



ENVIRONMENTAL PROTECTION DIVISION
Lori Cuniff, CEP, CHMM, Deputy Director
Community, Environmental and Development Services Department
800 Mercy Drive, Suite 4
Orlando, FL 32808-7896
407-836-1400 • Fax 407-836-1499
www.ocfl.net

June 25, 2014

Via Email: mark.kreller@fedex.com

FedEx Ground
Mark Kreller, Operations Manager
3000 Directors Row
Orlando, Florida 32809

RE: **Small Quantity Generator Inspection**
EPA ID No. FLD000030817
CHAZ Facility No. 74027

Dear Mr. Kreller:

An inspection was conducted at your facility on Thursday, May 15, 2014. Under the authority of Section 403.091 and Chapter 403, Part IV of Florida Statutes, the inspection was designed to ascertain compliance with applicable Florida law regarding solid and hazardous waste management. Relevant provisions of the Resource Conservation and Recovery Act (RCRA), Title 40 Code of Federal Regulations (CFR) 260-273 and 279 have been adopted in the Florida Administrative Code (FAC) Chapters 62-710, 62-730 and 62-737. **At the time of inspection, the facility was operating as a Small Quantity Generator of hazardous waste.**

Any potential non-compliance issues are listed in the attached report. Please respond in writing, within 14 days of receipt of this letter, describing what you have done to come into compliance. Address your response to the inspector listed below at the address noted on the letterhead. A follow-up inspection will be conducted within 45 days to verify compliance. If your facility remains in a non-compliance status, we will forward your information to the Florida Department of Environmental Protection for enforcement action.

If there were no compliance issues noted in the report, a response is not necessary and a follow-up inspection will not be performed. Thank you once again for your time during the inspection and complying with the aforementioned regulations. If I may be of further assistance, please feel free to contact me at 407.836.1423 or your Inspector at 321.689.2904.

Sincerely,

Vanessa Cruz
SQG Program Coordinator

Attachment
LQR/VC

ec: John White, Florida Department of Environmental Protection john.white@dep.state.fl.us
Florida Department of Environmental Protection – Central District DEP_CD@dep.state.fl.us



ORANGE COUNTY ENVIRONMENTAL PROTECTION DIVISION
Compliance & Waste Management Section



HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT

INSPECTION INFORMATION

Facility Name: _____ Facility ID No: _____

Inspection Date: _____ Inspector(s): _____

I. INSPECTION INFORMATION

EPA ID No: _____ SIC Code: _____

Physical Address: _____

Mailing Address: _____

Phone: _____ Email Address: _____

Operating Hours: _____ Number of Employees: _____

Ownership: Private ☐ Government ☐ Notification Form (8700-12 Provided): Yes ☐ No ☐ N/A ☐

Notified as: 40 CFR 262.12(a) _____ Current Generator Status: _____

Responsible Official: _____

District No.: _____ Business Tax I.D. _____ Surcharge Assessed: Yes ☐ No ☐

II. INSPECTION DETAILS

Inspection Type: Routine ☐ Follow-up ☐ CAV ☐ Complaint ☐ EPD Incident: _____

Facility Representative(s) Name and Title: _____

Previous Site Inspection Dates: _____

III. SITE DETAILS

Age of Facility: _____ Floor Drains: Yes ☐ No ☐

Sealed: Yes ☐ No ☐ N/A ☐

Sewer Service: _____

Drinking Water: _____

NPDES Pond on-site: Yes ☐ No ☐ Quantity: _____

Condition: _____

Drainage Basin: _____

Adjacent Water Body: _____

O/W/S on-site: Yes ☐ No ☐ Quantity: _____ Size (s): _____

Is the O/W/S serviced every 90 days?: Yes ☐ No ☐ N/A ☐

O/W/S service provider: _____



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DESCRIBE DISCREPANCIES IN WASTE IDENTIFICATION IN COMMENTS

YES NO

1.	Are any hazardous wastes treated or disposed of on-site? Describe in Comments		
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COMMENTS

