







Used Oil Management – Generator Responsibilities







Senior Environmental Manager



Indiana Department of Environmental Management
Office of Program Support
Compliance & Technical Assistance Program (CTAP)









Environmental Engineer



Indiana Department of Environmental Management
Office of Program Support
Compliance & Technical Assistance Program (CTAP)





Overview

- What is the intent?
- What are the environmental consequences?
- Who is impacted?
- What is used oil?
- What are the prohibitions?
- What are the regulations?
- How do I comply?





Intent of Used Oil Management Rule 329 IAC 13

<u>History</u>

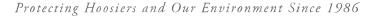
- US EPA
 - 1980's considered making used oil a listed waste for disposal
 - 1992 issued management standards for used oil that will be recycled
- Indiana
 - 1997 IDEM issued state-specific rule that mirrors federal rule





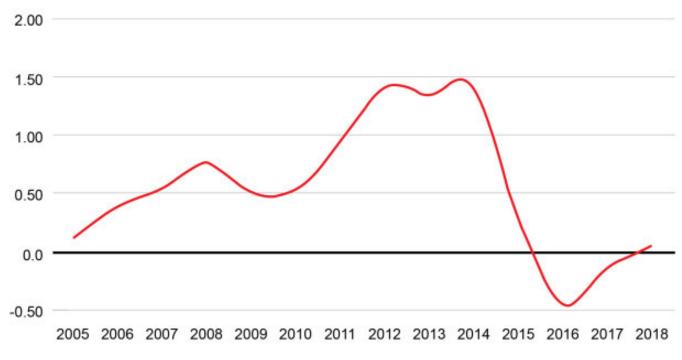
Intent of 329 IAC 13

- Encourage recycling
- Promote environmentally sound collection, storage & management
- Exclude as a hazardous waste unless mixed with a listed or characteristically hazardous waste





Market Incentives to Recycle Based on Economic Trends



Source: Kline & Company





What are the environmental consequences?

- You dump it, you drink it. Consider these facts:
 - One gallon of oil can contaminate
 one million gallons of water
 - One pint of oil released into a lake or wetland can cover an acre of surface water
- Used oil can contain a variety of contaminants including heavy metals and organic compounds





Who is impacted?

Categories of Used Oil

| | Generator/ Collection Center | Transporter Transfer Facility | Processor/ Re-refiner | Off-Spec Burner | Marketer |
|--------------------------------|------------------------------------|-------------------------------------|--------------------------|--------------------|----------|
| Labels | | ✓ | √ | ✓ | N/A |
| Release Cleanup | ✓ | ✓ | ✓ | ✓ | N/A |
| EPA ID Number and Notification | | | √ | √ | |
| Tracking | | ✓ | ✓ | ✓ | ✓ |





Who is impacted? Those who maintain . . .

- Passenger cars
- Motorcycles
- Marine
- Power generation
- Trucks & Buses





Who is impacted? Those who maintain . . .

- Tractors
- Combines
- Harrows
- Corn-pickers
- Balers
- Seeders





Who is impacted? Those who maintain . . .

- Manufacturing equipment
 - Compressors
 - Transformers
 - Hydraulic components
 - CNC & other types of metal fabricating equipment





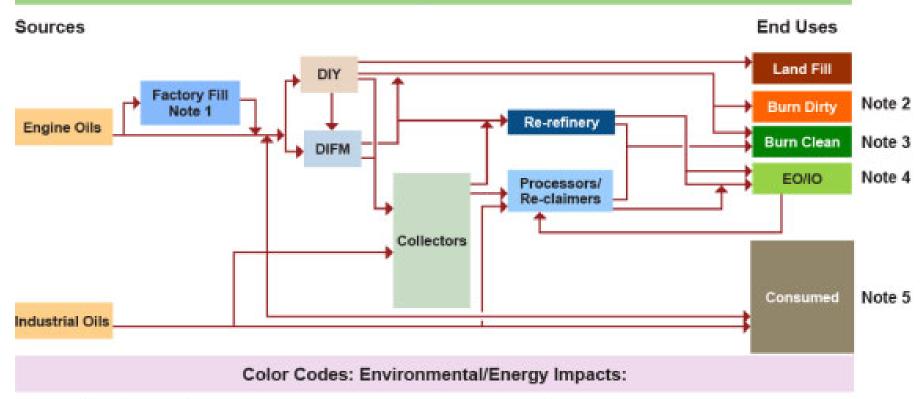
Article 13 Used Oil Management

- 13-3: Applicability
- 13-4: Generators
- 13-5: Collection centers/Aggregation points
- 13-6: Transporters & transfer facilities
- 13-7: Processors
- 13-8: Burning off-specification used oil
- 13-9: Fuel Marketers
- 13-10: Dust suppressant and Disposal





Tracking Oil Flows



Environmental

Most Environmentally Unfriendly Environmentally Unfriendly Environmentally Friendly Most Environmentally Friendly Difficult to Avoid

Land Fill Burn Dirty Burn Clean EO/IO Consumed

Energy Most Energy Wasted

Energy Recovered/Lubes Molecules not Recovered Energy Recovered/Lubes Molecules not Recovered

Most Energy Recovered/Lubes Molecules Recovered

Difficult to Avoid

DIY

DIFM

Notes:

- 1. Factory fill is the intial charge of motor oil into a new car engine
- 2. Space heaters, uncontrolled combustion
- 3. Utility boilers, asphalt manufacturing, controlled combustion
- 4. Re-refined oil products (engine oils & industrial oils)
- 5. Consumed in process (e.g., rubber extenders, two cycle oils, motor oil consumed in engines, etc.)

"Do It Yourself"

*Do It For Me" includes: quick lubes, garages, and fleet operators





as regulated by 329 IAC 13

There are three criteria

- 1. Origin
- 2. Use
- 3. Contamination

^{*}Derived from the Latin word "Oleum" which is derived from the Greek word "Elaion" meaning "olive oil"



What is Used Oil?

as regulated by 329 IAC 13

- 1. Any oil refined from
- Crude oil*
- Synthetic oil** (e.g., derived from coal, shale or polymers)
- Excludes animal & vegetable oils***
- * A mixture of hydrocarbons that exists in liquid phase in natural underground reservoirs and remains liquid at atmospheric pressure after passing through surface separating facilities.
- ** Synthetic lubricants can be manufactured using chemically modified petroleum components rather than whole crude oil.





Could the Material in this Container be Managed as Used Oil?



