



**TRSA Environmental Committee
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Major Concerns

Laundries

- Reusable wipes not be considered solid waste
- Potential for state solid waste fees
- Increased costs if closed containers required
- Lower costs for disposables could adversely impact laundries

Primary Goals

- Protect human health and the environment at the lowest cost possible
- Promote recovery and reuse of solvents
- Easily understood regulatory structure
- Clear federal framework to promote consistency
- Accommodate concerns of all stakeholders to the extent possible and appropriate

Over-all Approach for Reusables

Conditional Exclusion from Being a Solid Waste EPA is looking to Propose:

- Generators
 - Accumulation in non-leaking covered containers
 - Shipment in DOT-compliant containers that minimize identifiable releases to the environment
 - No free liquids in wipes when shipped
- Handling Facilities
 - Managed in containers that minimize identifiable releases to the environment until entering handling process
 - Relief when free liquids are discovered

Free Liquids Standard

- Determining presence of free liquids
 - Common sense approach versus a specific test
 - Feedback?

Current Status

- Drafting proposed rule to be sent to intra-agency work group
- Workgroup closure to be scheduled when OSW review of package is complete
 - Division Director final review
 - Office Director-level review
 - Anticipate Workgroup closure in late September/early October