



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

February 7, 2014

Mr. Eddie Avery, Safety Director
North Florida Shipyards Inc.
2060 East Adams Street
Jacksonville, Florida 32202
eavery@nfsy.net

**Re: North Florida Shipyards Inc.
EPA/DEP ID: FLD 093 598 548
Duval County - Hazardous Waste**

Dear Mr. Avery:

Department personnel conducted a compliance inspection of the above-referenced facility on September 17, 2013. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is attached for your records. Non-compliance identified in the inspection report has been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Pam Fellabaum at (904) 256-1670 or via e-mail at Pamela.Fellabaum@dep.state.fl.us.

Sincerely,

Michael J. Fitzsimmons
Environmental Administrator
Compliance Assurance Program

Enclosure(s)



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: North Florida Shipyards Inc

On-Site Inspection Start Date: 09/17/2013

On-Site Inspection End Date: 09/17/2013

ME ID#: 51177

EPA ID#: FLD093598548

Facility Street Address: 2060 E Adams St, Jacksonville, Florida 32202-1212

Contact Mailing Address: 2060 E Adams St, Jacksonville, Florida 32202

County Name: Duval

Contact Phone: (904) 354-3278

NOTIFIED AS:

LQG (>1000 kg/month)

INSPECTION TYPE:

Routine Inspection for LQG (>1000 kg/month) facility

Routine Inspection for Used Oil Generator facility

INSPECTION PARTICIPANTS:

Principal Inspector: Pam Fellabaum, Inspector

Other Participants: Heather Hahn, Inspector; Eddie Avery, Safety Director

LATITUDE / LONGITUDE: Lat 30° 19' 16.509" / Long 81° 37' 36.7523"

SIC CODE: 3731 - Manufacturing - ship building and repairing

TYPE OF OWNERSHIP: Private

Introduction:

North Florida Shipyards, Inc. (NFSY) was inspected by the Department's Hazardous Waste Section on September 17, 2013, as an unannounced hazardous waste compliance inspection. The facility was last inspected as a Large Quantity Generator (LQG) of hazardous waste in 2007. The facility has been issued the EPA/DEP identification number FLD 093 598 548. Please use this number on all correspondence with the Department's Hazardous Waste Section.

NFSY repairs and overhauls private, commercial, and military ships. Depending on its contract status, the facility can have anywhere from 100 to 150 employees and has been at this location since 1970. NFSY consists of numerous offices, a Shipping and Receiving Building, a Maintenance Shop/Old Blast House, a Dry Dock, and four large Warehouses. Warehouse A contains a Tool Room and a Fabrication Shop; Warehouse B contains a Machine Shop, a Paint Shop, an Electrical Shop, and a Lagging Shop; and Warehouse C which contains a Dry Dock Department, a Storage Area, a Pipe Shop, and a Carpentry Shop.

Process Description:

Shipping and Receiving/Hazardous Waste Accumulation Area

This building serves as the shipping and receiving area for the entire facility. The building is located South of East Adams Street. It contains product that is used throughout the facility. The building also has a locked and gated hazardous waste accumulation area. Hazardous wastes from each area, such as solid and liquid paint waste, punctured aerosol cans, hydrochloric acid, and other hazardous wastes, are brought here to be prepared and shipped out. Inside the hazardous waste area, there were twenty-two 55-gallon drums, one 15-gallon container, three 1-gallon containers, and one over pack container of hazardous waste. All of the drums

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and containers were closed, sealed, labeled, and placed on secondary containment pallets. All of the drums were dated and all had been accumulating for less than 90 days. Adequate aisle space was provided for all containers.

Old Blast House Building

This building is located on the Southern part of the property. Blasting of ship parts with Black Beauty used to take place in this building. Blast collection equipment was still in place and blast media could be observed in the equipment (Photos 1 and 2). Subsequent to the inspection, the waste was analyzed by the facility through a Toxicity Characteristic Leaching Procedure (TCLP) and found to be non-hazardous. Even though this waste is non-hazardous, it is recommended that the equipment be cleaned and all waste removed and properly managed.

