

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.

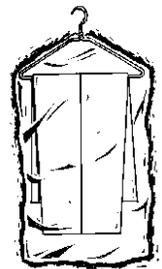
What is my generator category?

- **Dry cleaners that produces 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**



State of Oregon
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Quality

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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, you are a SQG if you store more than 2,200 pounds of hazardous waste 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 | |

You may use manifests or other paperwork left by a hazardous waste company to help determine your generator category. If you do, remember that your category is not determined by how much waste is *PICKED UP* in each month, but rather by how much is *PRODUCED* in each month.

Dry cleaners generating less than 220 pounds of hazardous waste per month have the easiest requirements to follow. If you are not sure how to count your wastes or want to try and stay below 220 pounds per month, please contact DEQ for help.

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 your 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 you are in a remote Oregon location or did not produce enough hazardous waste to economically ship the waste

offsite annually, you can submit a written request to DEQ to keep waste onsite an additional year.

- **Recordkeeping.** Always get hazardous waste shipping records that show how you disposed of your waste. Keep these records onsite for three years. You will need this information for your 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 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 and monitoring of their perc machines for compliance with air quality requirements. 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 have



solvent and solvent containing waste removed from a dry cleaning machine left on the premise, plus the dry cleaning machine must not be connected to any utilities and must not be operated.

- **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 Dick De Zeeuw, Portland, at 503-229-6240, or toll-free in Oregon at 1-800-452-4011.

Dry cleaner fact sheets and rules available from DEQ

- Oregon Dry Cleaner Program Overview for Dry Cleaners
- Dry Cleaners: Overview of Environmental Requirements
- Dry Cleaners: Hazardous Waste Management
- Dry Cleaners: Wastewater Management
- Dry Cleaners: Containment Under and Around Dry Cleaning Systems
- Dry Cleaners: Annual Hazardous Waste And Air Quality Compliance Report
- Dry Cleaners: Reporting Releases of Dry Cleaning Solvent
- Dry Cleaners: Delivery of Perchloroethylene Solvent
- Dry Cleaner Program Environmental Response Claim and Claim Form
- Dry Cleaners and Air Quality Requirements
- Emergency Information (poster)
- Change of Dry Cleaning Activity Form
- Dry Cleaner Rules (OAR 340-124)

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: www.deq.state.or.us/wmc/cleanup/dry0.htm

Alternative formats

Alternative formats of this document (such as large type or Braille) can be made available. Contact DEQ Office of Communication and Outreach, Portland, for more information at 503-229-5696.

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