

Management of Solvent-Contaminated Wipes

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Introduction

On January 31, 2014, the Hazardous Waste Program revised its policy on the handling and management of solvent-contaminated wipes to reflect the requirements in the Environmental Protection Agency (EPA) rule, *Conditional Exclusions from Solid Waste and Hazardous Waste for Solvent-Contaminated Wipes*. The EPA rule allows exclusions from hazardous waste regulation for reusable and disposable solvent-contaminated wipes under certain conditions. The updated program policy described in this guidance will remain in effect until the federal rule is adopted into the NR 600 series hazardous waste rules.

Reusable and disposable wipes are commonly used by businesses and institutions to clean parts and equipment. Through use, the wipes become contaminated with solvents and other materials that could classify them as hazardous waste. This publication provides guidance on the proper management and disposal of hazardous solvent-contaminated wipes.

A *Solvent-Contaminated Wipes Exclusion Documentation Form* is attached to this publication. This form is not mandatory, it is provided as an example to assist with meeting and documenting the federal conditional exclusion requirements.

What is a wipe and when is it eligible for the exclusion?

Wipe means a woven or non-woven shop towel, rag, pad or swab made of wood pulp, fabric, cotton, polyester blends or other materials. To be eligible for the exclusions, a solvent-contaminated wipe must meet one of the following criteria:

- A wipe that, after using or cleaning up a spill, contains one or more of the F001 to F005 solvents listed in [s. NR 661.31](#) Wis. Adm. Code, or the corresponding P- or U-listed solvents in [s. NR 661.33](#), or exhibits a hazardous characteristic found in [subch. C. of ch. NR 661](#) when that characteristic results from a listed solvent, **or**
- A wipe that exhibits only the hazardous waste characteristic of ignitability found in [s. NR 661.21](#) due to the presence of one or more non-listed solvents.

Solvent-contaminated wipes **not eligible** for the exclusion include:

- Contaminated wipes that contain listed hazardous waste other than solvents; or
- Exhibit the characteristic of toxicity, corrosivity or reactivity due to contaminants other than solvents; or
- Disposable used wipes contaminated with trichloroethylene.



These contaminated wipes **must** be managed as **hazardous waste**.

Management of Reusable Wipes

Generators of solvent-contaminated wipes sent to be cleaned by a commercial laundry or dry cleaner must meet the following conditions to be exempt under this guidance:

- Store in closed containers, unless wipes are being added or removed.
- Containers must not be leaking and able to contain free liquids;
- Label containers “Excluded Solvent-Contaminated Wipes”;
- Store each container for up to 180 days from start of accumulation before being sent offsite for laundering;
- Prior to transporting offsite, remove free liquids from the wipes before sealing the lid to prevent leaks or emissions. Methods that may be used to remove solvents include centrifuging, mechanical-wringing, screen-bottom drums and vacuum extraction. The solvent extract must be managed as hazardous waste;
- Maintain records to confirm the wipes are being managed appropriately, including:
 1. The name and address of the commercial laundry receiving the wipes and documentation that the laundry has an approved wastewater treatment system or discharge permit;
 2. Document the 180-day accumulation limit is being met; and
 3. Document that there are no free liquids in the wipes before being sent offsite to be laundered, using Test Method 9095B (Paint Filter Liquids Test), EPA publication SW-846 or a comparable method.

A container is considered closed when all openings are closed and there is **complete contact** between the fitted lid and the rim.

Management of Disposable Wipes

Generators may send disposable solvent-contaminated wipes, except wipes contaminated with trichloroethylene, offsite for disposal by one of the following methods:

- (1) Burn wipes for energy recovery at a licensed or permitted hazardous waste incinerator or a licensed or permitted municipal solid waste combustor, or
- (2) Dispose of wipes in a licensed or permitted solid waste landfill.

In order for the wipes to be exempt from hazardous waste regulation, and the disposal methods identified above to be considered acceptable, the disposable wipes must meet the following conditions:

- Store in closed containers, unless wipes are being added or removed.
- Containers for storing wipes must not be leaking and must be able to contain free liquids;
- Label containers “Excluded Solvent-Contaminated Wipes”;
- Store each container for up to 180 days from start of accumulation

A container is considered closed when all openings are closed and there is **complete contact** between the fitted lid and the rim.

before being sent offsite for disposal;

- Prior to transporting offsite, remove free liquids from the wipes before sealing the lid to prevent leaks or emissions. Methods that may be used to remove solvents include centrifuging, mechanical-wringing, screen-bottom drums and vacuum extraction. The solvent extract must be managed as hazardous waste;
- Use a DNR licensed Solid Waste transporter to ship the wipes offsite;
- Maintain records to confirm the wipes are being managed appropriately, including:
 1. The name and address of the hazardous waste incinerator, solid waste combustor or solid waste landfill receiving the wipes;
 2. Document the 180-day accumulation limit is being met; and
 3. Document that there are no free liquids in the wipes before being sent offsite, using Test Method 9095B (Paint Filter Liquids Test), EPA publication SW-846 or a comparable method.

