

Management of Contaminated Wipes and Reusable Cloth Items

1. Version, Date. 1, 8 April 2021 (EMS)
2. Purpose
 - a. This procedure establishes the requirements for the management of contaminated and re-usable cloth items at Marine Corp Base (MCB), Quantico. Complying with these requirements assists with the management of solvent-contaminated and reusable cloth items at MCB, Quantico, in accordance with the Base's Hazardous Waste permit (EPA ID# VA1170247222) and Virginia State Solid Waste Regulations (9 VAC 20-60-18).
3. Applicability
 - a. Audience. The procedure applies to all personnel responsible for the handling, management and disposal of rags/wipes using the Red Rag Program.
 - b. Scope. Under the Solvent-Contaminated Wipes Rule (also known as the "Wipes Rule"), solvent-contaminated wipes sent for cleaning or disposal are conditionally excluded from hazardous waste regulation. As long as the solvent-contaminated wipes meet the conditions of the exclusions, they are not considered hazardous waste under the RCRA. Specifically, solvent-contaminated wipes sent for cleaning (i.e., laundering or dry cleaning) are excluded from solid waste regulation under Title 40 of the Code of Federal Regulations (CFR) section 261.4(a)(26), known as the "reusable wipes exclusion." Solvent-contaminated wipes sent for disposal (i.e., landfilling or incineration) are excluded from hazardous waste regulation under 40 CFR section 261.4(b)(18), known as the "disposable wipes exclusion." Wipes sent for disposal continue to be considered solid wastes. However, all required conditions must be met in order for the wipe to be excluded from full hazardous waste regulations.
4. Definitions. The following definitions are provided to support this procedure:
 - a. Wipe - Wipe is a shop towel, rag, pad, or swab made of wood pulp, fabric, cotton, polyester blends, or other material
 - b. Solvent-contaminated wipe - wipe that, after use or after cleaning up a spill, contains a solvent that would be considered hazardous waste in accordance with 40 CFR part 261.

5. Responsible Parties. The following parties are responsible for activities associated with the management of contaminated wipes and reusable cloth items at MCB, Quantico.

a. Hazardous waste generators, handlers and other interested parties

(1) Marine Corps Community Services (MCCS)

(2) Weapons Training Battalion (WTBn)

b. Natural Resources & Environmental Affairs (NREA) Branch
Hazardous Waste Program Manager (HWPM)

c. NREA Branch, Training Coordinator

6. Procedures for Excluded Solvent-Contaminated Wipes.

a. What is included in the exemption

- (1) Wipes containing one or more F001 - F005 listed solvents listed in §261.31 or the corresponding P-listed or U-listed solvents found in §261.33, including:

Acetone	Ethyl acetate	Methylene chloride
Benzene	Ethyl benzene	Tetrachloroethylene
N-Butanol	2-Ethoxyethanol	Toluene
Chlorobenzene	Isobutyl alcohol	1,1,2-Trichloroethane
Cresols	Methanol	Trichloroethane (<i>*For reusable wipes only.</i>)
Cyclohexanone	Methyl ethyl ketone	Xylenes
1,2-Dichlorobenzene	Methyl isobutyl ketone	

- (2) Wipes that exhibit a hazardous characteristic resulting from a solvent listed in 40 CFR 261.
- (3) Wipes that exhibit only the hazardous characteristic of ignitability when containing one or more non-listed solvents.

b. Storage Requirements and Labeling Requirements

- (1) Wipes must be accumulated, stored, and transported in non-leaking, closed containers that can contain free liquids, should they occur.
- (2) Containers must be labeled "Excluded Solvent-Contaminated Wipes".
- (3) Containers are considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes.
- (4) When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions (follow Degreasing Solvent Emissions ESOP 7; Air Program).

c. Accumulation Time Limits

- (1) Generators may accumulate wipes up to 180 days from the start of accumulation prior to being sent for cleaning or disposal.

d. Condition of Wipes Prior to Transport

- (1) Wipes must contain no free liquids prior to being sent for cleaning or disposal and there may be no free liquid in the container holding the wipes.
- (2) "No free liquids" condition is defined in 40 CFR 260.10 and is based on the EPA Method Test 9095B (Paint Filter Liquids Test).