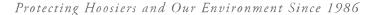




Could the Material in this Container be Managed as Used Oil?









as regulated by 329 IAC 13

- 2. Used as a
- Lubricant
- Hydraulic fluid
- Heat (non-contact) transfer fluid

Excludes petroleum-based solvents used for its solvent-based properties, e.g., solubilize (dissolve)





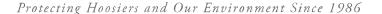
What is Used Oil?

as regulated by 329 IAC 13

Examples - lubricants

- Used oil from vehicles
- Metalworking oil/coolants
- Emulsions (two immiscible liquids & emulsifier or surfactant)







Used Oil from Vehicles

Examples – lubricants

- Differential fluid
- Motor oil
- Transmission fluid
- Brake fluid
- Used oil drained from vehicle filters

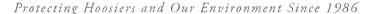




Used Oil from Vehicles





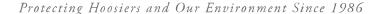




as regulated by 329 IAC 13

Examples – hydraulic fluids

- Transmission fluid
- Excavators and backhoes
- Industrial machinery



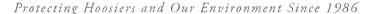


as regulated by 329 IAC 13

Examples – heat transfer fluids

- Metalworking oil/coolants
- Heat transfer
- Refrigeration oils
- Electrical insulating oils
- Quench oil
- Excludes antifreeze



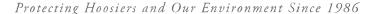




as regulated by 329 IAC 13

- 3. Contaminated by physical or chemical impurities
- e.g., high water content
- e.g., lead, halogens or other hazardous constituents





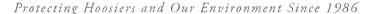


as regulated by 329 IAC 13

Contaminated used crankcase oil

- Additive breakdown products e.g.,
 Barium & Zinc
- Engine "blow-by"
- Metal particles from engine wear e.g.,
 Arsenic, Lead, Nickel & Cadmium
- Poly Aromatic Hydrocarbons







as regulated by 329 IAC 13

Other factors

- Used oil mixed with other wastes
- PCBs
- Materials mixed with used oil



Generator mixing used oil with hazardous waste

- Used oil & characteristically* hazardous waste might result in more hazardous waste
- Used oil & listed hazardous waste results in more hazardous waste
- Mixing might be considered treatment requiring a permit

^{*} And certain waste listed only for characteristics of ignitability, corrosivity and/or reactivity





Generator mixing used oil with hazardous waste

- Some metalworking oils contain chlorinated additives
- Some refrigeration system compressor oils contain CFCs
- Used oil containing more than 1,000 ppm total halogens is presumed to be hazardous



Very Small Quantity Generator (VSQG) of hazardous waste

- Mixing is allowable until it changes the hazardous waste generator status
- Used oil recyclers typically prefer used oil which has not been mixed
- Generator status could change





Electrical Insulating Oils Containing PCBs* - 40 CFR 761

- Transformers, capacitors, voltage regulators, etc.
- Manufactured from 1929 to 1979
- < 2 ppm can be managed as used oil
- 2-49 ppm can be burned at a qualified incinerator
- Any concentration can go to a facility with a PCB permit

^{*} Polychlorinated Biphenyls





PCBs - 40 CFR 761









Materials contaminated with or containing used oil

- If the used oil is properly drained or removed from the material
 - No longer considered used oil
 - Dispose as hazardous or solid waste
- Used oil drained from material is regulated as used oil
- Materials containing or contaminated and burned for energy recovery are regulated as used oil (fuel oil)





Oily Waste Rags







Oil filter crusher





Some shops may utilize an oil filter crusher that presses the filter under high pressure and squeezes the oil out. The device reduces used filters to 25 percent of their original size—about the size of a hockey puck.





Crushed oil filters







Managing Metal Turnings Laden with Coolant









Prohibitions

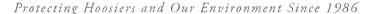
- Used oil cannot be managed in impoundments
- Used oil cannot be used as a dust suppressant
- Off-spec fuel may be burned for energy recovery at:
 - Industrial furnace (40 CFR 260.10)
 - Boiler (see 329 IAC 13 for specifics)
 - Used oil space heater (see 329 13-4-4)
- Hazardous waste incinerator





Who is the Generator?

"... any person, by site, whose act or process produces used oil or whose act first causes used oil to become subject to regulation." 329 IAC 13-2-24 definition of used oil generator





Generator Exclusions

- Households
- Vessels at sea
- Mixtures with diesel fuel used in a generator's vehicle
- Farmers generating an average of 25 gallons or less per month





Should I consider?







Burning Allowances in a 0.5 MMBtu/hour Space Heater

- Used oil generated by the owner or operator
- Used oil received from a household
- Combustion gases are vented to the ambient air*

^{*} The OSHA PEL for Carbon Monoxide is 50 parts per million (ppm).





Burning Allowances in a 0.5 MMBtu/hour Space Heater





Generator Exclusions from becoming a processor *

- Filtering, cleaning or reconditioning for reuse or burning in a space heater
- Decanting used oil & water for discharge of water to the sanitary sewer and/or reuse



Generator Exclusions from becoming a processor *

- Used oil mist collectors
- Segregating used oil from other materials to improve recyclability

^{*} used oil generated onsite





How do generators store used oil?

- Containers Good condition
- Labeling "Used Oil"
- Release clean-up
- Secondary containment not required





Unlabeled Used Oil Tote







What Happens if this Valve Fails?







Maybe?





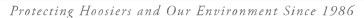




And?









Not properly labeled with the words "Used Oil"







Correctly labeled with the words "Used Oil"







Condition of storage drums







Being Prepared Helps







Who is the Used Oil Transporter?







Who is the Used Oil Transporter?

- Operates under an EPA ID
- Transports used oil to processors, rerefiners, off-specification used oil burners



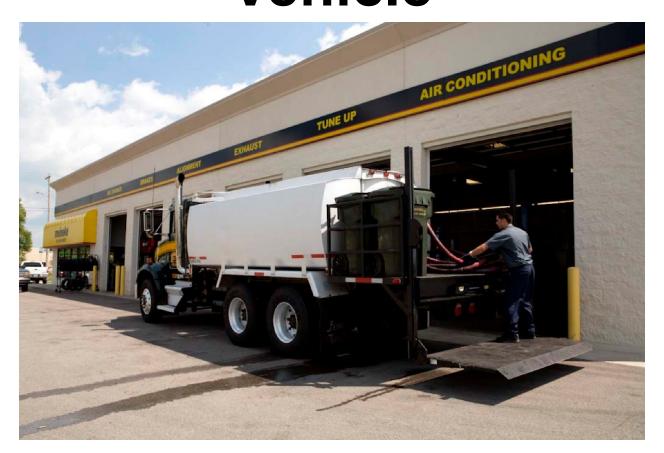
Exceptions to Using a Transporterwith an EPA ID

- Used oil generated onsite
- Used oil generated by a household
- No more than 55-gallons at any time
- May be moved to an aggregation point owned or operated by the generator
- As part of a tolling agreement





