

Burning the midnight oil

A guide to managing used oil

According to some figures, over 240,000,000 gallons of used oil are released into the sewers or onto soil in the U.S. every year. That's roughly equivalent to an Exxon Valdez spill every fourteen days!

Over 1.3 billion gallons of used oil are generated in the United States each year, but it's estimated that only 800 million gallons or so are recycled and reused. While federal EPA and the states have worked to make recycling used oil easier by establishing recycling programs and reducing regulatory requirements, there's still a long way to go before used oil recycling reaches its full potential.

Congress passed the Used Oil Recycling Act in 1980. The law called upon EPA to address the hazards posed by used oil and to address its proper management.

The provisions of the Used Oil Recycling Act were incorporated into the Resource Conservation and Recovery Act (RCRA), EPA's hazardous waste rules and regulations. But used oil was recognized as a special issue apart from hazardous waste.

Under many circumstances, used oil is a hazardous waste and must be managed as a hazardous waste if it is to be disposed of.

EPA's used oil program, found at 40 CFR Part 279, does allow the management of used oil under less stringent regulatory requirements — but only if it is managed according to the regulations and the oil is ultimately sent to a recycler, recycled, or burned for fuel.

Under this program, used oil is not regulated as a hazardous waste unless the oil exceeds the regulatory limits for toxicity.

What is used oil?

Used oil is any petroleum-based or synthetic oil that has been used. During normal use, impurities such as dirt, metal scrapings, water, or chemicals can get mixed in with the oil, so that in time, the oil no longer performs well. Eventually, this used oil must be replaced with virgin or re-refined oil to do the job correctly.

In order to meet the definition of "used oil," your oil must meet each of the following items:

- *Origin:* Used oil must have been refined from crude oil or made from synthetic materials.
- *Use:* Oils used as lubricants, hydraulic fluids, heat transfer fluids, buoyants, and for other similar pur-

poses are considered used oil. Unused oil such as bottom clean-out waste from virgin fuel oil storage tanks or virgin fuel oil recovered from a spill does not meet the definition of used oil (because it has never been "used"). Used oil does not include products that are used as cleaning agents or solely for their solvent properties, as well as certain petroleum-derived products such as antifreeze and kerosene.

- *Contaminants:* The used oil must be contaminated as a result of being used. This aspect of the definition includes residues and contaminants generated from handling, storing, and processing used oil. Physical contaminants could include metal shavings, sawdust, or dirt. Chemical contaminants could include solvents, halogens, or saltwater.

Examples of used oils:

- Brake fluids
- Compressor oils
- Coolants
- Electrical insulating oil
- Emulsions
- Engine oil
- Fluids used in hydraulic equipment
- Greases
- Industrial hydraulic fluid/industrial process oils
- Laminating oils
- Lubricant sprayed onto gears
- Metal-working fluids and cutting oils
- Mineral oil
- Motor oil
- Oils used as buoyants
- Refrigeration oil
- Refrigeration coolant
- Synthetic oil
- Transmission fluid
- Used oil residues or sludges
- Wire drawing solutions

What does not qualify as a used oil?

- Animal and vegetable oil (even when used as a lubricant)
- Antifreeze