



# Solvent-Contaminated Wipes Exclusion and Vendor Responsibilities

*Hazardous Waste Roundtable  
December 8, 2020*



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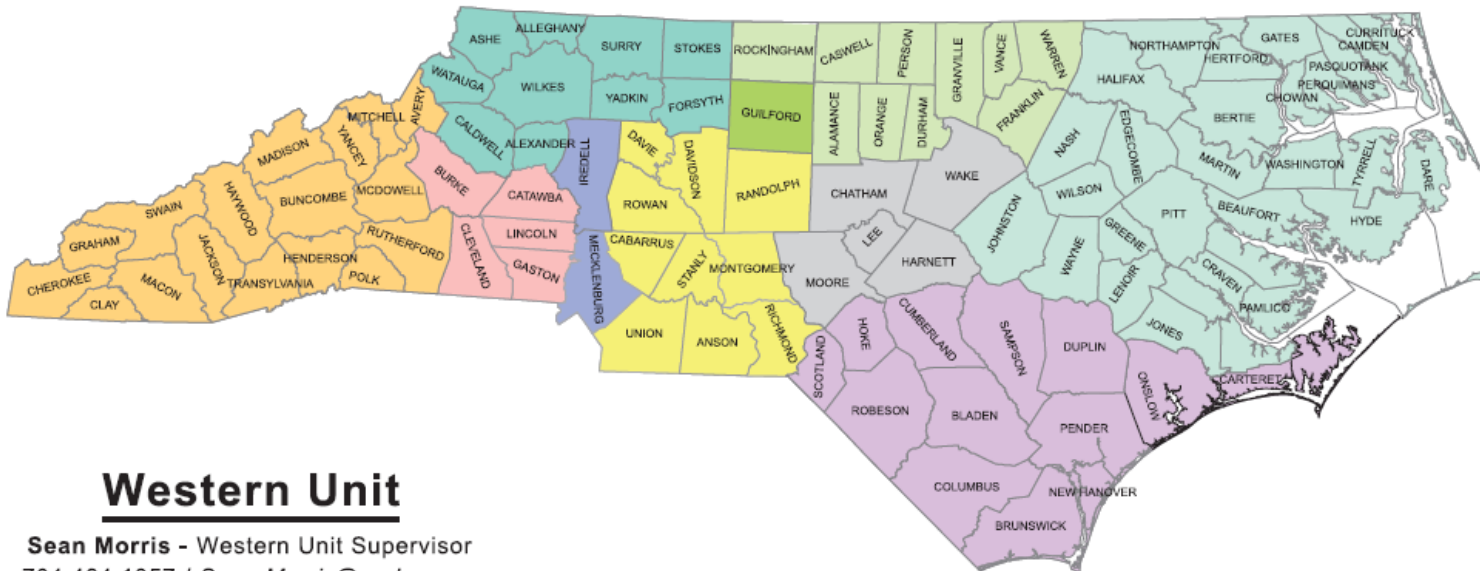
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North Carolina Department of Environmental Quality  
 Division of Waste Management  
 Hazardous Waste Section - Compliance Branch

**REGIONAL INSPECTOR MAP**

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# Solvent-Contaminated Wipes Exclusion



# *Solvent-Contaminated Wipes Exclusion Overview*

- Provisions of this federal rule effective in North Carolina on January 31, 2014
- Modifies RCRA hazardous waste regulations for solvent-contaminated wipes
- Updates made to 40 CFR 261.4, adopted by reference at 15A NCAC 13A .0106(a)
  - 40 CFR 261.4(a)(26) reusable wipes: conditional exclusion from the definition of solid waste
  - 40 CFR 261.4(b)(18) disposable wipes: conditional exclusion from the definition of hazardous waste



# *Solvent-Contaminated Wipes Exclusion Scope*

- This is a conditional exclusion that applies to specific wipes managed in a specific way.
  - Waste must meet the definition of a wipe
  - Wipes can only be contaminated with specific hazardous waste
  - Wipes must be managed under specified requirements
- If the conditions are not met, the material returns to being a hazardous waste and all applicable hazardous waste requirements must be met for management/disposal of wipes.



# *What will be covered?*

- Overview of Solvent-Contaminated Wipes Exclusion
  - Definition of a Wipe
  - Definition of Solvent-Contaminated Wipe
  - Requirements for Management to Maintain the Exclusion
- Vendor Responsibilities
- Vendor Audit Suggestions
- Frequent Questions/Answers



# Definitions

The rule provides a definition for "**wipe**" and "**solvent-contaminated wipe**" in 40 CFR 260.10

- **Wipe** means a woven or non-woven shop towel, rag, pad, or swab made of wood pulp, fabric, cotton, polyester blends, or other material
- **Solvent-Contaminated Wipe** defined in a few slides







# *What qualifies as a wipe?*

## Is considered a wipe:

- Paper towels
- Cloth towels
- Rags
- Absorbent pads
- Swabs (like cotton swabs)
- Pads (cotton, polyester, or other)

## Is **NOT** considered a wipe:

- Personal Protective Equipment (PPE) - like gloves, masks, aprons, lab coats, chemical suits
- Uniforms
- Clothing (like coveralls)
- Mop heads, mops
- Floor mats
- Sponges
- Mattresses

# *What happens when the waste does not qualify as a wipe?*

- The exclusion is very specific and only includes items that meet the definition of a wipe.
- A waste determination (in accordance with 40 CFR 262.11) must be made on any other items that are not considered wipes.
- Do not mix any other items with wipes unless you are certain the other items are non-hazardous (or otherwise excluded).



