Audit Checklist -

Towels/Wipes/Sorbents

Vehicle Maintenance Providers

Environmental Audit Checklist

Environmental audit checklists are designed to assist businesses by providing a low cost way of reviewing compliance with Minnesota’s environmental laws and rules. Because the laws and rules are numerous and often complicated, this checklist cannot be a complete guide to your legal obligations. You may have obligations that are not covered on this checklist. If you have questions regarding the Environmental Audit Program or this checklist, please call the Small Business Environmental Assistance Program (SBEAP) at 651-282-6143 or 800-657-3938.

Date of audit

Company

Completed by/Title

Environmental Audit Program Participation

A check mark in any of the boxes indicating that a requirement is not being met designates a violation of one or more regulations. To participate in the Environmental Audit Program, submit a report of your findings to the Minnesota Pollution Control Agency (MPCA). The Report Inventory form lists items that need to be included in the report and meets the audit report requirements. You do not need to submit a copy of this checklist.

Answer each question unless specifically directed otherwise.

Hint: First, get up every bit of a spill that is possible with a dust pan and a squeegee. Then, only after that is done, use towels, wipes, or sorbents. This approach can significantly reduce, if not totally eliminate, the need for towels, wipes, or sorbents. You will save on purchase and disposal costs and ease your regulatory burden.

1. Do you use towels, wipes, or sorbents in your shop?
   - Yes You need to complete this checklist. Call SBEAP to request Hazardous Waste fact sheet #4.61, Managing Towels, Wipes and Sorbents, or find it at [http://www.pca.state.mn.us/publications/w-hw4-61.pdf](http://www.pca.state.mn.us/publications/w-hw4-61.pdf).
   - No You do not need to complete this checklist.

2. Do you use towels, wipes, or sorbents that are launderable?
   - Yes  Continue on to the next question.
   - No  Skip to question 4.

3. Are the launderable towels, wipes, or sorbents contaminated with oil or grease, a Listed or Ignitable solvent, or other hazardous waste?
   - See Table 1 located at the end of this checklist.
   - See Table 2 located at the end of this checklist.
   - Yes
     - Remove free liquid by wringing. (We recommend using a mechanical wringer or extractor.)
     - Send to a laundry permitted to discharge to a wastewater treatment plant.
     - Reuse or manage the liquid as used oil or a hazardous waste.
     - If you manage the liquid as a hazardous waste, you also need to complete the Vehicle Maintenance Providers: Audit Checklists - Hazardous Waste.
   - No  Start wringing. Send to a laundry or launder on site.

4. Do you use disposable towels, wipes, or sorbents?
   - Yes  Continue to the next question.
   - No  You are done with this checklist.
5. Are the disposable towels, wipes, or sorbents contaminated with oil or grease; a Listed* or Ignitable** solvent; or other hazardous waste?
   *See Table 1 located at the end of this checklist.
   **See Table 2 located at the end of this checklist.
   - Yes  Continue to the next question.
   - No
     - Start wringing. (We recommend using a mechanical wringer or extractor.)
     - Manage as an industrial solid waste. Follow guidance in Table 4 at the end of this checklist.

6. Are they contaminated only with an Ignitable** solvent?
   **See Table 2 located at the end of this checklist.
   - Yes
     - Remove free liquid by wringing. (We recommend using a mechanical wringer or extractor.)
     - Manage rags as an industrial solid waste. Follow guidance in Table 4.
     - Reuse or manage liquid as a hazardous waste. If you manage the liquid as a hazardous waste, you also need to complete the Vehicle Maintenance Providers: Audit Checklists - Hazardous Waste.
   - No  Continue on to the next question.

7. Are they contaminated with Characteristic*** or Listed* hazardous wastes other than ignitable solvents?
   *See Table 1 located at the end of this checklist.
   ***See Table 3 located at the end of this checklist.
   - Yes
     - Wring to remove free liquid.
     - Manage and dispose of disposable rags as a hazardous waste. You also need to complete the Vehicle Maintenance Providers: Audit Checklists - Hazardous Waste.
     - Reuse or manage liquid as a hazardous waste.
   - No  Continue on to the next question.

8. Are they contaminated with used oils or greases?
   - Yes
     - Wring if dripping; recycle recovered oil.
     - Send towels, wipes, or sorbents to an incinerator burning for energy recovery and permitted to burn oil-contaminated materials; or test to determine if they are a Characteristic*** hazardous waste due to toxicity and manage accordingly.
     - ***See Table 3 located at the end of this checklist.
   - No  Review your answers to questions 6 and 7. Call your county or MPCA hazardous waste staff if you still need further help. See Table 5.

