

SEPTEMBER 8, 1986

Mr. Benjamin Y. Cooper  
Senior Vice President  
Printing Industries of America, Inc.  
Government Affairs Department  
1730 North Lynn Street  
Arlington, Virginia 22209

Dear Mr. Cooper:

Thank you for your letter of August 20, 1986, concerning the regulatory obligations of printers who use recyclable rags and wipers.

As noted in your letter, a manifest exemption does exist under 40 CFR 262.20(e) for reclamation shipments from generators of 100-1000 kg/mo. To the extent that a printer ships industrial wipers or rags that are hazardous wastes, the printer would be eligible for the manifest exemption provided that he is a 100-1000 kg/mo generator and that both he and the industrial laundry facility act in accordance with the other conditions of the exemption. It should be noted that a printer's generator status is determined by totalling all hazardous wastes generated by him in a calendar month.

The Agency is presently considering a petition which asks us to exempt solvent-contaminated industrial wipers from hazardous waste status under the mixture rule. In our response to this petition, we intend to address the entire issue of industrial wipers.

If you have any other questions related to the manifest exemption or to the rag issue in general, please feel to contact either Bob Axelrad (382-4761) or David DiFiore (382-7738) of my staff.

Sincerely,

Marcia Williams Director Office of  
Solid Waste

Faxback 11178

# INDUSTRIES OF AMERICA, INC

4 730 North Lynn Street  
Arlington, VA 22209  
(703) 841-8100  
Government Affairs Department

Marcia Williams  
Director, Office of Solid Waste  
U.S. Environmental Protection Agency  
401 M Street S.W.  
Washington, DC 20460

Dear Ms. Williams:

An issue of major interest to the printing and graphic arts industry is in urgent need of clarification from your office.

Printing is the nation's largest manufacturing industry in terms of number of establishments. More than 53,000 printing facilities operate today with an average of 22 employees per plant.

The bulk of the hazardous wastes generated by a typical printing company end up in the rags and wipers used during frequent press cleanups. While some of the wipers are disposable, many printers have contracts with industrial launderers for the reclamation of cloth rags.

If a printing company has a contractual relationship with an industrial laundry facility that meets the requirements found in 40 CFR 262.20 (Manifest exemption for certain reclamation shipments), will the printer be eligible for a manifest exemption when the rags are transported from his or her plant?

Your prompt clarification of this issue would be greatly appreciated.

Sincerely,

Benjamin Y. Cooper  
Senior Vice President