# Definitions

A **solvent-contaminated wipe** is a wipe that, after use or after cleaning up a spill, either:

- Contains one or more of the F001 through F005 solvents (listed in 40 CFR 261.31) or the corresponding P- or U-listed solvents (found in 40 CFR 261.33);
- Exhibits a hazardous characteristic when that characteristic results from a listed solvent; or
- Exhibits only the hazardous waste characteristic of ignitability (D001) due to the presence of solvents that are not listed



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# *Solvent-Contaminated Wipes*

Includes (for reusable and disposable wipes): Wipes containing one or more F001-F005 listed solvents or corresponding P- or U-listed solvents

Acetone  
Benzene  
n-butanol (n-butyl alcohol)  
Chlorobenzene  
Cresols  
Cyclohexanone  
1,2-Dichlorobenzene  
Ethyl acetate  
Ethyl benzene  
2-Ethoxyethanol

Isobutyl alcohol (Isobutanol)  
Methanol  
Methyl ethyl ketone  
Methyl isobutyl ketone  
Methylene chloride  
Tetrachloroethylene  
Toluene  
1,1,2-Trichloroethane  
Xylenes

Trichloroethylene (For reusable only)



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# *Solvent-Contaminated Wipes*

Includes (for reusable and disposable wipes): Wipes containing one or more F001-F005 listed solvents or corresponding P- or U-listed solvents

Acetone

**Benzene**

n-butanol (n-butyl alcohol)

**Chlorobenzene**

**Cresols**

Cyclohexanone

1,2-Dichlorobenzene

Ethyl acetate

Ethyl benzene

2-Ethoxyethanol

Isobutyl alcohol (Isobutanol)

Methanol

**Methyl ethyl ketone**

Methyl isobutyl ketone

Methylene chloride

**Tetrachloroethylene**

Toluene

1,1,2-Trichloroethane

Xylenes

**Trichloroethylene** (For reusable only)



# Definitions

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- Exhibits a hazardous characteristic when that characteristic results from a listed solvent; or
- Exhibits only the hazardous waste characteristic of ignitability (D001) due to the presence of solvents that are not listed





# *Wipes that Do Not Qualify Exclusion*

- Wipes that have not been used
- Wipes that contain listed hazardous waste other than solvents
- Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents
- Wipes do not qualify for exclusion if contaminated with:
  - Corrosives
  - Reactives
  - Non-solvent TCLP materials
    - Examples: Cr, Cd, Pb, Hg, Ag
- Disposable Wipes only: cannot contain TCE



# *What happens when the waste does not qualify as a solvent-contaminated wipe?*

- The exclusion is very specific and only includes items that meet the definition a solvent-contaminated wipe.
- A waste determination (in accordance with 40 CFR 262.11) must be made on wipes that are contaminated with waste other than the ones described in the definition for solvent-contaminated wipes.
- Do not mix any other items with wipes unless you are certain the other items are non-hazardous (or otherwise excluded).



# *Solvent-Contaminated Wipes Exclusion Scope*

- Reusable industrial shop towels and rags that are contaminated with hazardous solvents and are sent for laundering are not solid waste
- Disposable industrial wipes that are contaminated with hazardous solvents and are going to disposal are not hazardous waste





You have an oil spill and clean it up with absorbent wipes. Can these wipes be managed under the solvent-contaminated wipe exclusion?



No, they do not qualify for the exclusion because they are not solely contaminated with a listed or ignitable solvent. Site must determine they are non-hazardous or may be able to be manage as off-spec fuel and burn for energy recovery (if they are contaminated with a fuel).

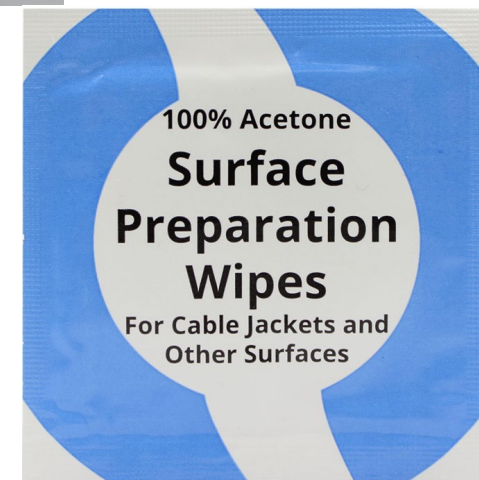




Wipes with acetone are used to clean products before a finish is applied. Can these wipes be managed under the solvent-contaminated wipes exclusion?

Maybe.

If the wipe is only contaminated with acetone (and does not pick up a contaminate like metals from the cleaning process) it qualifies for the exclusion as long as all conditions are met.



**Question:** If I am using disinfecting wipes for cleaning at my facility, can I manage them under the solvent-contaminated wipe exclusion?



**Answer:**

- Maybe.
- If the wipe is contaminated only with an ignitable solvent (e.g. isopropyl alcohol) that is not listed, consider performing a waste determination and managing as a non-hazardous waste.
- If the wipe is contaminated with a corrosive cleaner, the exclusion will not apply.





# *Disposal/Laundry Requirements*

## Disposable Wipes

As long as no TCE; and all conditions are met can go to:

- Regulated municipal solid waste landfill (40 CFR 258) or
- Hazardous waste landfill (40 CFR 264 or 265) or
- A combustor regulated under section 129 Clean Air Act
- Hazardous waste combustor, boiler, or industrial furnace (40 CFR 264, 265, 266)

## Reusable Wipes

As long as all conditions are met can go to:

- Laundry or dry-cleaning facility
  - Any wastewater discharge must be regulated under sections 301 and 402 or 307 of the Clean Water Act
- Rule is more stringent than DEQs previous laundered wipe policy
  - Reusable wipes not covered by exclusion must be non-hazardous if laundered/dry-cleaned

# *Accumulation Requirements for Exclusion*

Solvent-contaminated wipes must be:

- Accumulated for no more than 180 days prior to being sent for cleaning or disposal
- Placed in a non-leaking closed container, that can contain free liquids, should they occur
- Marked "Excluded Solvent-Contaminated Wipes"







