

FAQs for Connecticut Dry Cleaners (full list)



The Connecticut Department of Energy & Environmental Protection (DEEP) has prepared answers to questions that are frequently asked by dry cleaners. While these do not constitute legal advice, they are meant to be a starting point to help you prevent pollution, use best management practices and understand environmental regulations that affect your dry cleaning operations.

Connecticut's Air & Waste Environmental Regulations:

1. What air requirements do I need to follow in CT if I use perc?

Dry cleaners in CT must comply with a number of requirements, such as venting of dryer exhaust, use of control devices, treatment of filters and cartridges and several other items. It is recommended that a dry cleaner review all of the requirements listed in the [CT regulations](#) Section 22a-174(w).

- Inspect perc equipment for obvious (sight, smell, touch) leaks at least every other week, unless you are a [larger dry cleaner](#) and would be required to inspect every week. Leaks should be repaired promptly.
- Keep a record of leak detection and repair dates.
- Keep amounts and dates of perc purchases so that at any time you could provide information on how much perc you had purchased during the previous 12 month period. This is important to establish what size facility you are which determines requirements for vapor recovery or further controls for the recovery of residual perc at the end of the drying phase.
- Drain cartridge filters in their cartridge housing for at least 24 hours.
- Keep machine doors closed when not loading or unloading.
- Any perc dry cleaner should have sent EPA an initial notification report and pollution prevention compliance report by June 1994 or upon start-up if it occurred after that date.

The notification address is: U.S. EPA NE
5 Post Office Square
Suite 100
Boston, MA 02109-3912

- More detailed information is contained in Perchloroethylene Air Emissions [fact sheet](#).

2. What waste requirements do I need to follow if I use perc or a hydrocarbon solvent like DF2000 or EcoSolv?

All waste from perc or hydrocarbon solvent machines must be properly disposed as hazardous.

- The waste commonly consists of four types - still bottoms from solvent recycling, spent filters and cartridges, lint, and condensate or separator water. Each of these wastes must be collected in a container for off-site shipment to a permitted commercial hazardous waste company.
- Condensate, or separator water, **cannot** be discharged to the city sewer unless you have a wastewater permit to discharge it. Condensate should **never** be discharged to an on-site septic system.
- Keep a record of filter purchases. These may be requested by an inspector when reviewing your hazardous waste records.
- Under the hazardous waste law, companies that generate specified amounts of hazardous waste have specific waste management requirements that must be followed. Most perc or hydrocarbon solvent dry cleaners would fall under the requirements for small quantity generators; some may be CESQGs http://www.ct.gov/deep/cwp/view.asp?a=2718&q=451960&depNAV_GID=1967.
- **If your dry cleaner is a small quantity generator (SQG)**, meaning that you generate between 220 pounds and 2200 pounds of hazardous waste per month you must follow the requirements for a SQG. Those

requirements can be found in the [SQG guidance handbook](#) under the “Hazardous Waste” web page. To summarize, those requirements include:

- Determining if each of your wastes is a hazardous waste. This is known as making a “hazardous waste determination”. There are two classifications of hazardous waste. One is known as the “listed hazardous waste” and the other is known as “waste that exhibits a hazardous waste characteristic (commonly referred to as “characteristic hazardous waste”). The “listed hazardous waste” classification is a list of chemicals that are known to be dangerous such as perc. The “characteristic hazardous waste” means the waste has a characteristic or physical property that is dangerous such as flammable. When hiring or contracting with a company that will be taking your waste, they will do the hazardous waste determination. However, it is up to you to provide them with the necessary information to make a proper determination such as the Material Safety Data Sheets for the products used and a description of what the waste is such as “sludge from the solvent still”, “spent filters”, “lint”, etc.
 - While collecting waste, the containers should be located at or near where the waste is generated (such as behind your dry cleaning machine). The container must remain closed except when adding waste, and the container must be labeled with the words “hazardous waste” and with a description of the waste. If you use a bucket to collect the waste, it should be labeled as hazardous waste, include a description of the waste and be kept closed or transferred to a waste container that can be tightly closed.
 - When a container becomes full, the date of accumulation must be written on the label.
 - Once the container is full, it must be stored within a secondary containment system that has a base (or floor) that is impervious to the waste and provides sufficient secondary containment capacity for 10% of the total volume of all containers in the storage area (or 100% of the largest container, whichever is greater). Use of a prefabricated poly spill pallet will satisfy this requirement. Even if you are not an SQG it is a best management practice to store your hazardous waste container within or on a secondary containment structure even if not full to avoid contamination from a spill.
 - The full containers must be shipped off-site to a permitted commercial hazardous waste company within 180-days of the accumulation date written on the full container. When making this shipment, a transportation document known as a “hazardous waste manifest” must be used. In most cases the transportation company that is shipping the waste will fill out the hazardous waste manifest for you. All you need to do is look it over for accuracy and then sign it in the “generator signature” section.
 - You must inspect your waste collection containers and the storage area (secondary containment system) at least once per week and document those inspections in an inspection log. An example log, which can be copied for your use, can be found in the SQG guidance handbook.
 - You must post emergency information at or near your waste storage area. The emergency posting should include the name and phone number of the emergency coordinator (person who has the authority to summons help from a spill contractor or fire department), location of spill kits, and evacuation routes. It is a best management practice to also include phone numbers for local police, fire and emergency personnel in your posted emergency information.
 - You are required to train your staff so that they know how to properly collect and store the waste, and what to do in the event of an emergency
 - You must keep copies of all inspection logs and transportation documents for the off-site shipments of your waste for a minimum of three years.
- More [information is in the SQG handbook at \[http://www.ct.gov/deep/lib/deep/compliance_assistance/manuals_guidelines/sqguide.pdf\]\(http://www.ct.gov/deep/lib/deep/compliance_assistance/manuals_guidelines/sqguide.pdf\)](#)

