

SOLVENT CONTAMINATED WIPES

Waste Management Guidance

Introduction

Wipes (woven or non-woven shop towels, rags, pads, or swabs made of wood pulp, fabric, cotton, polyester blends, or other material) and solvents are used by many businesses and institutions as part of the cleaning process. The wipes are then either cleaned and reused or sent for disposal. On July 31, 2013, the federal “Conditional Exclusions from Solid Waste and Hazardous Waste for Solvent-Contaminated Wipes” regulation was promulgated. The regulation revises key definitions to exclude solvent contaminated wipes that are cleaned and reused or that are sent for disposal from being considered a waste or hazardous waste, respectively, thereby providing a consistent regulatory framework that is commensurate with the level of risk posed by the wipes while maintaining protection of human health and the environment and reducing compliance costs to businesses.

Michigan has incorporated these provisions into the administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, (Act 451) effective April 5, 2017. This publication provides guidance on the proper management of solvent-contaminated wipes and should not be considered a substitute for reading the applicable Part 111 rules.

What is a solvent-contaminated wipe and when is it eligible for exclusion?

A solvent-contaminated wipe is one that, after use or cleanup of a spill, meets any of the following criteria:

- Contains one or more of the F001 through F005 solvents listed in R 299.9220 or the corresponding P- or U-listed solvents found in R 299.9224, R 299.9225, or R 299.9226.
- Exhibits a hazardous characteristic as defined in R 299.9212 and that characteristic results from a solvent listed in Part 2 of the Part 111 rules.
- Exhibits only the hazardous characteristic of ignitability as defined in R 299.9212 due to the presence of one or more solvents that are not listed in Part 2 of the Part 111 rules.

The aforementioned solvent-contaminated wipes are eligible for exclusion under R 299.9204(1)(z) and (2)(q). This means that the generator is not required to include the wipes in his/her generator status calculation.

Exclusion Conditions

There are two exclusions specific to solvent-contaminated wipes, one for wipes that are cleaned and reused (reusable wipes) and one for wipes that are sent for disposal (disposable wipes). Each of the exclusions has its own set of conditions.

Reusable wipes are not considered wastes, and therefore are not subject to the definition of hazardous, at the point of generation if they are managed in accordance with all of the following requirements:

- The wipes are contained in closed* containers, except for when wipes are being added or removed.
- The containers are non-leaking and able to contain free liquids, if free liquids occur.
- The containers are labeled “Excluded Solvent-Contaminated Wipes.”
- Each container of wipes is stored for no more than 180 days from the start date of accumulation (date the first wipe is placed in the container) before sending wipes for cleaning. This may be demonstrated by placing the accumulation start date on the container. If the wipes are moved from one container to another, the earliest accumulation start date must be used for the final container.
- Remove all free liquids before sending the container of wipes for cleaning, either on-site or off-site, and manage the free liquids in accordance with Part 111. Compacting solvent wipes is considered treatment and must be performed in accordance with Part 111. If free liquids are generated during solvent accumulation due to percolation, compression, or compaction, they must be characterized and managed as a newly generated waste stream.

- Maintain records to demonstrate that the wipes are being managed appropriately. Records shall include:
 - The name and address of the laundry or dry cleaner that is receiving the wipes.
 - Documentation confirming the 180-day accumulation time limit is being met.
 - A description of the process used to ensure that the wipes contain no free liquids at the point of being laundered or dry cleaned on-site or transported off-site for laundering or dry cleaning. No free liquids may be determined using Method 9095B, the Paint Filter Liquids Test, included in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, EPA publication SW 846 or by another standard or test method approved by the Director, and that there are no free liquids in the container holding the wipes.
 - The wipes are sent to a laundry or dry cleaner whose discharge, if any, is regulated under Sections 301 and 402 or Section 307 of the federal Clean Water Act.

Disposable wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, are not hazardous waste at the point of generation if all of the following requirements are met:

- The wipes are contained in closed* containers, except for when wipes are being added or removed.
- The containers are non-leaking and able to contain free liquids, if free liquids occur.
- The containers are labeled “Excluded Solvent-Contaminated Wipes.”
- Each container of wipes is stored for no more than 180 days from the start date of accumulation (date the first wipe is placed in the container) before sending wipes for disposal. This may be demonstrated by placing the accumulation start date on the container. If the wipes are moved from one container to another, the earliest accumulation start date must be used for the final container.
- Remove all free liquids before sending the container of wipes for disposal, and manage the free liquids in accordance with Part 111.
- Maintain records to demonstrate that the wipes are being managed appropriately. Records shall include:
 - The name and address of the landfill or combustor that is receiving the wipes.
 - Documentation confirming the 180-day accumulation time limit is being met.
 - A description of the process used to ensure that the wipes contain no free liquids at the point of being transported for disposal. No free liquids may be determined using Method 9095B, the Paint Filter Liquids Test, included in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, EPA publication SW 846 or by another standard or test method approved by the Director, and that there are no free liquids in the container holding the wipes.
 - The wipes are sent to for disposal to any of the following:
 - A municipal solid waste landfill regulated under Part 115, Solid Waste Management, of Act 451.
 - A municipal solid waste landfill regulated under 40 C.F.R. Part 258, including 40 C.F.R. §258.40.
 - A hazardous waste landfill regulated under Part 111.
 - A hazardous waste landfill regulated under 40 C.F.R. Part 264 or 265.
 - A municipal waste combustor or other combustion facility regulated under Section 129 of the federal Clean Air Act.
 - A hazardous waste combustor, boiler, or industrial furnace regulated under Part 111.
 - A hazardous waste combustor, boiler, or industrial furnace regulated under 40 C.F.R. Part 264, 265, or 266, Subpart H.

