



Wipes Rule Guide

What you need to know about the Solvent-Contaminated Wipes Rule issued by the Environmental Protection Agency

 **AbsorbTech**®
Cleaner, safer solutions for industry



What is the Wipes Rule?

In July 2013, the Environmental Protection Agency issued a final rule that modifies the hazardous waste management regulations for solvent-contaminated wipes. The Rule took effect January 31, 2014.

The Wipes Rule outlines new standards for how to store, manage and transport solvent-contaminated wipes. It is aimed primarily at the printing industry with the purpose of keeping solvent out of landfills, the air and sewer systems.

Wipes Rule Overview

The Wipes Rule applies to solvent-contaminated wipes or towels used or stored at your facility. It does not apply to wipes or towels that contain hazardous waste other than solvent or exhibit the characteristics of toxicity, corrosivity, or reactivity due to contaminants other than solvents, such as metals.

Wipes may accumulate for up to 180 days prior to being sent for cleaning or disposal, which begins the date the first solvent-contaminated wipe is placed in the container.

While accumulating, storing, and/or transporting solvent-contaminated wipes:

- Wipes must be contained in non-leaking, closed containers
- Containers must be labeled "Excluded Solvent-Contaminated Wipes"
- Containers must be able to contain free liquids, should free liquids occur
- When transporting for cleaning or disposal, solvent-contaminated wipes and containers must contain no free liquids

Free liquids from the towels or wipes must be managed according to applicable hazardous waste regulations outlined by the EPA.

You must maintain documentation that you are managing excluded solvent-contaminated wipes and keep that documentation at your site:

- Name and address of the laundry, dry cleaner, landfill or combustor that is receiving the wipes.
- Documentation that the 180-day accumulation time limit is being met.
- A description of the process you are using to meet the "no free liquids" condition.

Towels or wipes must be managed by one of the following:

- A laundry or dry cleaner whose discharge, if any, is regulated under sections 301 and 402 or section 307 of the Clean Water Act.
- A municipal solid waste landfill regulated under 40 CFR part 258 (including §258.40) or to a hazardous waste landfill regulated under 40 CFR parts 264 or 265.
- 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 264, 265, or 266 subpart H.

The above requirements must have been met by January 31, 2014.

How has ITU AbsorbTech's program changed?

We implemented the following updates to our printer towel program to help customers comply with the rule:

- Updated storage containers to ensure they are sealed and labeled according to the new standard.
- Offering labels for any customer accumulation containers needing labels.
- Implementing more stringent checks on no-free-liquids requirement in printer towel containers, as no free liquids can be accepted for transportation.

**EXCLUDED SOLVENT-
CONTAMINATED
WIPES**

Our Ultra™ Printer Towel program offers labels that meet the Wipes Rule standard.

Is your laundry or disposal service part of your compliance plan?

Ask these important questions to find out.

5 questions to ask your laundry or disposal service

1. Will you provide non-leaking, closed containers to store soiled towels until ready for pick-up?

2. Will these containers be labeled "Excluded Solvent-Contaminated Wipes," or will you provide labels?

3. Do you accept free standing liquids? What is your policy?

4. LAUNDRY: Is your discharge compliant with sections 301 and 402 or section 307 of the Clean Water Act?

DISPOSAL: Do solvent contaminated wipes go to a municipal solid waste landfill regulated under 40 CFR part 258 or to a hazardous waste landfill regulated under 40 CFR parts 264 or 265?

INCINERATION: Are you regulated under section 129 of the Clean Air Act or are you regulated under 40 CFR parts 264, 265, or 266 subpart H?

5. Were you compliant with the Wipes Rule by January 31, 2014?

ITU AbsorbTech


Yes

Yes, containers will be properly labeled and extra labels will be available

We do not accept free-standing liquids

Yes, ITU AbsorbTech's towel processing facilities are Clean Water Act and Clean Air Act permitted and meet the requirements outlined in the Wipes Rule. *Permit information on back page of this guide.*

Yes



Frequently Asked Questions regarding the Wipes Rule

180 day accumulation

Q: The rule states we need documentation that the 180 day accumulation limit is being met, but does it have to be on the label that goes on our drums? Is there other documentation that I can reference in my program as to how we're meeting that time limit; i.e. refer to scheduled service pickup agreement/invoices?

A: The rule is not prescriptive in how you document the 180 days, or the method you use to comply with the no free liquids requirement. A date does not have to be on the label - that is just an option. ITU AbsorbTech re-labels drums every week so that clean product is not brought to your facility with an excluded solvent contaminated wipes label.

Q: Does the accumulation date restart when I transfer wipes from a smaller accumulation container to a larger bulk container?

A: No, the date will not restart.

Solvents

Q: For purposes of the Wipes Rule, what constitutes a solvent? Is it VOC content?

A: VOC content is not the determining factor in this case. Listed solvents or the characteristic of ignitability are the criteria.