3. If I use another dry cleaning chemical solvent other than perc are there waste or air regulations that I need to comply with?

At this time, Connecticut dry cleaners using a solvent other than perc do not have air regulations to comply with unless the solvent is listed as a Hazardous Air Pollutant. See list at <https://www.epa.gov/haps/what-are-hazardous-air-pollutants>.

Waste from solvents other than perc or hydrocarbon must be shipped by a permitted commercial waste company. Prior to off-site shipment the permitted waste company will require that the waste be evaluated to determine if it is a hazardous waste. In most cases the evaluated waste will be a CT Regulated Waste.

4. How should I dispose of filters and lint?

That depends on what chemical has contaminated them.

- Lint and filters from a dry cleaning machine that uses perc or hydrocarbon solvent must be collected in a container as hazardous waste and follow the disposal guidelines for SQGs above.
- Filters should be drained in their cartridge for 24 hours and then both should be promptly disposed in a properly labeled hazardous waste container.
- Lint and filters from dry cleaning machines that use chemical solvents other than perc or hydrocarbon must be collected in a properly labeled waste container. In most cases the waste will be a CT Regulated Waste that must be shipped by a permitted commercial waste company. Prior to off-site shipment the permitted waste company will require that the waste be evaluated to determine if it is a hazardous waste.
- Lint from wet cleaning machines that use a detergent can be disposed in the trash.

5. How should I manage used rags and other absorbents?

That depends on which chemicals are on them.

- Rags or absorbents that have come in contact with perc or hydrocarbon solvents must be collected in a properly labeled hazardous waste container, along with your spent filters and lint.
- Rags and absorbents that have only been in contact with a chemical solvent other than perc or hydrocarbon must be collected in a properly labeled waste container. In most cases the waste will be a CT Regulated Waste that must be shipped by a permitted commercial waste company, however prior to off-site shipment the permitted waste company will require that the waste be evaluated to determine if it is a hazardous waste.
- Rags and absorbents in small volumes (cubic foot or less) that have only been in contact with wet cleaning detergents or non-hazardous solvents can be discarded in the trash.
- Don't leave any rags or absorbents lying around on the floor or in the spot cleaning area.

6. How should I dispose of the sludge from the solvent still?

Sludge or still bottoms from a dry cleaning machine that uses perc or hydrocarbon solvent must be collected in a properly labeled waste container as soon as it is removed from the machine and the container lid tightly secured and follow disposal guidelines for SQGs above.

Sludge or still bottoms from dry cleaning machines that use chemical solvents other than perc or hydrocarbon must be collected in a properly labeled waste container and as soon as it is removed the container lid should be tightly closed. In most cases the waste will be a CT Regulated Waste that must be shipped by a permitted commercial waste company. Prior to off-site shipment the permitted waste company will require that the waste be evaluated to determine if it is a hazardous waste.

7. What should I do if some solvent or waste spills?

Any size spill of a petroleum or chemical, whether a product or a waste must be reported to CT DEEP Emergency Dispatch Center at **860-424-3338** 24-hour phone line.

In general, properly trained employees should take appropriate actions to stop and contain a spill and call 911.

If very minor amounts spill, such as incidental amounts, properly trained employees may cleanup immediately with appropriate sorbent materials and place waste materials in the appropriate hazardous waste disposal container.

Connecticut's Wastewater Discharge Regulations:

8. If my shop wastewater is discharged to a septic system or the sewer are there any regulations I must comply with?

Yes. Any discharge of dry cleaning process wastewater to a septic system (or dry well or surface water) is **prohibited**.

You must obtain a **wastewater permit** from CT DEEP before discharging dry cleaning wastewater to the sewer. A holding tank may be used in unsewered areas whose contents could then be transported to a sewage treatment plant.

