

Solvent-Contaminated Wipes Rule: Abridged Version

Hazardous Waste Compliance Officer
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What is a Wipe?

- A wipe is a shop towel, rag, pad, or swab made of wood pulp, fabric, cotton, polyester blends, or other material that after use or after cleaning up a spill, contains a solvent that would be considered hazardous waste either because it is listed in the hazardous waste regulations, or because it exhibits the characteristic of ignitability.



- **Solvent Contaminated Reusable Wipes**
 - 40 CFR 261.4(a)(26)
 - Solid Waste Exclusion

- **Solvent Contaminated Disposable Wipes**
 - 40 CFR 261.4(b)(18)
 - Hazardous Waste Exclusion

■ Solvent Contaminated Reusable Wipes

- Solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes, provided the conditions of the exclusion are met.

■ Solvent Contaminated Disposable Wipes

- Solvent-contaminated wipes that are sent for disposal are not hazardous wastes, provided the conditions of the exclusion are met.

Includes

Wipes containing one or more F001-F005 listed solvents listed in § 261.31 or the corresponding P- or U- listed solvents found in § 261.33, including:

- Acetone
- Isobutyl alcohol
- Benzene
- Methanol
- n-Butanol
- Methyl ethyl ketone
- Chlorobenzene
- Methyl isobutyl ketone
- Creosols
- Methylene chloride
- Cyclohexanone
- Tetrachloroethylene
- 1,2-Dichlorobenzene
- Toluene
- Ethyl acetate - 1,1,2
- Trichloroethane
- Ethyl benzene
- Trichloroethylene (**For reusable wipes only.*)
- 2-Ethoxyethanol
- Xylenes

- Wipes that exhibit a hazardous characteristic resulting from a solvent listed in part 261.
 - Spilled Commercial Chemical Product (Contained-in Policy)
 - Hazardous Codes: (I,R,C)

- Wipes that exhibit only the hazardous characteristic of ignitability when containing one or more non-listed solvents.
 - Ex. Isopropyl Alcohol (IPA)

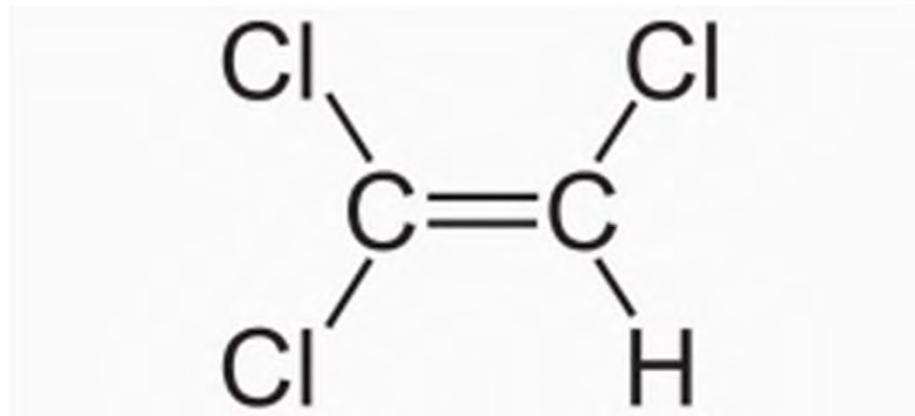
Does not Include

- Wipes that contain listed hazardous waste other than solvents.
 - Ex. Cyanide Salts P-List (Contained-in Policy)
 - Ex. F006

- Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents.
 - Ex. Fails TCLP for RCRA 8 metals or pesticides.

Does not Include Continued

- Wipes that are hazardous waste due to the presence of trichloroethylene.



Storage Requirements

- Wipes must be accumulated, stored, and transported in non-leaking, closed containers that can contain free liquids, should they occur.
- Containers do not need to be sealed during accumulation (must be closed except when adding or removing wipes).
- A container must be sealed when the container is full, when the wipes are no longer being accumulated, and during transportation.