The maintenance shop has been relocated to the old blast house. In the service area, the facility's cranes and vehicles are maintained and repaired. The shop consists of the service area and a containment area. The facility generates used oil, used oil filters, spent antifreeze, and spent blast grit. Used oil is drained from vehicles into 5-gallon containers or drain pans and accumulated into a polyurethane used oil tote located within the secondary containment area. The tote was labeled with the words "Used Oil." Drained used oil filters are accumulated in one 55-gallon drum. The drum was labeled and located on an oil impermeable surface.

One 55-gallon drum of spent rags was located on a pallet in the service area. The drum was labeled "Non-Hazardous Waste." All rags are managed as non-hazardous oily rags; however a review of the Material Safety Data Sheets (MSDSs) for aerosol cleaners used by the facility revealed that the Gunk Pro-Series Brake Cleaner used in the shop contains 90-100% tetrachloroethylene. When spent these rags would be F002 hazardous waste. The facility did not make a hazardous waste determination on all aerosol cans and spent rags prior to disposal [40 CFR 262.20]. The facility stated during the inspection that the rags that have been accumulated will be managed as F002 hazardous waste. The solvent wipe exclusion that is effective January 31, 2014, may affect this waste stream. Attached is a summary of the new solvent-contaminated wipes rule.

The facility has one System 1 parts washer containing diesel. According to the facility, it is rarely used. Waste sludge removed from the part washer is added to the facility's used oil.

One sand blast glove box in this area contained sand. According to the facility, the blast media is reused and no spent blast media has been generated in several years. The Department recommends performing a hazardous waste determination pursuant to 40 CFR 262.11 on all spent blast media and that all waste is removed and properly managed.

Dry Dock

The floating Dry Dock is used to lift ships from the water so that repairs can be made to the hull and other components that usually reside below water level. Water is used to blast the boats and is collected in a sump. Wastewater is sampled prior to disposal. At the time of the inspection the Dry Dock was not being used.

Warehouse A:

Warehouse A is located on the Southern end of the property. The building contains the Tool Room and Fabrication Shop.

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Tool Room

Tools used in the fabrication shop as well as in other areas of the facility are stored here. No hazardous waste is generated in this area, but at the time of the inspection, several gasoline containers were being stored here. According to the facility, the containers are pending a waste determination and will be managed appropriately based upon the determination.

Fabrication Shop

This shop fabricates ships parts such as hulls, flooring, and other metal pieces. Various lathes, grinders and other machines are used in the fabrication process. Minor amounts of welding are also performed in this area. Scrap metal from the fabrication and welding process are accumulated in a metals dumpster and recycled. After fabrication, parts are blasted with steel shot to prepare them for painting. The spent blast media is collected through a filtration system into bags located outside the building. The facility performs a TCLP analysis on the spent blast media annually. A review of the facility's TCLP data showed the spent blast media to be non-hazardous. According to shop personnel, no blasting of painted parts is performed.

After parts are blasted, they are painted in the Fabrication Shops paint booth. Spent paint booth filters are taken to the 90-Day Area for disposal as D001/F003/F005 solid paint waste. A review of the MSDSs of the facility's paints revealed that they did not contain heavy metal pigments. The shop uses Sherwin Williams Reducer (containing 39% methyl n-amyl ketone, 19% 1-butanol, 17% 1,2,4-trimethylbenzene, and 11% 1,3,5-trimethylbenzene) which generates D001 hazardous waste when spent. Waste thinner and paint are accumulated in one 55-gallon satellite accumulation drum located adjacent to the paint booth. One 55-gallon drum of D001/F003/F005 liquid paint waste was accumulating. On the opposite side of the paint booth, one 55-gallon satellite accumulation drum of D001/F003/F005 paint waste solids was accumulating. Both drums were closed, sealed, and properly labeled.

Spent aerosol cans are punctured and drained into a 55-gallon satellite accumulation drum. There was one 55-gallon satellite drum of aerosol can liquid accumulating. It was closed, sealed, and properly labeled.

Warehouse B:

Warehouse B is located between Warehouse A and Warehouse C. The building contains a Machine Shop, a Paint Shop, an Electrical Shop, and a Lagging Shop.

Machine Shop

This shop uses grinders, lathes and other types of machines to repair or modify various parts for use on ships. Various types of metal are used, including brass. All scrap metal is accumulated in either a metal dumpster or 55-gallon drums and recycled.

