



## MEMO

**TO:** IOWA BUSINESSES, ASSOCIATION OF BUSINESS & INDUSTRY, IOWA MUNICIPAL SOLID WASTE LANDFILLS  
**FROM:** AMIE DAVIDSON, SOLID WASTE SECTION SUPERVISOR [DNR]  
**SUBJECT:** DISPOSAL OF SOLVENT-CONTAMINATED WIPES  
**DATE:** JUNE 4, 2014  
**CC:** U.S. EPA REGION 7 WASTE ENFORCEMENT AND MATERIALS MANAGEMENT BRANCH

Information that was recently disseminated to Iowa businesses prohibiting the disposal of solvent-contaminated wipes into Iowa's Subtitle D municipal solid waste landfills requires further clarification.

### Background

In 2013, the U.S. Environmental Protection Agency (EPA) issued a final rule that modifies the hazardous waste management regulations for solvent-contaminated wipes under the Resource Conservation and Recovery Act (RCRA). Specifically, the rule revises the definition of hazardous waste to conditionally exclude disposable solvent-contaminated wipes. More specific details can be found here: [http://www.epa.gov/epawaste/hazard/wastetypes/wasteid/solvents/wipes\\_faq.htm](http://www.epa.gov/epawaste/hazard/wastetypes/wasteid/solvents/wipes_faq.htm).

### Problem

In Iowa, neither the statutory definition for "hazardous waste" nor the rules for Subtitle D municipal solid waste landfills recognize EPA's hazardous waste exclusions. Instead, Iowa's Subtitle D municipal solid waste landfill rules prohibit the disposal of hazardous waste of any kind based upon a determination that a waste stream is a chemical compound specifically listed by EPA as a regulated hazardous waste or a characteristic hazardous waste (toxic, corrosive, ignitable, flammable). In other words, without EPA's exclusion, disposable solvent-contaminated wipes would be characterized as a hazardous waste in Iowa under most situations because of the toxicity of the solvent or the potential for ignitability.

### Resolution

The results of EPA's final risk analysis demonstrated that solvent-contaminated wipes managed in non-leaking, closed containers do not pose significant risk to human health and the environment when disposed in municipal solid waste landfills with composite liners because solvents are unlikely to be released to the environment and the risk of fires is reduced. Because the federal hazardous waste exclusion for disposable solvent-contaminated wipes is conditional, we have determined that the conditions in and of themselves, prevent the wipes from violating the prohibition of hazardous waste disposal in Iowa's Subtitle D municipal solid waste landfills.

In summary, provided that the conditions for the hazardous waste exclusion are met, solvent-contaminated wipes may be disposed of into Iowa's Subtitle D municipal solid waste landfills, effective immediately. If you have any questions about this clarification, please feel free to contact Susan Johnson, Iowa DNR Special Waste Coordinator, at 515-725-8317 or [susan.johnson@dnr.iowa.gov](mailto:susan.johnson@dnr.iowa.gov).