9. Do you plan to test your oily or greasy towels, wipes, or sorbents to determine if they are a Characteristic*** hazardous waste due to toxicity?
   - Yes
     - Submit a representative sample for testing according to the Toxicity Characteristic Leaching Procedure (TCLP).
     - If the TCLP test for this waste shows any results above the maximum allowable concentrations listed in Table 3, this waste is a hazardous waste. You must manage it according to hazardous waste rules. You also need to complete the Vehicle Maintenance Providers: Audit Checklists - Hazardous Waste.
     - If the TCLP test for this waste shows all results below the maximum allowable concentrations listed in Table 3, this waste is not a hazardous waste. You may manage it as an industrial solid waste according to the guidance in Table 4. (If you send it to an incinerator that burns for energy recovery, the incinerator would have to be permitted to burn oil-contaminated materials.)
   - No  Send towels, wipes, or sorbents to an incinerator burning for energy recovery and permitted to burn oil-contaminated materials as directed in question 8.
### Table 1

**Listed Solvents**

*Check the solvent’s Material Safety Data Sheet for a description of contents.*

**F001 Solvents (used in degreasing):**

methylene chloride (dichloromethane); trichloroethylene; tetrachloroethylene (perchloroethylene); 1,1,1-trichloroethane; carbon tetrachloride; chlorinated fluorocarbons; and all spent solvent mixtures/blends used in degreasing containing, before use, a total of 10 percent or more by volume of one or more F001, F002, F004, or F005 solvents.

**F002 Solvents:**

methylene chloride (dichloromethane); trichloroethylene; tetrachloroethylene (perchloroethylene); 1,1,1-trichloroethane; 1,1,2-trichloroethane, chlorobenzene; orthodichlorobenzene; trichlorofluoromethane; 1,1,2-trichloro-1,2,2-trifluoroethane; and all spent solvent mixtures/blends containing, before use, a total of 10 percent or more by volume of one or more F001, F002, F004, or F005 solvents.

**F004 Solvents:**

cresols and cresylic acid; nitrobenzene; and all spent solvent mixtures/blends containing, before use, a total of 10 percent or more by volume of one or more F001, F002, F004, or F005 solvents.

**F005 Solvents:**

toluene; methyl ethyl ketone; benzene; carbon disulfide; 2-ethoxyethanol; isobutanol; 2-nitropropane; pyridine; and all spent solvent mixtures/blends containing before use, a total of 10 percent or more by volume of one or more F001, F002, F004, or F005 solvents.

### Table 2

**Ignitable Solvents**

**F003 Solvents:**

xylene; acetone; methanol; methyl isobutyl ketone; n-butyl alcohol; ethyl acetate; ethyl benzene; ethyl ether; cyclohexanone; and all spent solvent mixtures/blends containing, before use, only the above spent solvents.

**D001 Solvents:**

all liquid solvents and mixtures not listed as an F001, F002, F003, F004, or F005 solvent having a flashpoint* below 140°Fahrenheit (60°Celsius).

