

Questions asked during the 6/24/14 Solvent Contaminated Wipes webinar

Q: If exempt solvent contaminated wipes are satellite accumulated, does the 180 storage rule apply?

A. There is no provision for satellite accumulation for solvent contaminated wipes.

Q: Can reusable wipes with used oil that may have TCLP metals and no solvents still be sent to a laundry in FL?

A. Such wipes would not meet the criteria of the solvent contaminated wipes exclusion and must be handled as hazardous waste if they are a waste product.

Q: What is a proper disposal method? Dumpster? Landfill?

A. If the excluded solvent contaminated wipes meet the criteria of the exclusion then they may be disposed of as solid waste. Check with your solid waste handler for permission to dispose of excluded solvent contaminated wipes

Q: Do accumulated solvent rags count against my hazardous waste accumulation limits (SQG)?

A. If the excluded solvent contaminated wipes meet the criteria of the exclusion then they do not count towards hazardous waste accumulation limits. Please note that generators can accumulate wipes for no longer than 180 days from the start date of accumulation for each container after which the wipes must be sent for disposal.

Q: If I have accumulated a container of solvent wipes after 1/31/14, and currently have it designated as Hazardous Waste, can I now change the HW designation and label the container "Excluded Solvent-Contaminated Wipes"?

A. Yes, provided you meet all the conditions of the exclusion.

Q: When adopting the rule, did the EPA / FDEP consider the purported time-delayed characteristic of ignitability that sometimes develops with wipes containing citrus-based solvents? (e.g., not characteristic at the time of generation but may become ignitable with time [during transport])

A. EPA has not addressed this concern.

Q: When does the 180-day accumulation period start (when placing the first solvent wipe in the container or when the container is full)?

A. The 180-day accumulation period begins when the first wipe is placed in the container.

Q: Are there any differences between the EPA and FDEP versions of the conditional exclusion for solvent wipes?

A. No. There are no differences between the EPA and the FDEP versions.

Q: In a collision center, where the use of a solvent wax and grease remover is being used, the disposable wipe that sits after use, do evaporate the liquid out. Do these follow under the guidelines of the rules and containment? If they do evaporate out the liquid, then are they able to be thrown into the dumpster? Just trying to clarify simply.

A. Evaporation of a free liquid is considered treatment of a hazardous waste. Typically, this would be a violation during a Compliance Evaluation Inspection. All wipes that meet the criteria for the exclusion can be placed in a closed container and the container (which includes plastic bags) may be placed in the solid waste handling container.

Q: Does this include throw away paper towel wipes?

A. Yes, this includes all paper towel wipes that meet the criteria for the exclusion.

Q: Is this PowerPoint going to be available on EPA's website for review?

A. The accompanying presentation is on FDEP's website.

Q: Do generators currently using a laundry service need to make changes?

- A. Generators using a laundry service must still place the excluded solvent contaminated wipes in a closed container, without any free liquids, that is properly labelled and has an accumulation start date even if using a laundry service.