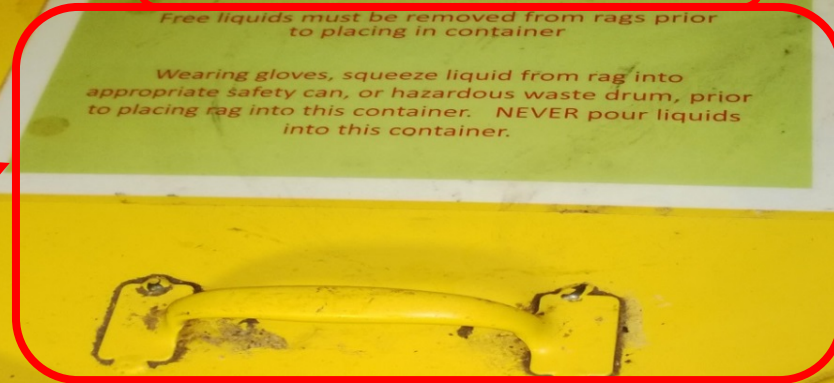
**REQUIRED**



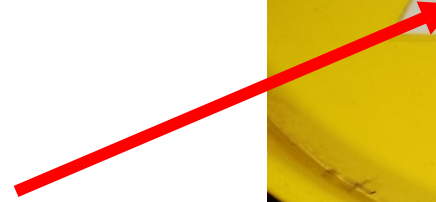
**EXCLUDED SOLVENT-CONTAMINATED WIPES**  
(also known as, used or dirty rags)

Free liquids must be removed from rags prior to placing in container

Wearing gloves, squeeze liquid from rag into appropriate safety can, or hazardous waste drum, prior to placing rag into this container. NEVER pour liquids into this container.



**Bonus Information**









## *Solvent-Contaminated Wipes – Free Liquids*

- There must be no free liquids in container prior to being sent for cleaning or disposal
- Free liquids removed from the wipes or from the wipes container must be managed according to applicable hazardous waste regulations in 40 CFR parts 260 through 273
- "No free liquids" condition is defined in 40 CFR 260.10 and is based on the EPA Methods Test 9095B (Paint Filter Liquids Test)





# *Records Required for Exclusion*

Generator must maintain documentation that includes:

- Name and address of the laundry, dry cleaner, landfill, or combustor
- Documentation that the 180-day accumulation time limit is being met
- Description of the process the generator is using to meet the "no free liquids" condition
- Documentation of claims that materials are not a solid waste or are conditionally exempt per 40 CFR 261.2(f)





# Solvent-Contaminated Wipes Vendor Responsibilities





# *Disposal/Laundry Requirements*

## Disposable Wipes

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# *Requirements for Exclusion Beyond Generating Site*

Solvent-contaminated wipes must be accumulated, stored, and transported in containers that are:

- Closed,
- Non-leaking and can contain free liquids, should they occur, and
- Marked/labeled "Excluded Solvent-Contaminated Wipes"



## *Solvent-Contaminated Wipes – Free Liquids*

- There must be no free liquids in container prior to being sent for cleaning or disposal
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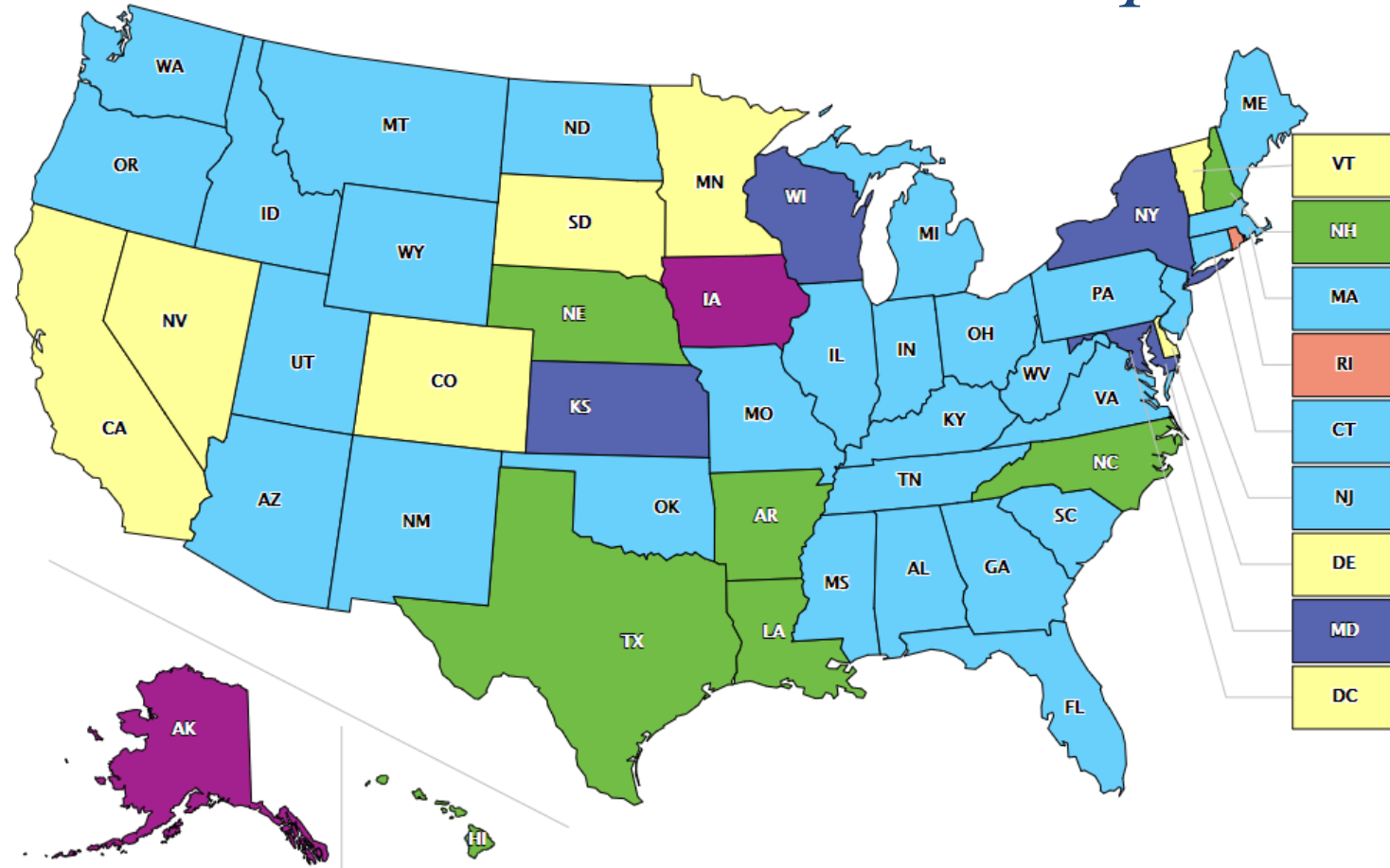


## *Solvent-Contaminated Wipes - Transportation*

- Solvent-contaminated wipes must meet applicable U.S. Department of Transportation (DOT) regulations under 49 CFR parts 171 through 179 when they are transported.
- Solvent-contaminated wipes managed under the Wipes Rule exclusions are not considered RCRA hazardous wastes and thus, would not be considered to fall under DOT hazard class 9 (Miscellaneous Hazardous Material).



