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Solvent-Contaminated Shop Towels, Rags, and Wipes

This guidance document has been produced by the Nebraska Department of Water, Energy, and Environment (DWEE) to provide guidance on managing solvent-contaminated shop towels, cloths, rags, and wipes; referred to as "wipes." This information is based on Nebraska [Title 128 – Hazardous Waste Regulations](#) and incorporates conditional exclusions for solvent-contaminated wipes, effective in Nebraska as of December 14, 2014. These exclusions apply to five classes of solvents common in industrial use. In Nebraska regulations, these are the "F001" through "F005" listed solvents found in Title 128, Chapter 3, [§013](#).

There are two categories of wipes: reusable and disposable. **Reusable wipes** are used for their intended purpose (such as parts degreasing or machine maintenance) and then sent to a launderer for cleaning and eventual reuse. **Disposable wipes** are used a single time for similar purposes and then discarded.

Generators of disposable solvent-contaminated wipes without hazardous co-contaminants may dispose of these wipes as solid waste at a permitted municipal solid waste (MSW) landfill. Generators of disposable wipes must determine that their wipes do not contain trichloroethylene (TCE), which is not eligible for exclusion. Generators of reusable solvent-contaminated wipes may continue to launder them, provided that the wipes have been determined to not contain hazardous co-contaminants.

Are Hazardous Co-Contaminants Present?

Generators of solvent-contaminated wipes must perform a hazardous waste determination under Title 128, Chapter 4, [§002](#) for the presence of hazardous co-contaminants above regulatory limits. Reusable wipes are a solid waste until all conditions of the exclusion have been met. A primary condition of the exclusion is that the wipes are contaminated *only* with the excluded solvent. Disposable wipes must be similarly characterized to ensure that they are not contaminated with hazardous materials other than exempted solvents. For more information on hazardous waste determinations, see the DWEE guidance document titled "Waste Determinations & Hazardous Waste Testing" for further information.

The following are two examples of reusable wipes and their proper laundering or disposal:

- Business A uses a methanol (F003) solvent on a cloth wipe to clean parts before being painted on their production line. Business A sends a representative sample for Toxic Characteristic Leaching Procedure (TCLP) analysis before laundering and receives a result of non-detect for all constituents. The methanol is an exempted solvent. Business A's wipes are permitted to be

laundered and reused without issue.

- Business B uses a methyl ethyl ketone (MEK) (F005) solvent to clean parts and spills after applying paint with heavy metal pigments. A TCLP analysis of their wipes shows quantities of chromium and cadmium over the regulatory levels. While the MEK is an exempted solvent, the high levels of heavy metals revealed in the analysis mean the wipes are now a characteristic hazardous waste for toxicity. These wipes cannot be laundered and must be contained, handled, and disposed of as a hazardous waste.

The following are three examples of disposable wipes and their proper disposal:

- Business C uses an isobutyl alcohol (F003) wipe to clean their vacuum mold between pressings. Samples sent for TCLP analysis come back as non-detect and the isobutyl alcohol is an exempt solvent. The wipes are therefore non-hazardous, exempt solid waste. They can now be sealed in their container and taken to a MSW landfill.
- Business D uses prepackaged disposable wipes and spray-on benzene solvent (F005) to clean auto-bodies during maintenance. Business D sends a sample for TCLP analysis and discovers excessive metals from the heavy equipment. Benzene is an exempted solvent, but the levels of metals make the wipes hazardous waste. The wipes must be handled, contained, and disposed of at a Treatment, Storage, and Disposal Facility (TSDF) by a hazardous waste service provider.
- Business E uses disposable cloth wipes and a trichloroethylene (TCE) (F002) solvent to wipe down engine parts during assembly. A TCLP of the wipes comes back with a result of non-detect, however TCE is only exempted for reusable wipes. TCE wipes are not allowed in a MSW landfill so the wipes must be disposed of to a TSDF via proper waste protocols.

Management Conditions

Both disposable and reusable wipes must be handled and stored according to the required management conditions in order to be eligible for the exclusions. These management conditions are:

1. **No Free Liquids.** This requirement describes a wipe that is wet, but not dripping with solvent. A wet but not dripping wipe will pass EPA Methods Test 9095B (Paint Filter Liquids Test). Any free liquids removed from storage or transport containers must be managed according to any applicable hazardous waste regulations.
2. **Storage.** Wipes must be accumulated, stored, and transported in non-leaking, closed containers that can contain free liquids, should they occur. During accumulation, "closed" is defined as complete contact between the fitted lid and rim. During transport, "closed" is defined as all openings are sealed or tightly bound to prevent the release of volatile organic emissions or spills if tipped over.
3. **Labeling.** Containers must be labeled "Excluded Solvent-Contaminated Wipes."
4. **180-day accumulation time limit.** This may be documented on the storage container or through routine business records, such as contracts or invoices.

5. Record-keeping. Generators must maintain documentation that includes:

- The name and address of the receiving facility (i.e., laundry, dry cleaner, landfill, or combustor).
- A description of the process that the generator is using to meet the “no free liquids” condition.
- Documentation that the 180-day accumulation time limit is being met.

RESOURCES:

- DWEE Home Page <https://dwee.nebraska.gov/>
- EPA Solvent-Contaminated Wipes Rulemaking:
<https://www.epa.gov/hwgenerators/frequent-questions-about-implementing-regulations-solvent-contaminated-wipes>

Contacts:

- DWEE Main Number (402) 471-2186
- DWEE Toll Free Number (877) 253-2603
- DWEE Hazardous Waste Compliance Assistant (402) 471-8308
- Email questions to: DWEE.moreinfo@nebraska.gov

DWEE Publications:

- Environmental Guidance Document – “Comparison of Hazardous Waste Generator Requirements”
- Environmental Guidance Document – “Waste Determinations and Hazardous Waste Testing”
Guidance documents are available on the DWEE website by clicking “Visit Nebraska Department of Environment and Energy (DEE),” selecting “Forms,” and “Publications, Grants & Forms.”
- [Title 128 – Nebraska Hazardous Waste Regulations](#)
Titles are available on the DWEE website by clicking “Visit Nebraska Department of Environment and Energy (DEE),” selecting “Resources and Services,” “Laws & Regulations,” and “Rules & Regulations.”

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