

**PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROCEDURE**

POLICY NO.: Technical Procedure, TECH-205

EFFECTIVE DATE: April 5, 2002

POLICY: SOLVENT WIPERS

In order to provide the public with a consistent interpretation of state and federal regulations, departmental protocol has been established for determining when solvent wipers are considered hazardous waste.

PURPOSE: The purpose of this policy is to establish when rags contaminated with F001-F005 solvents ("solvent wipers") are considered hazardous waste.

PROCEDURE:

1. Determine from the written guidance from ADEQ (Attachment One) and EPA (Attachment Two) if the solvent wipers will be laundered and reused. If they are intended for disposal, they are considered to be hazardous waste and must be handled and manifested accordingly.

APPROVED BY:

Director

Date

Original Policy Approved: March 10, 2000

Date(s) Revised: April 5, 2002

Inter-Office Memorandum

August 17, 1989

TO: Waste Compliance Unit
FROM: Leslie Leonard
THRU: Jeff Carmichael
THRU: Al Brown
RE: Rags (Solvent Wipers)

The attached memo discussed the use and management of rags contaminated with F001-F005 solvents. According to EPA these rags are considered as being hazardous wastes and must therefore be managed as such.

In paragraph two, EPA explains that whether the solvent is first applied to the work surface, equipment or directly to the rag, the chemistry of the solvent remains unchanged. So essentially, a hazardous waste is generated when the rags become used.

As discussed in the latter half of the memo, the only exemption made is for laundered rags. Thus, if a facility chooses to launder its solvents wipers, these rags will not be regulated as hazardous wastes.

On the other hand rags that are no longer useable and intended for disposal have to be manifested as hazardous waste. This, of course, is true even for rags, which were at some point laundered, reused for solvent wiping, and then disposed of.

Attachments

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: DEC 28, 1988

SUBJECT: Regulatory Status of Solvent Wipers

FROM: James B. Scarbrough
Chief, RCRA Branch

TO: RCRA Branch Personnel

“Solvent wipers,” as described herein, are considered by EPA Region IV to be a listed hazardous waste when discarded. Solvent wipers are rags or other types of applicators and absorbents which are used in cleaning or degreasing operations in conjunction with any solvent or mixture of solvents identified under the RCRA hazardous waste codes, F001 – F005, at 40 CFR §261.31.

Solvent wipers are generated by manufacturers of electronic components, automotive maintenance and repair shops, and many other industries during product manufacture and equipment maintenance. In practice, a solvent is applied to a wiper, which is then used to clean a part or work surface. Alternatively, the solvent may be applied to the part or work surface and the solvent along with dissolved greased and dirt are transferred to the wiper. This process may be repeated several times until the wiper becomes so contaminated with dirt and grease that it must be discarded or cleaned before reuse. Regardless of which surface the solvent is applied to, the discarded solvent wiper is considered to be a listed hazardous waste (i.e., a spent solvent). The wiper is merely a convenient carrier of the solvent to aid in its application, distribution and /or removal. The presence of the wiper in no way changes the use, nature, or constituents of the solvent.

Although solvent wipers may bear little physical resemblance to spent solvents generated from the conventional parts cleaning operations described in the F-Solvent Listing Background Document, they are generated by the same activity and involve the same chemicals. In Region IV’s view the improper disposal of solvent wipers would pose no less and environmental hazard than the disposal of an equivalent amount of spent solvent in liquid form. Therefore, solvent wipers which are discarded are considered a listed hazardous waste.

Region IV does not believe that all solvent wipers should be classified as solid or hazardous waste subject to regulation under RCRA. A wiper is a type of industrial textile. Other products which fall under the heading of industrial textiles include uniforms and mops. Two types of industrial textiles are available, disposable and nondisposable. The disposable products are laundered when they become soiled then used again. Eventually the nondisposable products will be discarded after they have reached the end of their useful life.

Nondisposable textiles, including solvent wipers, that are laundered and reused are not considered solid waste and therefore are not hazardous waste. This conclusion is based on our interpretation of the term “solid waste” as defined at 40 CFR 261.2 which reads as follows:

(a)(1) A solid waste is any discarded material that is not excluded by §261.4(a) or that is not excluded by a variance granted under §§260.30 and 260.31.

- (2) A discarded material is any material which is:
 - (i) Abandoned, as explained in paragraph (b) of this section; or
 - (ii) Recycled, as explained in paragraph (c) of this section; or
 - (iii) Considered inherently waste-like, as defined in paragraph (d) of this section.

A nondisposable industrial textile product, whether it is a mop, wiper, or uniform, which becomes soiled after use and is sent to a laundry for cleaning is clearly not being abandoned nor is it inherently waste-like. It could still be considered a discarded material and thus a solid waste if laundering was the same as recycling: but it is not. No definition of the terms “recycling” or “recycled material” is provided in the RCRA Subtitle C regulations but EPA promulgated guidelines for resources recovery facilities and source separation at 40 CFR Parts 245 and 246 define these terms as follow:

“Recycled material” means a material that is used in place of a primary, raw or virgin material in manufacturing a product.

“Recycling” means the process by which recovered materials are transformed into new products.

It is evident from these definitions that laundering differs from recycling. Laundering is not a manufacturing process. No new product is created when articles are laundered. Also, in recycling the feed materials lost their identity in the manufacturing process (i.e., the feed materials are “transformed” into a new product). When articles are laundered, no transformation takes place; the article is cleaned but is otherwise unchanged. Since laundering is not recycling, nondisposable wipers destined for laundering are not solid waste or hazardous waste and are not subject to regulations under RCRA Subtitle C regulations.