



MANAGEMENT OF USED RAGS AND WIPES

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Waste Determination.

The Department is providing the following information to clarify the classification of solvent contaminated rags and wipes. For understanding, the term “rag” is applied to launderable textile products only and the term “wipe” is universally applied to disposal items such as paper or other nontextile and some textile products. The North Dakota Department of Health has concluded that the regulatory status of used rags and wipes is dependent on how the solvent came into contact with the rag or wipe. In Section 33-24-03-02, it is generator’s responsibility for conducting a waste determination. The following four scenarios are most likely to occur:

1. Unused solvent product is placed on a rag or wipe and the rag or wipe is then used to clean a surface:

The rag or wipe is hazardous only if it exhibits a characteristic.

2. Spent solvent is generated, spilled or leaked, and cleaned with a rag or wipe:

If the solvent is listed, the contaminated rag or wipe is considered hazardous until it no longer contains any of the solvent and any liquid in the container holding the contaminated rags or wipes would be considered a hazardous waste.

If the solvent is characteristic only, the contaminated rag or wipe is considered hazardous only if it exhibits a characteristic.

3. Unused solvent product is spilled or leaked and cleaned up using a rag or wipe:

The rag or wipe is hazardous only if the solvent is a “P” or “U” listed commercial chemical product, or if the rag or wipe exhibits a characteristic.

4. Spent solvent is discarded by being dumped in a drum of rags or wipes:

If the solvent is characteristic only, the contaminated rags or wipes would be considered hazardous only if they exhibit a characteristic. In all other cases, the rags or wipes would be considered a hazardous waste. The Department cautions any generator from this approach as this is not considered treatment but dilution, which is prohibited by Section 33-24-05-252 NDAC.

Subsequent Management.

The handling and transportation of used rags and wipes is dependent upon which of the above four

possible scenarios occurred. It is also important to note that any accumulated liquids in a storage container holding used rags or wipes must also be characterized, and managed accordingly. In order to properly manage and characterize waste rags or wipes and any liquids contained in the rags or wipes, the Department recommends using a wringer to remove any liquids from a used rag or wipe for proper management prior to disposal.

If the used rags or wipes are considered a hazardous waste, a North Dakota waste transporter permit would be required for transportation of the used rags or wipes and the used rags and wipes are subject to the North Dakota Hazardous Waste Management Rules. This also applies to any liquids collected from used rags and wipes during storage.

Used rags and wipes destined for reuse after commercial laundering (either water washing or dry cleaning) are not considered a solid waste, and therefore not a hazardous waste. However, if the laundering facility makes a determination that a used rag or wipe is truly spent and considers it a waste, the above scenarios still apply.

Pollution Prevention Tips.

As the scenarios above point out clearly, the determination is based upon how the solvent came in contact with the rag or wipe. One method of ensuring that unused solvent contacted the wipe first is to use wipes with solvent already applied. This option may allow you to purchase less solvent while reducing the amount of waste wipes generated from routine operations.

Another method is to try different, less hazardous solvents. Removing the characteristic of ignitability does not necessarily result in the used rags or wipes being nonhazardous. The Department has found that through use some rags and wipes contain sufficient metal shavings or other contamination that they will fail the toxicity characteristic leaching procedure (TCLP) test for metals.

Wringing out used rags and wipers removes excess solvents. This management method allows you to reuse the solvent when and where possible while decreasing the amount of solvents that will drain from the rags or wipes during storage prior to disposal.

Implement a tracking program on how, when and where rags and wipes are used. You may find that there are alternatives to not only the method of cleaning but to the amount and type of solvent needed to perform the cleaning. This may allow you to purchase less solvent, less hazardous solvents or the right type of rag or wipe to best perform the cleaning operation.

Involve your employees. The people that work with the rags, wipes and solvents every day may have some good ideas on how to help.