

# Characterizing Waste & Solvent Contaminated Wipes Exclusion

A&WMA – Iowa Chapter

May 2014

**\*\*Knowledge of Process**

**\*\*Constituent Quantification**

**\*\*Testing**



# Knowledge of Process

- Understand the industrial process that generates the waste  
Cooling Tower Sediment contacts metal or process chemicals and should have total metals run before disposal.
- Define physical and chemical properties  
Spilled and neutralized acid has not been in contact with process metal equipment so if it's pH is 2-12.5 no testing.



# Industrial Process

- Maintenance
- Chemical Residue
- Manufacturing By-Products
- Used Containers (Aerosol Cans)
- Construction debris
- Spill clean up materials



# Constituent Quantification

- Listed Waste F K P U
- Characteristic Waste
  - ignitable 01
  - corrosive 02
  - reactive 03
  - toxic D-04 to 43



# Profiles

**WM**  
WASTE MANAGEMENT

Sandblast Grit Express Profile

Requested Disposal Facility: \_\_\_\_\_ Profile Number: \_\_\_\_\_  
 Renewal for Profile Number: \_\_\_\_\_ Waste Approval Expiration Date: \_\_\_\_\_  
 Check here if there are multiple generating locations for this waste. Attach additional locations.

**A. Waste Generator Facility Information (must reflect location of waste generation/origin)**

1. Generator Name: \_\_\_\_\_ 7. Email Address: \_\_\_\_\_  
 2. Site Address: \_\_\_\_\_ 8. Phone: \_\_\_\_\_ 9. FAX: \_\_\_\_\_  
 3. City/ZIP: \_\_\_\_\_ 10. NAICS Code: \_\_\_\_\_  
 4. State: \_\_\_\_\_ 11. Generator USEPA ID #: \_\_\_\_\_  
 5. County: US 12. State ID# (if applicable): \_\_\_\_\_  
 6. Contact Name/Title: \_\_\_\_\_ P. O. Number: \_\_\_\_\_

**B. Customer Information  same as above**

1. Customer Name: GeoStat Environmental, LLC 6. Phone: 316-260-2460 FAX: 316-260-2433  
 2. Billing Address: 115 E Marlin, Suite 107 7. Transporter Name: \_\_\_\_\_  
 3. City, State and ZIP: McPherson, KS 67460 8. Transporter ID # (if appl.): \_\_\_\_\_  
 4. Contact Name: Jane Alderson 9. Transporter Address: \_\_\_\_\_  
 5. Contact Email: kshobe@geostatenvironmental.com 10. City, State and ZIP: \_\_\_\_\_

**C. Waste Stream Information**

1. DESCRIPTION

a. Common Waste Name: Sandblast Grit  
 State Waste Code(s): \_\_\_\_\_

b. Describe Process Generating Waste or Source of Contamination:  
Exterior surface blasting to remove paint/rust from structures. MSDS for sandblast media is attached.

c. Typical Color(s): Any and all

d. Strong Odor?  Yes  No Describe: \_\_\_\_\_

e. Physical State at 70°F:  Solid  Liquid  Powder  Semi-Solid or Sludge  Other: \_\_\_\_\_

f. Layers?  Single layer  Multi-layer  NA

g. Water Reactive?  Yes  No If Yes, Describe: \_\_\_\_\_

h. Free Liquid Range (%): \_\_\_\_\_ to \_\_\_\_\_  NA(solid)

i. pH Range: \_\_\_\_\_ to \_\_\_\_\_  NA(solid)

j. Liquid Flash Point:  < 140°F  140°- 199°F  ≥ 200°F  NA(solid)

k. Flammable Solid:  Yes  No

l. Physical Constituents: List all constituents of waste stream - (e.g. Soil 0-80%, Wood 0-20%):  (See Attached)

Constituents (Total Composition Must be ≥ 100%)	Lower Range	Unit of Measure	Upper Range	Unit of Measure
		%	100	%
1. Sandblast debris (paint chips/rust)	100			
2.				
3.				
4.				
5.				
6.				

2. ESTIMATED QUANTITY OF WASTE AND SHIPPING INFORMATION

a.  One Time Event  Base  Repeat Event

b. Estimated Annual Quantity: 1  Tons  Cubic Yards  Drums  Gallons  Other (specify): \_\_\_\_\_

c. Shipping Frequency: \_\_\_\_\_ Units per  Month  Quarter  Year  One Time  Other

d. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If yes, answer e.)  Yes  No

e. USDOT Shipping Description (if applicable): \_\_\_\_\_

3. SAFETY REQUIREMENTS (Handling, PPE, etc.): Normal landfill site personal protective equipment

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# Testing

- TCLP Toxicity Characteristic Leachate Potential
  - Very expensive and time consuming
  - SW-846 is a multi-volume set of sampling and testing methods
  - Representative Sample



# Testing

- Rule of 20
  - Enables the generator to use total metals instead of the TCLP method.
  - Completely solid material, results are divided by 20 to determine if they are hazardous.

Example: 50 ppm total chrome  $\div$  20 = 2.5 ppm Cr





# Testing

- Other Characteristics
  - Flash Point Ignitable =  $< 150^{\circ}\text{F}$
  - Corrosive – pH 2-12.5 applies to liquids only
  - Reactive – 40 CFR 261.23 8 different properties which indicate that a waste is reactive.

Knowledge of process is almost always the determination.



# Solvent Contaminated Wipes Exclusion



# Solvent-Contaminated Wipes Exclusion

Reusable: 40CFR 261.4(a)(26) and Disposable: 40 CFR 261.4(b)(18)

- 2003 Proposed Rule
- 2009 Risk Analysis
- 2013 Final Rule



## 40 CFR 261.4 (a)(26)

- Solvent-contaminated wipes that are sent for cleaning and reuse are not **solid waste**, provided the conditions of the exclusion are met.



# 40 CFR 261.4(b)(18)

- Solvent-contaminated wipes that are sent for disposal are not **hazardous waste** provided the condition of the exclusion are met.



# Conditions of Exclusion

- Contains one or more of the F001-005 solvents **\*\*TCE for reusable wipes only\*\***
- Exhibits a hazardous characteristic resulting from a listed solvent, or
- Exhibits only the hazardous waste characteristic of ignitability due to the presence of a non-listed solvent



# New Definitions

- Wipe (n)

Woven or non-woven shop towel, rag, pad, or swab made of wood pulp, fabric, cotton, polyester blends, or other material

- No Free Liquids (adj)

No free Liquids based on the test 9095B paint filter test or other state standard. The condition of no free liquids must be met at the point of generation before the wipe enters the container in the satellite storage area. Any solvent extraction must be done before the waste is generated.



# Wipes that are still hazardous...

- Wipes that are contaminated with reactive materials (i.e. metals).
- Wipes that are contaminated with any toxic material from the D004-043 list.
- Wipes that contain TCE





# Accumulation Time

- Generators may accumulate wipes up to 180 days from the start date of accumulation.



# Recordkeeping

- Name and address of the launder, dry cleaner, landfill, or combustor.
- Documentation of the 180 day accumulation time limit is being met.
- Description of the process the generator is using to meet the “no free liquids” condition.



# Container Management

- Non-leaking, must be able to contain free liquids if they occur
- Closed
- Labeled “Excluded Solvent-Contaminated Wipes”
- Marked with accumulation start date
- Remove from site in 180 days



# Questions

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