

Dry Cleaner Hazardous Waste Checklist (Conditionally Exempt Small Quantity Generators)

- **Do you always generate less than 100 kilograms (about 220 pounds) of hazardous waste per calendar month?**
 - o In general, any wastes containing or contaminated with perchloroethylene (perc) or with a flash point less than 140 degrees F is regulated as hazardous waste.
 - o Common wastes include spent filter cartridges, spent solvent, separator water, filter muck, unused solvents, spent activated carbon, distillation bottoms, lint and contaminated material resulting from spill cleanup.
 - o Perchloroethylene weighs about 13.5 pounds per gallon; Stoddard solvent weighs about 6.5 pounds per gallon. (specific gravity x 8.3 = lbs/gal)
- **Is your waste stored in containers marked with words like “Hazardous Waste” or “Waste Filters” to identify the contents for your employees?**
- **Do you make sure that you store less than 1000 kilograms of waste on site at any one time? (equivalent to about three 55-gallon drums of waste perc or six 55-gallon drums of waste Stoddard solvent)**
- **Do you conduct periodic inspections of the waste containers looking for leaks or deterioration?**
 - o Are all containers in good condition and not leaking?
 - o Are all containers kept closed except when waste is being added or removed?
 - o Are all containers stored in a manner to prevent rupture or leakage?
- **Do you evaporate your separator water in an evaporation unit on site?**
 - o Is this conducted in a safe manner in a way that will not adversely impact human health or the environment?
 - o You are advised to always empty your separator water into your evaporation unit at the end of the day. If you store your separator water in a container overnight (or longer) before putting it in your evaporation unit, you will have to count the amount of separator water towards your monthly generator category.

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- **Do you have emergency response equipment in case of a spill?**
 - o Do you have spill cleanup materials and fire extinguishers?
 - o Do you have emergency assistance numbers posted by the telephone?
 - o Do you maintain adequate space around your waste containers for the unrestricted movement of emergency personnel and equipment?
- **Are all employees familiar with proper waste handling and emergency response procedures?**
- **Do you utilize the services of a reputable hazardous waste transporter and treatment, storage or disposal (TSD) facility to dispose of your wastes?**
 - o Do you maintain records to document the proper disposal of your wastes?
- **If you use perchloroethylene, have you notified the Colorado Department of Public Health and Environment that you are a generator of an F002 hazardous waste and received an EPA Identification Number?**
- **Have you paid your annual Conditionally Exempt Small Quantity Generator fee to the Colorado Department of Public Health and Environment?**