Example Documentation

An example Solvent-Contaminated Wipes Exclusion Documentation form is provided at the end of this document to assist generators with meeting and documenting the exclusion requirements. Use of the form is not mandatory.

Helpful Resources

Persons managing solvent-contaminated wipes may find the following resources helpful:

- Conditional Exclusions from Solid Waste and Hazardous Waste for Solvent-Contaminated Wipes, 78 Federal Register 46448, July 31, 2013, www.epa.gov/epawaste/hazard/wastetypes/wasteid/solvents/wipes.htm
- Method 9095B, the Paint Filter Liquids Test, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, EPA publication SW 846, www.epa.gov/wastes/hazard/testmethods/sw846/pdfs/9095b.pdf
- Part 111 Rules, www.michigan.gov/documents/deq/deq-whm-hwp-Part111Rules_248146_7.pdf
- Michigan Department of Environment, Great Lakes, and Environment, Hazardous Waste Program
P.O. Box 30241, Lansing, Michigan 48909
517-284-6562 | Michigan.gov/EGLEwaste

Other Management Options

The scope of the solvent-contaminated wipe exclusion is limited by the type of media, contaminant, and management method involved. However, additional options for managing wipes, which are not tied to specific contaminants, exist under R 299.9206(3)(g) of the Part 111 rules. This provision addresses textiles, which are any type of cloth made by weaving, knitting, or felting of raw materials and may include gloves, uniforms, linens, and wipes. Pursuant to this rule, textiles that meet all of the following requirements are not subject to regulation under Part 111 of the act or its rules, except for the environmental and human health standards of R 299.9602 and the applicable provisions of R 299.9809 to R 299.9816:

1. The textiles are being recycled in a manner other than being burned for energy recovery or used in a manner constituting disposal,
2. After original use, the textiles are not mixed with any hazardous waste, and
3. The textiles and the containers used to transport them do not contain any free liquids.

**Closed containers as defined under the solvent wipes exclusions is different than what is considered closed under the hazardous waste generator accumulation exemption. When accumulating excluded solvent wipes in a drum, a container opened with a foot pedal (e.g., a flip top or spring-loaded lid), or a container operated with a self-closing swinging door, the container is considered closed when there is complete contact between the fitted lid and the rim. Once the container is full or being transported, the container must be sealed to prevent the emissions of volatile organic compounds. Any rigid container that is full or being transported must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions. Any bags used to accumulate solvent-contaminated wipes must be chemically resistant to the solvents and able to contain liquids. Bags that are full or prepared for transport are to be closed. They are considered closed when the neck of the bag is tightly bound and sealed to the extent necessary to keep the solvent contaminated wipes and associated air emissions inside the container.*

SOLVENT-CONTAMINATED WIPES

Exclusion Form (Optional)

1. Facility Information

Site Identification Number:

Site Name:

Site Address:

Contact Name:

Contact Phone Number:

2. Types 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

3. Solvent Identification

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

- Contains 1 or more of the F001 through F005 solvents listed in R 299.9220 of the administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, (Part 111) or the corresponding P- or U-listed solvents found in R 299.9224, R 299.9225, or R 299.9226 of the Part 111 rules or,
- Exhibits a hazardous characteristic as defined in R 299.9212 of the Part 111 rules and that characteristic results from a solvent listed in Part 2 of the rules or,
- Exhibits only the hazardous characteristic of ignitability as defined in R 299.9212 of the Part 111 rules due to the presence of 1 or more solvents that are not listed in Part 2 of the rules.

B. Provide the basis used to make the exclusion determination (*complete a separate form for each type or excluded wipe*)

Solvent Name:

Hazardous Waste Number(s):

- Process Knowledge - Through knowledge of the process generating these wipes, I know that the wipes do exhibit the characteristic of toxicity, severe toxicity, corrosivity, or reactivity, and are not contaminated with trichloroethylene. See attached safety data sheet(s), if applicable.
- Laboratory Analysis - The wipes were analyzed by a state-certified laboratory to ensure that they do not exhibit a hazardous waste characteristic, other than the characteristic of ignitability as defined in R 299.9212 of the Part 111 rules, and are not contaminated with trichloroethylene. See attached analytical results.

4. Accumulation Time - Indicate the method that will be used to document that the wipes are on-site for no longer than 180 days:

- The accumulation start date is placed on each container.
- A contract is in place with a laundry/dry cleaner to remove the wipes at regular intervals of less than 180 days. A copy of the contract/invoices is attached showing 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:

5. No Free Liquids - Indicate the method and testing used to meet the “no free liquids” requirement:

6. Handler Information - Provide the name and address of all persons receiving the solvent-contaminated wipes, including transporters, laundries, dry cleaners, landfills, incinerators, and any other facility:

A. Company Name:

Company Address:

Contact Name:

Contact Phone Number:

B. Company Name:

Company Address:

Contact Name:

Contact Phone Number:

C. Company Name:

Company Address:

Contact Name:

Contact Phone Number:

D. Company Name:
Company Address:
Contact Name:
Contact Phone Number:

E. Company Name:
Company Address:
Contact Name:
Contact Phone Number:

F. Company Name:
Company Address:
Contact Name:
Contact Phone Number:

7. Verification - List the name and title of the person completing this form and date form was completed:

Name:

Title:

Date: