

**HAZARDOUS MATERIALS PROGRAM ENVIRONMENTAL FACT SHEET**

## Contaminated Wipes

Wipes are used in certain business settings, like those related to manufacturing, automotive repair, and food processing. Items like rags and pads are commonly used for purposes of cleaning and maintenance, and these routine processes may create what are referred to in the Vermont Hazardous Waste Management Regulations (VHWMR) as contaminated wipes. Generators should be aware that under the VHWMR, reusable wipes that meet specific criteria of contaminated wipes are exempt from regulation as hazardous waste. They are a conditionally exempt waste, and when managed per the requirements, they do not count toward a generator's hazardous waste generation rate.

### What is a contaminated wipe?

The VHWMR defines "wipe" as a woven or non-woven shop towel, rag, pad, or swab made of wood pulp, fabric, cotton, polyester blends, or other material. In summary, the VHWMR defines a "contaminated wipe" as a wipe that, after being used in a cleaning or degreasing process:

- Contains greater than 5% by weight of VT02 petroleum distillates;
- Contains one or more of the F001 through F005 solvents or the corresponding P- or U- listed solvents;
- Exhibits a hazardous characteristic when that characteristic results from a listed solvent (such as D001- ignitable); and/or
- Exhibits only the hazardous waste characteristic of ignitability due to the presence of one or more solvents that are not listed.

Note: contaminated wipes that contain listed hazardous waste other than VT02 petroleum distillates; or contain listed hazardous waste other than the F001 through F005 solvents or the corresponding P- or U- listed solvents; or exhibit the characteristic of toxicity, corrosivity, or reactivity due to contaminants other than solvents; are not eligible for the conditional exemption.

### What are my options for managing contaminated wipes?

Generators of contaminated wipes are encouraged to manage them according to the standards for meeting the conditional exemption, as this lessens the regulatory requirements the generator must follow and reduces the amount of hazardous waste they are generating. Choosing not to manage contaminated wipes as conditionally exempt waste equates to choosing to "over-manage" them, as they would otherwise be regulated as hazardous waste and would need to be managed according to the requirements of the VHWMR.

### What requirements must I follow in order to meet the conditional exemption for contaminated wipes?

Contaminated wipes must be reusable, be sent off-site for cleaning prior to reuse, and be accumulated and managed according to the following standards:

- They are kept in non-leaking containers that are:
  - Marked with the words “Excluded Contaminated Wipes.”
  - Able to contain free liquids.
  - Kept closed except when necessary to add or remove contaminated wipes.
  - Kept sealed when full or no longer accumulating, through the time of transport off-site.
- They are accumulated for no more than 180 days from the start date for each container.
- They contain no free liquids at the point when being sent for cleaning.  
Note: free liquids removed from contaminated wipes must be managed per VHWMR.
- Generators maintain required onsite documentation:
  - Name and address of launderer.
  - Verification of the 180-day time limit for accumulation.
  - Description of the process that ensures there are no free liquids when wipes are transported off-site.
- They are sent to a launderer whose discharge, if any, is permitted under the Clean Water Act.  
Note: generators should never launder their own contaminated wipes.

### **How do I manage my contaminated wipes if they are disposable wipes (e.g., Chemwipes)?**

Although permissible under federal rules, Vermont does not allow for disposable wipes that meet the criteria of contaminated wipes to be managed as solid waste (i.e., thrown out in the trash). Generators of disposable wipes in Vermont need to determine whether their disposable wipes are hazardous waste, and if so, manage them according to the requirements of the VHWMR. For more information on the hazardous waste determination process, refer to the fact sheet on [Making a Hazardous Waste Determination](#).

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***For more information regarding contaminated wipes, or if you have other hazardous waste management questions, please contact:***

Hazardous Materials Program – Hazardous Waste Section  
Waste Management and Prevention Division  
Vermont Department of Environmental Conservation  
1 National Life Drive – Davis 1  
Montpelier, VT 05620-3704  
802-828-1138  
<https://dec.vermont.gov/waste-management/hazardous>