# Where is the Solvent-Contaminated Wipe Rule in Effect?



American Samoa
Guam
Northern Mariana Islands
Puerto Rico
Virgin Islands

- Authorized
- Adopted
- State Interim Policy on Solvent Contaminated Wipes
- Administered by EPA Region
- Only Reusable Wipes Exclusion in Effect
- Neither Adopted nor Authorized

Updated as of November 20, 2020

# *Implications of Vendor Violations*

- The solvent-contaminated wipes exclusion is conditional.
- If the conditions are not met, the material returns to being a hazardous waste and all applicable hazardous waste requirements must be met for management/disposal of wipes.
- If the vendor mismanages the wipes and does not meet the conditions for exclusion, they could be considered an unpermitted hazardous waste treatment, storage, and disposal (TSD) facility.





# Solvent-Contaminated Wipes Vendor Audit Suggestions



# *Visit the Laundry Facility*



# Review Rules Applicable to Facility Example Checklists and Guidance Documents



NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION

## Summary of Solvent-Contaminated Wipes Exclusion Requirements

This table provides an overview of the solvent-contaminated wipes conditional exclusion provisions and how they apply when solvent-contaminated wipes are accumulated, stored, and transported. Solvent contaminated wipes that are sent for cleaning and reuse are not a solid waste from the point of generation provided the conditions of 40 CFR 261.4(a)(26), adopted by reference at 15A NCAC 13A .0106(a) are met. Solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the point of generation provided the conditions of 40 CFR 261.4(b)(18), adopted by reference at 15A NCAC 13A .0106(a) are met. An "X" means the provision is applicable.

Regulatory Provision and Description	Solvent Contaminated Wipes Exclusion Applicability of Regulatory Provision		
	Generator	Transporter/Transfer Facility	Landfill/Incinerator/Laundry/Dry Cleaner
<b>Definitions:</b> Must meet the definition of "wipe" <sup>**</sup> and "solvent-contaminated wipe" <sup>***</sup> (40 CFR 260.10)	X	X	X
<b>Container Requirements:</b> 40 CFR 261.4(a)(26)(i) (Reusable Wipes); 40 CFR 261.4(b)(18)(i) (Disposable Wipes) Solvent-contaminated wipes, when accumulated, stored, and transported must be placed in:	<i>This box is intentionally left blank.</i>		
- Non-leaking containers	X	X	X
- Closed containers <sup>***</sup>	X	X	X
- Container labeled "Excluded Solvent-Contaminated Wipes"	X	X	X
- Container that can contain any free liquids <sup>****</sup> (should free liquids occur)	X	X	X
<b>Accumulation time limit</b> 40 CFR 261.4(a)(26)(ii) (Reusable Wipes); 40 CFR 261.4(b)(18)(ii) (Disposable Wipes)	180 days	N/A	N/A
- At the point of being transported for			





# *Documentation/Information Applicable to Facility Sources of Information*

- Laserfiche:
  - Public document repository for Division of Waste Management :  
<https://edocs.deq.nc.gov/WasteManagement/Browse.aspx?startid=6>
  - Public document repository for Division of Water Resources:  
<https://edocs.deq.nc.gov/WaterResources/>
- EPA ECHO: <https://echo.epa.gov/>
  - EPA's Enforcement and Compliance History Online (provides information on air, water, and waste)
- RCRAInfoWeb: <https://rcrapublic.epa.gov/rcrainfoweb/action/main-menu/view>
  - EPA's public information website for electronic manifest (e-Manifest), financial assurance and other publicly accessible information



# *Laserfiche Tips and Guidance*

For additional information about Laserfiche go to this DWM website link:

<https://deq.nc.gov/about/divisions/waste-management/laserfiche>

Link to Laserfiche User Guide:

[https://files.nc.gov/ncdeq/Water%20Resources/files/laserfiche/LaserFiche\\_User\\_Guide.pdf](https://files.nc.gov/ncdeq/Water%20Resources/files/laserfiche/LaserFiche_User_Guide.pdf)

Link to Laserfiche Guide to Hazardous Waste Documents:

[https://files.nc.gov/ncdeq/Waste%20Management/DWM/HW/Laserfiche\\_WebLink%20instructionsHW.docx](https://files.nc.gov/ncdeq/Waste%20Management/DWM/HW/Laserfiche_WebLink%20instructionsHW.docx)





## Enforcement and Compliance History Online

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### Quick Search



### Search Options



### Analyze Trends



### Find EPA Cases



### Data Services



### Help



### News

## Quick Search

### Search By

 Location Facility Name/ID[More Search Options](#)

Use EPA's Enforcement and Compliance History Online website to search for facilities in your community to assess their compliance with environmental regulations. You can use ECHO to:

- Search for Facilities
- Investigate Pollution Sources
- Search for EPA Enforcement Cases
- Examine and Create Enforcement-Related Maps
- Analyze Trends in Compliance & Enforcement Data

[Read the Quick Start Guide](#)[Watch a Video Tutorial](#)[Explore the Tool Guide](#)

Hide Map Hide Table Hide Summary

Report Violation Help

Map Legend Basemap Options Zoom To: Enter city, state, and/or zip code Sync Map and Table



Facility Summary

ECOFLO, INC.  
2750 PATTERSON ST.



CAA	No Violation Identified
CWA	No Violation Identified
RCRA	No Violation Identified
SDWA	

Days Since Last Inspection: 5  
Date of Last Formal Enforcement Action: 03/29/2018  
Last Penalty Amount: \$25,200  
[More Facility Details](#)

Customize Columns Download Data Quick CSV Download Results Guide Reports Legend

Facility Name	Mapped	Street Address	City	State	FRS ID	Reports	Inspections (5 years)	Significant Violations	Quarters with Noncompliance (3 years)	Formal Enforcement Actions (5 years)
<a href="#">130563 - ECOFLO, INC.</a>		2750 PATTERSON STREET	GREENSBORO	NC	110070339370		0	No	--	0
<a href="#">ECOFLO, INC.</a>		2750 PATTERSON ST.	GREENSBORO	NC	110000346625		373	No	5	2

Current Search

2 Facilities Found

Selected Criteria

Search Type: All Data  
Facility Name or ID: ECOFLO

Explore Enforcement and Compliance Criteria

- 0 Facilities with Current Violations
- 0 Facilities with Significant Violations
- 1 Facilities with Violations (3 years)
- 1 Facilities with Formal Enforcement Actions (5 years)
- 1 Facilities with Informal Enforcement Actions (5 years)

Modify Search

# Documentation/Information Applicable to Facility Sources of Information

- NCDEQ, DWR, Pretreatment Section <https://deq.nc.gov/about/divisions/water-resources/water-resources-permits/percs/pretreatment-permits>

The Federal and State Pretreatment Program gives regulatory authority for EPA, states, and municipal governments to control the discharge of industrial wastewater into municipal Wastewater Treatment Plants (WWTPs) or Publicly Owned Treatment Works (POTWs). The objectives of the Pretreatment Program are to prevent pass-through, interference, or other adverse impacts to the POTW, its workers or the environment; to promote the beneficial reuse of biosolids; and to assure that all categorical pretreatment standards are met. There are over 600 Significant Industrial Users (SIUs) who discharge industrial wastewater to more than 110 POTWs throughout the State of North Carolina.

### Dental Amalgam Rule - 40 CFR Part 441

EPA promulgated 40 CFR Part 441 Effluent Limitations Guidelines and Standards for the Dental Category, on June 14, 2017 with an effective date of July 14, 2017. The new rule regulates mercury discharged in wastewater from dental facilities to a Publicly Owned Treatment Works (POTW) or municipal wastewater treatment plants (WWTP).

Existing sources are those dental dischargers in operation prior to July 14, 2017 and must submit to the Control Authority a one-time compliance report by October 12, 2020. Any dental practice that begins operation on or after July 14, 2017 is a new source and must comply with the Rule. Please see the [Fact Sheet](#) for further detail on requirements for equipment, best management practices and reporting and recording keeping and exemptions to the Rule.

For dental offices in locations with an approved pretreatment program the control authority is the POTW. Check the [list of municipal pretreatment contacts in NC](#) to determine if there is an approved pretreatment program in your location.

**Pretreatment**

- [Categorical User Information](#)
- [Comprehensive Guide](#)
- [Headworks Analysis](#)
- [Industrial Waste Survey](#)
- [Other Downloads](#)
- [Mercury Guidance](#)
- [Annual Report Guidance](#)
- [Permit Writing Guidance](#)
- [Training](#)
- [Collection Systems](#)



# *Public Website Searches*

- North Carolina Secretary of State, Business Registration:  
[https://www.sosnc.gov/online\\_services/search/by\\_title/Business\\_Registration](https://www.sosnc.gov/online_services/search/by_title/Business_Registration)
- County GIS and Tax Websites
  - Is the property owned or leased?
  - Are the taxes delinquent or are there liens on the property?
- Internet searches of the company name, address, and owner may reveal information about the facility
  - Remember to check news stories and social media





Secretary of State  
Elaine F. Marshall

ANNOUNCEMENTS

## Misleading Mailings

Alert: Don't Fall for Misleading Mailings from Filing Labor Compliance Department Services (FLCD)

[Misleading Mailings →](#)



[Elaine F. Marshall, Secretary](#)

*Elaine F. Marshall*

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- [Print an Amended a Annual Report form](#)

## Business Corporation

### Legal Name

North Star Logistics, Inc.

## Information

**SosId:** 0572486

**Status:** Multiple

**Annual Report Status:** Not Applicable

**Citizenship:** Domestic

**Date Formed:** 12/5/2000

**Fiscal Month:** December

**Registered Agent:** [Delp, Phillip D.](#)

## Addresses

### Mailing

917 Beaverdam Rd  
Canton, NC 28716-2735

## Business Registration

[Basics of Launching a NC Business](#)

[Forms/Fees](#)

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	2005 185 10254	7/4/2005	Annual Report	Annual Report
	2006 184 00868	7/3/2006	Annual Report	Annual Report
	2007 281 00226	10/8/2007	Annual Report	Annual Report
	2008 283 01950	10/2/2008	Annual Report	Annual Report
	CA200932101028	10/19/2009	Annual Report	Annual Report
	CA201110901384	4/19/2011	Annual Report	Annual Report
	CA201110901386	4/19/2011	Annual Report	Annual Report
	2012 356 00017	12/21/2012	Annual Report	Annual Report
	2013 296 02974	10/23/2013	Annual Report	Annual Report
	CA201402600076	1/26/2014	Annual Report	Annual Report
	2015 695 10971	10/22/2015	Suspension	Revenue Suspension
	C201700305450	12/23/2016	Notice Annual Report	ADM Notice
	C201718000582	6/29/2017	Destruction Filing	ADM Dissolution

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# *Look for Warning Flags*

- Complacency
  - Not keeping up with changes (new regulations (e-Manifest) or new technology)
  - No focus customer service
- Constant Change
  - Thriving in Chaos
  - Over expansion
  - Over extended in business (too diverse or too far of a reach)
- Circling the Wagons
  - Major Layoffs
  - Selling of Assets
  - Pension Buyouts



# *High Employee Turnover*

- Employee morale plummets with high turnover
- Employees may lack time/experience and training





# *Ask Questions*

- What is your business plan/model?
- Are you hiring? If so, what positions?
- What training do your employees have?
- Tell me about your last emergency incident at the site? How did you respond? How did you follow up?



# *Incidents Happen. The Response Matters.*

Having an incident does not necessarily mean you should not use a hazardous waste transporter; a treatment, storage, and disposal facility; or a vendor.

- Was the incident routine?
- Is there a pattern?
- Was the incident preventable?
- Were they negligent or at fault?
- How did they respond/react?
- How did they follow-up?



## *See What You See*

- Is the building maintained?
  - Are there any roof leaks?
- Is equipment operable?
- Is the landscaping maintained?
- Are vehicles maintained?
- Is the safety equipment new/at least up to date?
- Is the facility secure?















