

Standards for Used Oil Generators (R315-15-2)

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UTAH DEPARTMENT of
ENVIRONMENTAL QUALITY
**WASTE MANAGEMENT
& RADIATION CONTROL**

What is a used oil generator?

Official Definition: A used oil generator is any person, by site, whose act or process produces used oil or whose act first causes used oil to become subject to regulation.

Simplified Translation: Someone who creates used oil.

Limited exceptions (Clarification):

1. Household "do-it-yourselfers"

-and-

2. Small farmers (generate an average of 25 gallons per month or less of used oil from vehicles or machinery used on the farm in a calendar year)

are **ONLY** subject to the prohibitions of R315-15-1.3 and cleanup requirements of R315-15-9

Common examples of used oil generators



Vehicle mechanic and oil lube shops



Large farms with lots of farm machinery



Fleet maintenance shops



Machining/metal cutting facilities



Places that drain electrical equipment like transformers



Automotive scrap yards



Mixing used oil with hazardous waste

With limited exceptions, mixing used oil with hazardous waste produces a mixture of hazardous waste. This is discussed in R315-15-1.1(b) of the rules.

\$ \$ \$ This usually increases the cost of disposal, often dramatically. **\$ \$ \$**

(The oil goes from being a recyclable commodity to a waste which must be properly disposed).

Don't mix used oil with hazardous waste, antifreeze, water, etc.



It tends to make it more expensive to dispose

The rebuttable presumption for used oil

Historically, used oil has often been mixed with a particular type of hazardous waste: **chlorinated solvents**.

So EPA makes the **presumption** that any used oil tested to have a total halogen concentration of 1000 parts per million (ppm) has been mixed with chlorinated solvents (hazardous waste). That makes that mixture of oil and solvent **hazardous waste**.

Science Fact: chlorine is a type of chemical (element) called a halogen

The rebuttable presumption for used oil (cont.)

BUT, the EPA also recognized that *sometimes* chlorine and other halogens can get into the used oil in other ways than mixing with chlorinated solvents.

Therefore, they allow the generator to present evidence to **rebut** the **presumption** of hazardous waste mixing. *If* the generator can prove that there is an “innocent” explanation for those halogens in the used oil, that oil mixture will go back to being regulated as **used oil** (NOT Hazardous Waste).

An example of a successful rebuttal of the presumption of hazardous waste mixing – salt production machinery used oil.



Note that the generator must get approval from the Division that they agree with the rebuttal claim. Such claims are often proven with laboratory analysis to see if there are chlorinated solvents in the used oil. (Remember that non-hazardous waste used oil containing over 4000 ppm halogens is regulated as off-specification used oil.)

Used Oil Storage:

SPCC

Used oil storage is subject to all applicable Spill Prevention, Control and Countermeasures (SPCC), 40 CFR 112, in addition to the requirements of the generator rules (R315-15-2). SPCC is a federally-administered program.

Used Oil Storage:

(R315-15-2.3(a) through(c))

Generators must also comply with the following used oil storage regulations. In general, used oil must be stored in containers and tanks (units) that are:

1. Proper type.
2. Good condition.
3. Kept closed.
4. Managed to prevent releases.
5. Labeled with the words "Used Oil".

1. **Proper type.** Used oil generators shall not store used oil in units other than tanks, containers, or units subject to regulation under R315-264 and R315-265.





NOT proper storage containers.

2. **Good condition.** Those units must be in good condition (not severely rusting, deteriorating, etc.) and not leaking.





NOT in good condition.

3. **Kept closed.** Tanks and containers for storage of used oil must be closed during storage except when adding or removing used oil. (i.e. Loading ports should be capped, draining racks/funnels should have either caps or valves, drums should be lidded with closed bung holes)



NOT properly closed.



Open drain rack with no means of closing the opening (even when not draining).



Properly closed drain rack with a lid.

4. **Managed to prevent releases.** Tanks and containers storage areas shall be managed to prevent releases of used oil to the environment.



Overfilled (and likely improperly closed) drums stored outside in weather.



Precariously stacked (teetering on the edge of a bank overlooking a pond!).

5. Labeled with the words “Used Oil.” Containers and aboveground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil". Fill pipes used to transfer used oil into underground storage tanks at generator facilities shall be labeled or marked clearly with the words "Used Oil."



It doesn't have to be fancy...

Response to releases

R315-15-2.3(d)

Upon detection of a release of used oil to the environment shall comply with R315-15-9 of the Rules. We'll go over that in detail tomorrow.

What can generators do with their used oil?

1. Heat their facility under the on-site burning provisions of R315-15-2.4.
2. Arrange for a permitted transporter to pick it up.
3. Self-transport it under the provisions of R315-15-2.5(a) or (b).
(= Self-transportation of small amounts to approved collection centers or aggregation points owned by the generator.)



A generator may **not** sell or give away their used oil to another generator for burning unless that oil has been certified to be on-specification by a Utah-registered used oil marketer.

On-site burning

R315-15-2.4

On-site burners shall comply with R315-15-6 and, if applicable, shall obtain an Air Quality permit.

On-site burning (cont.)

Generators may burn used oil in used oil-fired space heaters without a used oil permit provided that:

- (1) The heater burns only used oil that the owner or operator generates;
- (2) The heater is designed to have a maximum capacity of not more than a half million Btu per hour;
- (3) The combustion gases from the heater are vented to the outside ambient air;
- (4) The generator has knowledge that the used oil has not been mixed with hazardous waste; and
- (5) The used oil is being legitimately burned to utilize its energy content.



NO!



Remember, used oil is defined very broadly.



For an excellent table with examples of what is and is not used oil, visit the EPA website called “What is Used Oil?” at:

<https://www.epa.gov/hw/reference-table-question-what-used-oil>