### Quickstart Guide to the 2013 EPA Solvent-Laden Wipe Rule Changes

It isn't every day that regulations are loosened, but the EPA has done just that with a set of exemptions for the disposal of certain types of solvent saturated wipes, rags and pads.

Because this is such an important change, we simplified pages of regs down to a flowchart decision guide to help you quickly understand if your facility might be eligible for the Exclusions, and a 4-Step Blueprint for Compliance to help you understand what you'll need to do to comply.



The Waste Minimization Forum (wastemin.com) surveyed 461 leading plants in the US and found that few were aware of the rule change and what it meant for their facility. That is why we created this Guide.

EPA's estimate of annual SAVINGS per facility from this rule change

Why this might be important for your facility:

\$30,4189 per LQG facility

\$4E,20% per SQG facility "Regulatory Impact Analysis for Conditional Exclusions from Solid Waste and Hazardous Waste for Solvent-Contaminated Wipes Final Rule," EPA

Find Your Facility's



Path to Exclusion

#### A how-to guide to understand the Solvent-Contaminated Wipes Solid Waste Exclusion or Solvent-Contaminated Wipes Hazardous Waste Exclusion.

Adapted from EPA rule materials available at: http://www.epa.gov/wastes/hazard/wastetypes/wasteid/solvents/wipes.htm

Is it "a woven or non-woven shop towel, rag, pad, or swab made of wood pulp, fabric, cotton, polyester blends or other material" No

Do the wipes/pads contain ONE OR MORE of the following solvents?

Methanol

an absorbent mat pad used for spill cleanup? 40 CFR 260.10 Yes



n-Butyl Alcohol n-Butanol

Carbon disulfide Carbon Tetrachloride Chlorobenzene

Creosols Cresylic Acid

Cyclohexanone O-Dichlorobenzene 1,2-Dichlorobenzene

**Ethyl Acetate** Ethyl Benzene

2-Ethoxyethanol

Ethyl Ether

Methyl Isobutyl Ketone Methylene Chloride

Isobutyl Alcohol

Nitrobenzene 2-Nitrobenzene

Methyl Ethyl Ketone

**Pyridine** 1,1,1-Trichloroethane 1,1,2-Trichloroethane

Tetrachloroethylene (Perchloroethylene)
Trichloroethylene (\*For reusable wipes ONLY) Toluene Trichlorofluoromethane

**Xylenes** EPA F001-F005 listed solvents per 261.31 and P- and U- listed solvents per 261.33, both cited per EPA wiper rule

Trichlorotrifluoroethane (Valclene)

Do the wipes/pads exhibit ONLY the hazardous characteristic of ignitability when containing one or more NON-LISTED solvents?

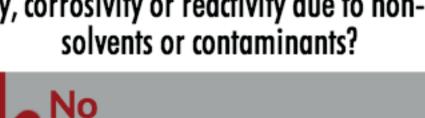
Yes



Yes

Do the wipes/pads contain listed

Do the wipes/pads exhibit the characteristic of toxicity, corrosivity or reactivity due to non-listed



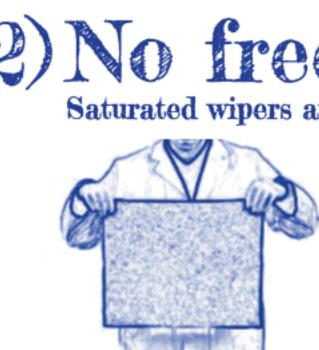


Not eligible.

No

Not eligible.

# should they occur."



Saturated wipers are OK, loose solvent in the container is not.

"Wipes must contain no free liquids prior to being sent for

cleaning or disposal and there may not be free liquid in

"Free liquids removed from the wipes or from the wipes

waste regulations in 40 CFR parts 260 through 273."

container must be managed according to applicable hazardous

to being sent for cleaning or disposal.



Eligible disposal: A municipal landfill "regulated under 40 CFR part 258 (incl. 258.40)" or "hazardous waste landfill regulated under 40 CFR parts 264 or 265." Eligible incineration: A combustor "regulated under section 129 of the

Clean Air Act" or "hazardous waste combustor, boiler, or industrial

furnace regulated under 40 CFR parts 264, 265, or subpart H."

Simple records make sure that you use the Exemption properly. Records must be maintained to capture the following:

> 2) Waste collection dates to assure that the wipes are not being accumulated for longer than the 180 day limit. 3) A description of the process the generator is using to

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- minimization, lean manufacturing and sustainability. 2. We are dedicated to creating real, usable insights and
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Contact Andy James, Publisher of The Waste Minimization Forum: andy@wastemin.com



No free liquids.

the container holding the wipes."

1) Name and address of the cleaning or disposal company where the wipes are sent.

meet the "no free liquids" requirement.

5 Things to know about The Waste Minimization Forum

information that plants can use NOW. 3. No question is too large or too small for the Forum.

Comments, feedback or ideas for new research are greatly appreciated, and we hope you found this helpful.

## 3) Time and handling. Dispose within 180 days from when the first wiper hits that drum. Wipes/pads may be accumulated up to 180 days on site prior Eligible laundering: A facility "regulated under sections 301 and 402 or section 307 of the Clean Water Act."