

How Do You Manage Solvent-Contaminated Wipes?

Wipes are used in conjunction with solvents for cleaning and other purposes in numerous industrial sectors, such as printing, automobile repair and in manufacturing of automobiles, electronics, furniture, and chemicals.

Under the Virginia Hazardous Waste Management Regulations, wipes that are contaminated with solvents and are either cleaned at industrial laundries or dry cleaners and reused, or sent for disposal to a municipal solid waste landfill or a solid waste combustor are conditionally excluded from certain hazardous waste requirements. However, all required conditions must be met in order for the wipe to be excluded from full regulation.

To be excluded, solvent-contaminated wipes must be managed in closed, labeled containers and cannot contain free liquids when sent for cleaning or disposal. Additionally, facilities that generate solvent-contaminated wipes must comply with certain recordkeeping requirements and may not accumulate wipes for longer than 180 days.

What is a solvent-contaminated wipe?

A solvent-contaminated wipe is a wipe (i. e., a shop towel, rag, pad, or swab made of wood pulp, fabric, cotton, polyester blends, or other material) that after use or after cleaning up a spill, contains a solvent that would be considered hazardous waste either because it is listed in the hazardous waste regulations, or because it exhibits the characteristic of ignitability. Solvent-contaminated wipes do not include wipes contaminated with hazardous waste other than solvents, or that exhibit the characteristic of toxicity, corrosivity, or reactivity due to contaminants other than solvents.

How is the exclusion for reusable wipes and the exclusion for disposable wipes different?

There are three main differences between the exclusion for reusable wipes and the exclusion for disposable wipes:

- Reusable wipes are not solid and hazardous wastes; however, disposable wipes are solid wastes, but not hazardous wastes.
- Disposable wipes that are hazardous waste due to the presence of trichloroethylene are not eligible for the exclusion. This is because the EPA's final risk analysis demonstrates that wipes contaminated with trichloroethylene may pose a significant risk to human health and the environment when disposed in a lined landfill.
- Reusable wipes may go to laundries or dry cleaners whose discharge, if any, is regulated under sections 301 and 402 or section 307 of the Clean Water Act. Disposable wipes may go to 1) combustors that are regulated under section 129 of the Clean Air Act or under 40 CFR parts 264, 265, or 266 subpart H, 2) municipal solid waste landfills regulated under 40 CFR part 258 (including § 258.40) or, 3) hazardous waste landfills regulated under 40 CFR parts 264 or 265.

For more information see the chart below which provides a summary and breakdown of the requirements that apply to both reusable and disposal solvent-contaminated wipes. Please contact the appropriate DEQ regional staff if you have any questions regarding applicability of these requirements to your facility and waste streams.

Requirements for Solvent-Contaminated Wipes Under the Virginia Hazardous Waste Management Regulations (VHWMR) Summary Chart

This chart summarizes the Virginia regulatory requirements in regards to managing solvent-contaminated wipes under 40 CFR 261.4(a)(26), which conditionally excludes from the definition of solid waste solvent-contaminated wipes that are cleaned and reused (“reusable wipes”), and under 40 CFR 261.4(b)(18), which conditionally excludes from the definition of hazardous waste solvent-contaminated wipes that are disposed (“disposable wipes”). These provisions have been incorporated into the VHWMR effective 01/xx/2014.

This summary chart is provided for compliance assistance purposes by the Virginia Department of Environmental Quality (DEQ). This is not a regulation and, therefore, does not add, eliminate, or change any existing regulatory requirements. The statements in this document are intended for informational purposes only.