9. Am I allowed to have a floor drain in my shop? Do I have any requirements?

You are allowed to have a floor drain only if it is connected to the sewer. No interior building floor drains shall exist which are connected to any storm drainage system or which may otherwise direct interior floor drainage to exterior surfaces, unless such floor drain connection has been approved and permitted by DEEP.

A *Best Management Practice* for chemicals is to not store them in rooms that have floor drains. Floor drains could be fitted with a berm that rises two inches above the floor to provide a delay and an opportunity to clean up spills before they go down the drain.

All areas where chemicals are stored should have an impermeable containment which will hold at least the volume of the largest chemical container, or 10% of the total volume of all containers in the area, whichever is larger, without overflow from the containment area.

Buying and Selling a Dry Cleaning Business:

10. What do I need to know if I'm planning to buy a dry cleaning business?

If you weren't aware of it, DEEP's Property Transfer program applies to CT dry cleaners. It requires the seller to disclose the environmental conditions of the site. Either the buyer or the seller has to certify that they will investigate and clean up the site within required timeframes. The dry cleaning process generally uses chemical solvents, such as perchloroethylene (perc), as well as chemical spot cleaners, so there is a high possibility that the property has hazardous substances or wastes that would require clean up. The seller can negotiate with the buyer prior to the sale regarding which party will be responsible for addressing any environmental issues that need to be resolved. It is recommended that before buying a dry cleaning business you consult with an attorney who has experience in environmental issues. Detailed information on the Property Transfer program is available on CT DEEP's website at: http://www.ct.gov/deep/cwp/view.asp?a=2715&q=325006&depNav_GID=1626.

11. What requirements should I be aware of if I am selling a dry cleaning business?

DEEP's Property Transfer Program requires all sellers of dry cleaning operations to disclose the environmental conditions to the buyer. The entire parcel must be evaluated even if only the business is being sold. The parties can negotiate who will be responsible for any required cleanup, but if no agreement is reached the seller is responsible. An Environmental Condition Assessment Form must be submitted to the CT DEEP along with the appropriate Property Transfer form. [Property Transfer Program](http://www.ct.gov/deep/cwp/view.asp?a=2715&q=325006&depNav_GID=1626) information can be found on the CT DEEP's website at http://www.ct.gov/deep/cwp/view.asp?a=2715&q=325006&depNav_GID=1626.

12. Are there any restrictions on the type of dry cleaning machine I can buy or use?

Yes, especially if your perc dry cleaning business is located in a residential building. It also depends on whether you are an "existing" dry cleaner or a "new" dry cleaner.

- Existing dry cleaners using perc machines and located in residential buildings will be required to switch to either wet cleaning or another solvent or move the perc dry cleaning equipment to a non-residential location by December 21, 2020.

- New dry cleaning machines located in residential buildings and installed after July 27, 2006, may not use perc.
- All dry cleaning facilities constructed before July 27, 2006 are considered existing sources; all dry cleaning facilities constructed on or after July 27, 2006 are considered new sources.
<https://www.epa.gov/ttn/atw/area/drycleanbs.doc>
- Also, as of December 1993 the legal use of any transfer (dry to dry) machine is prohibited at any location.

13. Where can dry cleaners get information on remediation in CT and other states as well as federal government information?

- [DEEP's Remediation Division](#) oversees the investigation and cleanup (also known as remediation) of contaminated properties.
- The CT Department of Economic and Community Development oversees the **Dry Cleaning Establishment Remediation Fund** and hosts informational meetings twice per year to provide updates to the industry on the administration of the Fund as well as to gather input and feedback from the industry. Information is available on their website at <http://www.ctbrownfields.gov/ctbrownfields/cwp/view.asp?a=2620&q=319328>.
- Members of the State Coalition for Remediation of Dry Cleaners have compiled information about their states' programs available on-line at <https://drycleancoalition.org/>
- US EPA has regulatory information for the Dry Cleaning Sector available at <https://www.epa.gov/regulatory-information-sector/dry-cleaning-sector-naics-8123>

14. Are there any issues related to dry cleaning chemicals the US EPA is currently reviewing?

Yes, in December 2016, the U.S. EPA announced it will evaluate [perc, also known as tetrachloroethylene](#), as one of the first chemicals to be evaluated under the new Toxic Substances Control Act (TSCA) for potential risks to human health and the environment. According to the Act the EPA must conclude its evaluation within 3 years which will determine whether perc presents an unreasonable risk to humans and the environment. If perc does present an unreasonable risk, EPA must abate that risk within two years. Perc is present in drinking water, indoor environments, and in air, groundwater and soil. It is a probable human carcinogen.

