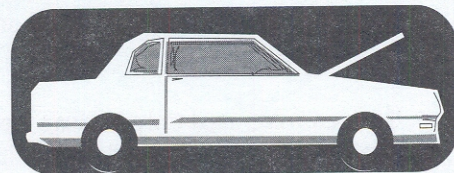


AUTOMOBILE DEALERS

FACT SHEET

Handling and Disposal of Paper Wipes Used for Cleanup



How are paper wipes typically disposed?

Paper wipes used to clean up small oil spills are often disposed in the trash. Wipes used to clean up solvents or oil mixed with hazardous wastes are often disposed as hazardous waste. Many shops have drummed wipes picked up by a waste management company.

Are paper wipes hazardous waste?

The proper disposal method for paper wipes largely depends on what they are being used to clean and the dryness of the wipes.

Under federal law, paper wipes used only to clean up used oil may be able to

be disposed as nonhazardous waste, if allowed under applicable state agency rules. However, if wipes are contaminated with other hazardous constituents (e.g., hazardous solvents), they should be tested to determine if they are characteristic hazardous wastes (e.g., for ignitability or toxicity). If they do test as hazardous, or if they are used to clean "listed" solvents, they would require disposal as hazardous waste.

State interpretations of the characterization of this waste stream vary. Many states require that paper wipes used to clean up a mixture of materials be tested for hazardous waste characteristics (ignitability and toxicity) in order to be disposed as nonhazardous waste; paper wipes used to clean up oil only are usually considered nonhazardous (e.g.,

in Connecticut, Florida, Iowa, Pennsylvania, Vermont). Some states classify waste oil as hazardous waste, thereby affecting the status of wipes used to cleanup small oil spills. For example, in Massachusetts, where waste oil is considered hazardous waste, wipes that contain any free-flowing oil must also be managed as hazardous waste.

Some states consider the leachability of the wipes to be key in determining whether the wipes can be disposed as hazardous or nonhazardous. In those states, dry wipes may be disposed as nonhazardous. For example, in Massachusetts, where waste oil is hazardous, if the wipes are squeezed sufficiently to eliminate all free-flowing liquid, the wipes could then be disposed as solid waste.

CLOTH VS. PAPER

As an alternative to paper wipes, you may want to consider using reusable cloth wipes. Like paper wipes, regulations regarding the disposal of cloth wipes vary from state to state. Many states do not require reusable wipes to be handled as hazardous if certain standards are met. While some states may require TCLP testing or disposal as hazardous for **paper wipes**, they may also specify that **cloth rags** may be handled as nonhazardous waste if they are sent to a laundering facility for cleaning and reuse, provided that the facility meets certain standards, e.g., regulated by the local sewer authority.

In Vermont, for example, wipes, shop towels, and other reusable absorbents contaminated with "listed" or characteristic hazardous wastes are specifically exempted if they are picked up and cleaned by a commercial laundry facility and returned to the customer and if the following standards are met: (1) the laundry service must use either a solvent-based dry cleaning or water-based laundering process to clean the wipers/absorbents, (2) hazardous waste must not be disposed of onto the wipers, and the paint filter liquids test shows no free liquid hazardous waste present, (3) contaminated absorbents going to the launderer must be identified and stored in closed bags/containers on an impervious surface in a roofed enclosure, and (4) the launderer must manage all residuals/wastes from laundering as required under Vermont's hazardous waste management regulations or other applicable state regulations, or in accordance with federal/state wastewater discharge requirements (e.g., National Pollutant Discharge Elimination System permit, pretreatment permit, local sewer ordinances).

RECOMMENDED BEST MANAGEMENT PRACTICES

- Practice good housekeeping to reduce the number of wipes needed to clean up spills (e.g., use drip pads, non-leak safety faucets). Reduce the number of paper wipes used to clean solvents or mixtures of solvents and oils.
- If wipes are used to clean up hazardous wastes, either dispose as hazardous or periodically test for hazardous waste characteristics using TCLP only for expected constituents. Dispose accordingly, depending on state regulations and policies.
- If wipes were used only to clean up small oil spills, and state rules do not list oily wastes as hazardous, dispose as nonhazardous either in a local sanitary landfill or some type of industrial nonhazardous landfill, in accordance with state rules.
- Consider using cloth rags and an industrial laundry service. Keep contaminated wipes in covered containers while being stored prior to pick up for laundering. Maintain documentation to show rags have been laundered.

How should dealerships dispose of paper wipes?

Paper wipes considered as hazardous must be disposed in accordance with hazardous waste regulations. Have these wastes picked up by a licensed hauler/waste management company to dispose at a hazardous waste incinerator or landfill. Some states require wipes tested as nonhazardous to be disposed as special waste (e.g., *Illinois*).

If wipes free of dripping liquids are allowed to be disposed as solid waste, have them disposed as solid waste at

an incinerator, solid waste landfill, or waste-to-energy facility. Landfills in certain states will accept oil-covered rags and wipes if not dripping with oil. Of course, provided it is allowed in your state, you may dispose such dry wipes with the regular trash as well.

How can dealerships minimize paper wipe disposal costs and liability?

Good housekeeping can help reduce the number and amount of oils or fluids spilled and thus, the volume of rags or absorbent needed to clean up spills.

Examples of good housekeeping practices to prevent spills include:

- Placing drip pads under vehicles that are being repaired or lubricated.
- Using self-closing, non-leak safety faucets on portable waste oil collection tanks.
- Minimizing wipes from contacting potentially hazardous substances.

Do you need more information?

Contact your state environmental agency or state dealer association for state-specific regulatory interpretations. Some pollution prevention/recycling/reuse practices encouraged in some states are not allowed in others. For more information on successful best management practices and for state agency contacts, call your state automobile dealers association or:

National Automobile Dealers Association

Douglas I. Greenhaus, Director, Environment Health and Safety
8400 Westpark Drive • McLean, Virginia 22102
(703) 821-7040

Prepared for the National Automobile Dealers Association under a grant from the U.S. Environmental Protection Agency Office of Small Business Ombudsman by:

Center for Hazardous Materials Research

320 William Pitt Way • Pittsburgh, PA 15238
(412) 826-5320 • Fax (412) 826-5552
<http://www.chmr.org>



POSSIBLE EPA EXCLUSION FOR WIPES

Data generated by two major companies in the late 1980s and early 1990s showed that wipes used to clean common solvents often test as nonhazardous. Based on these data, EPA is considering an exemption for rags and wipers containing spent solvents *if specific management standards are met*. That is, wipers with de minimis quantities of residual solvents that do not drip when hand squeezed would be able to be shipped to laundries regulated under the Clean Water Act or disposed in secure solid waste landfills. Most states support the notion that a minimal amount of solvent left on wipes does not present any significant environmental or human health risk.