



K A N S A S

RODERICK L. BREMBY, SECRETARY

DEPARTMENT OF HEALTH AND ENVIRONMENT

KATHLEEN SEBELIUS, GOVERNOR

August 21, 2003

Mr. James P. Barry, Chairman
GreenEarth Cleaning
402 Bannister Road, Suite C
Kansas City, Missouri 64131

RE: Decamethylcyclopentasiloxane (SB32) Drycleaning Process

Dear Mr. Barry:

This is in response to your August 1, 2003 letter regarding the subject referenced above. As noted in your letter we have previously indicated that it does not appear that waste resulting from the use of this product (SB32) alone would result in a hazardous waste. Our department, however, is not in a position to know the other products and materials used in every individual drycleaning establishment. The Kansas hazardous waste regulations require the generator of a waste to determine whether his or her waste is a hazardous waste. This determination can be based on laboratory testing or knowledge of the process generating the waste. If a drycleaner using the SB32 process also uses chemicals and detergents which do not result in the generation of any hazardous waste, then by knowledge of his or her drycleaning process, the drycleaner could safely conclude that no hazardous waste is generated based upon the knowledge of the process.

I trust that this explanation has helped to clarify our previous determination.

Should you have any questions regarding this matter, please feel free to contact me directly at 785-296-1608 or by e-mail at jmitchel@kdhe.state.ks.us.

Sincerely yours,

John W. Mitchell, Chief
Waste Compliance, Enforcement & Policy Section
Bureau of Waste Management