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Welcome to this PNEAC Webinar

on

Proposed Federal Rule Regulating Used Towels and Wipes

Webinar dates and times:

- [December 2, 2003](#)
 - 11:00am - 12:30pm Eastern
 - 10:00am - 11:30am Central
 - 9:00am - 10:30am Mountain
 - 8:00am - 9:30am Pacific
- [December 11, 2003](#)
 - 3:30pm – 5:00pm Eastern
 - 2:30pm – 4:00pm Central
 - 1:30pm – 3:00pm Mountain
 - 12:30pm – 2:00pm Pacific

Instructions for Participating in the PNEAC Webinar

What You Will Need to Participate in the Event

- Internet Access (56k modem or faster)
- Web browser
- Separate phone line and telephone for the audio portion of the presentation

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 - Meeting ID: Rule
 - Meeting Key: Leave Blank

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3. To access the **audio** portion (about 5-10 minutes prior to the session) of the conference, dial the following phone number: **888-677-9189** or 316-0022. When prompted, enter **Code 0941#**. When you connect, your phone will be muted. You will be able to hear, but other participants will not be able to hear you. Please wait for the Webinar to begin at the scheduled time.

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PNEAC Webinar on Proposed Federal Rule Regulating Used Towels and Wipes

December 2, 2003;

11:00 AM Eastern/10:00 AM Central/9:00 AM Mountain/8:00 AM Pacific

December 11, 2003

3:30 PM Eastern/2:30 PM Central/1:30 PM Mountain/12:30 PM Pacific

Program

Introduction

Wayne Pferdehirt (PNEAC / U. of Wisconsin)

Industry background and perspective

Dec. 2: Gary Jones (GATF/PIA)

Dec. 11: Marci Kinter (SGIA)

Briefing on Proposed Rule

Kathy Blanton (U.S. EPA)

Discussion, Q&A

Panelists: Kathy Blanton, Gary Jones, Marci Kinter, Doreen Monteleone (FTA),

Richard Dunnington (GAA)

Moderator: Wayne Pferdehirt

Review Process for Officially Submitting Comments on Proposed Rule

Kathy Blanton

Wrapup and evaluation

Please fill out online evaluation form

Wayne Pferdehirt

Today's Sponsors

■ PNEAC

- Illinois Waste Management and Research Center
- GATF/PIA
- University of Wisconsin-Extension



■ *Funding support by* **U.S. EPA**



Today's Context

- Is an informational meeting, hosted by PNEAC and partners
- Is not an EPA public meeting or hearing
- Focus is on proposed rule as it affects printers



Agenda

- Introduction and Logistics
- Printing Industry Background and Perspectives
- Briefing on Proposed Rule
- Questions and Discussion
- Process for Submitting Comments on Proposed Rule
- Wrap-up and Evaluation



Welcome to Today's Speakers and Panelists

- Kathy Blanton, U.S. EPA
- Gary Jones, GATF/PIA, PNEAC
- Marci Kinter, SGIA
- Doreen Monteleone, FTA
- Richard Dunnington, GAA
- Wayne Pferdehirt, U. of Wisconsin, PNEAC

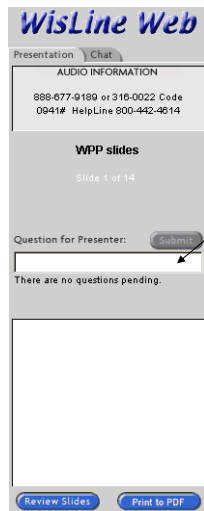


Some Logistics for Today

- You should have received handouts via e-mail or at PNEAC Web site (www.pneac.org)
 - At conclusion of program, you will be able to print a set of slides with all annotations from today
- Maximize the window on your screen
 - You may have to scroll to see entire display
- Technical Problems?
 - Dial *0



Comments and Questions



- Type comment or question at any time
 - Type question in Question box
 - Select "Submit"
- Moderator will collect questions and comments
- Moderator will pass along questions to speakers at appropriate times
- You will have opportunity for verbal follow-up if you identify yourself in your message



Poll Slides

- We'll be asking some questions to understand your needs, interests and positions
- All voting is anonymous
- One vote per connection
- Click on your preferred response
- We'll wait about 10 seconds, close polls, then show results



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Industry Background and Perspectives on Proposed Rule



Gary Jones

**Manager;
Environmental,
Health and Safety
Affairs**

GATF/PIA



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Printing Industry Perspective

