four sites in the Pueblo urban area. The department is working with PaintCare to ensure that Pueblo will return to their geographic requirement in 2025. Maps of the sites and services available in 2024 can be found on pages 20-23 of the [2024 PaintCare annual report on PaintCare's official documents page](#).

² The Census Bureau has replaced the term “Urbanized Area” with “Urban Area.” Urban area: a statistical geographic entity consisting of a densely settled core created from census blocks and contiguous qualifying territory that together have at least 2,000 housing units or 5,000 persons. While the Act (25-17-404(2)II) states “urbanized area,” the department will honor “urban area” as the updated terminology.

CDPHE recommendations

PaintCare is generally operating according to the program plan and the Act. Based on a review of PaintCare's 2024 Annual Report, the division has the following recommendations for PaintCare:

1. Provide collection events in communities that are beyond a 15-mile radius of permanent sites, prioritizing:
 - disproportionately-impacted communities, which can be identified using the [Colorado EnviroScreen](#) mapping tool, and
 - communities that did not have paint collection events in 2024.
2. Continue recruiting additional sites to meet the geographic density requirement in the three underserved metro areas of Colorado Springs, Denver, and Pueblo.
3. Maintain the door-to-door collection program until the geographic requirements are met for the Colorado Springs and Denver metro areas. Add door-to-door service in Pueblo, if PaintCare is unable to meet or exceed the geographic requirement in 2025.
4. In addition to recruiting sites in underserved areas, recruit additional sites in the urban areas that are just meeting the urban requirements, to build up resiliency in case sites drop from the program or close (e.g. Boulder, Greeley, and Longmont).
5. Monitor reserve levels and provide financial updates to CDPHE at frequent check-in meetings, including any program plan paint stewardship assessment changes. Also, provide ample time for stakeholder engagement work, if changes with the paint stewardship assessment become necessary.



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Statute: Senate Bill 14-029, 25-17-401 C.R.S