



Focus on Management of Materials Containing or Contaminated with Used Oil

Policy Change

Historically, Ecology has interpreted the Used Oil Management Standards to allow waste generated from processes that remove residual oil from mechanical parts to be managed as used oil. In consultation with the US EPA, Ecology is revising its policy to come into agreement with the Federal interpretation. **Wastes generated from processes that remove residual oil (high flash solvent part washers, caustic dip tanks, etc.) or are contaminated with residual oil (cleaning rags, etc.) may no longer be managed as used oil. The wastes are solid wastes subject to the designation process to determine if the wastes should be managed as dangerous wastes.**

Justification

Ecology has received questions about its interpretation of the Used Oil Management Standards (UOMS) as it pertains to the applicability statements found in the rule. Specifically, these questions concern Ecology's interpretation of the applicability statement that addresses material containing or otherwise contaminated with used oil (40 CFR Part 279.10 (c)).

Ecology's traditional position, since the adoption of the Federal UOMS, had been wastes that contain or were otherwise contaminated with used oil and were burned for energy recovery, were subject to the UOMS. For example, waste generated from high-flash solvent parts washers used to clean engine parts which, by the process, had become contaminated with used oil, could be managed as used oil. This guidance was based upon Ecology's previous interpretation of the status of the oily residue on the engine part as "used oil."

After re-examination of this position and further discussion with EPA Region 10 staff, Ecology is revising its original interpretation. Wastes generated from high flash solvent parts washers, caustic dip tanks, etc. that become contaminated with an oily residue while cleaning engine parts can not be managed as used oil. The reason for this revision is that residual oil on an engine part and later removed by a solvent is not



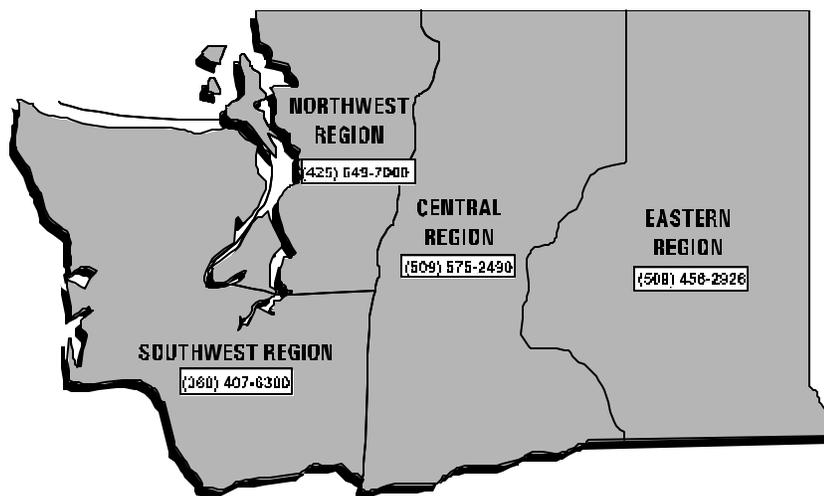
used oil by “definition”.

This “definition” can be found in Part 279.10(c) (1). The applicability statement reads, “Materials containing or otherwise contaminated with used oil from which the used oil has been properly drained or removed to the extent possible such that no visible sign of free-flowing oil remain in or on the material are not used oil and thus are not subject to the UOMS”.

Again, as in the above example, a solvent having a high flash point which is then used to clean an engine part which has been properly drained of free-flowing oil, is cleaning a residue from the part. Wastes generated from that process are not eligible to be managed as used oil. Another example is rags that have been used to clean engine parts. In both cases, the oily film on the engine part is not used oil for the purposes of the Used Oil Management Standards. Therefore, these waste streams can not be managed under the UOMS even if burned for energy recovery.

For More Information

If you have any questions regarding this change in interpretation of the UOMS please contact the Technical Assistance and Policy Section of the Hazardous Waste and Toxics Reduction Program at (360) 407-6700.



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