

Management of Solvent-Contaminated Wipes

Guidance on Hazardous Waste Requirements



Introduction

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 outlines the requirements for proper management and disposal of hazardous solvent-contaminated wipes.

Wisconsin Hazardous Waste regulations are found in [chs. NR 660-679](#) of the Wisconsin Administrative Code.

Under certain conditions the regulations allow for the exclusion of:

- reusable solvent-contaminated wipes to be classified and managed as a solid waste, and
- disposable solvent-contaminated wipes to be classified and managed as a hazardous waste.

The conditions are found in ss. NR 661.0004(1)(z) and (2)(r), Wis. Adm. Code, and they reflect the federal requirements of the Environmental Protection Agency (EPA) rule, *Conditional Exclusions from Solid Waste and Hazardous Waste for Solvent-Contaminated Wipes*.

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

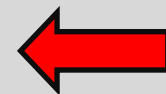
What is a Wipe and When is it Eligible for the Exclusion?

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 use, contains one or more of the F001 to F005 solvents listed in [s. NR 661.0031](#), Wis. Adm. Code, or the corresponding P- or U-listed solvents in [s. NR 661.0033](#), 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 661.0021](#) due to the presence of one or more non-listed solvents.

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

- Wipes that contain listed hazardous waste other than solvents; or
- Wipes that exhibit the characteristic of toxicity, corrosivity or reactivity due to contaminants other than solvents; or
- Wipes that are hazardous waste due to the presence of trichloroethylene and are being disposed of.



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

Management of Reusable Wipes

Eligible solvent-contaminated wipes that are sent for cleaning and reuse are excluded from solid waste regulation, provided they meet all conditions noted below while being accumulated, stored, transported and cleaned [s. NR 661.0004(1)(z), Wis. Adm. Code]:

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

1. Store in non-leaking, closed containers. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes.
2. Label all containers "Excluded Solvent-Contaminated Wipes." Labels can be pre-printed, or handwritten on stickers or duct tape, as long as the labels are legible.
3. Containers are able to contain free liquids, should free liquids occur.
4. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container is sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions.
5. Accumulate wipes for no more than 180 days before shipping off-site for laundering. The 180-day clock begins at the accumulation start date of each container (i.e., the date the first solvent-contaminated wipe is placed in the container).
6. At the point of being sent for cleaning on-site or at the point of being transported off-site for cleaning, the solvent-contaminated wipes shall contain no free liquids as defined in s. NR 660.10(48), Wis. Adm. Code.
7. Free liquids removed from the solvent-contaminated wipes or from the container holding the wipes shall be managed according to the applicable regulations specified in chs. NR 660 to 673 Wis. Adm. Code.
8. Maintain on-site all of the following documentation:
 - a. Name and address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes.
 - b. Documentation that the 180-day accumulation limit is being met.
 - c. Description of the process to ensure the solvent-contaminated wipes contain no free liquids at the point of being laundered or dry cleaned on-site or at the point of being transported off-site for laundering or dry cleaning.
9. The solvent-contaminated wipes are sent to a laundry or dry cleaner whose discharge, if any, is regulated under 33 USC 1311 and 33 USC 1342 or 33 USC 1317, and ch. 283, Wis. Stats.

Management of Disposable Wipes

Eligible solvent-contaminated wipes that can be sent for disposal are excluded from hazardous waste regulation provided they meet all the conditions below when accumulated, stored and transported for disposal [s. NR 661.0004(2)(r), Wis. Adm. Code]:

1. Do not contain trichloroethylene and are not a hazardous waste.
2. Store in non-leaking, closed containers.

3. Label all containers “Excluded Solvent-Contaminated Wipes.” Labels can be pre-printed, or handwritten on stickers or duct tape, as long as labels are legible.
4. Containers are able to contain free liquids, should free liquids occur.
5. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container is sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions.
6. Accumulate wipes for no more than 180 days before shipping off-site for disposal. The 180-day clock begins at the accumulation start date of each container (i.e., the date the first solvent-contaminated wipe is placed in the container).
7. At the point of being transported off-site for disposal, the solvent-contaminated wipes shall contain no free liquids as defined in s. NR 660.10(48), Wis. Adm. Code.
8. Free liquids removed from the solvent-contaminated wipes or from the container holding the wipes shall be managed according to the applicable regulations specified in chs. NR 660 to 673, Wis. Adm. Code.
9. Maintain on-site all of the following documentation:
 - a. Name and address of the landfill or combustor that is receiving the solvent-contaminated wipes.
 - b. Documentation that the 180-day accumulation limit is being met.
 - c. Description of the process the generator is using to ensure solvent-contaminated wipes contain no free liquids at the point of being transported for disposal.
10. The solvent-contaminated wipes are sent for disposal to any of the following:
 - a. To a licensed municipal solid waste landfill or to a hazardous waste landfill.
 - b. To a licensed municipal waste combustor or other combustion facility or to a hazardous waste combustor, boiler or industrial furnace.
11. Excluded contaminated wipes must be prevented from mixing freely with other solid waste, e.g., by using a bag to contain the wipes.



A recommended best management practices would be to remove the air from the bag prior to sealing 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 portion of the bag and folding it over in a goose neck before taping.

Additional Information

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

<http://www.epa.gov/hwgenerators/final-rule-2013-conditional-exclusions-solid-waste-and-hazardous-waste-solvent>

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

<http://www.epa.gov/hw-sw846/sw-846-test-method-9095b-paint-filter-liquids-test>

Resources and Contact Information

For more information including [publications, inspection forms, and administrative codes and statutes](#), go to dnr.wi.gov and search “hazardous waste resources.” Use the *Additional Resources* menu to navigate to specific topics. For staff contact information, go to the [staff directory](#) and enter “hazardous waste requirements” in the subject field and choose the appropriate county contact.

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Mailing address: DNR Waste and Materials Management Program, PO Box 7921, Madison, WI 53707

Email: DNRWasteMaterials@Wisconsin.gov

***Disclaimer:** This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.*

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Solvent Contaminated Wipes Documentation Form

5. ACCUMULATION OF WIPES

Check the method(s) that will be used to document that these wipes are accumulated for no longer than 180 days.

- An accumulation start date is placed on each container.
- 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. Document that the “no free liquids” requirement was met.

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

7. RECEIVING FACILITY

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

8. VERIFICATION

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

NAME (print)	TITLE	DATE

Note: This example documentation form is approved for general use by the Wisconsin DNR. It is not a required form.
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