Note:

Generators sending excluded disposable solvent-contaminated wipes to a licensed solid waste landfill must place the liquid-free wipes into a closed container (for example, a sealed plastic bag) before placing into a solid waste can or dumpster. This prevents the wipes from mixing freely with other solid waste.



Best management practices suggest removing the air from the bag prior to sealing in order to prevent the bag from breaking open during transit or at the landfill. Bags can be sealed with duct tape or by twisting the top edge of the bag and folding it over in a goose neck before taping.

Resources for more information

Environmental Protection Agency (EPA) rule, Conditional Exclusions from Solid Waste and Hazardous Waste for Solvent-Contaminated Wipes:

<http://www.epa.gov/epawaste/hazard/wastetypes/wasteid/solvents/wipes.htm>

EPA Test Method 9095B (Paint Filter Test), EPA publication SW-846:

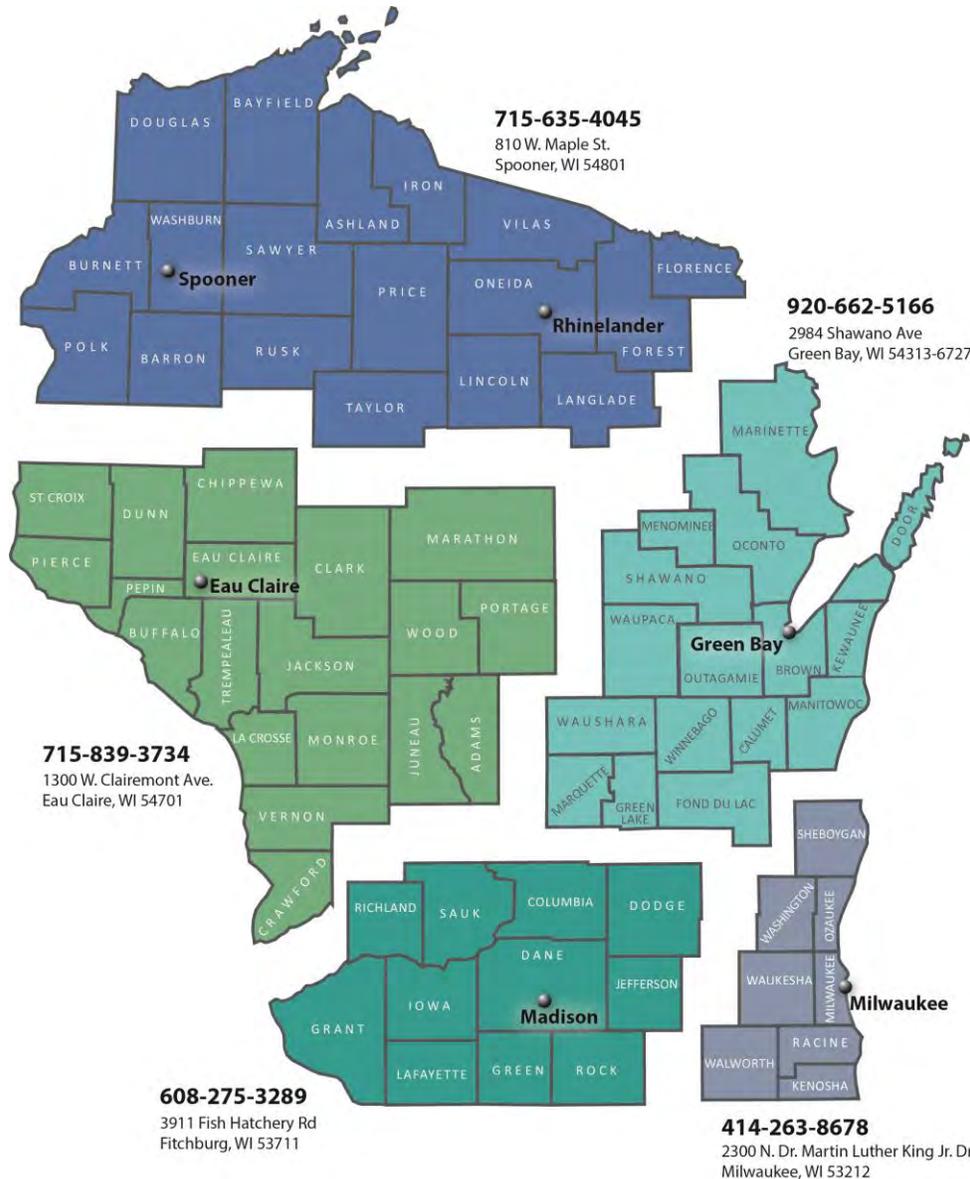
<http://www.epa.gov/wastes/hazard/testmethods/sw846/pdfs/9095b.pdf>

On-site Solvent Reclamation: A Guide for Hazardous Waste Generators

<http://dnr.wi.gov/files/PDF/pubs/wa/WA1523.pdf>

DNR CONTACT INFORMATION

For more information on this subject, including other publications, staff contacts and administrative codes and statutes, search by topic at dnr.wi.gov, or call your DNR regional office and ask for your [hazardous waste specialist](#).



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Solvent-Contaminated Wipes Exclusion Documentation Form

1. FACILITY INFORMATION

Facility name and address

2. EPA ID # and WDNR Facility ID(FID)

These are specific identification number per site address.

3. TYPE OF WIPES

Indicate which type of wipes are generated (complete a separate form for each type)

- Solvent-Contaminated Wipes that are being disposed
- Solvent-Contaminated Wipes that are being recycled or laundered

4. IDENTIFY YOUR SOLVENT

Indicate the excluded solvents used with wipes at the facility that:

- Contain one or more F001-F005 listed solvents in s. NR 661.31, Wisconsin Administrative Code (WAC) or corresponding P-or U-listed solvents found in s. NR 661.33 WAC or,
- Exhibits a hazardous characteristic resulting from a solvent listed in subchapter C of ch. NR 661 WAC or,
- Exhibits only the hazardous characteristic of ignitability when containing one or more non-listed solvents

For each type of solvent-contaminated wipe, indicate the evidence (product or process knowledge or analytical testing) used to make the exclusion determination.

Solvent name	Waste Code (Ex. D001, F003, etc.) (Characteristic or Listed)	Knowledge or laboratory analysis ¹

¹Samples must be analyzed by a Wisconsin certified laboratory.

Through knowledge of the process generating these wipes, I know that the wipes would not exhibit the characteristic of toxicity (D005 – D043), corrosivity (D002), reactivity (D003), and are not contaminated with trichloroethylene. See attached safety data sheet(s), if applicable.

The wipes were analyzed by a Wisconsin certified laboratory to ensure that they are not a characteristic hazardous waste – other than the characteristic of ignitability (D001) found in s. NR 661.21 WAC and are not contaminated with trichloroethylene. See attached analytical results.

Other:

5. COLLECT

a. Ensure each container is kept closed and labeled with the words “Excluded Solvent-Contaminated Wipes”

b. Choose the method that will be used to document that these wipes are on-site for no longer than 180 days.

- A date is placed on each container.

Solvent Contaminated Wipes Documentation Form

- A contract is in place with a laundry facility scheduled to remove the wipes at regular intervals of less than 180 days. A copy of the contract (or invoices) is attached detailing pick-up schedule.
- Each collection container has a designated number and a log is kept of when each collection container is emptied into the storage container. Also recorded in the log is the date each storage container is removed from the site.
- Other:

6. PREPARATION FOR TRANSPORT

Explain the method and testing used to meet the “no free liquids” requirement.

Possible methods include: mechanical wringing, vacuum extraction, centrifuging, or other equivalent method. The paint filter test is to be used to document the “no free liquid” requirement. Maintain records of methods and test results.

NOTE – All extracted solvent must be managed as hazardous waste.

8. USED WIPES RECEIVER

List the name and address of all handlers receiving the wipes, including transporters, laundries, dry cleaners, landfills, hazardous waste incinerators, solid waste combustors, or any other facility. Continue list on a separate page if necessary.

NOTE – Laundry facility must have an approved wastewater treatment system or discharge permit to launder excluded solvent-contaminated wipes.

Name	Address	City	State	Zip code

9. VERIFICATION

List the name and title of the person who completed this form.

NAME(print)	TITLE	DATE

Important: Update this information as products, processes or methods change.