V. ACCUMULATION REQUIREMENTS

YES NO N/A

1.	Does the facility accumulate the waste on-site prior to treatment or disposal?			
NOTE: Facilities accumulating un-containerized waste in buildings or on drip pads are subject to LQG requirements.				
2.	Does the facility comply with the 180-day accumulation time limit? (40 CFR 262.34 (d))			
3.	Does the facility comply with the 6000 kg maximum accumulation of hazardous waste? (40 CFR 262.34 (d)(1))			
4.	Is each container marked with the beginning date of accumulation? (40 CFR 262.34 (d)(4))			
5.	Is each container and tank marked with the words "Hazardous Waste"? (40 CFR 262.34 (d)(4))			
6.	Are satellite accumulation points used? Describe in Comments.			
	a. Are satellite containers closed and marked with the words or other words which describe contents? (40 CFR 262.34(c))			
	b. Do satellite accumulation points hold 55 gallons of waste or less?			
	c. If not, is the excess marked with the date the excess waste began accumulating? (The date must be within 3 days of the date of inspection (40 CFR 262.34(c)(2))			
7.	Is each container closed ? (40 CFR 262.34(d)(2))			
8.	Are there any containers on-site prepared for shipment?			
	a. If so, are the containers appropriate for the waste? (40 CFR 262.30)			
	b. Are they labeled with the correct diamond-shaped DOT hazard class? (40 CFR 262.31)			
	c. Does the label have generator's name, address, and manifest number? (40 CFR 262.32 (b))			
	d. Are placards available to be provided to the transporter? (40 CFR 262.33)			
9.	Are used oil containers in good condition? (FAC 62-710.401(6))			
10.	Are used oil filter containers in good condition? (FAC 62-710.850(5)(a))			
11.	Are used oil and oil filter containers labeled properly? (FAC 62-710.401(6))			
12.	If used oil containers are outside, are they on an impermeable surface & either double-walled or have secondary containment? (FAC 62.710.401(6))			



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VI. PERSONNEL TRAINING (40 CFR SUBPART C)		YES	NO	N/A
1.	Are facility personnel thoroughly familiar with proper waste handling and emergency procedures?			
2.	Is the trainer adequately trained in hazardous waste management procedures?			
3.	Does the training cover emergency response procedures, including equipment handling and inspection?			
4.	Does the training cover hazardous waste identification and handling procedures?			
VII. PREPAREDNESS AND PREVENTION (40 CFR 265)		YES	NO	N/A
1.	Is there evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment? (265.31)			
2.	Does the facility have an internal communication or alarm system? (265.32(a)) Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? (265.32(b))			
3.	Is spill control and decontamination equipment present? (265.32(c))			
4.	Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (265.35)			
5.	Has the facility made emergency response arrangements with the following: (265.37)	YES	NO	N/A
	Fire Department:			
	Police:			
	Hospital:			
6.	If not, has the facility attempted to do so and is the refusal documented?			
VIII. MODIFIED CONTINGENCY PLANS & EMERGENCY RESPONSE (40 262.34 (d)(5))		YES	NO	N/A
1.	Is there an emergency coordinator on-site or within short driving distance of the facility at all times?			
2.	Who is the emergency coordinator:			
3.	Is the following information posted near the telephone:			
	a. Name and telephone number of emergency coordinator?			
	b. Location of fire extinguishers, spill control material and, if present, fire alarm?			
4.	Are employees thoroughly familiar with proper waste handling and emergency procedures as relevant to their responsibilities during facility operations and emergencies?			
5.	Does the emergency coordinator or his designee know what is the required response in the event of a fire, a spill which can be contained, or a fire, explosion or other release?			

