



**Minnesota Pollution  
Control Agency**

520 Lafayette Road North  
St. Paul, MN 55155-4194

# 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>.
- ☐ 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*<sup>\*</sup> or *Ignitable*<sup>\*\*</sup> solvent, or other hazardous waste?**

<sup>\*</sup> See Table 1 located at the end of this checklist.

<sup>\*\*</sup> 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*<sup>\*</sup> or *Ignitable*<sup>\*\*</sup> solvent; or other hazardous waste?**

<sup>\*</sup>See Table 1 located at the end of this checklist.

<sup>\*\*</sup>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*<sup>\*\*</sup> solvent?**

<sup>\*\*</sup>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*<sup>\*\*\*</sup> or *Listed*<sup>\*</sup> hazardous wastes other than ignitable solvents?**

<sup>\*</sup>See Table 1 located at the end of this checklist.

<sup>\*\*\*</sup>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*<sup>\*\*\*</sup> hazardous waste due to toxicity and manage accordingly.
- <sup>\*\*\*</sup>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*<sup>\*\*\*</sup> 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

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

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

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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:**

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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:**

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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:**

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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.

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## Table 2

### Ignitable Solvents

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#### **F003 Solvents:**

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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:**

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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.

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Table 3

## Character Waste - Toxicity

Contaminant	Hazardous Waste Code	Maximum Allowable Concentration (milligrams per liter)
•Arsenic	D004	5.0
•Barium	D005	100.0
Benzene	D018	0.5
•Cadmium	D006	1.0
Carbon Tetrachloride	D019	0.5
Chlordane	D020	0.03
Chlorobenzene	D021	100.0
Chloroform	D022	6.0
•Chromium	D007	5.0
o-Cresol	D023	200.0*
m-Cresol	D024	200.0*
p-Cresol	D025	200*
Cresol*	D026	200.0
1,4-Dichlorobenzene	D027	7.5
1,2-Dichloroethane	D028	0.5
1,1-Dichloroethylene	D029	0.7
2,4-Dichlorophenoxyacetic acid (2,4-D)	D016	10.0
2,4-Dinitrotoluene	D030	0.13
Endrin	D012	0.02
Heptachlor	D031	0.008
Hexachlorobenzene	D032	0.13
Hexachlorobutadiene	D033	0.5
Hexachloroethane	D034	3.0
•Lead	D008	5.0
Lindane	D013	0.4
•Mercury	D009	0.2
Methoxychlor	D014	10.0
Methyl ethyl ketone	D035	200.0
Nitrobenzene	D036	2.0
Pentachlorophenol	D037	100.0
Pyridine	D038	5.0
•Selenium	D010	1.0
•Silver	D011	5.0
Tetrachloroethylene (perchloroethylene)	D039	0.7
Toxaphene	D015	0.5
Trichloroethylene	D040	0.5
2,4,5-Trichlorophenol	D041	400.0
2,4,6-Trichlorophenol	D042	2.0
2,4,5-Trichlorophen-oxypropanoic or propionic acid (Silvex)	D017	1.0
Vinyl chloride	D043	0.2

\*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

## Industrial Solid Waste Guidance

- Table 5

## Contacts

Hazardous Materials Section 651-215-6330  
<http://www.dot.state.mn.us/cvo/hazmat.html>