- Standard is performance-based; facilities have flexibility in determining how to meet the standard.
- “Closed” while accumulating
 - Wipes accumulated in an open-head drum or container would be considered closed when the cover makes complete contact between the fitted lid and the rim.
 - Containers with covers opened by a foot pedal (e.g., flip-top or spring-loaded lid) or with a self-closing swinging door;
 - Bags can be used, provided they meet the standard (i.e., the neck of the bag is tightly bound and sealed, the bag is able to contain liquids, and is non-leaking).
- “Sealed” while in transportation
 - After accumulation and during transport, this same container must be sealed to meet this standard; thus, the rings must be clamped or bolted to the container.

- Examples that do not meet the standard:
 - Bags leaving a trail of liquid on the ground;
 - Cardboard boxes.



- Containers must be labeled “Excluded Solvent-Contaminated Wipes.”



- Generators may accumulate wipes up to 180 days from the start date of accumulation prior to being sent for cleaning or disposal.
- While accumulation start dates are not required to be on containers holding solvent-contaminated wipes, ADEQ strongly recommends that facilities do so. Accumulation start dates are one of the easiest ways to be in compliance.

180 Days

- **Generators must maintain documentation that includes:**
 - name and address of the laundry, dry cleaner, landfill, or combustor
 - documentation that the 180-day accumulation time limit is being met
 - description of the process the generator is using to meet the “no free liquids” condition.

- **Disposable wipes** managed according to the conditions established in [40 CFR 261.4\(b\)\(18\)](#) are not hazardous wastes. Therefore, solvent-contaminated wipes managed under today's conditional exclusion **do not** count towards a generator's hazardous waste regulatory status.
- **Reusable wipes** managed according to [40 CFR 261.4\(a\)\(26\)](#) are not solid wastes and, thus, not hazardous wastes. Therefore, solvent-contaminated wipes managed under today's conditional exclusion **do not** count towards a generator's hazardous waste regulatory status.

- Wipes must contain no free liquids prior to being sent for cleaning or disposal and there may not be free liquid in the container holding the wipes.
- “No free liquids” condition is defined in 40 CFR 260.10 and is based on the EPA Methods Test 9095B (Paint Filter Liquids Test).



- Free liquids removed from the wipes or from the wipes container must be managed according to applicable hazardous waste regulations in 40 CFR parts 260 through 273.
 - 260: General and Definitions
 - 261: ID & Listing
 - 262: Generators
 - 263: Transporters
 - 264-265: TSDFs
 - 266: Certain Wastes, Certain Facilities
 - 268: LDRs
 - 270: TSDF Permits

- **Solvent Contaminated Reusable Wipes**
 - Must go to a laundry or dry cleaner whose discharge, if any, is regulated under sections 301 and 402 or section 307 of the Clean Water Act.



■ Solvent Contaminated Disposable Wipes

- Must go to a combustor regulated under section 129 of the Clean Air Act or to a hazardous waste combustor, boiler, or industrial furnace regulated under 40 CFR parts 264, 265, or 266 subpart H.
- Must go to a municipal solid waste landfill regulated under 40 CFR part 258 (including § 258.40) or to a hazardous waste landfill regulated under 40 CFR parts 264 or 265.



- Must store wipes in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.” Containers must be able to contain free liquids should they occur.



Other Important Points

- Can reusable wipes be laundered on-site?
Yes, provided the on-site laundry discharge is regulated under sections 301 and 402 or section 307 of the CWA.
- Can I manage uniforms, mats, PPE, mop heads, and comforters under the solvent-contaminated wipe rule?
No, because these items do not meet the definition of 'wipe' and because EPA did not consider these items under the scope of the rule.
- Can I transport a labeled closed container of solvent-contaminated wipes along with other solid waste trash to a landfill or combustor?
Yes, provided the wipes are in a closed container that is labeled.
- Can I add absorbents to the bag of solvent-contaminated wipes?
No.
- Can wipes contaminated with oil be managed under the rule?
A wipe that is contaminated with solvent may also be co-contaminated with oil and be eligible for the final rule as long as: (1) the oil is not listed hazardous waste and (2) the wipe only exhibits the characteristic of ignitability (and thus does not exhibit the characteristic of corrosivity, toxicity, or reactivity).