COMMENTS SECTIONS VI - VIII



ORANGE COUNTY ENVIRONMENTAL PROTECTION DIVISION
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HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT

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IX. THE MANIFEST (40 CFR 262 SUBPART B)		YES	NO	N/A
1.	Does the facility use the manifest for all is hazardous wastes? (262.20)			
2.	Is the facility using the correct manifest form (EPA 8700-22; OMB #2050-0039)?			
2a.	If no, does the generator qualify for the contractual agreement exclusion?			
3.	Are the following items completed correctly on the manifest?			
	1. Generator EPA ID Number			
	2. Manifest Document Number			
	3. Generator Name and Mailing Address			
	4. Generator Phone			
	5-8. Transporter names and ID numbers			
	D-F. Transporter phone number			
	9. TSD name and mailing address			
	10. TSD number EPA ID number			
	H. TSD Phone number			
	11. DOT description of waste, including hazard class, ID number & packaging group			
	12. Container number and type			
	13-14. Quantity of waste and units			
	I. EPA waste codes			
	K. Handling codes			
	16. Name, handwritten signature of generator and date			
	17-18. Name, handwritten signature of transporter and date			
	19. Are any manifest discrepancies noted?			
	20. Name, handwritten signature of TSD and date (if shipment occurred more than 60 days ago)			
4.	Number of manifests examined _____ Number of errors _____ Note manifest document numbers and dates of manifests with errors below.			
5.	If generator did not receive a signed return copy of the manifest from the disposal facility within 60 days of shipment, did the facility file an exception report? (40 CFR 262.42(b))			
6.	Are manifests retained for 3 years? (40 CFR 262.40 (a))			
MANIFEST	DATE	DESTINATION	ERROR(S) COMMENTS	



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X. RECORD KEEPING & REPORTING		YES	NO	N/A
1.	Is the generator keeping the following records?			
	Exception Reports (40 CFR 262.42)			
	Analytical Results (describe):			
2.	Any additional reporting, such as contingency plan implementation reports? (40 CFR 262.43)			
3.	Are records kept for a minimum of 3 years? (40 CFR 262.40(a))			
4.	Are weekly container inspections being conducted? (FAC 62-730.160(6))			
5.	Are weekly container inspections documented? (FAC 62-730.160(6))			
6.	a. Does the inspection log include the legibly printed name of the inspector?			
	b. Number of containers?			
	c. Condition of containers?			
	d. Date and time of the inspection?			
	e. Date and nature of any repairs or remedial actions?			

At the time of inspection this facility was:

IN COMPLIANCE ☐

NOT IN COMPLIANCE ☐

A hazardous waste compliance inspection was conducted on this date to determine your facility's compliance with applicable portions of Chapters 403 & 376 of the Florida Statutes and relevant provisions of the Resource Conservation and Recovery Act (RCRA), Title 40 Code of Federal Regulations (CFR) 260-273 and 279, which have been adopted in Florida Administrative Code (FAC) Chapters 62-710, 62-737, 62-730. This report details findings at the time of the inspection.

Report Prepared By:

Report Reviewed By:

Signature

Signature



ORANGE COUNTY ENVIRONMENTAL PROTECTION DIVISION
Compliance & Waste Management Section



HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT

INSPECTION INFORMATION

Facility Name: _____ Facility ID No: _____

Inspection Date: _____ Inspector(s): _____

COMMENTS / CORRECTIVE ACTIONS:



ORANGE COUNTY ENVIRONMENTAL PROTECTION DIVISION
Compliance & Waste Management Section



HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT

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PHOTOGRAPHS



ORANGE COUNTY ENVIRONMENTAL PROTECTION DIVISION
Compliance & Waste Management Section



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PHOTOGRAPHS



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Compliance & Waste Management Section



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PHOTOGRAPHS



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

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 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 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	➤ 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: <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> ➤ Wipes that exhibit a hazardous characteristic resulting from a solvent listed in part 261. ➤ Wipes that exhibit only the hazardous characteristic of ignitability when containing one or more non-listed solvents.		- 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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- Ethyl benzene	- Trichloroethylene (<i>*For reusable wipes only.</i>)																					
- 2-Ethoxyethanol	- Xylenes																					
Does not include	➤ Wipes that contain listed hazardous waste other than solvents. ➤ Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents.	➤ Wipes that contain listed hazardous waste other than solvents. ➤ Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents. ➤ Wipes that are hazardous waste due to the presence of trichloroethylene.																				

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: ➤ 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