*Check the solvent’s MSDS for the flashpoint.
Table 3
Character Waste - Toxicity

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>Hazardous Waste Code</th>
<th>Maximum Allowable Concentration (milligrams per liter)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic</td>
<td>D004</td>
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</tr>
<tr>
<td>Barium</td>
<td>D005</td>
<td>100.0</td>
</tr>
<tr>
<td>Benzene</td>
<td>D018</td>
<td>0.5</td>
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<tr>
<td>Cadmium</td>
<td>D006</td>
<td>1.0</td>
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<tr>
<td>Carbon Tetrachloride</td>
<td>D019</td>
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<tr>
<td>Chlordane</td>
<td>D020</td>
<td>0.03</td>
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<td>Chlorobenzene</td>
<td>D021</td>
<td>100.0</td>
</tr>
<tr>
<td>Chloroform</td>
<td>D022</td>
<td>6.0</td>
</tr>
<tr>
<td>Chromium</td>
<td>D007</td>
<td>5.0</td>
</tr>
<tr>
<td>o-Cresol</td>
<td>D023</td>
<td>200.0*</td>
</tr>
<tr>
<td>m-Cresol</td>
<td>D024</td>
<td>200.0*</td>
</tr>
<tr>
<td>p-Cresol</td>
<td>D025</td>
<td>200*</td>
</tr>
<tr>
<td>Cresol*</td>
<td>D026</td>
<td>200.0</td>
</tr>
<tr>
<td>1,4-Dichlorobenzene</td>
<td>D027</td>
<td>7.5</td>
</tr>
<tr>
<td>1,2-Dichloroethane</td>
<td>D028</td>
<td>0.5</td>
</tr>
<tr>
<td>1,1-Dichloroethylene</td>
<td>D029</td>
<td>0.7</td>
</tr>
<tr>
<td>2,4-Dichlorophenoxyacetic acid (2,4-D)</td>
<td>D016</td>
<td>10.0</td>
</tr>
<tr>
<td>2,4-Dinitrotoluene</td>
<td>D030</td>
<td>0.13</td>
</tr>
<tr>
<td>Endrin</td>
<td>D012</td>
<td>0.02</td>
</tr>
<tr>
<td>Heptachlor</td>
<td>D031</td>
<td>0.008</td>
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<tr>
<td>Hexachlorobenzene</td>
<td>D032</td>
<td>0.13</td>
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<tr>
<td>Hexachlorobutadiene</td>
<td>D033</td>
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<tr>
<td>Hexachloroethane</td>
<td>D034</td>
<td>3.0</td>
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<td>Lead</td>
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<td>Lindane</td>
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<td>Mercury</td>
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<tr>
<td>Methoxychlor</td>
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<td>Methyl ethyl ketone</td>
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<td>Nitrobenzene</td>
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<tr>
<td>Pentachlorophenol</td>
<td>D037</td>
<td>100.0</td>
</tr>
<tr>
<td>Pyridine</td>
<td>D038</td>
<td>5.0</td>
</tr>
<tr>
<td>Selenium</td>
<td>D010</td>
<td>1.0</td>
</tr>
<tr>
<td>Silver</td>
<td>D011</td>
<td>5.0</td>
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<tr>
<td>Tetrachloroethylene (perchloroethylene)</td>
<td>D039</td>
<td>0.7</td>
</tr>
<tr>
<td>Toxaphene</td>
<td>D015</td>
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<tr>
<td>Trichloroethylene</td>
<td>D040</td>
<td>0.5</td>
</tr>
<tr>
<td>2,4,5-Trichlorophenol</td>
<td>D041</td>
<td>400.0</td>
</tr>
<tr>
<td>2,4,6-Trichlorophenol</td>
<td>D042</td>
<td>2.0</td>
</tr>
<tr>
<td>2,4,5-Trichlorophenoxoaproic or propionic acid (Silvex)</td>
<td>D017</td>
<td>1.0</td>
</tr>
<tr>
<td>Vinyl chloride</td>
<td>D043</td>
<td>0.2</td>
</tr>
</tbody>
</table>

*Laboratory analyses that show any individual cresol above the 200.0 milligrams/liter level are hazardous for that reason. For analyses where o-, m-, and p-cresol concentrations cannot be differentiated, the total cresol concentration is used.
• Heavy metals - toxic
Table 4

Industrial Solid Waste Guidance

- Ensure that liquids do not go to landfills.
- Arrange for transport of this waste to a permitted solid waste incinerator or to a mixed municipal or industrial landfill that specifies in its industrial solid waste management plan that it will accept and can safely manage towels, wipes, and sorbent waste.
  - Find out where your hauler plans to take your solid waste.
  - Contact SBEAP at 651-282-6143 or 800-657-3938 to verify that the disposal facility has an MPCA permit.
  - Contact the operator of the disposal facility to find out what material it accepts. Verify that the facility accepts this waste.
- Store this waste separately in marked containers for the hauler.
- Solid waste facilities may require testing prior to accepting a waste.
- Keep records of any tests or determinations used in the evaluation of paint-related wastes for at least three years. (For protection from future liability, we recommend that you never discard these records.)

Table 5

Contacts

**MPCA Web site**  [http://www.pca.state.mn.us](http://www.pca.state.mn.us)

**Small Business Environmental Assistance Program (SBEAP)**  651-282-6143  
[http://www.pca.state.mn.us/programs/sbap_p.html](http://www.pca.state.mn.us/programs/sbap_p.html)

**Minnesota Technical Assistance Program**  612-624-1300  
[http://www.mntap.umn.edu](http://www.mntap.umn.edu)  800-247-0015

**Metropolitan Counties Hazardous Waste Staff**

- Anoka County  763-422-7093  
  [http://www.co.anoka.mn.us](http://www.co.anoka.mn.us)
- Carver County  952-361-1800  
  [http://www.co.carver.mn.us](http://www.co.carver.mn.us)
- Dakota County  952-891-7557  
  [http://www.co.dakota.mn.us](http://www.co.dakota.mn.us)
- Hennepin County  612-348-3777  
  [http://www.hennepin.us](http://www.hennepin.us)
- Ramsey County  651-266-2400  
  [http://www.co.ramsey.mn.us](http://www.co.ramsey.mn.us)
- Scott County  952-496-8475  
  [http://www.co.scott.mn.us](http://www.co.scott.mn.us)
- Washington County  651-430-6655  
  [http://www.co.washington.mn.us](http://www.co.washington.mn.us)

**Minnesota Department of Transportation**

Hazardous Materials Section  651-215-6330  
[http://www.dot.state.mn.us/cvo/hazmat.html](http://www.dot.state.mn.us/cvo/hazmat.html)