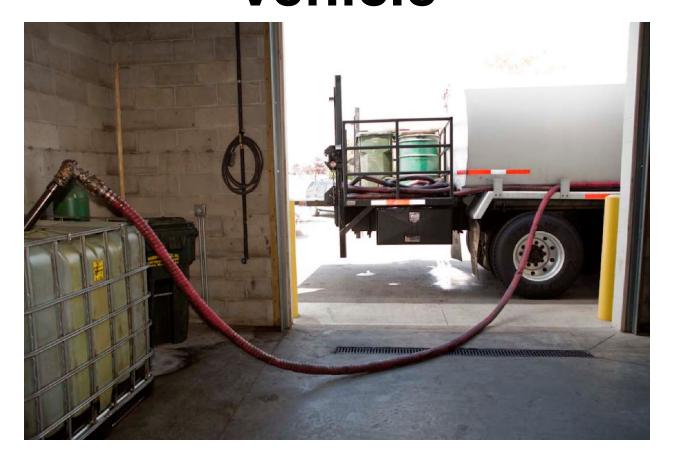
Used Oil Transfer to a Transport Vehicle







Used Oil Transfer to a Transport Vehicle







Who is the Collection Center and Aggregation Point?





Who is the Collection Center and Aggregation Point?

- Accepts, aggregates & stores used oil from a generator and household
- Accepts shipments of no more than 55gallons
- Adheres to generator practices
- Possibly registered, licensed or permitted





Who is the Collection Center and Aggregation Point?

Any potential problems?













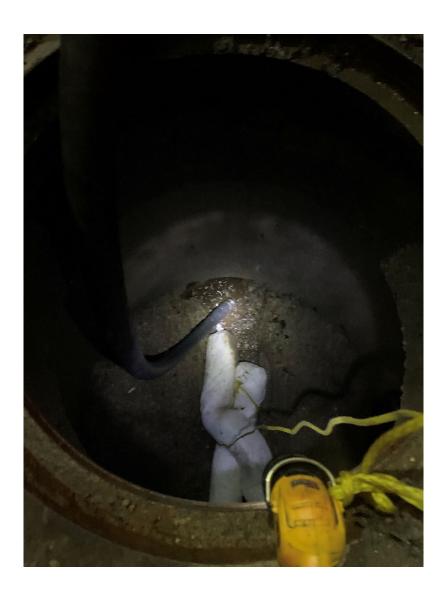


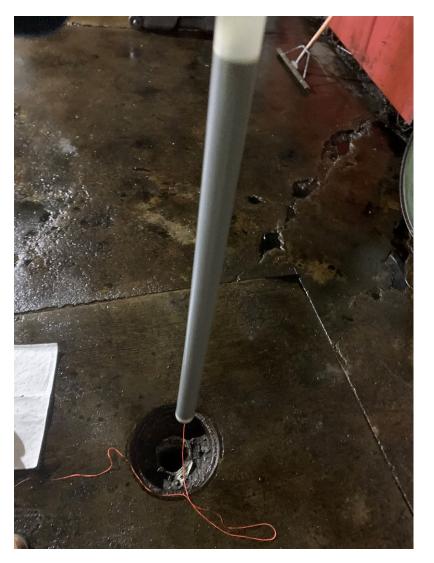






















Who is the Used Oil Processor & Re-Refiner?

- Operates under an EPA ID
- Reclaims used oil for reuse





Who is the Used Oil Processor?







Who is the Off-Specification Used Oil Burner?

- Operates under an EPA ID
- Used oil burned for energy recovery





Who is the Fuel Marketer?

- Directs shipment of off-specification used oil to off-specification used oil burner
- First claims the used oil meets the used oil specifications (329 IAC 13-3-2)

| Table 1-Used Oil not Exceeding any Specification Level is not Subject to this Article when Burned for Energy Recovery ¹ | |
|------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Constituent or Property | Allowable Level |
| Arsenic | 5 ppm maximum |
| Cadmium | 2 ppm maximum |
| Chromium | 10 ppm maximum |
| Lead | 100 ppm maximum |
| Flash point | 100° F minimum |
| Total halogens | 4,000 ppm maximum ² |





Used Oil as a Dust Suppressant 329 IAC 13-10-3

"The use of used oil as a dust suppressant is prohibited in accordance with IC 13-30-2-1(14)"





Tote storage – secondary containment – what are the risks?



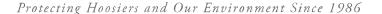




What is a spill (327 IAC 2-6.1-4)?

- any unexpected, ... discharge or other loss of petroleum, hazardous substances, extremely hazardous substances, or objectionable substances.
- The term does not include releases to impermeable surfaces when the substance does not migrate off the surface or penetrate the surface....







What is a spill (327 IAC 2-6.1-4)?

- Typically, the use of secondary containment provides for a respite to respond to any release
- Certain exclusions, e.g., spills of less than one pound or one pint are also not reportable except...





What is a reportable spill (327 IAC 2-6.1-5 (facility) & 2-6.1-6 (transportation)?

- Any spill for which a spill response has not been done.
- "Spill response", for purposes of this rule, means the spill is contained & free material is removed or neutralized.





Emergency Response Spills Reported

Excerpt from November 2020 to September 2021 *

- Transformer oil 2
- Soybean oil 3
- Petroleum & hydraulic fluid 56
- Oil & grease 11
- Motor oil 52
- Mineral oil 11

^{*} https://www.in.gov/idem/cleanups/investigation-and-cleanup-programs/emergency-response/





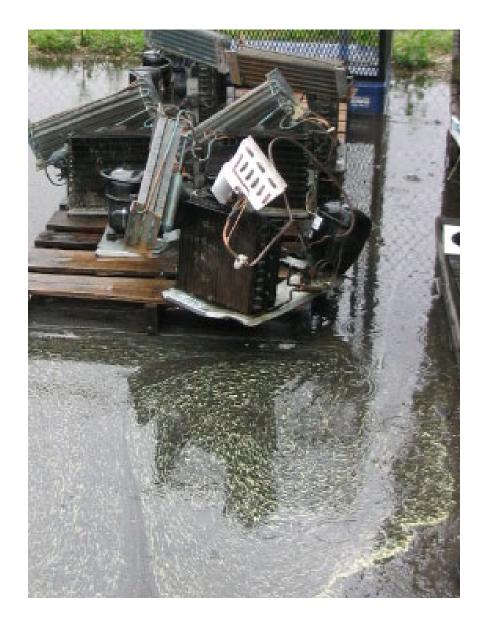
Any cause for alarm?







Compressor oil – Can I ignore it?







Spill response pack located on a wall in case of need







Other Potential Requirements

- Spill Prevention, Control & Countermeasure (SPCC) – 40 CFR 112
- Underground Storage Tanks 40 CFR 280
- Fire codes





Would this require an SPCC plan?



