

Ohio's Used Oil Regulations for Generators

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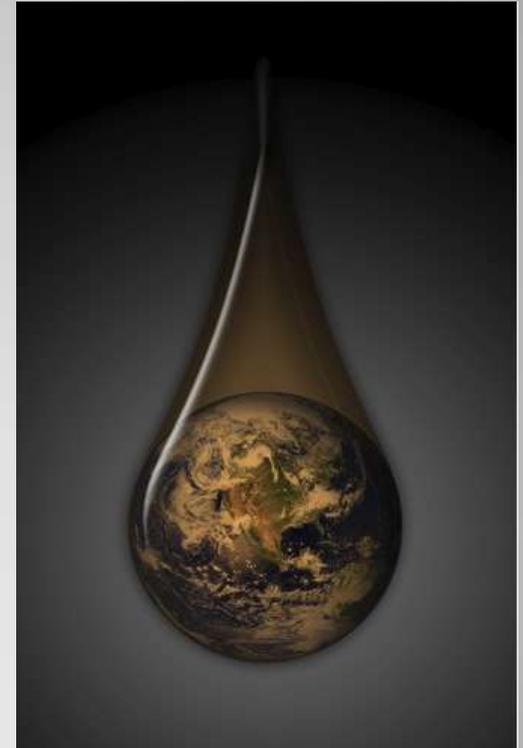
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What we will cover

- Definition
- Generator responsibilities
 - On-site management
 - Spills/releases
- Management options
 - Burning in space heater
- Used oil filters
- Do's and Don'ts
- Resources



What is Used Oil?



Must meet three criteria:

- Origin
 - Refined from crude oil or synthetic-based
- Use
 - lubricant, hydraulic fluid, heat transfer (coolant), cutting fluid
- Contaminated
 - Physical or chemical impurities
 - Examples: dirt, metal shavings, solvents

Examples of Used Oil

- engine oils from vehicles and equipment
- lubricating oil
- brake/transmission fluids
- hydraulic fluids
- insulating oils
- metal cutting fluids
- industrial process oils
- compressor or refrigerant oil



Used Oil Does Not Include

- oil products (unused/new)
- cleanup material from oil product spills
- animal/vegetable oil
- sludge from virgin oil storage tanks
- antifreeze
- kerosene (unless used for lubricating purposes)
- petroleum distillate solvents
- gasoline, diesel fuel
- oily waste water



What is a used oil generator?

Used oil generator: the 1st person whose action or process 1st causes used oil to become subject to regulation.

Different types of businesses generate used oil:

- Manufacturing companies
- Machine shops
- Metal working industries
- Auto service stations
- Quick lube shops



Additional used oil rules

Based on your activities you may also be subject to other used oil rules including:

- Transporting
- Collecting from other businesses/homeowners
- Re-refining or reprocessing
- Burning
- Marketing

Where to go for more information?

epa.state.oh.us/dmwm/Home/UsedOil2.aspx

Regulation under other programs?

- Spill Prevention Control and Countermeasures (SPCC)
 - A total aboveground storage capacity of 1,320 gallons; or
 - More than 42,000 gallons of underground storage capacity
 - epa.ohio.gov/portals/41/sb/publications/spcc.pdf
- Bureau of Underground Storage Tank Regulation (BUSTR)
 - If you store used oil in an underground storage tank, you may have additional requirements.
 - Contact BUSTR at 614-752-7938 or visit their Web page at com.ohio.gov/fire/bustmain.aspx

What are your used oil generator responsibilities?

- Labeling
- Storing
- Releases/Spills
- Transporting
- Mixing



Did you know that...

U.S. businesses produce about 1.2 billion gallons of used oil a year?

Labeling Used Oil Containers and Tanks

Containers and aboveground tanks must be clearly labeled with the words, "Used Oil"



Storing used oil

Containers and tanks must be in good condition (not rusting, leaking, etc.)



Responding to releases/spills

If there is a leak or spill of used oil: stop the leak, contain it, clean it up, and manage the clean-up materials properly.



Transporting used oil

Must use a transporter with an EPA identification number when shipping used oil off-site.

- Three exceptions:
 - You are transporting less than 55-gallons of used oil on-site;
 - You are the generator of the used oil and are transporting less than 55-gallons to a collection center or aggregation point; or
 - Tolling agreement
 - Contractual agreement to reclaim and return oil to be reused by generator



Mixing used oil

You can mix other wastes with your used oil, but it could cause problems:

- Mixture is often considered hazardous waste
 - May no longer be able to manage as used oil
 - May increase your management and disposal costs



Used oil mixing exceptions

- CESQGs can mix their used oil and hazardous waste and manage as used oil
 - HOWEVER...may not be accepted by used oil processors, re-refiners, or burners
- Used oil mixed with hazardous waste that is only ignitable (D001) can be managed as used oil if the resulting mixture is not ignitable
 - Must analyze to prove this
- Used oil mixed with hazardous waste that is corrosive, reactive or TCLP toxic can be managed as used oil if the mixture does not exhibit any characteristic.
 - Must analyze to prove this

