

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.

Why this might be important for your facility:

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

\$30,489 per LQG facility
&
\$4,207 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"

OR

an absorbent mat pad used for spill cleanup?

40 CFR 260.10



Not eligible.

Yes

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

Acetone
Benzene
n-Butyl Alcohol
n-Butanol
Carbon disulfide
Carbon Tetrachloride
Chlorobenzene
Creosols
Cresylic Acid
Cyclohexanone
O-Dichlorobenzene
1,2-Dichlorobenzene
2-Ethoxyethanol
Ethyl Acetate
Ethyl Benzene
Ethyl Ether

Isobutyl Alcohol
Methanol
Methyl Ethyl Ketone
Methyl Isobutyl Ketone
Methylene Chloride
Nitrobenzene
2-Nitrobenzene
Pyridine
1,1,1-Trichloroethane
1,1,2-Trichloroethane
Tetrachloroethylene (Perchloroethylene)
Trichloroethylene (*For reusable wipes ONLY)
Toluene
Trichlorofluoromethane
Trichlorotrifluoroethane (Valclene)
Xylenes

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

Yes

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

Yes

No

Do the wipes/pads contain listed hazardous waste other than solvents?

Yes

No

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

Yes

No

Not eligible.

Eligible for Exclusion!

Disposable Wipes/Pads are eligible for Hazardous Waste Exclusion - 40 CFR 261.4(b)(18)

Reusable Wipes/Pads are eligible for Solid Waste Exclusion - 40 CFR 261.4(a)26

4-Step Blueprint for Compliance

1) Closed containers.

A liquidproof container with a tight fitting lid is needed.



"Wipes must be accumulated, stored and transported in non-leaking, closed containers that can contain free liquids, should they occur."

Containers must be clearly labelled as

"Excluded Solvent-Contaminated Wipes"

2) No free liquids.

Saturated wipes 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 the container holding the wipes."

"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."

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 to being sent for cleaning or disposal.

Eligible laundering: A facility "regulated under sections 301 and 402 or section 307 of the Clean Water Act."

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."

4) Recordkeeping.

Simple records make sure that you use the Exemption properly.



Records must be maintained to capture the following:

- 1) Name and address of the cleaning or disposal company where the wipes are sent.
- 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 meet the "no free liquids" requirement.

5 Things to know about The Waste Minimization Forum



1. It is a forum dedicated to sharing Best Practices for waste minimization, lean manufacturing and sustainability.

2. We are dedicated to creating real, usable insights and information that plants can use NOW.

3. No question is too large or too small for the Forum.

4. No fluff or spin is allowed. No selling, no press releases.

5. Join us at www.wastemin.com