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Hotline Questions and Answers

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3. Hotel Dry Cleaning Waste and the Household Waste Exclusion

A hotel generates spent solvents from its on-site dry cleaning facility. For purposes of the 40 CFR 261.4(b)(1) household waste exclusion, EPA defines households to include hotels and motels. Will hotel dry cleaning wastes be excluded from RCRA Subtitle C regulation as household waste?

Wastes produced by a hotel dry cleaning facility are not household wastes and therefore will not be excluded from RCRA hazardous waste regulation. A waste has to meet two conditions to be excluded as household waste. Household waste must be generated on the premises of a temporary or permanent residence and be comprised primarily of materials generated by consumers in their homes. In general, wastes from hotels and motels will be excluded as household waste as long as the waste is similar to the type of waste that consumers generate in their home. Even though generated on premises of a temporary residence (i.e. hotel), dry cleaning waste is not household waste because the spent solvents from the dry cleaning operations are not similar to wastes typically produced by a consumer in the home. The dry cleaning wastes produced by the hotel do not meet both criteria for household waste and will not qualify for the household waste exclusion per 261.4(b)(1) (49 FR 44978; November 13, 1984).