e. Recordkeeping

- (1) Generators must maintain documentation that includes name and address of the laundry, dry cleaner, landfill, or combustor.
 - (A) Solvent Contaminated Reusable Wipes 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. Hazardous waste may not be improperly disposed by mixing with wipes or clothing to be sent to laundering facilities.
 - (B) Solvent Contaminated Disposable Wipes 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 254, 265, or 266 subpart H. or to a municipal solid waste landfill regulated under 40 CFR parts

258 (including \$258.40) or to a hazardous waste landfill regulated under 40 CFR parts 264 or 265. Hazardous waste may not be improperly disposed by mixing with wipes or clothing.

- (2) Generators must maintain documentation that demonstrates the 180-day accumulation time limit is being met.
- (3) Generators must maintain documentation that demonstrates the description of the process the generator is using to meet the "no free liquids" condition.

7. Inspection and Corrective Action.

a. Inspection

- (1) NREA will inspect all Contracted Solvent Contaminated Wipe Programs annually to ensure Handlers are complying with all State and Federal requirements.
- (2) The EC/Handler shall provide inspectors with all material and labor necessary to prepare for inspection in accordance with Hazardous Waste Management Plan.
- (3) The EC/Handler shall assist the inspector and take corrective actions, including any adjustments to contract, determinations of exemptions, handling techniques, and labeling.
- (4) The EC/Handler shall adhere to the terms of the third party contractor, Regional Contract Office, NREA's Hazardous Waste Management Plan, and Command/Unit's policy.

b. Corrective Actions.

- (1) All units must comply with federal and state regulations, whether utilizing a third party "Solvent Exempt Wipe Program" or "Red Rag Program" or solvent-contaminated wipes will be managed as hazardous waste.
- (2) If units fail to comply and adhere with federal and state regulations, NREA will remove unit from the Solvent Exempt Wipe Program or Red Rag Program.

8. Internal Communication. Included in paragraphs 6 and 7 of this ESOP.

9. Training/Awareness.

- a. MCCS and WTBn provide and document initial and annual instructions to enable employees to conduct their work in a safe manner and to recognize and report hazardous conditions.

- b. Training responsibilities include:
- (1) Safe practices;
 - (2) Proper use, care, and maintenance of tools and equipment;
 - (3) Accident reports and individual responsibility for accident prevention;
 - (4) Known hazards in work areas;
 - (5) Applicable regulations and/or permits;
 - (6) The EC/Handler develop procedures to ensure newly hired employees are properly trained prior to work assignment; and
 - (7) EC/Handler are responsible for maintaining a file of employees who have attended training including the name of the employee, date of training, location of training, and nature of training received for three years.
- c. The NREA Training Coordinator trains on the applicable provisions of this ESOP to include Hazardous Waste Handlers Course.
- d. The HWPM provides additional guidance to appropriate personnel regarding this procedure. Guidance may include, but is not limited to, clarification of the information process, and recordkeeping requirements.

10. Emergency Preparedness and Response.

- a. EC/Handler witnessing a fire or accident call the fire department by dialing 911. The EC/Handler shall maintain a log recording the time of notification, the person notified, and scope of the emergency.
- b. EC/Handler shall comply with installation, OSHA and other regulatory agency requirements for record keeping and reporting of all accidents in the course of work which result in death, trauma, occupational disease, or environmental damage.

11. References and Related Documents.

- a. 40 CFR 261.4(a)(26) (Solid Waste Exclusion)
- b. 40 CFR 261.5(b)(18) (Hazardous Waste Exclusion)
- c. 9 VAC 20-60-18 (Virginia State Solid Waste Regulation)

12. Document Revision History. The following provides a history of revisions of this ESOP:

Revision Number	Date	Revision Made By	Section	Page	Summary of Change and Reason	Signature

13. Document Owner. This document has been reviewed and approved by the document owner. Any revisions or future updates to the procedure will be completed by the document owner as needed.

a. Document Owner. Mr. David Norris, Hazardous Waste Program Manager, NREA Branch.

b. Document Approval. Capt Travis E. McWhirter, Acting Director Natural Resources and Environmental Affairs Branch, EMS Core Team