	Solvent-Contaminated Reusable Wipes	Solvent-Contaminated Disposable Wipes																				
Regulation Citation	40 CFR 261.4(a)(26) (Solid Waste Exclusion)	40 CFR 261.4(b)(18) (Hazardous Waste Exclusion)																				
Description	Solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes, provided the conditions of the exclusion are met.	Solvent-contaminated wipes that are sent for disposal are not hazardous wastes, provided the conditions of the exclusion are met.																				
Includes	<p>✦ Wipes containing one or more F001 – F005 listed solvents listed in §261.31 or the corresponding P- or U- listed solvents found in §261.33, including:</p> <table style="margin-left: 40px; border: none;"> <tr> <td style="padding-right: 20px;">Acetone</td> <td>Isobutyl alcohol</td> </tr> <tr> <td>Benzene</td> <td>Methanol</td> </tr> <tr> <td>N-Butanol</td> <td>Methyl ethyl ketone</td> </tr> <tr> <td>Chlorobenzene</td> <td>Methyl isobutyl ketone</td> </tr> <tr> <td>Cresols</td> <td>Methylene chloride</td> </tr> <tr> <td>Cyclohexanone</td> <td>Tetrachloroethylene</td> </tr> <tr> <td>1,2-Dichlorobenzene</td> <td>Toluene</td> </tr> <tr> <td>Ethyl acetate</td> <td>1,1,2-Trichloroethane</td> </tr> <tr> <td>Ethyl benzene</td> <td>Trichloroethane (<i>*For reusable wipes only.</i>)</td> </tr> <tr> <td>2-Ethoxyethanol</td> <td>Xylenes</td> </tr> </table> <p>✦ Wipes that exhibit a hazardous characteristic resulting from a solvent listed in part 261.</p> <p>✦ Wipes that exhibit only the hazardous characteristic of ignitability when containing one or more non-listed solvents.</p>		Acetone	Isobutyl alcohol	Benzene	Methanol	N-Butanol	Methyl ethyl ketone	Chlorobenzene	Methyl isobutyl ketone	Cresols	Methylene chloride	Cyclohexanone	Tetrachloroethylene	1,2-Dichlorobenzene	Toluene	Ethyl acetate	1,1,2-Trichloroethane	Ethyl benzene	Trichloroethane (<i>*For reusable wipes only.</i>)	2-Ethoxyethanol	Xylenes
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**Requirements for Solvent-Contaminated Wipes
Under the VHWMR
Summary Chart (continued)**

Does not include	<ul style="list-style-type: none"> ✦ Wipes that contain listed hazardous waste other than solvents. ✦ Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents. 	<ul style="list-style-type: none"> ✦ Wipes that contain listed hazardous waste other than solvents. ✦ Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents. ✦ Wipes that are hazardous waste due to the presence of trichloroethylene.
Storage Requirements	Wipes must be accumulated, stored, and transported in non-leaking, closed containers that can contain free liquids, should they occur.	
Labeling	Containers must be labeled "Excluded Solvent-Contaminated Wipes".	
Accumulation Time Limits	Generators may accumulate wipes up to 180 days from the start of accumulation prior to being sent for cleaning or disposal.	
Recordkeeping	Generators must maintain documentation that includes: <ul style="list-style-type: none"> ✦ Name and address of the laundry, dry cleaner, landfill, or combustor. ✦ Documentation that the 180-day accumulation time limit is being met. ✦ Description of the process the generator is using to meet the "no free liquids" condition. 	
Condition of Wipes Prior to Transport	Wipes must contain no free liquids prior to being sent for cleaning or disposal and there may be no free liquid in the container holding the wipes. "No free liquids" condition is defined in 40 CFR 260.10 and is based on the EPA Method Test 9095B (Paint Filter Liquids Test).	
Management of Free Liquids	Free liquids removed from the wipes container must be managed according to applicable hazardous waste regulations in 40 CFR parts 260 through 273.	

**Requirements for Solvent-Contaminated Wipes
Under the VHWMR
Summary Chart (continued)**

Eligible Handling Facilities	Must go to a laundry or dry cleaner whose discharge, if any is regulated under sections 301 and 402 or section 307 of the Clean Water Act.	<p>Must go to a combustor regulated under section 129 of the Clean Air Act or to a hazardous waste combustor, boiler, or industrial furnace regulated under 40 CFR parts 254, 265, or 266 subpart H.</p> <p>Must go to a municipal solid waste landfill regulated under 40 CFR parts 258 (including §258.40) or to a hazardous waste landfill regulated under 40 CFR parts 264 or 265.</p>
Storage at Handling Facilities	Must store wipes in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes”. Containers must be able to contain free liquids should they occur.	
Management of Free Liquids by Handling Facilities	Free liquids removed from the wipes or from the container holding the wipes must be managed according to applicable hazardous waste regulations in 40 CFR parts 260 through 273.	

Additional Resources:

- ✦ EPA Webpage [Solvent-Contaminated Wipes Rulemaking](#)
- ✦ [Paint Filter Test](#)
- ✦ Virginia DEQ [Regional Office Contacts](#)