Solvent-contaminated wipe means a wipe that, after use or after cleaning up a spill, either (1) contains one or more of the F001 through F005 solvents listed in 40 CFR 261.31 or the corresponding P- or U- listed solvents found in 40 CFR 261.33; (2) exhibits a hazardous characteristic found in 40 CFR part 261 subpart C when that characteristic results from a solvent listed in 40 CFR part 261; and/or (3) exhibits only the hazardous waste characteristic of ignitability found in 40 CFR 261.21 due to the presence of one or more solvents that are not listed in 40 CFR part 261.

Solvent-contaminated wipes that contain listed hazardous waste other than solvents, or exhibit the characteristic of toxicity, corrosivity, or reactivity due to contaminants other than solvents, are not eligible for the exclusions at 40 CFR 261.4(a)(26) and 40 CFR 261.4(b)(18).

Labels

Q: Will ITU AbsorbTech put labels on blue drums that contain our printer towels?

A: ITU AbsorbTech provides labels for the containers to be transported if there are none already on. It is the customers' responsibility to label the accumulation containers (if they are different) within the facility. As example if you have the red containers with flip tops at each work station, those must also be labeled. ITU AbsorbTech sells extra labels for those uses, or you can make your own as the rule does not limit the type of label. When possible, we remove labels as we process product so clean product is not being shipped out labeled as "excluded solvent contaminated wipes."

Q: Will your ITU AbsorbTech representative put a date on the labels?

A: Since we do not know the start date of when solvent wipes will be placed in the containers, we will not be putting dates on the labels.

Q: Do all my containers need a label, even the small ones?

A: Yes, all containers must have a label with the words 'Excluded Solvent-Contaminated Wipes.'

Q: Are we required to label our containers with the accumulation date?

A: A date on the label is not required – it is just a good way to track the 180 days. Accumulation date record keeping is the generators requirement. The generator (customer) must document how they are meeting the 180 day requirement.

Containers

Q: Do the "closed" containers that ITU AbsorbTech provides be 55 gallon drums or something else?

A: The closed containers in most cases are 55 gallon Sure Seal drums.

Q: Can we still use the open tubs for soiled shop towels and how often do those need to be transferred to the "closed" containers?

A: You cannot use open tubs anywhere in your facility for solvent contaminated towels, but may use them for red general purpose towels. The rule states that containers must be closed and labeled while wipes are accumulated. When the containers are full they must have no free liquids and be sealed. You are not required to keep a cover on clean product.

No free liquids

Q: Is free liquid forbidden at any time, in any container, with wipes or only for the transportation container?

A: Only in the transportation containers. You may have it in your collection/accumulation containers, but be sure that what you offer to a laundry or disposal facility doesn't have free liquids. You have to document how you meet the no free liquids requirement.

Q: Once the towels are placed into the closed containers awaiting pickup by ITU AbsorbTech, how is the "no free liquids" condition determined – and by whom? If there are any free liquids, what can we do about it?

A: You can determine if your towels meet the standard by using the Paint Filter test (see link in Resource section).

No free liquids must be determined during accumulation and preparation for delivery by the generator. ITU AbsorbTech checks the containers at pickup for liquids and may leave some behind that contain free liquid. Every effort should be taken to prevent free liquids from accumulating in the transportation containers prior to pick up. Preventing the towels from being oversaturated is the best way to control free liquid from being generated. Remove any excess liquid before placing in an accumulation or transportation container.

Q: What are some best management practices for achieving no free liquids?

A: A few examples would be:

- The user wrings or squeezes the wiper while it is still in their hand following use to remove excess liquid.
- The user applies only the needed amount of liquid for wiping rather than fully saturate.
- The wipe is placed in a temporary location on a perforated screen or rack that would allow the excess liquid to drain and be collected prior to placing in containers for pickup.
- The wipes are placed in smaller approved containers at each use area and any accumulated liquid is not transferred when the wipers are placed in containers to be picked up.
- Employee responsible for preparing wipers for pickup checks containers.

Disposable wipes

Q: We use disposable solvent contaminated wipes. Can these go in the dumpster?

A: No matter what you're putting in the dumpster, you must have a waste profile that has been

approved. The wipes cannot be openly mixed with other waste. The disposable solvent-contaminated wipes container must be sealed sufficiently to prevent leaks and emissions, contain no free liquids, and be labeled.

According to Wisconsin guidelines, generators sending disposable solvent-contaminated wipes to a licensed or permitted solid waste landfill are not allowed to mix the wipes with regular solid waste (e.g., toss them into a solid waste dumpster).

Documentation and permits

Q: Is your discharge regulated under sections 301 and 402 or section 307 of the Clean Water Act, per the requirement of the Wipes Rule?

A: Yes, ITU AbsorbTech's towel processing facilities are Clean Water Act and Clean Air Act permitted and meet the requirements outlined in the Wipes Rule. See permit and address information for your documentation files.



