



## Summary of EPA Regional Office and State Positions Concerning the Regulatory Status of Contaminated Shop Towels

Shop towels are common place in the printing industry. More commonly used are the reusable shop towels rather than the disposable type. With the use of the reusable shop towels comes the possibility of compliance issues. If the shop towels become contaminated and contain certain substances, state and federal regulations may prohibit textile rental companies from transporting and laundering them. This ultimately adds burden to the printer.

The regulation of reusable shop towels differ from state to state. Therefore, the following 1996 summary of EPA regional offices and state positions concerning the regulatory status of contaminated shop towels is a helpful tool for the printer to use for proper shop towel management.

Region / State	Considered Solid Waste		Considered Hazardous Waste		Not Considered Hazardous Waste or Exempt	Management Standards / Comments
	No	Yes	If Contains a listed Hazardous Waste	If exhibits a Characteristic of a Hazardous Waste		
<b>EPA Region I</b>		X	X	X		
Connecticut					X	Yes, must be handled by industrial laundry, A, B, C, D, E, F, G, J
Maine **		X	X	X		Yes, J
Massachusetts					X	Yes, A, B, C, D, E, F, G, J
New Hampshire					X	Yes, A, B, C, D, E, F, G, J
Rhode Island					X	Yes, A, B, C, D, E, F, G, H, J
Vermont		X	X	X		Yes, J

<b>EPA Region II</b>			Yes, for generator depending on how the solvent came in contact with the shop towel/wiper/rag	Yes, for generator depending on how the solvent came in contact with the shop towel/ wiper/ rag	Yes. After shipment to the laundry.	Yes, if not saturated, handled as if they are hazardous until shipment, no manifest needed, not hazardous upon shipment to the laundry.
New Jersey			Not if they are to be laundered	Not if they are to be laundered	X	Yes, A, B, C, D, E, F, G, H, I, J
New York			Not if they are to be laundered	Not if they are to be laundered	X	Yes, A, B, C, D, E, F, G, H, I, J

<b>EPA Region III</b> States have been authorized to administer RCRA program and decide the regulatory status of contaminated towels.						
Delaware		X	X	X		Yes, J
Maryland	X				X	Yes, A, J
Pennsylvania **					X	Yes, A, B, G, H, J
Virginia	X				X	Yes, A, B, C, D, E, F, G, H, I, J
West Virginia		X	X	X		Yes, handle as hazardous until cleaned, no manifest needed if small quantity generator, J

Region / State	Considered Solid Waste		Considered Hazardous Waste		Not Considered Hazardous Waste or Exempt	Management Standards / Comments
	No	Yes	If Contains a listed Hazardous Waste	If exhibits a Characteristic of a Hazardous Waste		
<b>EPA Region IV</b>	X				X	Yes, A
Alabama ****	X				X	Yes, J
Florida **	X				X	Yes, A, B, C, H, J
Georgia	X				X	Yes, E, J
Kentucky						No response received
Mississippi	X				X	Yes, J
North Carolina	X				X	Yes, J
South Carolina **	X				X	Yes, J
Tennessee	X				X	Yes, J

<b>EPA Region V</b>	X				X	
Illinois	X				X	Yes, J
Indiana *					X	Yes, J
Michigan *		X	X	X		Yes, J
Minnesota					X	Yes, A, considered hazardous waste if contains free liquids, J
Ohio	X				X	Yes, A, G, J
Wisconsin **					X	Yes, A, B, H, J

<b>EPA Region VI</b> Leaves it up to each state to decide regulatory status because all the states in the region have RCRA authorization.						
Arkansas						No response received
Louisiana	X				X	Yes, A, J
New Mexico		X	X			Yes, J
Oklahoma	X				X	Yes, J
Texas	X				X	Yes, A, B, C, D, E, F, G, H, I, J

<b>EPA Region VII</b>	X				X	
Iowa	X				X	Yes, J
Kansas					X	Yes, A, J
Missouri	X				X	Yes, J
Nebraska	X				X	Yes, A, G, J

Region / State	Considered Solid Waste		Considered Hazardous Waste		Not Considered Hazardous Waste or Exempt	Management Standards / Comments
	No	Yes	If Contains a listed Hazardous Waste	If exhibits a Characteristic of a Hazardous Waste		
<b>EPA Region VIII</b>	X				X	
Colorado	X				X	Yes, A, J
Montana **					X	Yes, A, B, G, H, J
North Dakota		X	X	X		Yes, J
South Dakota		X	X	X		Yes, J
Utah	X				X	Yes, G, J
Wyoming	X				X	Yes, J

<b>EPA Region IX</b>		X	X	X		
Arizona	X				X	Yes, A, J
California					X	Yes, A, F, G, H, I, J
Hawaii		X	X	X		Yes, J
Nevada		X	X	X		Yes, J

<b>EPA Region X</b> Leaves it up to each state to decide regulatory status because all the states in the region have RCRA authorization.						
Alaska					X	Yes, A, B, C, D, E, F, G, H, I, J
Idaho		X	X	X	X	Considered hazardous or non-hazardous depending on type of solvent, exhibits characteristics of ignitability, or exhibits toxicity characteristics below level; J
Oregon **		X	X	X		Yes, J
Washington					X	Yes, A, B, C, D, E, F, G, H, I, J

**Management standards specified by a state for the handling of contaminated shop towels:**

- A – No free liquids.
- B – Use proper containers.
- C – Label containers.
- D – Date containers.
- E – Remove contaminated textiles within required time frame.
- F – Transport in accordance with all applicable Department of Transportation regulations.
- G – Laundry facility must be properly permitted and in compliance with permit(s).
- H – Shop towels/wipers/rags are not mixed with other wastes.
- I – No solvent or other hazardous wastes are poured on or added to towels already in containers.
- J – Shop towels that are to be discarded are a solid waste and may be subject to hazardous-waste regulations.

\* Michigan is reviewing its current policy based on EPA Region V’s response to TRSA’s survey that laundered and reused textile products are not a solid waste and, therefore, not a hazardous waste.

\*\* Position based on 1991 correspondence.

\*\*\* Position based on 1992 correspondence.

\*\*\*\* Position based on 1994 correspondence.

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