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Solvent-Contaminated Shop Towels, Rags, and Wipes

This Environmental Guidance Document provides general waste management guidance on solid and hazardous waste issues associated with managing solvent-contaminated shop towels, cloths, rags, and wipes; hereafter referred to as "wipes." This information is based on Title 128 - Nebraska Hazardous Waste Regulations and incorporates new conditional exclusions for solvent-contaminated wipes, effective in Nebraska as of December 14, 2014. These exclusions apply to five classes of solvents common in industrial use. In Nebraska regulations, these are the "F001" through "F005" listed solvents found in Title 128, Chapter 3, §013.

The new regulations create two categories of wipes: reusable and disposable. **Reusable wipes** are used for their intended purpose (such as parts degreasing or machine maintenance) and then sent to a launderer for cleaning and eventual reuse. **Disposable wipes** are used a single time for similar purposes and then discarded.

Generators of **disposable** solvent-contaminated wipes without hazardous co-contaminants may dispose of these wipes as solid waste at a permitted municipal solid waste landfill, where formerly they required management as a hazardous waste. Generators of disposable wipes must, however, determine that their wipes do not contain trichloroethylene (TCE), which is not eligible for the exclusion. Generators of **reusable** solvent-contaminated wipes may continue to launder them, provided they have determined that their wipes do not contain hazardous co-contaminants.

Are Hazardous Co-Contaminants Present?

The requirement that generators of solvent-contaminated wipes perform a hazardous waste determination under Chapter 4, Section 002 for the presence of hazardous co-contaminants above regulatory limits is new. Nebraska's previous policy on the management of reusable wipes considered wipes to be a commodity or product in continuous use. Now, reusable wipes are a solid waste until all conditions of the exclusion have been met. A primary condition is that the wipes are contaminated with the excluded solvent *only*. Disposable wipes must be similarly characterized to ensure that they are not contaminated with hazardous materials other than exempted solvents.

The following are two examples of reusable wipes and their proper laundering or disposal:

1. Business A uses a Methanol (F003) solvent on a cloth wipe to clean parts before being painted on their production line. Business A sends a representative sample for Toxic Characteristic Leaching Procedure (TCLP) analysis before laundering and receives a result of non-detect on all constituents. The Methanol is an exempted solvent. Business A's wipes are permitted to be laundered and reused without issue.

2. Business B uses a Methyl Ethyl Ketone (MEK) (F005) solvent to clean up parts and spills after applying paint with heavy metal pigments. A TCLP analysis of their wipes shows quantities of Chromium and Cadmium over the regulatory level. While the MEK is an exempted solvent, the high levels of heavy metals revealed in the analysis means the wipes are now a characteristically hazardous waste for toxicity. These wipes cannot be laundered and must be contained, handled and disposed as a hazardous waste.

The following are three examples of disposable wipes and their proper disposal:

1. Business C uses an isobutyl alcohol (F003) wipe to wipe down their vacuum mold between pressings. Samples sent to the laboratory come back as non-detect and the isobutyl alcohol is an exempt solvent. The wipes are therefore non-hazardous, exempt solid waste. They can now be sealed in their container and taken to a MSW landfill.
2. Business D use prepackaged disposable wipes and a spray-on Benzene solvent (F005) to clean auto-bodies during maintenance. Business D sends a sample of their wiper waste in for analysis and discovers excessive metals from the heavy equipment. The Benzene solvent is an exempted solvent, but the metals push the wipes over into the hazardous waste category. The wipes must be handled, contained and disposed at a Treatment Storage and Disposal Facility (TSDF) by a hazardous waste service provider.
3. Business E uses disposable cloth wipes and a TCE (F002) solvent to wipe down engine parts during assembly. A TCLP of the wipes comes back non-detect; however, TCE is only exempted for reusable wipes. TCE wipes are not allowed in an MSW landfill, and so the wipes must be disposed to a TSDF via proper hazardous waste protocols.

Management Conditions

Both types of wipes must be handled and stored according to the required management conditions in order to be eligible for the exclusions. These management conditions are:

1. No Free Liquids. This requirement describes a wipe that is wet, but not dripping with solvent. A "wet, but not dripping" wipe will pass EPA Methods Test 9095B (Paint Filter Liquids Test). Any free liquids removed from storage or transport containers must be managed according to any applicable hazardous waste regulations.
2. Storage. Wipes must be accumulated, stored, and transported in non-leaking, closed containers that can contain free liquids, should they occur. During accumulation, "closed" is defined as complete contact between the fitted lid and rim. During transport, "closed" is defined as all openings are sealed or tightly bound to prevent the release of volatile organic emissions or spills if tipped over.
3. Labeling. Containers must be labeled "Excluded Solvent-Contaminated Wipes."
4. 180 day Accumulation Time Limit. This may be documented on the storage container or through routine business records, such as contracts or invoices.
5. Record-keeping. Generators must maintain documentation that includes:
 - The name and address of the receiving facility (i.e. laundry, dry cleaner, landfill, or combustor).
 - A description of the process the generator is using to meet the "no free liquids" condition.
 - Documentation that the 180-day accumulation time limit is being met.

RESOURCES:

- NDEE Home Page:

<http://dee.ne.gov/>

- EPA Solvent-Contaminated Wipes Rulemaking:
<https://www.epa.gov/hwgenerators/frequent-questions-about-implementing-regulations-solvent-contaminated-wipes>

Contacts:

- NDEE Waste Management Section (402) 471-4210
- NDEE Toll Free Number (877) 253-2603
- NDEE Hazardous Waste Compliance Assistance (402) 471-8308
- Email questions to: NDEE.moreinfo@Nebraska.gov

NDEE Publications:

- Guidance Document – Comparison of Hazardous Waste Generator Requirements
Guidance Documents are available on the NDEE Website under “Publications & Forms”
- Title 128 – Nebraska Hazardous Waste Regulations
Titles are available on the NDEE Website under “Laws & Regulations”

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