Two System 1 parts washers were located in this area. One parts washer was empty at the time of the inspection. The second parts washer contains solvent and was recently acquired from another company. The facility stated that a hazardous waste determination on spent parts washer solvent will be done prior to disposal.

One sand blast glove box containing sand is used to blast rust off of small parts. According to the facility, the blast media is reused and no spent blast media has been generated in several years. The Department recommends performing a hazardous waste determination on all spent blast media and that when generated, all waste be removed and properly managed.

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Paint Shop

The paint shop is used to store paint and supplies for use on various contract ships. Painting is mainly done on the ships and any waste generated is brought back to the Paint Shop. One 55-gallon satellite accumulation drum for solid waste paint was located in this area. The drum was closed, sealed, and properly labeled. One 55-gallon satellite accumulation drum for liquid waste paint was also located in this area. The drum was closed, sealed, and properly labeled. The facility uses Ameron T-10 Thinner containing 40% n-butyl alcohol, 40% xylene, and 20% methyl amyl ketone for clean-up.

Spent aerosol cans are punctured and drained into a 55-gallon satellite accumulation drum. There was one 55-gallon satellite drum of aerosol can liquid accumulating. It was closed, sealed, and properly labeled.

Electrical Shop

The shop repairs electrical components from contract ships and stores electrical supplies. The shop no longer uses Selig TSolv 141-SX-92 solvent cleaner (containing 90-100% trichloroethylene) on a rag.

Spent fluorescent tubes are accumulated in this area and crushed. There was one drum top bulb crusher located in this area. It was closed, sealed, dated, and labeled. Once full, the 55-gallon drum of crushed tubes is taken to the Hazardous Waste Accumulation Area for disposal.

Lagging Shop

This shop insulates pipes that will be outfitted onto contract ships. No hazardous waste is generated in this area.

Warehouse C:

Warehouse C is located on the Northern side of the property. The warehouse contains a Dry Dock Department, a Storage Area, a Pipe Shop and a Carpentry Shop.

Dry Dock Department

In this department, parts and materials used on the dry dock are stored. One 55-gallon drum of non-hazardous oil dry was stored in this area. The drum was closed and labeled.

Storage Area

In the storage area was a large metal bin containing oil. This is an area of concern. Any machinery or equipment containing oil that is not in use or usable should be drained. When spent used oil should be accumulated in closed, labeled containers located within secondary containment.

Pipe Shop

This shop cuts and welds pipes for use on contract ships. Pipe cutter machines used in this area generate used oil. The machines were not in use at the time of the inspection. One 55-gallon container for collecting scrap metal was located in this area. Spent aerosol cans are punctured with a 55-gallon drum top aerosol can puncture system located in this area prior to disposal.

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Carpentry Shop

Building of the facility's crates and other shipment containers occurs in the Wood Shop. Wood is not treated or painted in this building. No hazardous waste is generated in this shop.

Record Review

NFSY is currently operating as a LQG of hazardous waste. The facility generates LQG amounts of D001/F003/F005 solid and liquid paint waste, D002 acids, and minor amounts of hazardous wastes from other activities. Hazardous wastes are shipped within 90 days to Rineco (ARD 981 057 870).

Used oil, used oil filters, and spent oily absorbents are recycled by Rineco.

Inspections of the containers in the Hazardous Waste Accumulation Area are performed and documented weekly. Documentation of annual employee training is kept on-site. The facility's Contingency Plan is currently up-to-date and emergency arrangements have been made with local authorities.

The facility keeps a record of TCLP data for each ship worked on. All records reviewed were found to be in order.

New Potential Violations and Areas of Concern:**Violations**

Type:	Violation
Rule:	262.20
Explanation:	The facility disposed of F002 hazardous waste rags by throwing them into the trash.
Corrective Action:	No further action is required. The facility stated during the inspection that the rags that have been accumulated will be managed as F002 hazardous waste.