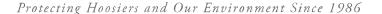
Four (4) used oil drums and 1,000-gallon used oil AST located inside the building





In Conclusion, Conservation and Recycling of the Nation's used oil

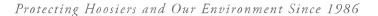
- extends the life of U.S. crude oil resources,
- reduces the likelihood of improperly disposed used oil contaminating the environment and
- is energy efficient, as it can take less energy to recycle used oil.





Key Take Aways

- Segregate some used oil, e.g., synthetic, is more valuable than other used oil
- Know your risks containment
- Have a plan spill response
- Use a transporter with an EPA ID
- Know the destination





Thank You!

- Cathy Csatari
- Susan Lowry
- Joe Neuklis
- George Ritchotte
- Brian Smith
- Matthew Peterschmidt





CTAP is a mouse click away









Compliance and Technical Assistance Program

Empowering Indiana businesses with environmental compliance assistance that is:

Free and confidential

Non-regulatory

Multimedia





CTAP Services

CTAP Hotline and Online Portal

Site Assessments

Training

Online Resources

Contact CTAP to:

- Receive timely assistance with interpreting a rule or permit requirement.
- Determine what steps are needed to obtain a permit to operate or modify processes.
- Ask general environmental regulatory or compliance questions
- Request a site assessment.

Submit a confidential request via CTAP's online portal: <u>portal.idem.IN.gov</u>.

Or call our hotline: 317-232-8172 or 800-988-7901





New CTAP Online Portal

IDEM has launched a new Compliance and Technical Assistance Program online portal through Access Indiana. This new portal is a secure online system that makes it easier for businesses and organizations to request confidential assistance regarding environmental regulations, compliance, and permitting.

In the new CTAP portal, businesses, companies, organizations, and individuals can:

- Create a secure account and submit confidential requests directly.
- Request confidential site assessments for your business or specific equipment/processes.
- Communicate and track interactions with CTAP staff.
- Invite collaborators within the company or designated consultants to access and view the CTAP request and recommendations.
- Provide feedback to the CTAP team through surveys.

To submit a confidential request using the new CTAP portal, visit <u>portal.idem.IN.gov</u>.

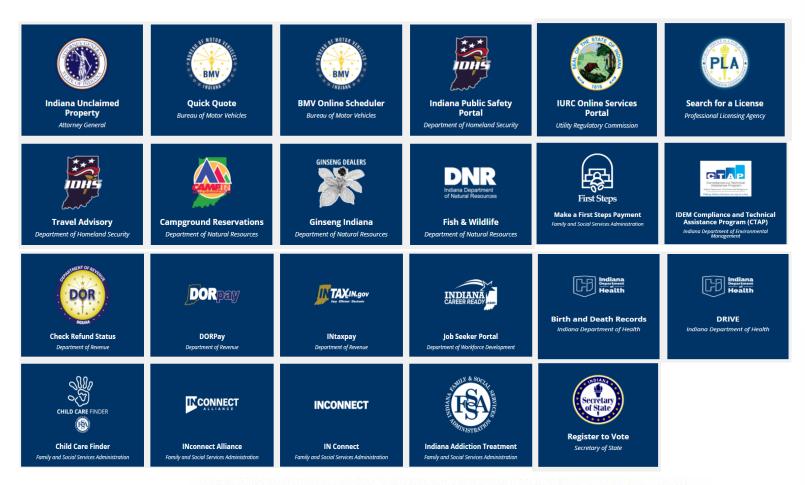




Available Services



https://www.in.gov/access/





Check the
Available Services
to see a list of all
online services
utilizing the Access
Indiana login
(https://www.in.gov
/access/availableservices.html).



A SINGLE LOGIN & PASSWORD FOR YOUR INDIANA SERVICES





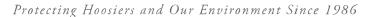
New CTAP Online Portal



CTAP online portal can also be accessed through IDEM's electronic resources.

https://portal.idem.in.gov/







Questions?





IDEM Resources

- https://www.in.gov/idem/waste/hazardouswaste/used-oil/
- https://www.in.gov/idem/waste/files/hw_used_oil rule.pdf





EPA Resources - PCBs

- Learn about Polychlorinated Biphenyls - <u>https://www.epa.gov/pcbs/learn-aboutpolychlorinated-biphenyls-pcbs</u>
- Preventing & Detecting PCB Contamination is Used Oil - Managing Used Oil: https://www.epa.gov/system/files/documents/2022-04/pcbs in used oil fact sheet corrected2.pdf

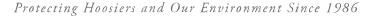




EPA Resources - PCBs

- PCB Cleanup & Disposal Guidance -<u>https://www.epa.gov/pcbs/pcb-cleanup-and-disposal-guidance-interpretive-letters-issued-epa</u>
- PCB Commercial & Disposal Facilities - <u>https://www.epa.gov/pcbs/list-approved-</u> <u>polychlorinated-biphenyl-pcb-commercial-</u> <u>storage-and-disposal-facilities</u>







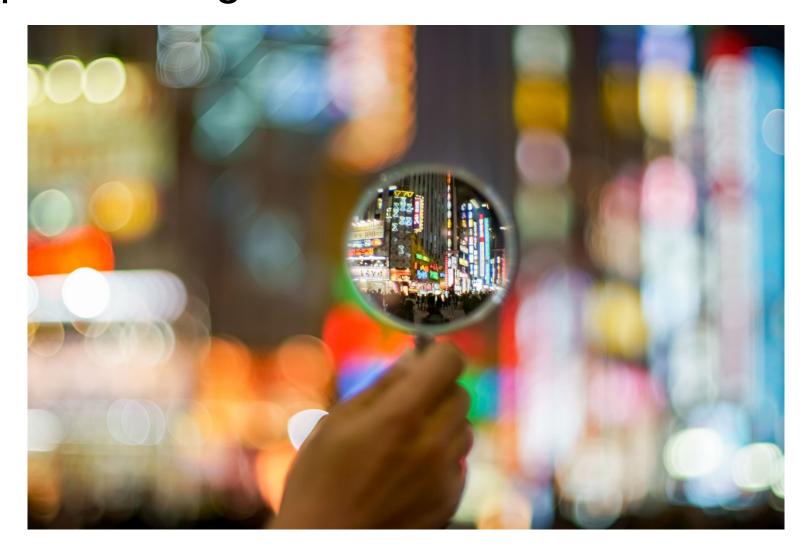
EPA Resources

- Managing Used Oil: FAQ -<u>https://www.epa.gov/hw/managing-used-oil-answers-frequent-questions-businesses</u>
- RCRA Info https://enviro.epa.gov/facts/rcrainfo/search.html
- RCRA Online -https://rcrapublic.epa.gov/rcraonline/





How to be a better sleuth Tips for using RCRAInfo and RCRA Online





What is that?