# Be Extra Cautious When Using Brokers



*Brokers have no Liability*



*Also be cautious of the lowest bid by any vendor*





# Trust your Instincts





# Solvent-Contaminated Wipes Exclusion Final Thoughts and Frequent Questions





# *Solvent-Contaminated Wipes*

- Does my facility use wipes?
- Does my facility generate solvent-contaminated wipes?
- Do the solvent-contaminated wipes meet the definition for the exclusion?
  - How are the wipes used?
  - What is the source of the contamination?
    - Is the solvent characteristic for ignitability only?  
(consider a waste determination instead of exclusion)

# *Solvent-Contaminated Wipes*

- Does my facility launder any items on site?
- Does my facility send any items to a laundry?
  - Items laundered on site or sent to be laundered/dry cleaned must be non-hazardous or meet the conditional exclusion
  - Hazardous waste must not be laundered on-site or off site unless laundry is permitted as a hazardous waste treatment, storage, disposal facility
    - Excluded solvent-contaminated wipes may be laundered/dry-cleaned on site or off-site but there must be an appropriate and valid CWA permit associated with the operation/activity



# *Solvent-Contaminated Wipes – Frequent Questions*

Your facility uses MEK on wipes to clean parts. In the process of using the wipe, it becomes contaminated with chrome (high enough to exceed the TCLP concentrations).

**Question:** If the facility wanted to launder the wipes, can the wipes be managed under the solvent-contaminated wipe exclusion?

**Answer:** If the solvent-contaminated wipe is also characteristic for toxicity, it cannot be managed under the solvent-contaminated wipe exclusion.

Additionally, unless the laundry facility is a permitted TSD, only non-hazardous or excluded solvent-contaminated wipes may be sent to a laundry facility.



# *Solvent-Contaminated Wipes – Frequent Questions*

A facility uses isopropyl alcohol (IPA) on wipes. When personnel are done using the wipe, it has no free liquids on the wipe.

**Question:** If these wipes are laundered or incinerated, can the facility manage the wipes by the solvent-contaminated wipe exclusion?

**Answer:** The wipes could be managed by the exclusion.

However, since the solvent is not F-listed, the facility may just want to make a waste determination on the wipes. If the wipes are not listed and are not characteristic, they could be managed as non-hazardous waste.



# *Solvent-Contaminated Wipes – Frequent Questions*

**Question:** Under the solvent-contaminated wipes exclusions, can solvent-contaminated wipes just be thrown in the trash?

**Answer:** No, the solvent-contaminated wipes as defined in 40 CFR section 260.10 must meet the conditions of the exclusion, which include being in a labeled, closed container with no free liquids.



# *Solvent-Contaminated Wipes – Frequent Questions*

**Question:** May a labeled, closed bag of contaminated wipes that does not contain free liquids be transported to a landfill or municipal waste combustor with other solid waste trash?

**Answer:** Yes, a bag of solvent-contaminated wipes that meets the conditions of the exclusion (i.e., closed, labeled, and contains no free liquids) may be placed into a dumpster and transported to a landfill with other solid waste trash.



# *Solvent-Contaminated Wipes – Frequent Questions*

**Question:** Are wipes contaminated with paints that include a listed solvent as an ingredient in the paint eligible for the exclusions?

**Answer:** No. The solvent-contaminated wipes exclusion is limited to wipes contaminated with solvents as defined in 40 CFR section 260.10.

This includes wipes contaminated with solvents that meet the listing under F001 through F005 in 40 CFR section 261.31.

Paints that include a solvent chemical as an ingredient would not meet this listing description and thus wipes contaminated with these paints are not eligible for the solvent-contaminated wipes exclusion.



# *Solvent-Contaminated Wipes – Frequent Questions*

**Question:** Are wipes contaminated with fuel or oil eligible for the solvent-contaminated wipes exclusion?

**Answer:** Solvent-contaminated wipes may be co-contaminated with fuels and still be eligible for the exclusion provided the fuels are not listed hazardous waste and the wipes do not exhibit the characteristic of toxicity, corrosivity, or reactivity.

In other words, solvent-contaminated wipes that are co-contaminated with fuels that are not themselves listed hazardous waste and which only exhibit the characteristic of ignitability are eligible for the solvent-contaminated wipes exclusion.





# *Solvent-Contaminated Wipes – Frequent Questions*

**Question:** Are unused wipes (such as unused retail products) eligible for the exclusions?

**Answer:** No. Pre-dosed, unused solvent or alcohol-containing wipes or pads (e.g., nail polish remover pads), such as those discarded by the retail industry, would not be eligible for the solvent-contaminated wipes exclusion.

This is because these pads, which are unused, would not meet our definition of solvent-contaminated wipe which is specific to wipes that “after use or after cleaning up a spill” contain certain solvents (40 CFR section 260.10).



# *Solvent-Contaminated Wipes – Frequent Questions*

**Question:** Are wipes that are contaminated with a solvent that is not a listed hazardous waste under RCRA (i.e., not a listed solvent) eligible for the exclusions?

**Answer:** Yes, wipes that are contaminated with a solvent that is not listed under F001 through F005 in 40 CFR 261.33 are eligible for the solvent-contaminated wipes exclusion provided the wipes do not exhibit the characteristic of reactivity, corrosivity, or toxicity in 40 CFR 261.

Stated another way, wipes contaminated with a solvent that is not listed under F001 through F005 and that only exhibit the characteristic of ignitability in 40 CFR part 261 are eligible for the exclusions.



# *Solvent-Contaminated Wipes – Frequent Questions*

**Question:** Are wipes that are contaminated with a solvent that is only listed for ignitable, corrosive, or reactive (ICR) properties but the contaminated wipe itself does not exhibit the ignitability, corrosivity, or reactivity characteristic eligible for the solvent-contaminated wipes exclusion?

