

Dry Cleaner Hazardous Waste Checklist (Small Quantity Generators)

- **Have you determined how much hazardous waste you generate each calendar month?**
 - o In general, any wastes contaminated with perchloroethylene (perc) or that have 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)
- **If you generate more than 100 kilograms (about 220 pounds) of hazardous waste in any calendar month, have you obtained an EPA Identification Number?**
 - o Small Quantity Generators of hazardous waste generate between 100 and 1000 kilograms (between 220 and 2200 pounds) of hazardous waste per calendar month.
- **Is your waste stored in containers marked with the words “Hazardous Waste”?**
- **Is each container clearly marked with the accumulation start date – the date waste was first placed in the container?**
 - o Are all of the container accumulation start dates less than 180 days ago (270 days if the waste is shipped more than 200 miles away)?
 - o Do you make sure that you store less than 6000 kilograms of waste on site at any one time (equivalent to less than eighteen 55-gallon drums of waste perc)?
- **Do you conduct weekly inspections of the waste accumulation 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?

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- **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.
- **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 information posted by the telephone, including how to contact your emergency coordinator, local response agencies and spill reporting numbers, as well as listing the location of emergency response equipment?
 - o Do you maintain adequate space around your waste containers for the unrestricted movement of emergency personnel and equipment?
- **Are all employees thoroughly familiar with proper waste handling and emergency response procedures relevant to their job responsibilities?**
- **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 have copies of your Land Disposal Restriction (LDR) notifications and final signed hazardous waste manifests?
 - o Do you have copies of any test results, waste analysis or other information used to determine if your waste is a hazardous waste?
 - o Do you maintain these records for at least three years?
- **Have you notified the Colorado Department of Public Health and Environment that you are a hazardous waste generator and received an EPA Identification Number?**
- **Have you paid your annual Small Quantity Generator fees and Hazardous Waste Commission fees to the Colorado Department of Public Health and Environment?**