- RCRAInfo
 - US EPA database supporting RCRA
 - Hazardous waste handlers including used oil
- RCRA Online
 - US EPA database that indexes thousands of letters, publications, questions and answers





RCRAInfo Search

Home | Multisystem Search | Topic Searches | System Data Searches | About the Data | Data Downloads | Widgets | Services |

Mobile | Other Datasets





Facility Selection

| Facility Identification: | |
|-----------------------------------------------------------|---|
| Facility Name (Enter a partial or complete Facility Name) | ~ |
| Facility Identification Option Value: | |
| ■ Beginning With ○ Exact Match ○ Containing | |





RCRAInfo Search

Geography Search

Enter a partial value for any geography option except for the state value. We strongly recommend that you enter a small geographical area to begin the search since Envirofacts contains a large number of facilities.

| ZIP Code | :: | |
|--------------------------|--------------------------------------|---|
| Address: | : | |
| | | |
| Begini | ning With ○ Exact Match ○ Containing | |
| City: | | 1 |
| | | |
| County: | | 1 |
| | | |
| State: | | |
| IN | | |





RCRAInfo Search

North American Industry Classification System (NAICS) Data Search

Select a search option from the drop down menu. For the "Equal to" option enter a 4 to 6-digit NAICS code. For "Beginning with" or "Containing" enter up to 6 digits.

NAICS Codes: Equal to

Handler Universe

| O All Handler Universes | | |
|--------------------------------------------|---|---|
| O Treatment, Storage, Disposal Facilities: | | |
| Full Enforcement Universe | | ~ |
| Other Universes: | | |
| Used Oil Universe | ~ | |





Process Search Option

Search for facilities that have the processes selected below (Defaults to All Processes):

ALL Processes:

| O Disposal Process: | | |
|---------------------------------------------------------------------------------------------------|-----------------------------------------------------|-----------------------------------|
| ☐ Underground Inject. Well Disp. | □ Landfill | ☐ Land Application |
| □ Ocean Disposal | ☐ Surface Impoundment Disposal | ☐ Other Disposal |
| ○ Storage Process: | | |
| □ Container | ☐ Tank Storage | ☐ Waste Pile |
| ☐ Surface Impoundment Storage | □ Drip Pad | ☐ Containment Building - Storage |
| □ Other Storage | | |
| ○ Treatment Process: | | |
| □ Tank Treatment | □ Surface Impoundment Treatment | □ Incinerator |
| □ Other Treatment | □ Boiler | ☐ Cement Kiln |
| □ Lime Kiln | □ Aggregate Kiln | ☐ Phosphate Kiln |
| ☐ Smelting/Melting/Refining Fur. | □ Coke Oven | ☐ Blast Furnace |
| ☐ Titanium Dioxide Chloride Process Oxidation Reactor | ☐ Methane Reforming Furnace | ☐ Pulping Liquor Recovery Furnace |
| $\hfill \square$ Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid | ☐ Other Industrial Furnaces Listed in 40 CFR 260.10 | ☐ Halogen Acid Furnace |
| ☐ Containment Building - Treatment | | |
| Miscellaneous Process: | | |
| ☐ Open Burning/Open Detonation | □ Thermal Unit | ☐ Mechanical Processing |
| ☐ Geologic Repository | □ Other Subpart X | |







Active/Inactive Site Option

- Active Sites Only
- O Inactive Sites Only
- O Both Active and Inactive Sites

Search Values

- O Use Multisystem facility information to perform facility search
- Use RCRAInfo facility information only to perform facility search

