Business Environmental Program
College of Business
University of Nevada, Reno

Providing environmental and energy information and solutions to Nevada's businesses and communities

Business Environmental Program Hazardous Waste Fact Sheet

Hazardous Waste Management for Dry Cleaners

Dry Cleaning facilities are subject to a number of environmental, health and safety regulations. This fact sheet addresses basic hazardous waste management and waste reduction issues impacting dry cleaning facilities in Nevada. Please contact the Business Environmental Program (BEP) for more information on air quality regulations for drycleaners or questions related to this fact sheet.

Hazardous Wastes

Hazardous waste from dry cleaning facilities typically includes spent filter cartridges, cooked powder residue, filter muck, lint, blow-down, condensate, and still bottom (sludge) from the distillation of solvents. If perchloroethylene (perc) is used in the dry cleaning operations, the hazardous wastes are considered "F-listed" wastes, which are assigned the EPA waste code, F002. All wastes which have contacted perc are considered hazardous wastes, even filter cartridges and muck from which perc has been extracted. Facilities that use high-flash petroleum-based solvent may not generate hazardous wastes, however; still bottoms and other wastes should be assessed to determine if they exhibit any of the hazardous waste characteristics. See our Identifying your Hazardous Wastes fact sheet.

Some pre-treatment agents may be hazardous wastes if disposed. Most often, dry cleaners do not dispose of the pre-treatment agents individually; rather the chemical is applied to the garment and becomes incorporated into the solvent and still bottoms. If these products contain chemicals on the toxic characteristics list they have the potential to cause wastes from high-flash petroleum operations, such as still bottoms, to exhibit hazardous characteristics.

The regulations that apply to your business are determined by your generator status. The generator status is determined by the cumulative amount of all hazardous waste generated in each calendar month. The categories are:

Conditionally Exempt Small Quantity Generator (CESQG) is any business generating less than 100 kg (220 pounds) of hazardous waste in any calendar month.
Small Quantity Generator (SQG) is any business generating more than 100 kg, but less than 1000 kg 220 lbs.-2,200 lbs.) of hazardous waste in any calendar month.
Large Quantity Generator (LQG) is any business generating more than 1000 kg (2,200 lbs.) of hazardous waste in any calendar month.

Dry cleaning still bottoms weigh approximately 12 pounds per gallon. If you store your waste in a 15-gallon drum, the full drum will weigh 180 pounds. If your business generates one 15-gallon drum or less per month this places you in the conditionally exempt category.
The length of time allowed for on-site storage of hazardous waste depends on generator status.

CESQG: no time limit as long as your business doesn't accumulate more than 1,000 kg (2,200 lbs).
SQG: 180 days (if the nearest facility that can accept your waste is more than 200 miles away the waste may remain on site an additional 90 days)
LQG: 90 days

Regardless of generator status, all hazardous waste must be stored in closed, labeled containers. All containers of hazardous waste must be marked with the words "Hazardous Waste," a description of the contents, and the EPA waste code(s) for the waste. SQGs and LQGs are required to perform and document weekly inspections of waste containers and retain records for three years. Weekly container inspections are also recommended for CESQG's. For additional information, refer to the BEP fact sheets on Containers and Inspection Requirements.

Hazardous waste shipped from SQGs and LQGs must be accompanied by a Hazardous Waste Manifest. Additionally if waste is shipped outside of Nevada a copy of the returned manifest must be submitted to NDEP within 30 days and kept on file for three years. A land disposal notification should accompany your first shipment of hazardous waste to a facility and be maintained in your files along with your manifests.

All hazardous wastes should be shipped off-site to permitted facilities for proper management and solvent recovery. An exception is blow-down water or condensates. These waters that are generated in small quantities and contain low concentrations of perc may be managed using evaporators. Blowdown and condensate wastes should never be disposed in the toilet or any other drain.

Waste Reduction

Good hazardous waste management can be thought of as performing "good housekeeping" practices. These include: performing proper drying (reclamation) and distillation, using and reusing materials as much as possible, recycling or reclaiming waste; or reducing the amount of waste you generate. To reduce the amount of waste you generate:

- Do not mix non-hazardous waste with hazardous ones. For example, do not put non-hazardous cleaning agents or rags in the same container as solvent wastes, the entire contents may become subject to the hazardous waste regulations.
- Avoid mixing several different hazardous wastes. Doing so may make recycling very difficult, if not impossible. It may also make disposal more expensive.
- Avoid spills or leaks of hazardous products. Spilled cleaning solutions may be recovered by running the absorbent media (i.e. sleeping bag) through the garment cleaning cycle.
- Make sure the original containers of hazardous products, such as stain removing chemicals, are completely empty before you throw them away. Use all of the product.
- Use only the amount of product needed. For example, use no more solvent than you need to do the job. Keep containers close to avoid product loss through evaporation.
- Ensure equipment is properly maintained and operated and consider new garment cleaning technologies, which reduce or eliminate hazardous waste generation.
- Consider installing spin disk filters to replace the split filters usually found on dry cleaning machines. Spin disk filters are not thrown out, just cleaned off, which greatly reduces the total amount of hazardous waste generated, and the cost of having to replace the traditional split filters.
- Reducing your hazardous waste means saving money or raw materials and reducing the costs to your business for managing and disposing of your hazardous wastes.

The Business Environmental Program (BEP) is a partner in the Business Services Group
College of Business of the University of Nevada, Reno.

 This guidance document was developed by BEP with funding support provided by the Nevada Division of Environmental Protection (NDEP).
Printed on recyclable paper