

Dry Cleaners: Hazardous Waste Management

Background

This fact sheet explains dry cleaner hazardous waste management requirements found in Oregon rules and legislation.

Complying with the requirements described in this fact sheet is necessary for your facility to be eligible to be cleaned up using funding from the Dry Cleaner Environmental Response Account.

What is a hazardous waste?

Every business, no matter how small, has the responsibility to determine if the waste produced is hazardous. Waste can be a “listed” hazardous wastes based on the material used, or the process that produces the waste. **Dry cleaner wastes containing perchloroethylene (perc) are listed hazardous wastes.**

Wastes are “characteristic” hazardous wastes if they exhibit certain characteristics such as ignitability or toxicity. For example, solvents are considered ignitable if they have a flashpoint of less than 140 degrees Fahrenheit.

According to Oregon law, all wastes produced at a dry cleaning facility that contain perc must be managed as hazardous waste. In addition, waste that is ignitable, corrosive, reactive or toxic is hazardous, regardless of the solvent used. Examples of hazardous wastes found in dry cleaning facilities include:

- filters
- sludge
- lint
- wastewater from the water separator
- unused solvents and cleaning products that will be thrown away
- paint and solvent from building maintenance.
- aerosol cans
- spill debris containing solvents
- fluorescent light tubes

Wastewater from laundering operations is not a hazardous waste. However, wastewater from the water separator contaminated with perc is considered a hazardous waste. Wastewater contaminated with other solvents **may** be hazardous waste, depending on the specific ingredients in the solvent or spotting chemicals.

It is the responsibility of the operator of the dry cleaning facility to determine if the waste is hazardous.

Management of wastewater produced from the water separator on the dry cleaning machines is addressed in a separate DEQ fact sheet: “Dry Cleaners: Wastewater Management.”

It is important to correctly identify all the hazardous wastes that you produce. A “How to determine if “Your Waste is Hazardous” fact sheet explains how to conduct a hazardous waste determination and is available from DEQ.

How do I know what requirements to follow?

Your management requirements depend upon your generator category which is determined by the weight of hazardous waste you produce each month, or the hazardous waste you accumulate at your dry cleaning facility.

What hazardous wastes should be counted to determine the generator category?

The following waste should be counted:

- All dry cleaning wastes that contain perc dry cleaning solvent.
- Perc-contaminated separator water collected in a bucket.
- Other types of hazardous waste such as the ones listed in the *What is a Hazardous Waste?* section in this fact sheet.

What wastes are not counted?

Do not count separator wastewater that is piped directly from the dry cleaning machine to a wastewater treatment unit. A wastewater treatment unit is equipment that removes solvents from wastewater. For a complete description of wastewater treatment units see “Dry Cleaners: Wastewater Management” fact sheet. If your wastewater is collected in a bucket, the weight of that wastewater is counted towards your generator category.

What is my generator category?

- **Dry cleaners that produce 220 pounds or less of hazardous waste in a month, and accumulate less than 2,200 pounds of hazardous waste at their facility, must manage their hazardous wastes according to**



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waste management requirements described in this fact sheet.

- **Small Quantity Generators (SQGs)** produce more than 220 pounds, but less than 2,200 pounds, of hazardous waste each month. In addition, dry cleaners are a SQG if more than 2,200 pounds of hazardous waste are stored at any time. Some larger dry cleaners are SQGs.
- **Large Quantity Generators (LQGs)** are businesses that produce 2,200 pounds or more of hazardous waste each month. LQGs have the most stringent regulations to

follow because of the large volumes of hazardous waste produced. It is unlikely that a dry cleaner in Oregon will fall into this category.

The following table provides examples of how to count hazardous waste produced by a dry cleaner. You can see that Dry Cleaner No. 1 would be considered a SQG and would have to follow SQG hazardous waste management rules. Dry Cleaner No. 2 would follow waste management requirements outlined in Oregon Administrative Rules Title 340 Division 124.

HAZARDOUS WASTE COUNTING				
Type of Hazardous Waste	Dry Cleaner No. 1	Is This Counted?	Dry Cleaner No. 2	Is This Counted?
Sludge containing perc	50 pounds	Yes	15 pounds	Yes
Filters containing perc	50 pounds	Yes	100 pounds	Yes
Lint	2 pounds	Yes	1 pound	Yes
Perc separator water collected in a bucket	15 gallons@ 8.34 pounds per gallon, equals 125.10 pounds	Yes	None	N/A
Perc separator water piped directly to an evaporator	None	N/A	10 gallons@ 8.34 pounds per gallon, equals 83.40 pounds	No
Old paints	3 gallons@ 9 pounds per gallon, equals 27 pounds	Yes	None	N/A
Total Hazardous Waste Produced In One Month:	254 pounds produced in one month Facility is a SQG		116 pounds produced in one month	

Remember the generator status is not determined by how much waste is *PICKED UP* in each month, but rather by how much is *PRODUCED* in each month.

What requirements do I need to follow?

All dry cleaners must follow certain hazardous waste management requirements. These include:

- **Container management.** Keep containers of hazardous waste such as wastewater, and filters, closed except when adding or removing wastes. Label containers as “hazardous waste” and date containers when waste is first placed in them.
- **Hazardous waste disposal.** Dispose of hazardous waste at least once a year* through either a permitted hazardous waste disposal company, or at a government-sponsored Conditionally Exempt Generator (CEG) collection event or facility. A list of some of these services is provided on this fact sheet. (*If in a remote Oregon location or did not produce enough hazardous waste to economically ship the waste offsite annually, submit a written request to DEQ to keep waste onsite an additional year.
- **Recordkeeping.** Always retain hazardous waste shipping records that show how the waste was disposed. Keep these records onsite for five years. This information is needed for the annual report, which DEQ uses to track the state’s hazardous waste.
- **Post emergency information.** Emergency information must be prominently displayed so it is immediately available to employees. Solvent releases over 1 pound must be reported to Oregon Emergency Response System (OERS) at 1-800-424-0311.
- **Reporting.** Dry cleaners are required to report annually on quantities of hazardous wastes produced, waste management practices. Monitoring for air quality standards is also required for perc machines. DEQ sends report forms to all dry cleaners and dry stores.
- **Changes in operation.** Any dry cleaning facility that converts and operates as a dry store must remove solvent and solvent containing waste from the premise. In addition, the dry cleaning machine must not be connected to any utilities.
- **Ceasing operation.** A dry cleaning facility that ceases operation for 45 continuous days must have solvent and solvent-containing waste removed from the dry cleaning machine prior to the machine being disposed, recycled or reused.

Large and Small Quantity Generators. In addition to the above requirements, LQGs and SQGs have the following management requirements:

- Notify DEQ that they are hazardous waste generators.
- Use licensed hazardous waste transporters and facilities.
- Use hazardous waste manifests to ship waste offsite. Keep manifests for three years.
- Train employees in hazardous waste management and emergency response.
- Prepare for emergencies.
- Submit annual hazardous waste report to DEQ.
- Pay annual hazardous waste generator fees.

DEQ has the *Small Quantity Generator Handbook* that explains the SQG requirements in detail. Additional information about the requirements that LQGs must follow is also available from DEQ

Who provides hazardous waste services?

The following companies can provide hazardous waste disposal services to dry cleaners. There may be other companies that are not included on this list. DEQ does not recommend or endorse any of these hazardous waste companies, but is providing this list as a service to the dry cleaning community.

- Safety-Kleen Corporation
 - Clackamas: 503-655-5798
 - Medford: 541-770-8066
 - Springfield: 1-800-669-5941
 - Phillips Services, 1-800-547-2436
 - Technichem, 1-800-652-5455 [Serves only the I-5 Corridor]
 - Lane County, 541-682-4120
 - Metro, 503-234-3000
- The Metro facility is in Portland, and accepts hazardous waste from businesses throughout Oregon. Dry cleaners must transport their own waste. The facility only services dry cleaners that produce less than 220 pounds of hazardous waste each month.

Who do I call with questions?

If you have any questions about the Dry Cleaner Program, call Nancy Cardwell, Portland, at 503-229-6240, or toll-free in Oregon at 1-800-452-4011.

To request a copy of any or all of these fact sheets please call 503-229-6783 or toll-free in Oregon at 1-800-452-4011.

You can also find this information at DEQ's dry cleaner Web site at:

<http://www.oregon.gov/deq/Hazards-and-Cleanup/Pages/Dry-Cleaner.aspx>

Alternative formats

Documents can be provided upon request in an alternate format for individuals with disabilities or in a language other than English for people with limited English skills. To request a document in another format or language, call DEQ in Portland at 503-229-5696, or toll-free in Oregon at 1-800-452-4011, ext. 5696; or email deqinfo@deq.state.or.us

Fact sheets are also available in Korean & Vietnamese. For copies, contact Ed Patnode, in Portland, at 503-229-6783.