Rebuttable presumption

- This applies to all used oil
- Used oil with >1000 ppm total halogens (Chlorine, Fluorine, Bromine compounds) is presumed to be mixed with halogenated hazardous waste
- You may rebut the presumption by:
 - Demonstrating that the oil is from a CESQG
 - Demonstrating that it contains insignificant levels of halogenated hazardous constituents
 - Demonstrating that they are cutting or machining oils containing chlorinated paraffins that are reclaimed under a tolling agreement

epa.ohio.gov/portals/32/pdf/UsedOilBurnerGuidance.pdf

Used oil management options

- Take to a registered collection center
 - Use company or employee owned vehicle and no more than 55-gallons so used oil transporter rules do not apply
 - epa.ohio.gov/portals/32/pdf/Used%20Oil%20Collection%20Centers%20List.pdf
- Take to aggregation point(s)
 - Aggregation point is a site you own that you take used oil to
 - Use company or employee owned vehicle and no more than 55-gallons so used oil transporter rules do not apply
- Burn your used oil in your space heater
- Pick-up by used oil recycler
 - Reconditioning
 - Re-refining
 - Reusing
 - Burning for energy recovery in boiler, industrial furnace or space heater



epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=17

Sending your used oil to a Burner

If you send used oil directly to a company that will be burning for energy recovery, you are a used oil marketer.

Used oil marketer must:

- Obtain U.S. EPA identification #
(unless you already have one)
- Maintain records
 - Name/Address of transporter and burner
 - U.S. EPA ID # of transporter and burner
 - Quantity and date shipped
- Obtain/retain certification
 - Must be done before 1st shipment
 - Written notice from burner must state:
 - Burner has notified Ohio EPA
 - Burner will only burn in boiler or industrial furnace
 - Retain certification for 3 years on-site



Sending used oil to another business to be burned in a space heater

Must meet the following:

- Obtain EPA identification number (unless you already have one)
- Keep records
 - the name of the receiving facility;
 - the quantity of used oil delivered;
 - the date of shipment or delivery; and,
 - a cross-reference to the analysis or information that demonstrates that it meets the specification.
- Determine if the used oil contains greater than 1,000 ppm total halogens, and be able to rebut the presumption
- Must be "on-specification" used oil

All used oil is presumed to be off-specification until otherwise demonstrated. Therefore you cannot mix multiple shipments and then test the used oil.

On-specification used oil

Used Oil Specification Constituent / Property Maximum Allowable Level (total concentration)

- Arsenic 5 ppm
- Cadmium 2 ppm
- Chromium 10 ppm
- Lead 100 ppm
- Flash Point 100° F minimum
- Total Halogens 4,000 ppm*

*Although the used oil specification's total halogen regulatory limit is 4,000 ppm, if the total halogens exceed 1,000 ppm Ohio EPA presumes the used oil has been mixed with a hazardous waste, unless you can prove that it hasn't.

Space heaters must...

- Be vented to the outside;
- Have a heating capacity of 500,000 BTU/hr or less;
and
- Be legitimately used for heating purposes such as for comfort in homes, workspaces or garages or for other heating purposes such as in a greenhouse.



Used oil filters



Two filter types:

- Terne plated
 - Heavy duty vehicles
 - May be hazardous for lead
 - Hot drain and recycle as scrap metal to avoid HW rules
- Non-terne plated
 - Light duty vehicles
 - Hot drain and can be disposed in regular trash
 - Strongly recommend recycling as scrap metal

epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=18

Do's and Don'ts

- **DO** inspect equipment for oil leaks and take quick actions if repairs are needed
- **DO** train personnel on the correct methods for handling used oil
- **DO** look for ways to reduce the amount of used oil waste that your business generates

DON'T do this!



DON'T do this!



DON'T pour used oil into a sewer, floor drain or a storm drain!

Not only does this cause environmental damage, it can also lead to violations or penalties.

The oil from a single oil change (1 gallon) can ruin the taste of a million gallons of drinking water, the supply of 50 people for one year.





DON'T use used oil outside on the ground for any reason!

epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=31

**DON'T mix other wastes
with used oil!**



Resources

Ohio EPA's Used Oil Web page

epa.state.oh.us/dmwm/Home/UsedOil2.aspx

Ohio EPA's Used Oil Forms

epa.ohio.gov/dmwm/Home/NonHWForms.aspx

Used Oil Generator Guidance

epa.state.oh.us/Portals/32/pdf/Used_Oil_Generators_Guidance.pdf

EPA Identification Number Form

epa.state.oh.us/dmwm/Home/Notiform.aspx

Used Oil Requirements Summary Table

epa.state.oh.us/Portals/32/pdf/UsedOilRequirementsTable.pdf

Questions?

OCAPP: 1-800-329-7518
Free and confidential hotline

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