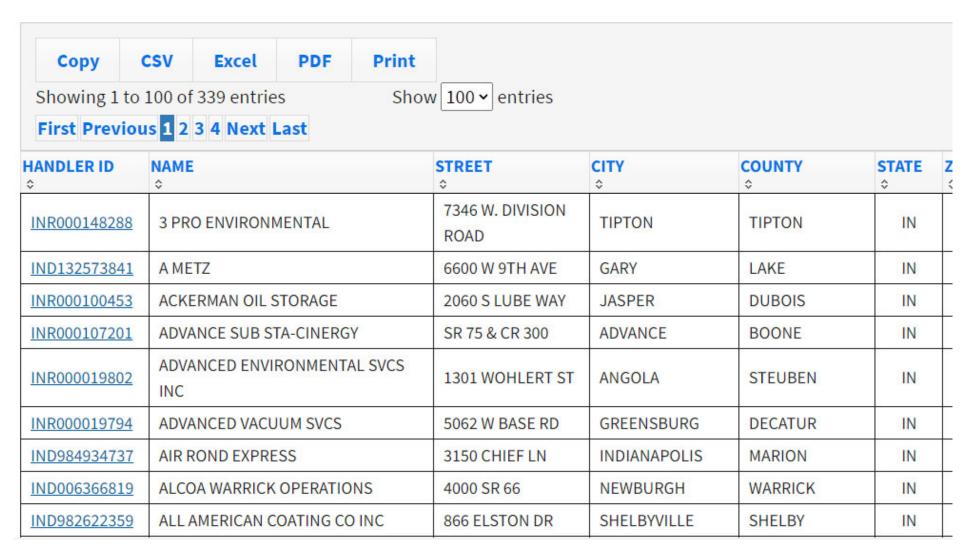
Search

Clear





Search Results – in part







Search Results – Excel

| RCRAINFO Search US EPA | | | | | | | |
|--------------------------|---------------------------|-------------------|----------------|------------|-------|------------|----------------------|
| HANDLER ID | NAME | STREET | CITY | COUNTY | STATE | ZIP CODE | LATITUDE/LONGITUDE |
| | | 7346 W. DIVISION | | | | | |
| INR000148288 | 3 PRO ENVIRONMENTAL | ROAD | TIPTON | TIPTON | IN | 46072 | 40.30263/-86.15309 |
| INR000100453 | ACKERMAN OIL CORP | 2060 S LUBE WAY | JASPER | DUBOIS | IN | 47546 | 38.36255/-86.94014 |
| | ACTION ENVIRONMENTAL | | | | | | |
| IND985026566 | INCORPORATED | 5449 KEYSTONE DR | FORT WAYNE | ALLEN | IN | 46825 | 41.12828/-85.14402 |
| INR000107201 | ADVANCE SUB STA-CINERGY | SR 75 & CR 300 | ADVANCE | BOONE | IN | 46102 | 39.995679/-86.619849 |
| | ADVANCED ENVIRONMENTAL | | | | | | |
| INR000019802 | SVCS INC | 1301 WOHLERT ST | ANGOLA | STEUBEN | IN | 46703 | 41.65041/-85.00438 |
| | ADVANCED VACUUM | | | | | | |
| INR000019794 | SERVICES | 5062 W BASE RD | GREENSBURG | DECATUR | IN | 47240 | 39.33575/-85.57538 |
| | ALL AMERICAN COATING CO | | | | | | |
| IND982622359 | INC | 866 ELSTON DR | SHELBYVILLE | SHELBY | IN | 46176 | 39.51214/-85.74585 |
| | | 9977 NORTH STATE | | | | | |
| INR000149146 | ALTITUDE MANUFACTURING | ROAD 39 | LA PORTE | LAPORTE | IN | 46350 | 41.75156/-86.723932 |
| | AM ELECTRIC POWER CO BAER | | | | | | |
| IND086777364 | FIELD SVC CTR | 8201 BAER RD | FORT WAYNE | ALLEN | IN | 46809-9781 | 41.007572/-85.182645 |
| | AMERICAN COMM BARGE LINE | | | | | | |
| INR000017616 | LLC | 1701 E MARKET ST | JEFFERSONVILLE | CLARK | IN | 47131 | 38.280353/-85.720024 |
| | AMERICAN ENVIRONMENTAL | 8500 GEORGETOWN | | | | | |
| INR000017350 | CORP | RD | INDIANAPOLIS | MARION | IN | 46268 | 39.90845/-86.24082 |
| INR000145292 | APOLLOS WATER | 108 W 1250 S | BATTLE GROUND | TIPPECANOE | IN | 47920 | 40.568945/-86.871161 |
| INR000129940 | APPOLOS WATER | 3420 FAIRFIELD CT | LAFAYETTE | TIPPECANOE | IN | 47909 | 40.36808/-86.85531 |





Ackerman Oil Storage

ACKERMAN OIL CORP

Handler ID: INR000100453 2060 S LUBE WAY JASPER, IN 47546

County Name: DUBOIS

Latitude: 38.36255 Longitude: -86.94014

Hazardous Waste Generator:

Owner Name: ACK INC



*You can navigate within the map with your mouse.

No BIENNIAL REPORT data is available for the facility listed above.

LIST OF FACILITY CONTACTS

| NAME | STREET | <u>CITY</u> | STATE | ZIP CODE | PHONE | TYPE OF CONTACT |
|---------------------|---------------|-------------|-------|----------------|------------------|--------------------|
| MICHAEL ACKERMAN | PO BOX 806 | JASPER | IN | 47547- 0806 | 812-482- 6666 | Public |
| MICHAEL ACKERMAN | PO BOX 806 | JASPER | IN | 47547- 0806 | 812-482- 6666 | Permit |





Ackerman Oil Storage

Unspecified Universe for the facility listed above.

| HANDLER TYPE | LAND DISPOSAL | INCINERATOR | BOILER AND OR INDUSTRIAL FURNACE | STORAGE | TREATMENT |
|-----------------|------------------|-------------|-------------------------------------------|---------|-----------|
|-----------------|------------------|-------------|-------------------------------------------|---------|-----------|

HANDLER TYPE

Transporter

Used Oil Program

No PROCESS INFORMATION is available for the facility listed above.

No NAICS Codes are available for the facility listed above.

No Waste Codes are available for the facility listed above.





Ackerman Oil Storage

Certified Quality under ISO-9001 Standards









Metalworking Lubricants

METALWORKING LUBRICANTS COMPANY

Handler ID: IND000646950

1509 S SENATE

INDIANAPOLIS, IN 46225

County Name: MARION

Latitude: 39.74681

Longitude: -86.1643

Hazardous Waste Generator:

Owner Name: METALWORKING LUBRICANTS

COMPANY



*You can navigate within the map with your mouse.

No BIENNIAL REPORT data is available for the facility listed above.





Metalworking Lubricants

LIST OF FACILITY CONTACTS

| NAME | STREET | CITY | STATE | ZIP CODE | PHONE | TYPE OF CONTACT |
|----------------------|----------------------------------|--------------|-------|-------------|-----------------------|-----------------|
| MICHAEL ZIELINSKI | 1509 S SENATE | INDIANAPOLIS | IN | 46225 | 317-269- 2444 | Public |
| GARY JR BAIZE | 1509 S SENATE AVE | INDIANAPOLIS | IN | 46225 | 317-269- 2444 | Permit |
| MICHAEL ZIELINSKI | 1509 S SENATE | INDIANAPOLIS | IN | 46225 | 317-269- 2444 | Permit |
| JAMES P TOMLINSON | | | | | 313-332- 3500 | Permit |
| GARY BAIZE | | | | | 317-269- 2444 | Permit |
| JAMES P TOMLINSON | | | | | 810-332- 3500 | Permit |
| GARY BAIZE | | | | | 317-269- 2444, 120 | Permit |
| JAMES TOMLINSON | 25 SILVERDOME INDUSTRIAL PARK | PONTIAC | MI | 48057 | 313-332- 3500 | Permit |
| GARY BLAZE | 1509 S SENATE | INDIANAPOLIS | IN | 46225 | 317-269- 2444 | Permit |
| DAVID HOGG | | | | | 317-632- 3613 | Permit |



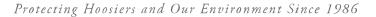


Metalworking Lubricants

LIST OF PROCESS UNIT INFORMATION FOR GROUP #240 TANKS

| PROCESS CODE / DESCRIPTION | LEGAL OPERATING STATUS | UNIT OF MEASUREMENT TYPE / DESCRIPTION | CAPACITY TYPE / DESCRIPTION | QUANTITY | CAPACITY | EFFECTIVE DATE |
|----------------------------------|----------------------------------------------------------------|-------------------------------------------------|-----------------------------------|----------|----------|-------------------|
| S02 - TANK STORAGE | PERMITTED - OPERATING, ACTIVELY MANAGING RCRA- REGULATED WASTE | G - GALLONS | - | 1 | 172298 | 31-DEC-93 |
| S02 - TANK STORAGE | PERMITTED OPERATING, ACTIVELY MANAGING RCRA- REGULATED WASTE | G - GALLONS | - | 2 | 29374 | 22-DEC-00 |
| S02 - TANK STORAGE | PERMITTED OPERATING, ACTIVELY MANAGING RCRA- REGULATED WASTE | G - GALLONS | - | 2 | 29374 | 27-SEP-06 |
| S02 - TANK STORAGE | PERMITTED - OPERATING, ACTIVELY MANAGING RCRA- REGULATED WASTE | G - GALLONS | - | 2 | 29374 | 29-FEB-12 |
| S02 - TANK STORAGE | PERMITTED - CLEAN CLOSED | G - GALLONS | - | 2 | 29374 | 27-SEP-12 |