Inspection Date: 09/17/2013

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Inspection Date: 09/17/2013

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Pam Fellabaum

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

2/6/2014

DATE**Supervisor:** Pam Fellabaum**Inspection Approval Date:** 02/06/2014

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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2600 BLAIRSTONE ROAD
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MANAGEMENT PRACTICES FOR WIPES, RAGS AND SHOP TOWELS

January 31, 2014

INTRODUCTION

Florida adopted by reference in Rules 62-730.020 and 62-730.030, Florida Administrative Code (F.A.C.) the federal rule [40 CFR 261.4(a)(26) and (b)(18)] for the management of solvent-contaminated wipes under the Resource Conservation and Recovery Act (RCRA), effective January 31, 2014. The purpose of this guidance is to outline management options for both laundered and non-laundered wipes and shop towels, including wipes and shop towels that do not meet the conditional exclusions of 40 CFR 261.4(a)(26) and 261.4(b)(18), or the definition of “solvent-contaminated wipe” at 40 CFR 260.10.

The rule: 1) revises the definition of solid waste to conditionally exclude solvent-contaminated wipes that are laundered and reused (reusable wipes); and 2) revises the definition of hazardous waste to conditionally exclude solvent-contaminated wipes that are disposed (disposable wipes).

MANAGEMENT OF SOLVENT-CONTAMINATED REUSABLE WIPES

Solvent-contaminated reusable wipes are not solid waste when reused provided they meet the conditions of the exclusion.

Conditional Exclusion

1. Wipes that after use or after cleaning up a spill, either: *(refer to the attached EPA’s Solvent-Contaminated Summary Chart for additional details)*
 - a. Contain one or more F001-F005 listed solvents in 40 CFR 261.31, or
 - b. Corresponding P- or U- listed solvents found in 40 CFR 261.33;
 - c. Exhibit a hazardous waste characteristic from a solvent listed in 40 CFR 261; and/or
 - d. Exhibit ONLY the hazardous waste characteristic for ignitability (flashpoint of less than 140 F) when containing one or more non-listed solvents (Examples are mineral spirits and some paint thinners).
2. **Storage:** Container requirements are performance-based. They apply to accumulation and storage at the generating facility, during transportation, and at the handling facility. The containers must be non-leaking and closed. There must be complete contact between the fitted lid and the rim, except when wipes are being added or removed. During accumulation, closed containers do not have to be sealed. Containers must be sealed when the container is full, or no longer being accumulated, or when the container is

being transported. Sealed means that the lid is properly and securely attached to the container and all openings securely bound or closed to prevent leaks and emissions.

3. **Label:** Containers must be labeled “Excluded Solvent-Contaminated Wipes”.
4. **Accumulation Time:** 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 cleaning.
5. **Prior to Transport:** When the wipes are sent for cleaning, the wipes and containers must not contain free liquids as determined by the Paint Filter Liquids Test (EPA Methods Test 9095B).
No Free Liquids Condition: Facilities may use mechanical wringers, solvent extraction technologies or process knowledge to meet the standard to ensure that if the Paint Filter Liquids Test was performed, the wipes would pass.
6. **Recordkeeping:** Generators must maintain documentation for three years that includes:
 - a. Name and address of handling facility receiving the wipes.
 - b. Documents that show the 180 day accumulation standard is being met.
 - c. Description of the process used to meet the “no free liquids” condition.
7. **Eligible Handling Facilities:** Laundries or dry cleaners whose discharge is regulated under sections 301 and 402 or section 307 of the Clean Water Act.

MANAGEMENT OF SOLVENT-CONTAMINATED DISPOSABLE WIPES

Solvent-contaminated disposable wipes are not hazardous waste when sent for disposal provided they meet the conditions of the exclusion.

Conditional Exclusion

1. Wipes that after use or after cleaning up a spill, either: *(refer to the attached EPA’s Solvent-Contaminated Summary Chart for additional details)*
 - a. Contain one or more F001-F005 listed solvents in 40 CFR 261.31, or
 - b. Corresponding P- or U- listed solvents found in 40 CFR 261.33;
 - c. Exhibit a hazardous waste characteristic from a solvent listed in 40 CFR 261; and/or
 - d. Exhibit ONLY the hazardous waste characteristic for ignitability (flashpoint of less than 140 F) when containing one or more non-listed solvents (Examples are mineral spirits and some paint thinners);
 - e. *Are not hazardous waste due to presence of trichloroethylene.*
2. **Storage:** Container requirements are performance-based. They apply to accumulation and storage at the generating facility, during transportation, and at the handling facility. The containers must be non-leaking and closed. There must complete contact between the fitted lid and the rim, except when wipes are being added or removed. During accumulation, closed containers do not have to be sealed. Containers must be sealed when the container is full, or no longer being accumulated, or when the container is

being transported. Sealed means that the lid is properly and securely attached to the container and all openings securely bound or closed to prevent leaks and emissions.

