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Subject: Proposed Wiper Language

08/15/2002 01:06 PM

Thank you for providing TRSA and UTSA with the opportunity to suggest the following clarification to EPA's draft, proposed, shop towel preamble language:

It has long been EPA's policy to encourage the appropriate State or EPA Regional office to characterize the regulatory status of laundered and reused shop towels and wipers based on site-specific factors. See Memo from Mike Shapiro, Director, EPA Office of Solid Waste, to EPA Waste Management Division Directors, February 14, 1994. Most authorized States conditionally exempt or exclude reusable shop towels and wipers from RCRA regulation as long as certain basic conditions are met, such as the removal of free liquids by the shop towel user. It is not EPA's intent to modify or in any way limit the existing State or EPA Regional exemptions or policies through this proposed federal rulemaking. "Because this action is a proposed rulemaking, provisions of the proposal, as well as EPA's assumptions and rationale leading to them, are subject to public notice and comment. Therefore, until a final rule governing these materials is issued, (strikethrough: they remain regulated), the regulatory status and classification of these materials, including all regulatory exemptions and exclusions, remains unchanged, (strikethrough: as they are currently,) (strikethrough: by the State or EPA Region implementing the) under the current RCRA programs implemented by States and EPA Regions. This (strikethrough: proposed rule) proposal is not intended to affect individual states' policies, exclusions and regulations on management of (strikethrough: industrial wipes) reusable shop towels and wipers until it, or a variant of it, is finalized. "

Also, TRSA and UTSA suggest that EPA consistently use the following terms to clearly distinguish between "reusable shop towels" and "disposable paper towels and other rags".

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