Metalworking Lubricants

LIST OF PROCESS UNIT INFORMATION FOR GROUP SWMI

| PROCESS CODE / DESCRIPTION | LEGAL OPERATING STATUS | UNIT OF MEASUREMENT TYPE / DESCRIPTION | CAPACITY TYPE / DESCRIPTION | QUANTITY | CAPACITY | EFFECTIVE DATE |
|--------------------------------------------|-------------------------------------------------------|-------------------------------------------------|-----------------------------------|----------|----------|-------------------|
| SWM - SOLID WASTE MANAGEMENT UNIT | PERMITTED - REFERRED TO CORRECTIVE ACTION FOR CLOSURE | Z - SWM- SPECIFIC | - | 1 | 0 | 12-DEC-12 |
| SWM - SOLID WASTE MANAGEMENT UNIT | PERMITTED - REFERRED TO CORRECTIVE ACTION FOR CLOSURE | Z - SWM- SPECIFIC | - | 1 | 0 | 12-MAY-17 |

LIST OF NAICS CODES AND DESCRIPTIONS

| NAICS CODE | NAICS DESCRIPTION |
|------------|----------------------------------------------------|
| 324191 | PETROLEUM LUBRICATING OIL AND GREASE MANUFACTURING |

LIST OF WASTE CODES AND DESCRIPTIONS

| WASTE CODE | WASTE DESCRIPTION |
|------------|-------------------|
| D001 | IGNITABLE WASTE |





RCRA Online

RCRA Online is an electronic database that indexes thousands of letters, memoranda, publications, and questions and answers issued by EPA's **Office of Resource Conservation and Recovery (ORCR)**. These documents represent past EPA Headquarters interpretations of the RCRA regulations governing the management of solid, hazardous, and medical waste. RCRA Online allows users to locate documents by browsing topics or performing full text or advanced searches. RCRA Online also allows users to view the actual text of the documents identified in a search.

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| used oil | All | ~ | Search |
|----------|-----|---|--------|
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- Commonly Used Acronyms

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- New and Updated Documents
- System Changes





Search Results – in part

| Results | Results of 1382 for 'used oil' | | | | | |
|--------------|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|--|--|--|
| | (1 of 14 | 1 2 3 4 5 6 7 8 9 10 | 0 ~ | | | |
| RCRA # \$ | Date | Document ≎ | Document Type \$ | | | |
| 51267 | 2008- 06-01 | A Collection of Solid Waste Resources, 2008 Edition (CD-ROM) This CD contains more than three hundred publications on hazardous and nonhazardous waste including Spanish publications. The publications cover many topics including recycling and reuse, buying recycled, hazardous waste management, composting, and used motor oil. In addition, the CD includes a wide variety of educational materials. The CD also contains information about the Resource Conservation Challenge (RCC), an innovative national effort to find flexible, yet protective, ways to conserve the nation's resources. | Publication | | | |
| 13756 | 1995- | A DETERMINATION OF WHETHER A DETOX(SM) WET OXIDATION PROCESS WOULD BE REGULATED UNDER SUBPART X OR UNDER SUBPART O | Memo | | | |





Search Results

sorting by date

| | | <u> </u> | |
|-------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| 14895 | 2017- 07-27 | OFF-SPECIFICATION USED OIL This letter informs NORA 'An Association of Responsible Recyclers 'that off-specification used oil that is characteristically hazardous is considered a hazardous waste and not a non-hazardous secondary material (NHSM), as defined in section 241.2. This letter also states that any used oil that is found to be off-spec because of flashpoint is by definition characteristically hazardous for ignitability. | Memo |
| 14894 | 2017- 07-19 | Unused cigarettes and cigars are not P075 listed hazardous waste when discarded. While EPA has no evidence that cigarettes and cigars exhibit any of the four hazardous waste characteristics, it is the generator's responsibility to make a hazardous waste determination including whether the waste exhibits a hazardous characteristic. | Memo |
| | | SAFE HANDLING, STORAGE, AND TREATMENT OF WASTE FIREWORKS | |





Search Results – Memo Detail

Full Document:

RCRA Online Number: 14895

Title: OFF-SPECIFICATION USED OIL

Document Date: 2017-07-27

To: Harris

From: Johnson

Organization of Recipient: NORA

Description: This letter informs NORA 'An Association of Responsible Recyclers' that offspecification used oil that is characteristically hazardous is considered a hazardous waste and not a non-hazardous secondary material (NHSM), as defined in section 241.2. This letter also states that any used oil that is found to be off-spec because of flashpoint is by definition characteristically hazardous for ignitability.

Regulatory Citation(s): 261.21, 261.6(a)(4), 241.2 EXIT Disclaimer

Official ORCR Policy: Yes

Associated Topic(s): Combustion, Used Oil, Waste Determinations for Combusted Non-

Hazardous Secondary Materials





Search Results – Memo



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

NOW THE OFFICE OF LAND AND EMERGENCY MANAGEMENT

JUL 2 7 2017

Mr. Christopher Harris General Counsel NORA 1511 West Babcock Bozeman, Montana 59715

Dear Mr. Harris:

Thank you for your April 26, 2016 and November 12, 2013, letters regarding off-specification (off-spec) used oil and a non-waste determination for off-spec used oil. In your submittal (on behalf of NORA - An Association of Responsible Recyclers) you requested that EPA modify its description of off-spec used oil fuel to exclude the flashpoint criterion, in the context of 40 C.F.R. Part 241 [non-hazardous secondary material (NHSM)]. You requested that off-spec used oil be placed in the same category as on-spec used oil for purposes of determining whether the used oil is a waste or non-waste when burned for energy recovery under the NHSM rule. You also requested confirmation that off-spec used oil that is a hazardous waste solely because it exhibits a characteristic, is not an NHSM. Your interpretation is based on: 1) section 261.6(a)(4), which