In 2016 EPA also published in the Federal Register a proposed regulation to prohibit commercial use of trichloroethylene (TCE), for aerosol degreasing and for spot cleaning in dry cleaning facilities; to require manufacturers, processors, and distributors, except for retailers of TCE for any use, to provide downstream notification of these prohibitions throughout the supply chain; and to require limited recordkeeping.

15. What is the best way to store my supply of solvent and spot chemicals?

- It's best to have as little solvent stored as possible, since what you use may be a hazardous chemical.
- Be sure to keep lids tightly sealed on all chemicals.
- Try to switch to non-hazardous spot cleaners and to store these items as high as possible from the floor.
- Try to switch to wet cleaning because it uses non-toxic detergents. Information and resources for wet cleaning can be found on the CT DEEP website at <http://www.ct.gov/deep/cwp/view.asp?a=2708&q=323976>

16. Which dry cleaning solvents or methods are "green" or safe for the environment and human health?

Several alternatives to perc were assessed by the Massachusetts Toxic Use Reduction Institute at UMass- Lowell in an effort to find economically viable and environmentally preferred methods for professional garment cleaning. The full report is available on-line at http://www.ct.gov/deep/lib/deep/p2/business_industry/drycleaner/2012_M&P_Report_27_Assessment_of_Safer_Alternatives_to_Perchloroethylene.pdf, and a summary fact sheet at

[http://www.turi.org/TURI_Publications/TURI_Chemical_Fact_Sheets/Fact_Sheet - Alternatives to Perchloroethylene Used in Professional Garment Care.](http://www.turi.org/TURI_Publications/TURI_Chemical_Fact_Sheets/Fact_Sheet_-_Alternatives_to_Perchloroethylene_Used_in_Professional_Garment_Care)

Seven alternatives were assessed including wet cleaning, Carbon Dioxide (Cool Clean Technologies and Solvair), High Flashpoint Hydrocarbons (DF2000, EcoSolv), Acetal (SolvonK4), Propylene Glycol Ethers (Solvair, Gen-X), Siloxane (Green Earth, D5 solvent), and n-Propyl Bromide (Drysolv, Fabrisolv XL). Overall the assessed alternative solvents are less toxic than perc with the exception of n-Propyl Bromide. However, a major concern is that many of the alternatives are flammable, with the exception of wet cleaning and carbon dioxide. In addition, there is not enough toxicological data and other information on these alternatives at this time.

17. Why should I consider using wet cleaning instead of a chemical solvent?

Wet cleaning uses water and non-hazardous detergents rather than a chemical solvent therefore you can avoid any health hazards and regulatory requirements associated with solvents. Used perc and hydrocarbon solvents are hazardous wastes and must be managed as such; other solvent wastes, such as those from K-4 (Solvon), and Green Earth are also subject to [regulatory requirements for waste handling](#).

In CT, dry cleaners who use only wet cleaning do not need to pay into the CT [Dry Cleaning Establishment Remediation Fund](#). CT Dept. of Revenue Services has a new Special Notice **SN 2018(6)**, *Obligation of Dry Cleaners for the Dry Cleaning Establishment Surcharge and Business Use Tax*; wet cleaning establishments are not subject to the dry cleaning surcharge and would **not** complete REG-1, Addendum B.

For details, visit: <https://portal.ct.gov/-/media/DRS/Publications/pubssn/2018/SN20186pdf.pdf?la=en>

A number of dry cleaners in Massachusetts have switched to using wet cleaning only. The Toxic Use Reduction Institute at UMass-Lowell (TURI) has [case studies](#) of these dry cleaners that you can read.

New York State is also promoting wet cleaning and has produced a short video, entitled Wet is the New Dry. It can be viewed on YouTube here <https://youtu.be/ehsMSNZ1v-s>.

18. How can I prepare my business to be more resilient against extreme weather events (storms and floods) as well as other unpredictable hazards like broken pipes?

There are many steps you can take to reduce your risks. First, know if your property is located in a vulnerable area such as a flood zone. Try to reduce or eliminate chemicals and hazardous waste that you have on-site by switching to non-toxic alternatives. Keep all chemicals and waste tightly covered at all times, and secure tanks and drums and locate chemicals as high up off the floor as feasible. CT DEEP has materials on posted on our website to help dry cleaners be resilient and “weather the storm” at:

http://www.ct.gov/deep/cwp/view.asp?a=2708&q=323976&deepNav_GID=1763

A best management practice for any size dry cleaner using solvents is to have an emergency coordinator, emergency response equipment (absorbents, gloves or other protective equipment) and keep an emergency contact phone tree for your facility which includes phone numbers for the Emergency Coordinator, local police, fire and emergency medical service (EMS), and spill contactor(s). At a minimum, you should post this list in areas where you store hazardous waste and near all telephones within the facility.

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http://www.ct.gov/deep/cwp/view.asp?a=2708&q=323976&deepNav_GID=1763