

Shop Rags Contaminated with Used Oil or Hazardous Waste

This fact sheet covers management options for Vermont businesses that handle shop rags contaminated with used oil or hazardous wastes such as spent solvent and ink. Shop rags (also called wipes, wipers, or towels) generally fall into two categories: rags that are intended for reuse and made of woven cotton or a polyester blend, and disposable (non-woven) rags made of wood pulp or a polyester blend. This fact sheet describes the conditions that must be met in order for reusable shop rags to be considered exempt from regulation under the Vermont Hazardous Waste Management Regulations (VHWMR), and when contaminated rags that are to be disposed of are subject to full regulation as hazardous waste.

When are contaminated shop rags considered exempt from regulation as hazardous waste?

Contaminated shop rags are considered exempt from regulation as hazardous waste provided:

1. The rags are picked up and cleaned under a contractual agreement with a commercial laundry service.
2. Hazardous waste is not intentionally added to (i.e., poured onto) the rags beyond what is picked up through normal use of the rag, and no free liquid is present in the rags (i.e. no liquid can be wrung from the rags).
3. Prior to being picked up by a laundry service, the rags are accumulated and stored on-site in containers that are:
 - Marked with words that identify the contents, such as “Used Rags for Laundering;”
 - Kept closed except to add or remove contaminated rags (if laundry bags are used, they must be kept inside a closed container);
 - In good condition (i.e. no apparent structural defects); and
 - Stored on an impervious surface, and if stored out-of-doors, within a structure that sheds rain and snow.
4. The laundering facility manages:
 - Wastes from laundering contaminated rags in accordance with local, state and federal regulations; and
 - Wastewater in accordance with local, state and federal wastewater discharge requirements.

It is a good idea to ask the laundry service to provide written verification that they hold all applicable permits and are in good standing with the municipal wastewater treatment facility in the town in which they operate.

Since shop rags that are managed according to the conditions described above are considered to be exempt from regulation as hazardous waste, they do not have to be counted toward your facility's monthly hazardous waste generation rate, or shipped using a manifest. You should be aware, however, that the U.S. Environmental Protection Agency is in the process of developing a rule for shop rags that, if adopted, could supersede this policy.

Can I self-launder contaminated shop rags at my own facility?

No. In order to be considered exempt from regulation as hazardous waste, contaminated rags must be picked up and laundered by a commercial laundry service. By self-laundering contaminated shop rags, you could inadvertently contaminate groundwater.

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Can I allow hazardous waste to evaporate from contaminated shop rags?

No. The evaporation of hazardous waste is specifically prohibited under Section 7-302(a) of the VHWMR. Once shop rags are no longer usable, they must be placed in a marked container and managed according to the requirements described in this fact sheet.

How do I manage shop rags that I intend to dispose of?

Any shop rags that are destined for disposal and that are:

- Contaminated with a “listed” hazardous waste (for example, rags that contain greater than 5% by weight of petroleum distillates, or any amount of an “F-listed” solvent); and/or
- Exhibit a hazardous “characteristic”

must be managed as hazardous waste according to the requirements of the VHWMR. For more information about listed hazardous wastes, the hazardous waste characteristics, and basic hazardous waste management requirements, please refer to the Conditionally Exempt Generator Handbook, which is available on-line at:

<http://www.anr.state.vt.us/dec/wastediv/rcra/pubs.htm>

Shop rags that are not contaminated with hazardous waste and do not exhibit a hazardous waste characteristic may be disposed of in the regular trash.

What else should I know about managing shop rags?

Reusable shop rags contaminated with an ignitable material must be stored in a closed metal container according to Vermont Occupational Safety & Health Act (VOSHA) requirements. For information regarding VOSHA requirements, you may contact the Vermont Department of Labor & Industry’s Office of Occupational Safety at (802) 828-2765 or VOSHA’s non-regulatory assistance program, Project WorkSafe, at 1-888-723-3937.

What are some best management practices?

- Store containers holding contaminated shop rags away from ignition sources.
- Avoid saturating rags such that they can not be laundered.
- Use drip pans, funnels, drain trays, etc. to prevent oil and other fluids from reaching the shop floor, thus eliminating the need for clean-up.
- Improve housekeeping and preventative maintenance practices to minimize need for clean-up. Identify circumstances that routinely require the clean-up of fluids, and develop a spill prevention plan that identifies measures to address each of circumstances. Involve facility workers in the planning process – they know how and why spills happen.
- Remove excess solvent or oil from rags before laundering by wringing them with a mechanical device, and then recycle the collected fluids.
- When a spill is more than just a drip, clean the fluids up with a wet-vac or squeegee and dust pan, and then recycle the collected fluids.

For more information contact:

Vermont Department of Environmental Conservation:

Waste Management Division
103 South Main Street, West Bldg.
Waterbury VT 05671-0404
802-241-3888

Environmental Assistance Office
103 South Main Street, Cannery Bldg.
Waterbury VT 05671-4911
1-800-974-9559