- Industry uses both reusables and disposables
 - Difference depends upon process and application
- Priority for printing industry
 - Several states regulate reusables as hazardous waste
 - Virtually all states regulate disposables as hazardous
 - Printers have received citations



Printing Industry Perspective

- Benefits
 - Provide consistent approach for handling and disposal of shop towels
 - Addresses disposables
 - Can throw away under limited circumstances
 - Solvent removal not considered "treatment"
 - No manifesting or other hazardous waste requirements



Printing Industry Role

- Worked with EPA for past 10 years on rule
 - Conducted survey and coordinated plant visits
 - Ongoing constructive dialogue
- Work with the Agency to gain clarification regarding proposed language
- Accurately determine the impact proposal will have on the industry
- Outreach and education on rule



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Submitting Comments

- The associations will be commenting on this rule as the Graphic Arts Coalition.
- If you are not submitting comments independently and would like your concerns addressed, contact any of the associations on this webinar.
 - Provide your input to GATF/PIA, FTA, SGIA or GAA no later than January 15, 2004



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Overview of Proposed Rule on Solvent-Contaminated Wipes

Kathy Blanton
Office of Solid Waste
Environmental Protection Agency
blanton.katherine@epa.gov
703.605.0761



Today's Topics

- Developing a Regulation
- Proposal Details and Feedback from Participants
- Opportunity to Ask Questions
- How to Submit Official Comments



What's the Big Deal With Wipes?

- Many of the solvents used with industrial wipes are hazardous waste when spent.
- Therefore, the wipes with which they are used can also be considered hazardous waste.
- Potential for risk

EPA's proposal applies to *listed* (F001-F005) and *characteristic* spent solvents.



Current Policy

- Currently EPA has no formal regulation
- Feb 14, 1994 Memo from Mike Shapiro to Waste Management Division Directors
 - This policy deferred determinations and interpretations regarding regulation of solvent-contaminated wipes to:
 - states authorized to implement the federal RCRA (waste) program; or
 - the EPA region for those states that are not authorized



Rulemaking Process

NPRM

Notice of Proposed Rulemaking ("proposal")

- EPA has to propose any change to the Code of Federal Regulations
- Proposed rule was published in the Federal Register on Nov. 20, 2003 (68 FR 65586)



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Rulemaking Process

Public Comment

- Public has the opportunity to read and comment on proposed changes
 - Can also examine the background documents for the proposal, which are available in the docket
 - www.epa.gov/edocket
- Comments due on the proposal by Feb. 18, 2004.



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Rulemaking Process

Final Rule

- EPA examines the comments on the proposal and revises the rule accordingly
- EPA has to respond to all applicable comments
 - in rule and/or preamble or
 - in “Response to Comments” document



Rulemaking Process

State Regulatory Action

Once rule is finalized by EPA, a state must adopt rule for it to be effective in that state

- Some states automatically adopt EPA's rules by reference
 - State rule identical to EPA's
- Some states replicate EPA's proposal and finalization process
 - State rule could be identical to EPA's
 - State rule could be more stringent than EPA's



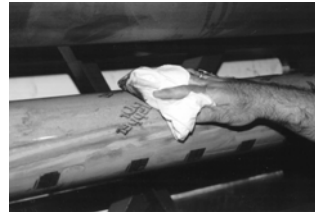
What is EPA Proposing?

- Disposable wipes do not need to be handled as hazardous waste
 - If generator and handler meet certain conditions
 - “Conditional exclusion from the definition of hazardous waste”
- Reusable wipes do not need to be handled as solid waste
 - If generator and handler meet certain conditions
 - “Conditional exclusion from the definition of solid waste”



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Definitions



Disposable

- Any wipe that is used and then thrown away

Reusable

- Any wipe that is used and sent to a commercial launderer or dry cleaner



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Disposable Wipes

Incineration – Solid Waste Incinerators

If a generator does the following things, the wipes do not have to be managed as hazardous waste:

- Keep in covered containers
- Ship with no free liquids
- Handle removed solvent as hazardous waste
- Ship in containers designed to minimize releases to the environment
- Label containers “excluded solvent-contaminated wipes”



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No Free Liquids

Q. How do I know if I meet the no free liquids condition?

A. You can remove solvents by hand or mechanically before placing them in containers

OR

You can check two easy things:

- (1) Do the wipes drip if picked up?
- (2) Is there solvent in the container?