3. **Label:** Containers must be labeled “Excluded Solvent-Contaminated Wipes”.
4. **Accumulation Time:** 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 cleaning.
5. **Prior to Transport:** When the wipes are sent for disposal, the wipes and containers must not contain free liquids as determined by the Paint Filter Liquids Test (EPA Methods Test 9095B).
No Free Liquids Condition: Facilities may use mechanical wringers, solvent extraction technologies or process knowledge to meet the standard to ensure that if the Paint Filter Liquids Test was performed, the wipes would pass.
6. **Recordkeeping:** Generators must maintain documentation for three years that includes:
 - a. Name and address of handling facility receiving the wipes.
 - b. Documents that show the 180 day accumulation standard is being met.
 - c. Description of the process used to meet the “no free liquids” condition.
7. **Eligible Handling Facilities:** *Municipal solid waste landfills regulated under 40 CFR 258 or to a hazardous waste landfill under 40 CFR parts 264 or 265. 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 subpart H.*

MANAGEMENT OF ALL OTHER WIPES AND SHOP TOWELS

Solvent-contaminated wipes that contain listed hazardous waste other than solvents, or exhibit the characteristic of corrosivity (D002), reactivity (D003) or toxicity (D004-D043) due to contaminants other solvents, are not eligible for the solvent wipe exclusions at 40 CFR 261.4(a)(26) and 261.4(b)(18)), as adopted in subsection 62-730.030(1), F.A.C. Non-excluded wipes and shops towels are subject to a hazardous waste determination as required in 40 CFR 262.11. Wipes and shop towels determined to be hazardous waste must be managed according to the applicable regulations in 40 CFR 260 through 273. Non-hazardous waste wipes and shop towels may be disposed or sent to a dry cleaner or laundry for cleaning and reuse.

Solvent-Contaminated Wipes Final Rule

Summary Chart*

This chart summarizes the federal regulations 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”).

This summary chart is a guidance document provided by the U.S. Environmental Protection Agency (EPA). This is not a regulation and, therefore, does not add, eliminate, or change any existing regulatory requirements. The statements in this document are intended solely as guidance. Additionally, state regulations may be different from the federal program.

	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><tr><td>- 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>- Creosols</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>- Trichloroethylene (<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	- Creosols	- Methylene chloride	- Cyclohexanone	- Tetrachloroethylene	- 1,2-Dichlorobenzene	- Toluene	- Ethyl acetate	- 1,1,2- Trichloroethane	- Ethyl benzene	- Trichloroethylene (<i>*For reusable wipes only.</i>)	- 2-Ethoxyethanol	- Xylenes
- Acetone	- Isobutyl alcohol																					
- Benzene	- Methanol																					
- n-Butanol	- Methyl ethyl ketone																					
- Chlorobenzene	- Methyl isobutyl ketone																					
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- 1,2-Dichlorobenzene	- Toluene																					
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- Ethyl benzene	- Trichloroethylene (<i>*For reusable wipes only.</i>)																					
- 2-Ethoxyethanol	- Xylenes																					
Does not include	<p>➤ Wipes that contain listed hazardous waste other than solvents.</p> <p>➤ Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents.</p>	<p>➤ Wipes that contain listed hazardous waste other than solvents.</p> <p>➤ Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents.</p> <p>➤ Wipes that are hazardous waste due to the presence of trichloroethylene.</p>																				

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 date 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 not be 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 Methods Test 9095B (Paint Filter Liquids Test) or other authorized state standard.	
Management of Free Liquids	Free liquids removed from the wipes or from the wipes container must be managed according to applicable hazardous waste regulations in 40 CFR parts 260 through 273.	
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.	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 264, 265, or 266 subpart H. Must go to 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.
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.	

★Source: EPA