**Answer:** Wipes that are contaminated with an ICR-only listed waste but do not exhibit the ignitability, corrosivity, or reactivity characteristic are not hazardous wastes per 40 CFR section 261.3(g)(1). Thus, these wipes would not need to be managed under the conditions of the solvent-contaminated wipes exclusion. (66 FR 27266, May 16, 2001)

However, it is the generator's responsibility to determine whether the solvent-contaminated wipes do exhibit a characteristic (such as ignitability). There is no specific test for ignitable solids so the generator would need to use knowledge and his or her best professional judgment to make that determination. Any free liquids would, of course, need to be managed as hazardous waste if they are themselves ignitable.



# *Solvent-Contaminated Wipes*

For More Information (Federal Rule, FAQ, History):

<https://www.epa.gov/hwgenerators/final-rule-2013-conditional-exclusions-solid-waste-and-hazardous-waste-solvent>

EPA Summary Chart for Solvent-Contaminated Wipes:

[https://www.epa.gov/sites/production/files/2015-11/documents/sumry\\_chrt\\_wipes\\_fnl\\_rul\\_070913.pdf](https://www.epa.gov/sites/production/files/2015-11/documents/sumry_chrt_wipes_fnl_rul_070913.pdf)



	Solvent-Contaminated Reusable Wipes	Solvent-Contaminated Disposable Wipes
<b>Regulation Citation</b>	40 CFR 261.4(a)(26) (Solid Waste Exclusion)	40 CFR 261.4(b)(18) (Hazardous Waste Exclusion)
<b>Description</b>	Solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes, provided the conditions of the exclusion are met.	Solvent-contaminated wipes that are sent for disposal are not hazardous wastes, provided the conditions of the exclusion are met.
<b>Includes</b>	<p>➤ Wipes containing one or more F001-F005 listed solvents listed in § 261.31 or the corresponding P- or U- listed solvents found in § 261.33, including:</p> <ul style="list-style-type: none"> <li>- Acetone</li> <li>- Benzene</li> <li>- n-Butanol</li> <li>- Chlorobenzene</li> <li>- Creosols</li> <li>- Cyclohexanone</li> <li>- 1,2-Dichlorobenzene</li> <li>- Ethyl acetate</li> <li>- Ethyl benzene</li> <li>- 2-Ethoxyethanol</li> <li>- Isobutyl alcohol</li> <li>- Methanol</li> <li>- Methyl ethyl ketone</li> <li>- Methyl isobutyl ketone</li> <li>- Methylene chloride</li> <li>- Tetrachloroethylene</li> <li>- Toluene</li> <li>- 1,1,2- Trichloroethane</li> <li>- Trichloroethylene (<i>*For reusable wipes only.</i>)</li> <li>- Xylenes</li> </ul> <p>➤ Wipes that exhibit a hazardous characteristic resulting from a solvent listed in part 261.</p> <p>➤ Wipes that exhibit only the hazardous characteristic of ignitability when containing one or more non-listed solvents.</p>	

	<b>Solvent-Contaminated Reusable Wipes</b>	<b>Solvent-Contaminated Disposable Wipes</b>
<b>Does not include</b>	<ul style="list-style-type: none"> <li>➤ Wipes that contain listed hazardous waste other than solvents.</li> <li>➤ Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Wipes that contain listed hazardous waste other than solvents.</li> <li>➤ Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents.</li> <li>➤ Wipes that are hazardous waste due to the presence of trichloroethylene.</li> </ul>
<b>Storage Requirements</b>	Wipes must be accumulated, stored, and transported in non-leaking, closed containers that can contain free liquids, should they occur.	
<b>Labeling</b>	Containers must be labeled “Excluded Solvent-Contaminated Wipes.”	
<b>Accumulation Time Limits</b>	Generators may accumulate wipes up to 180 days from the start date of accumulation prior to being sent for cleaning or disposal.	
<b>Recordkeeping</b>	<p>Generators must maintain documentation that includes:</p> <ul style="list-style-type: none"> <li>➤ name and address of the laundry, dry cleaner, landfill, or combustor</li> <li>➤ documentation that the 180-day accumulation time limit is being met</li> <li>➤ description of the process the generator is using to meet the “no free liquids” condition.</li> </ul>	

	Solvent-Contaminated Reusable Wipes	Solvent-Contaminated Disposable Wipes
<b>Condition of Wipes Prior to Transport</b>	<p>Wipes must contain no free liquids prior to being sent for cleaning or disposal and there may not be free liquid in the container holding the wipes.</p> <p>“No free liquids” condition is defined in 40 CFR 260.10 and is based on the EPA Methods Test 9095B (Paint Filter Liquids Test) or other authorized state standard.</p>	
<b>Management of Free Liquids</b>	<p>Free liquids removed from the wipes or from the wipes container must be managed according to applicable hazardous waste regulations in 40 CFR parts 260 through 273.</p>	
<b>Eligible Handling Facilities</b>	<p>Must go to a laundry or dry cleaner whose discharge, if any, is regulated under sections 301 and 402 or section 307 of the Clean Water Act.</p>	<p>Must go to a combustor regulated under section 129 of the Clean Air Act or to a hazardous waste combustor, boiler, or industrial furnace regulated under 40 CFR parts 264, 265, or 266 subpart H.</p> <p>Must go to a municipal solid waste landfill regulated under 40 CFR part 258 (including § 258.40) or to a hazardous waste landfill regulated under 40 CFR parts 264 or 265.</p>

	Solvent-Contaminated Reusable Wipes	Solvent-Contaminated Disposable Wipes
<b>Storage at Handling Facilities</b>	Must store wipes in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.” Containers must be able to contain free liquids should they occur.	
<b>Management of Free Liquids by Handling Facilities</b>	Free liquids removed from the wipes or from the container holding the wipes must be managed according to applicable hazardous waste regulations in 40 CFR parts 260 through 273.	





Questions?





# Wipes Used for Disinfecting/Cleaning





# *Frequent Questions*

**Question:** When disposing of a disinfectant/cleaning chemical, how do I know if it is a hazardous waste?

**Question:** The cleaning chemical I am using is considered a pesticide, when disposed, is it a hazardous waste?

**Question:** The waste I generated from cleaning is contaminated (or suspected to be contaminated) with COVID-19, is it a hazardous waste?



