

**Proposed Amendments to Title 128 –  
*Nebraska Hazardous Waste Regulations*  
for Solvent-Contaminated Wipes**

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**NDEQ Waste Division**

**Initial Outreach Meeting, Lincoln NE**

**June 4, 2014**



# Solvent Wipes Public Outreach

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What?	When?
1 <sup>st</sup> Outreach Meeting to discuss concepts	June 4, 2014, 2:00pm @ NDEQ
Preliminary draft regulations available on NDEQ website	Mid-July 2014
2 <sup>nd</sup> Outreach Meeting to discuss draft regulations	August 2014
Legal Notice Period	Sept. – Oct. 2014
EQC Hearing Date	October 9, 2014



# Solvent-Contaminated Wipes

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## What are “wipes?”

- shop wipes, such as reusable shop towels, rags, disposable wipes and paper towels
- typical uses include machine cleaning & maintenance, parts degreasing, spill clean-up



Source: U.S. EPA



## Rule covers 2 types:

- reusable wipes – usu. cloth, sent to a laundry
- disposable wipes – paper, may be a HW



# Solvent-Contaminated Wipes

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## Do you or your clients generate wipes?

- printing, publishing, & painting
- auto repair & maintenance; auto-body shops
- manufacturing, fabricated metal products
- plastics & rubber

## Do you or your clients receive wipes?

- commercial laundries – launder reusable wipes & return to generators
- MSW landfills – could start receiving disposable wipes if rule adopted



# Solvent-Contaminated Wipes

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## Rule is limited to:

- Large- and Small-Quantity Generators
  - LQG > 1000 kg HW/month; SQG > 100-1000 kg HW/month
  - Does not apply to Conditionally-Exempt Small Quantity Generators (<100 kg HW/month)
- “F001-F005” listed solvents
  - acetone, benzene, methanol, isobutyl alcohol, toluene, creosols, and others
  - In Nebraska regulations: Title 128, Chapter 3, §013
- NO CO-CONTAMINANTS!...more on this later.
- No trichloroethylene in disposable wipes



# Solvent-Contaminated Wipes

## Required Management Practices

- CONTAINER standard – performance based
  - closed, labeled, can hold free liquids
- 180-day accumulation TIME LIMIT (+ record)



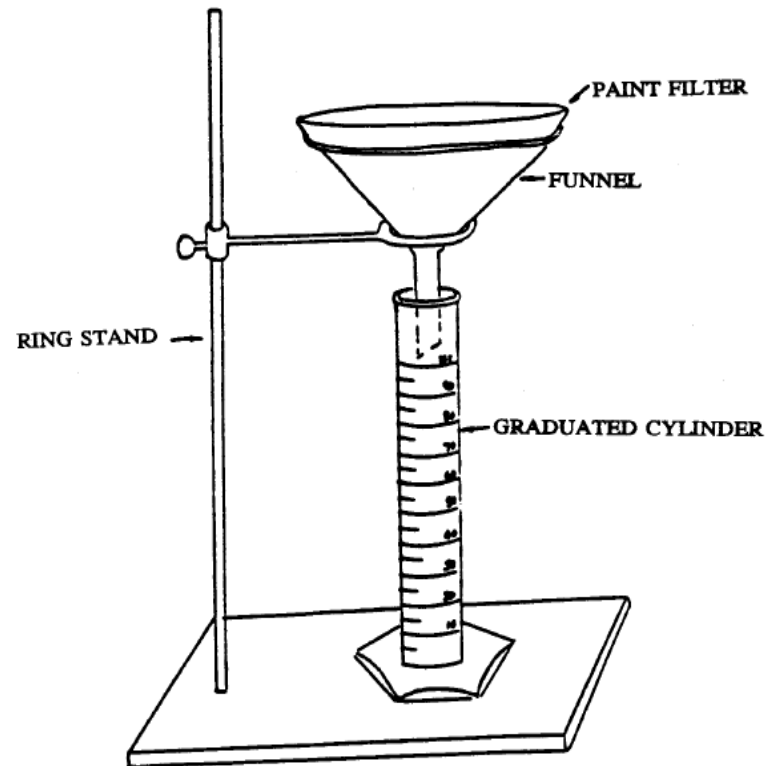
Source: U.S. EPA



# Solvent-Contaminated Wipes

## Required Management Practices (cont.)

- RECORD-KEEPING
  - laundry, landfill, or HW combustor receiving waste
  - description of how no free liquids condition is met
- NO FREE LIQUIDS
  - the “heart of the rule” according to EPA
  - free liquids managed under applicable HW regulations
  - see “EPA METHOD 9095B” for Paint Filter Test



Source: U.S. EPA



# Solvent-Contaminated Wipes

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## Changes from current NDEQ management requirements

### **Disposable Wipes – less stringent**

- CURRENT: must be managed as HW
- PROPOSED: can be disposed of MSW landfill

### **Reusable Wipes – more stringent**

- CURRENT: no HW determination necessary if no free liquids and laundry complies w/ CWA
- PROPOSED: HW determination required – 1x





# Solvent-Contaminated Wipes

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## Is a co-contaminant present?

- apply process knowledge
  - to identify any co-contaminants & testing needed
- laboratory testing

## What are the costs of lab testing?

- Paint filter test – \$10
- RCRA total metals – \$158
- RCRA TCLP Inorganics – \$240
- RCRA TCLP Volatiles –\$185; Semi-V's –\$325



# Solvent-Contaminated Wipes

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## Questions to Stakeholders:

1. Do you currently use disposable or reusable solvent-contaminated wipes in your business and, if so, for what purposes and in what amounts?
2. Do you launder your cloth wipes on-site, send them to a laundry service, or dispose of them as hazardous waste?
3. If the rule were adopted, how do you imagine your current management of solvent wipes would change?