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01-080

Revised 12/2025

Solvent-Contaminated Shop Towels, Rags, and Wipes

This guidance document has been produced by the Nebraska Department of Water, Energy, and Environment (DWEE) to provide guidance on managing solvent-contaminated shop towels, cloths, rags, and wipers; referred to as “wipes.” This information is based on Nebraska [Title 128 – Hazardous Waste Regulations](#) and incorporates conditional exclusions for solvent-contaminated wipes, effective in Nebraska as of December 14, 2014. These exclusions apply to five classes of solvent common in industrial use. In Nebraska regulations, these are the “F001” through “F005” listed solvents found in Title 128, Chapter 3, [§013](#).

There are two categories of wipes: reusable and disposable. **Reusable wipes** are used for their intended purpose and then sent to a launderer for cleaning and eventual reuse. **Disposable wipes** are used a single time for their intended purpose and then discarded.

Generators of disposable solvent-contaminated wipes without hazardous co-contaminants may dispose of these wipes as solid waste at a permitted municipal solid waste (MSW) landfill. Generators of disposable wipes must determine that their wipes do not contain trichloroethylene (TCE), which is not eligible for exclusion. Generators of reusable solvent-contaminated wipes may continue to launder them provided that the wipes have been determined to not contain hazardous co-contaminants.

Are Hazardous Co-Contaminants Present?

Generator of solvent-contaminated wipes must perform a hazardous waste determination under Title 128, Chapter 4, [§002](#) for the present of hazardous co-contaminants above regulatory limits. Reusable wipes a solid waste until all conditions of the exclusion have been met. A primary condition of the exclusion is that the wipes are contaminated *only* with the excluded solvent. Disposable wipes must be similarly characterized to ensure that they are not contaminated with hazardous materials other than exempted solvents. For more information on hazardous waste determinations, see the DWEE guidance document titled “Waste Determinations & Hazardous Waste Testing.”

The following are examples of reusable wipes and their proper laundering or disposal:

- Business A uses a methanol (F003) solvent on a cloth wipe to clean parts before being painted on their production line. Business A sends a representative sample for Toxic Characteristic Leaching Procedure (TCLP) analysis before laundering and receives a result of non-detect for all constituents. Methanol is an exempted solvent, and the wipes are permitted to be laundered and reused without issue.

- Business B uses a methyl ethyl ketone (MEK) (F005) solvent to clean parts and spills after applying paint with heavy metal pigments. A TCLP analysis of their wipes shows quantities of chromium and cadmium over the regulatory levels. While the MEK is an exempted solvent, the high levels of heavy metals means that that the wipes are now a characteristic hazardous waste for toxicity. These wipes cannot be laundered and must be contained, handled, and disposed of as a hazardous waste.

The following are examples of disposable wipes and their proper disposal:

- Business C uses an isobutyl alcohol (F003) wipe to clean their vacuum mold between pressings. Samples sent for TCLP analysis come back as non-detect and the isobutyl alcohol is an exempt solvent. The wipes are therefore non-hazardous, exempt solid waste. They can now be sealed in their container and taken to a MSW landfill.
- Business D uses prepackaged disposable wipes and spray-on benzene (F005) solvent to clean auto-bodies during maintenance. They send a sample for TCLP analysis and discover excessive heavy metals from the equipment. Benzene is an exempted solvent, but the levels of heavy metals make the wipes hazardous waste. The wipes must be handled, contained, and disposed of at a permitted Treatment, Storage, and Disposal Facility (TSDF) by a hazardous waste service provider.
- Business E uses disposable cloth wipes and trichloroethylene (TCE) (F002) solvent to wipe down engine parts during assembly. A TCLP analysis of the wipes comes back with a result of non-detect, however TCE is only exempted for reusable wipes. TCE wipes are not allowed in a MSW landfill so the wipes must be disposed of to a permitted TSDF by a hazardous waste service provider.

Management Conditions

Both disposable and reusable wipes must be handled and stored according to the required management conditions to be eligible for the exclusions. These management conditions are:

1. No Free Liquids – A wipe may be wet but not dripping with solvent and must pass the Paint Filter Liquids Test (Environmental Protection Agency (EPA) Methods Test 9095B). Any free liquids removed from storage or transport container must be managed in accordance with hazardous waste regulations.
2. Storage – Wipes must be accumulated, stored, and transported in non-leaking, closed containers that can contain free liquids, should they occur. During accumulation, “closed” is defined as having complete contact between the fitted lid and rim. During transport, “closed” is defined as having all opening sealed or tightly bound to prevent the release of volatile organic emissions or spills if tipped over.
3. Labeling – Containers must be labeled with “Excluded Solvent-Contaminated Wipes”
4. 180-Day Accumulation Time Limit – May be documented on the storage contains or through routine business records such as contracts or invoices.
5. Record-Keeping – Generators must maintain documentation that includes:

- a. The name and address of the receiving facility
- b. A description of the process that the generator is using to meet the “no free liquids” condition
- c. Proof that the 180-day accumulation time limit is being met

RESOURCES:

- DWEE Home Page <https://dwee.nebraska.gov/>

Contacts:

- DWEE Main Number (402) 471-2186
- DWEE Toll Free Number (877) 253-2603
- DWEE Hazardous Waste Compliance Assistant (402) 471-8308
- Email questions to: DWEE.moreinfo@nebraska.gov

DWEE Publications:

- Environmental Guidance Document – “Comparison of Hazardous Waste Generator Requirements”
- Environmental Guidance Document – “Waste Determinations & Hazardous Waste Testing”
Guidance documents are available on the DWEE website by clicking “Visit Nebraska Department of Environment and Energy (DEE),” selecting “Forms,” and “Publications, Grants & Forms.”
- [Title 128 – Nebraska Hazardous Waste Regulations](#)
Titles are available on the DWEE website by clicking “Visit Nebraska Department of Environment and Energy (DEE),” selecting “Resources and Services,” “Laws & Regulations,” and “Rules & Regulations.”

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