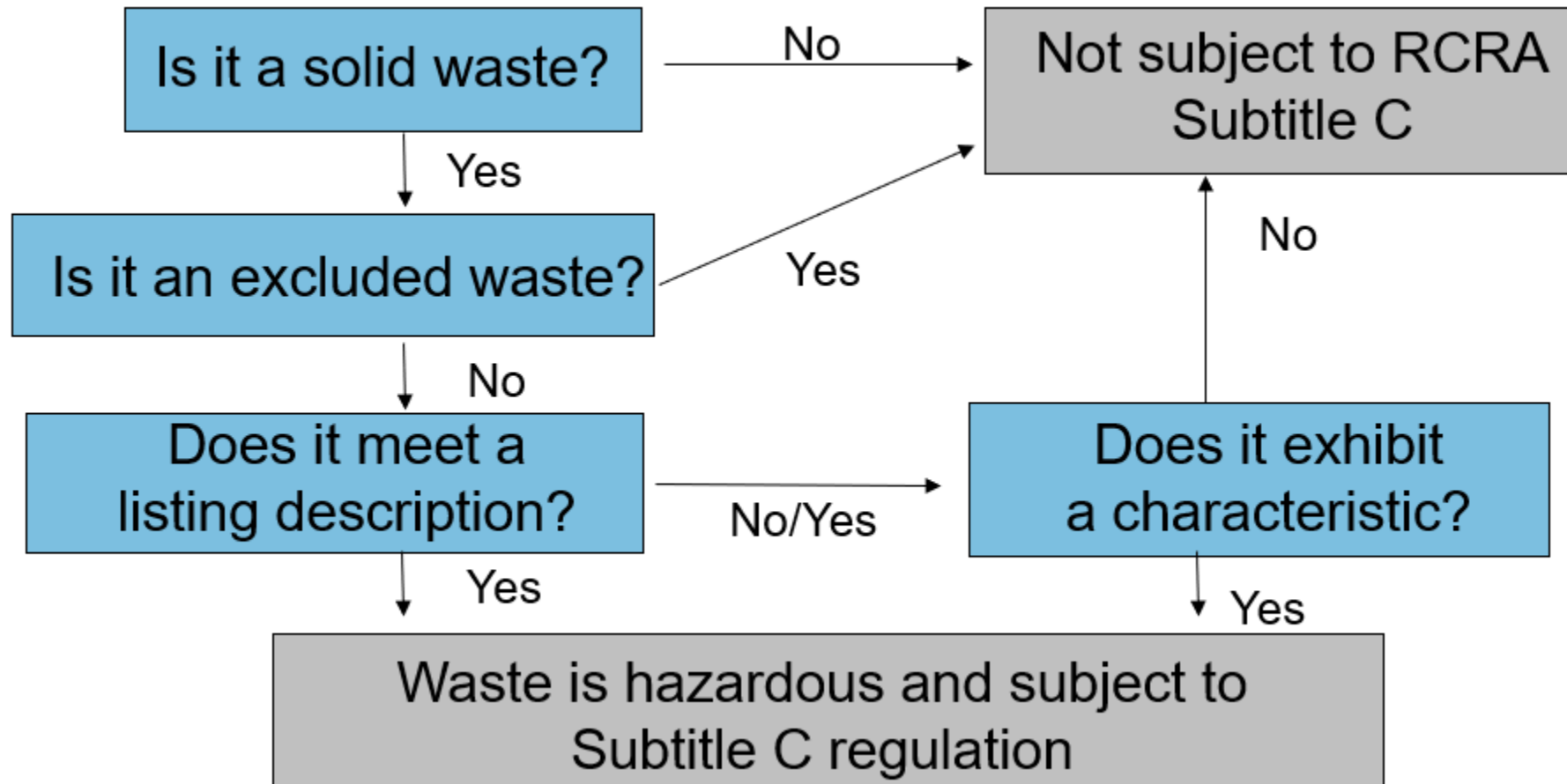
# *Frequent Questions - Answer*

## **Answer:**

- There is no single list of disinfectants/cleaning chemicals that may be considered hazardous waste.
- Just because it is a pesticide waste or a waste contaminated with COVID-19 does not automatically make it a hazardous waste.
- A waste determination must be performed on any chemical waste.
- It is the generator's responsibility to make a hazardous waste determination.



# *Hazardous Waste Determination*



# *Frequent Questions*

**Question:** If I am using disinfecting wipes for cleaning at my facility, can I manage them under the solvent-contaminated wipe exclusion?

**Answer:**

- Maybe.
- If the wipe is contaminated only with an ignitable solvent (e.g. isopropyl alcohol) that is not listed, consider performing a waste determination and managing as a non-hazardous waste.
- If the wipe is contaminated with a corrosive cleaner, the exclusion will not apply.





# *Do Not Flush Any Wipes*

Regardless of whether the wipe is hazardous, non-hazardous, or otherwise

**do not flush**

any wipes down the toilet!



# *What is not considered Hazardous Waste?*

These are not hazardous waste unless they have been mixed with hazardous waste:

- Medical Waste
- Biohazards
- Radioactive Material/Waste
- Household Hazardous Waste
- Asbestos
- PCBs







# *Frequent Question*

**Question:** What do I do with empty containers that held cleaning products?

**Answer:** If it meets the standard for empty containers under 40 CFR 261.7 it can be placed in the trash.



# *Empty Containers*

Very basic overview of 40 CFR 261.7:

- If container held an acute hazardous waste, the container must be triple rinsed to be considered empty.

Otherwise, for a container that is less than or equal to 119 gallons:

- All wastes have been removed that can be removed using common practices to remove materials, (e.g., pouring, pumping, and aspirating) and
- No more than 2.5 cm (1 inch) of residue remains on the bottom of the container or inner liner
- For a compressed gas: When the pressure in the container approaches atmospheric





# *North Carolina Landfill Prohibitions*

Among other items, the following are prohibited from disposal in a North Carolina solid waste landfills:

- Hazardous Waste
- Liquids



# *Frequent Question*

**Question:** If I have extra cleaning products or they are expired what do I do with them?

**Answer:**

- If you cannot use it for its intended purpose, try to find someone else who can use it as-is and legitimately for its intended purpose.
  - North Carolina Waste Trader (<http://www.ncwastetrader.org/>) may be a useful resource.
- If it is an unused commercial chemical product, there may be reclamation outlets that would keep the material from having to be managed as a hazardous waste.