Please contact ITU AbsorbTech's Environmental Engineer, Jodi Drew, with questions. She can be reached at 888-729-4884 or jdrew@ITUAbsorbTech.com.



Resources

[EPA.gov/osw/hazard/wastetypes/wasteid/solvents/sumry_chrt_wipes_fnl_rul_070913.pdf](https://www.epa.gov/osw/hazard/wastetypes/wasteid/solvents/sumry_chrt_wipes_fnl_rul_070913.pdf) - Summary Chart of the Wiper Rule from the EPA.

[EPA.gov/epawaste/hazard/testmethods/sw846/pdfs/9095b.pdf](https://www.epa.gov/epawaste/hazard/testmethods/sw846/pdfs/9095b.pdf)
Paint filter liquids test used to determine if free liquids are present.

[ITUAbsorbTech.com/epa-wiper-rule-compliance/](https://www.ituabsorbtech.com/epa-wiper-rule-compliance/)
ITU AbsorbTech's comprehensive Wipes Rule Resource Page with a pre-recorded webinar, links, and other resources.

[ITUAbsorbTech.com/programs/printer-towels/](https://www.ituabsorbtech.com/programs/printer-towels/) - ITU AbsorbTech printer towel program information.

Common Terms

No free liquids, as used in 40 CFR 261.4(a)(26) and 40 CFR 261.4(b)(18), means that solvent-contaminated wipes may not contain free liquids as determined by Method 9095B (Paint Filter Liquids Test), included in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA Publication SW-846), which is incorporated by reference, and that there is no free liquid in the container holding the wipes. No free liquids may also be determined using another standard or test method as defined by an authorized state.

Solvent-contaminated wipe means a wipe that, after use or after cleaning up a spill, either:

- Contains one or more of the F001 through F005 solvents listed in 40 CFR 261.31 or the corresponding P- or U- listed solvents found in 40 CFR 261.33;
- Exhibits a hazardous characteristic found in 40

CFR part 261 subpart C when that characteristic results from a solvent listed in 40 CFR part 261; and/or

- Exhibits only the hazardous waste characteristic of ignitability found in 40 CFR 261.21 due to the presence of one or more solvents that are not listed in 40 CFR part 261.

Solvent-contaminated wipes that contain listed hazardous waste other than solvents, or exhibit the characteristic of toxicity, corrosivity, or reactivity due to contaminants other than solvents, are not eligible for the exclusions at 40 CFR 261.4(a)(26) and 40 CFR 261.4(b)(18).

Wipe means a woven or non-woven shop towel, rag, pad, or swab made of wood pulp, fabric, cotton, polyester blends, or other material.

The statements in this document are intended solely as guidance. State regulations may be different from the federal

Where do ITU AbsorbTech regulated discharges go?

New Berlin, WI Facility

Milwaukee Metropolitan
Sewerage District
*Wastewater Discharge
Permit 2458.05*

Neenah, WI Facility

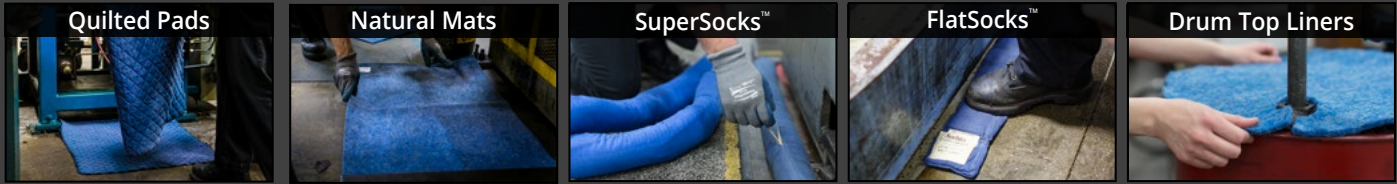
Neenah Menasha
Sewerage Commission
*MSC Permit
NMSC-013-9*

Titusville, PA Facility

City of
Titusville
*Wastewater Discharge
Permit 03-D*

Compare our products, processing and service to alternatives.
We are confident you'll find our programs the **best** in the industry.

Sorbblts® Absorbents



Sorbblts® Safety Mats

Ultra™ Towels



Additional Programs: Uniforms, Flame Resistant Uniforms, Cotton Roll Towels, First Aid, Office Floor Mats, Wet Mops, Dust Mops, Washroom Needs, Glove & Filter Bag Cleaning

A Leader in the Industry

ITU AbsorbTech is locally, nationally and internationally recognized as a leader in safety, environmental and training.



Family owned and operated since 1930

ITU AbsorbTech is owned and operated by the Leef family now in its third generation of ownership. Brothers Jim and David Leef are committed to continuing the company's historical tradition of Genuine Service Excellence, process and service innovation, and community involvement.



Jim & David Leef
Third Generation Owners

Customer Response Center (888) 729-4884
ITUAbsorbTech.com

All products processed in our ISO 14001:2004 registered facilities. Our South Bend, Ind., processing facility is also registered to ISO 9001:2008.