Compliance Checklist for Drivers

□ Container must be sealed (not just closed) for transport

□ Container must be capable of containing free liquids if they occur during transport

□ Container is impermeable to liquids

□ Shows no signs of leaks or drips

□ Inspect bottom of container (inside and out) and underneath container for signs of liquid

□ Container is labeled “Excluded Solvent-Contaminated Wipes”

□ Customer provides documentation of liquid extraction method used to minimize free liquids.

□ If documentation of extraction method is provided, and there are no signs of visible free liquids, Paint Filter Test does not need to be performed.

□ If no documentation of extraction method is provided, request the customer to prepare documentation identifying the method used to minimize “free liquids.” Methods may include (a) conducting some form of treatment to extract liquids, such as (but not limited to) centrifuging, mechanical wringing, screening, and vacuum treatment; or (b) certification of “no free liquids” based on customer knowledge of the process used to generate the soiled towels and confirmatory visual inspection (driver should request that container be opened to allow for visual inspection in this scenario).

□ If free liquids are visible, request customer to remove the free liquids (and manage them properly as hazardous waste) and treat shop towels to extract free liquids prior to transport.

□ Confirm with customer that shop towels are contaminated only with listed solvents or solvents that make the towels ignitable.

□ Shop towels do not contain other hazardous contaminants or non-listed solvents that make the towels corrosive, reactive, or toxic.