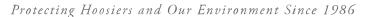




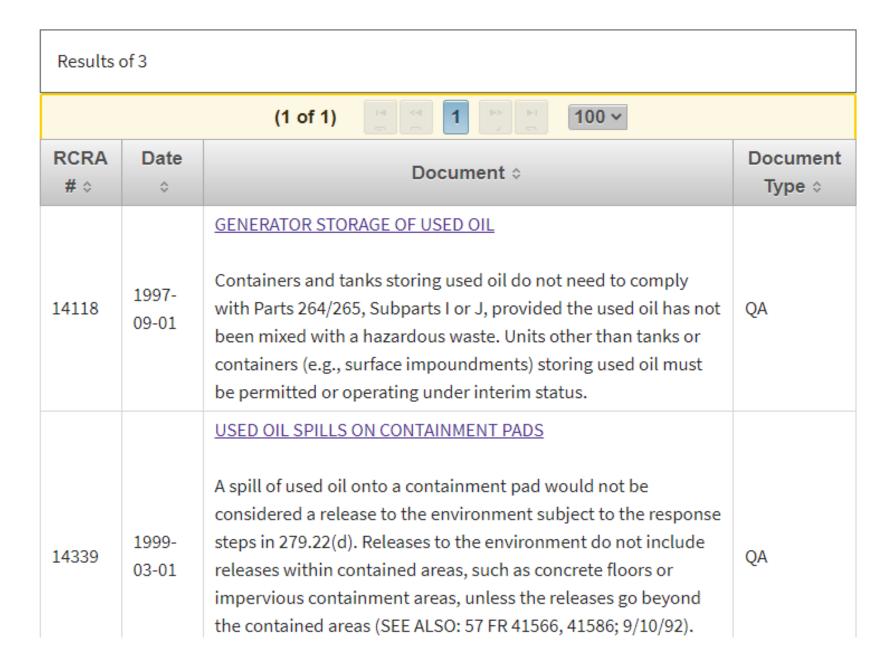
Advanced Search

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| EPA Number 1 | | |
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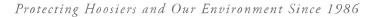
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| RCRA # \$ | Date • | Document o | Document Type 0 | | | | |
| 14627 | 2002- 08-01 | Mixtures of used oil and hazardous waste generated by conditionally exempt small quantity generators (CESQGs) are subject to the used oil rebuttable presumption. The rebuttable presumption applies to all used oils containing more than 1,000 ppm of total halogens (SEE ALSO: 57 FR 41566, 41579; 9/10/92). The presumption can be rebutted by documenting that the hazardous waste/used oil mixture contains only CESQG waste. The rebuttal documentation for the used oil stream should be maintained by subsequent handlers. | QA | | | | |
| 14396 | 1999- 11-16 | INTERPRETATION OF FEDERAL USED OIL REGULATIONS Spent petroleum-based solvents do not meet definition of used oil. Sent petroleum-based solvents are subject to hazardous waste determination. Spent petroleum-based solvents that are intentionally mixed with used oil (e.g., to make fuel oils) can be regulated as used oil under 279.10(b). Hazardous waste determination required prior to mixing. | Memo | | | | |







EPA530-R-02-005h

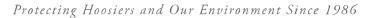
RCRA, SUPERFUND & EPCRA CALL CENTER MONTHLY REPORT August 2002

1. CESQG Mixtures of Used Oil and Listed Waste

According to the used oil management standards in 40 CFR Part 279, mixtures of used oil and conditionally exempt small quantity generator (CESQG) hazardous waste regulated under Section 261.5 are subject to regulation as used oil under Part 279 (Section 279.10(b)(3)). A CESQG generates a hazardous spent solvent (F005) and waste oil that meets the definition of used oil as specified in Section 279.1. Prior to shipping the used oil off site to a used oil collection center, the CESQG mixes the listed F005 waste and used oil together in a container, generating a mixture containing 2,000 ppm total halogens. Since the used oil/F005 mixture originates from a CESQG, would the mixture be subject to the rebuttable presumption under the Part 279 used oil provisions?

The mixture is subject to the rebuttable presumption, since the rebuttable presumption provisions apply to all used oils containing more than 1,000 ppm of total halogens (with the exception of metalworking oils and used oils destined for reclamation which are contaminated with chlorofluorocarbons (CFCs) removed from refrigeration units as specified in Sections 279.10(b)(ii)(A) and (B)) (57 FR 41566, 41579; September 10, 1992). In this situation, the presumption of mixing can be rebutted by providing convincing documentation to show that the mixture is an excluded CESQG used oil mixture covered under Sections 261.5(j) and 279.10(b)(3). In addition, the rebuttal documentation for this used oil stream should be maintained by subsequent used oil handlers. Rebuttals from each generator of used oil are necessary to rebut the presumption of mixing when used oils from multiple sources are combined and the total halogen concentration of the mixture is greater than 1,000 ppm.







Advanced Search

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Results of 2 (1 of 1) 100 ~ **RCRA** Date Document Document : # 0 Type 0 **\$ DEFINITION OF SPENT SOLVENT** 1989-Cutting oil containing 80 percent 1,1,1-trichloroethane, before 13257 OA 03-01 use, is not F002 when spent. 1,1,1-trichloroethane is used as an ingredient, which is not a use covered by the F001-F005 spent solvent listings. REGULATORY STATUS OF USED CUTTING OILS AND USED OIL COATED STEEL TURNINGS GENERATED DURING MACHINING OPERATIONS 1993-Cutting oils, including those removed from steel turnings, may 13639 Memo 11-17 be regulated as used oil. The steel turnings would be regulated as used oil as a material containing or otherwise contaminated with used oil, if used oil is visibly dripping. After the oil is removed, the steel turnings are not used oil. Steel turnings may meet the definition of scrap metal.





9444.1989(02c)

RCRA/Superfund/OUST Hotline Monthly Report Question

March 1989

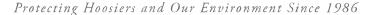
2. Definition of Spent Solvent

The owner of a metal working facility uses a cutting oil to cool and lubricate metals during a drilling process. The cutting oil is purchased as a product and consists of 80% 1,1,1-trichloroethane and 20% lubricating oil. When spent, the fluid is sent for disposal. Would this material meet the F002 listing found in 40 CFR Section 261.31?

. . .

(dissolve) or mobilize other constituents. For example, solvents used in degreasing, cleaning, fabric scouring, as diluents, extractants, reaction and synthesis media, and similar areas are covered under the listings (when spent). A solvent is considered 'spent' when it has been used and is no longer fit for use without being regenerated, reclaimed, or otherwise reprocessed (50 FR 53316)." However, the December 31, 1985, Federal Register also specifies that "process wastes where solvents were used as reactants or ingredients in the formulation of commercial chemical products are not covered by the listing. The products themselves are also not covered (50 FR 53316)." The 1,1,1-trichloroethane, in this circumstance is being used as a cooling ingredient in the formulation of product cutting oil. The metal working facility is







EPA RCRA Online examples of what can be discovered

- Specification used oil fuel -https://rcrapublic.epa.gov/rcraonline/details.xhtm
 https://rcrapublic.epa.gov/rcraonline/details.xhtm
 l?rcra=12554
- Used oil fired space heaters https://rcrapublic.epa.gov/files/14280.pdf
- Mixing hazardous waste with used oil -https://rcrapublic.epa.gov/files/12567.pdf





You can always reach out to CTAP for help!

