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RCRA Solvent-Contaminated Wipes Rule: Arkansas Department of Environmental Quality Compliance Checklist

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Ms. Penny Wilson, Branch Manager (Compliance and Emergency Response) for the Arkansas Department of Environmental Quality Office of Land Resources, undertook a presentation at the recent Arkansas Environmental Federation ("AEF") Regulated Waste Conference.

During her presentation she was asked about a checklist for the relatively new Resource Conservation and Recovery Act ("RCRA") Solvent-Contaminated Wipes Rule ("Wipes Rule").

Wipes (wipes, cloth towels, paper wipes, wipers and other absorbent materials) are frequently utilized by a number of commercial and industrial facilities in conjunction with solvents as part of the cleaning process. Such wipes may be either cleaned and reused (reusable wipes) or sent for disposal (disposal wipes).

EPA had promulgated a RCRA rule, "Conditional Exclusion from Solid Waste and Hazardous Waste Solvent-Contaminated Wipes" that addresses reusable and disposal wipes. Under this rule, reusable and disposal wipes are excluded from regulation under Subtitle C of RCRA if certain conditions are met. RCRA generators failing to follow the mandates of this rule lose the conditional exclusions from the definition of solid waste or hazardous waste.

Ms. Wilson is sending a checklist to a number of AEF Conference attendees that requested it.

Because the checklist is a helpful tool for determining the status of solvent-contaminated wipes, Ms. Wilson wanted to ensure that it is circulated to as much of the regulated community in Arkansas as possible. The checklist contains a series of questions helpful in delineating the status of particular wipes.

[Click here to download a copy of the checklist.](#)