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Disposable Wipes

Landfilling – Municipal Landfills

If a generator does the following things, the wipes do not have to be managed as hazardous waste:

- Keep in covered containers
- Meet the “dry” condition when shipped
 - Less than 5 grams of solvent per towel
- Handle removed solvent as hazardous waste
- Ship in containers designed to minimize releases to the environment
- Label containers “excluded solvent-contaminated wipes”
- Ensure wipes do not contain any of 11 specific solvents



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“Dry” Condition?

Q. How do I meet the “dry” condition?

A. A generator can know it has met the “dry” condition if it—

- removes excess solvent by centrifuge or other removal technology
- calculates through business records that they aren’t using enough solvent to have more than 5 grams on each wipe
- takes a representative sample of wipes and results show less than 5 grams on each



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Which 11 Solvents May Not Go to Municipal Landfills?



**Solvents that May Not Go to Municipal Landfills
(aka the Table 1 solvents)**

2-Nitropropane	Methylene Chloride
Benzene	Nitrobenzene
Carbon Tetrachloride	Pyridine
Chlorobenzene	Tetrachloroethylene
Cresols (o,m,p)	Trichloroethylene
Methyl Ethyl Ketone (MEK)	



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A Polling Question

- Would requiring disposable wipes to be labeled “Excluded Solvent-Contaminated Wipes” serve a useful purpose?



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Reusable Wipes

Conditional Exclusion from the
Definition of Solid Waste



Reusable Wipes

Recycling – Industrial Laundry or Dry Cleaner

If a generator does the following things, the
wipes do not have to be managed as solid
waste:

- Keep in covered containers
- Ship with no free liquids
- Handle removed solvents as hazardous waste
- Ship in containers designed to minimize releases
to the environment



- Would making sure containers of wipes have no free liquids when shipped be an appropriate management standard?



Intra-Company Transfers

Applies to both disposable wipes and reusable wipes

The generator can transport the wipes with free liquids if--

- Wipes are sent to another facility within the company that generated the wipe for removal of free liquids to meet the "no free liquid" or "dry" condition;
- The generator accumulates the used wipes in a non-leaking covered container
- The generator packages wipes for shipment off site in containers that are designed, constructed, and managed to minimize loss to the environment



Is solvent removal “treatment”?

- EPA is proposing that when a generator removes solvent from contaminated wipes through centrifuge or other solvent-extraction, this is not “treatment,” as defined by RCRA – generators performing this activity would not need a permit.

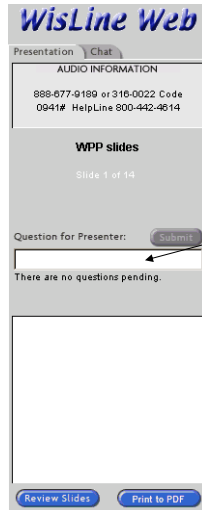


Other Issues

- Wipes that cannot meet these conditions would not be excluded and must be managed as hazardous waste
- Any removed solvent or residues must be accumulated, handled, and disposed as hazardous waste (if they are hazardous)



What would you need to further your understanding of the rule?



Type questions, needs or suggestions in "Questions for Presenter" box

*Follow-up discussion:
611# to unmute phone
600# to remute*



Submitting Comments

Comments are due to EPA by Feb. 18, 2004

- The proposal's docket number is RCRA-2003-0004
- EDocket
 - <http://www.epa.gov/edocket>
 - Follow instructions for submitting comments
- Email
 - rcra-docket@epamail.epa.gov
- Mail (written, disk or CD ROM)
 - OSWER Docket, EPA Docket Center, MC: 5305T, EPA, 1200 Pennsylvania Ave., NW, Washington DC, 20460, Attn: Docket ID No. RCRA-2003-0004.
- Fax
 - 202.566.0270, Attn. Docket ID. No. RCRA-2003-0004.



Thank You for Attending Today's Webinar

- Thank you to today's co-hosts
- Please remember to submit official comments to EPA
- Can also submit comments via Graphic Arts Coalition
- You can download and print annotated slides from today
- PNEAC will post follow-up information
 - Archive of today's session at Web site (www.pneac.org)
 - Follow-up announcements
 - Web site
 - Printech and Printreg listservs



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Evaluation of Today's Webinar

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 - Select "Start Survey"
 - Complete evaluation
 - Select "Submit"
- After 5 minutes, you will return to Webinar site
- Can download and print annotated slides at that time



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