



Colorado Department  
of Public Health  
and Environment

## Compliance Bulletin Hazardous Waste

### Contaminated Shop Towels and Reusable Absorbents

reviewed/revised August 2002

Wastes that are contaminated with one or more listed hazardous wastes or that exhibit any of the characteristics of ignitability, reactivity, corrosivity, or toxicity as defined in the Colorado Hazardous Waste Regulations 6 CCR 1007-3 Subpart 261 are considered to be hazardous wastes unless they are specifically exempted from the regulations.

Rags, shop towels, and other reusable absorbents that are contaminated with listed hazardous waste or that exhibit a hazardous waste characteristic are considered to be exempt from the provisions of the Colorado hazardous waste regulations only if they are picked up, cleaned, and delivered back to the customer by a laundering service which uses a solvent-based dry cleaning process to clean the rags or a water-washing commercial laundry with all appropriate waste water discharge permits from the local municipal waste water treatment plant. The preferred alternative is commercial dry cleaning, because this process enables recovery and destruction of the contaminants removed during the dry cleaning process. Materials contaminated with solvents, resins, lacquers, etc., cleaned in commercial water-washing facilities are simply transferring the contaminants to the water, which is discharged to the sanitary sewer. The water is then treated by the municipal wastewater treatment facility. Laundering may be done at the generator site only with the written approval of the local sewer district.

Reusable absorbent materials cleaned by such contractual/closed loop cleaning services would not have to be managed as hazardous waste when on site; do not need to be shipped under a manifest to a licensed hazardous waste treatment, storage, or disposal facility, and do not count toward the total monthly on site generation of hazardous waste. A copy of the current laundering contract should be maintained in the operating files.

Please note that the generator is responsible for the safe storage of ignitable/flammable materials from the time of generation until the time that they are picked up by the commercial laundry facility. The used absorbent materials must be stored in sealed, labeled waste containers.

The rags, shop towels, or absorbents would not be exempt from the hazardous waste regulations if free liquid hazardous waste is dumped onto the absorbents or if the absorbents are saturated with free liquid hazardous wastes. One way to ensure that no free liquids are present would be to wring out the soiled materials and collect the released liquid for proper hazardous waste handling and disposal.

Any absorbents that are contaminated with a listed hazardous waste or that exhibit a hazardous characteristic and are not commercially dry cleaned or laundered must be handled as hazardous waste. If you are unsure as to the type of waste involved, you should make a hazardous waste determination prior to disposal.

#### For more information:

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Public Health & Environment**

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Division Website <http://www.cdphe.state.co.us/hm/>  
Regulations <http://www.cdphe.state.co.us/regulate.asp>  
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CHW-002

This Compliance Bulletin is intended to provide guidance on the appropriate management of wastes based on Colorado solid and hazardous waste statutes and regulations only. The wastes described in this guidance may be regulated under other statutes and regulations.