

# Used Oil Management in Connecticut

## *What is Used Oil?*

Used oil includes used crankcase (engine) oil, used liquid and semi-solid gear, chain, and ball bearing lubricants, and used hydraulic fluid. Materials that contain or are contaminated with used oil can also fall under the definition of used oil, such as used oil filters, oily rags and wipers, used absorbents, and oily wastewater.

## *What State and Federal Requirements Apply?*

Used oil is a regulated waste in Connecticut [RCSA §22a-449(c)-119 and 40 CFR 279], and must be recycled [RCSA §22a-241b-2(1)(I)].

## *Is it Hazardous?*

Used oil is not considered hazardous waste unless it is mixed with a hazardous waste such as a chlorinated solvent. If used oil has been mixed with a hazardous waste, see Appendix B for management requirements.

## *How Should a Marina Manage the Used Oil it Generates?*

Note that used crankcase oil, automatic transmission fluid, power steering fluid, and hydraulic fluid are all considered used oil and can be mixed and managed together.

There are a few options for managing used oil. Two of the most common are collecting it, testing it and having it hauled away for recycling, or collecting it, testing it and burning it in on-site space heaters. If the used oil tests positive for hazardous constituents, it must be managed as hazardous waste (see Appendix B). If the used oil does not test positive for hazardous waste, the options for management are:

### **COLLECT, TEST, HAUL**

1. Collect and store used oil in a secure collection tank or drum, separate from other wastes (proper storage described on page 112).
2. Test the used oil for total halogen content (see sidebar on next page). Maintain records on site.
3. Contract with a permitted waste oil transporter to haul oil to a permitted recycling facility. Commercial haulers of such used oil must be permitted to transport used oil in Connecticut. Contact CT-DEP's Waste Bureau at (860) 424-4193 for a list of permitted commercial transporters.

**OR**

### **COLLECT, TEST, BURN**

1. Collect and store used oil in a secure collection tank or drum, separate from other wastes (proper storage described on page 112).
2. Test the used oil for total halogen content (see sidebar on next page). Maintain records on site.

3. Burn the used oil in space heaters for energy recovery, i.e., to heat your shop, providing the heater burns only used oil generated on-site or received from “do-it-yourself” oil changers.

NOTE: Used oil heaters must:

- a. have a maximum design capacity of not more than 0.5 million BTU’s per hour; and
- b. vent combustion gases outside the building; and
- c. burn only used oil that you generate or that you have collected from your do-it-yourselfer customers.

For more information on burning used oil at your marina, contact CT-DEP’s Bureau of Material Management and Compliance Assurance at (860) 424-4193 and Air Bureau at (860) 424-3443.

### *What are the Requirements for Used Oil Storage in Tanks or Containers?*

- Place the tank or container on an impervious base. If the tank or container is outdoors, you must provide for secondary containment equal in volume to the capacity of the storage tank. If the tank or container is indoors, no secondary containment, device or structure is required [RCSA §22a-449(c)-119(b)(2)].
- Label the tank or container “Used Oil” [40 CFR 279.22(c)].
- Use a licensed waste oil transporter to haul the oil to a permitted recycling facility [CGS §22a-454].
- Keep results of used oil testing [RCSA §22a-449(c)-119(b)(1)(C)].
- Prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan if you store more than 1,320 gallons of used (or new) oil aboveground (containers of less than 55 gallons are exempt from the total) [40 CFR 112.1]. See Appendix E for more information.

### *What are Recommended Practices for Used Oil Storage in Tanks or Containers?*

- Locate the tank or container in an aboveground area, preferably roofed, that will prevent unauthorized access or vandalism, minimize possibility of fire or explosion and accidental release of oil to the environment.
- Lock the tank or container’s fill spout when not in use.
- Visually inspect the tank or container on a regular basis for leaks or malfunctions. Maintain written inspection records.
- Instruct all employees who handle used oil on the proper operation and management of the oil storage area. Assign one person the responsibility for monitoring oil storage.
- Use kitty litter, saw dust, or a commercially available product to absorb oil from minor spills.
- If providing a collection tank or container for used oil from your customers who do their own engine maintenance, clearly label the tanks or containers to indicate the importance that ONLY used oil be placed in the tank. Remember that you’ll be responsible to pay for disposal of used oil that is contaminated with hazardous waste.



When testing used oil for hazardous constituents, four steps must be taken in this order: 1) determine if it is mixed with any listed hazardous waste; 2) determine if it has been mixed with any characteristic hazardous waste; 3) test for total halogens (if the oil contains total halogens of greater than 1,000 parts per million (ppm), it must be managed as hazardous waste); 4) if the oil tested at over 1,000 ppm, you can rebut the presumption of mixing by having the oil tested for the presence of chlorinated solvents. If no listed hazardous waste solvent is present over 100 ppm, the oil does not have to be managed as hazardous waste.



**U**sed oil testing can be conducted in a laboratory, or marina personnel can test for total halogens using inexpensive, EPA-approved total halogen field testing kits. These total halogen test kits are available from numerous sources, including industrial supply or health and safety supply companies. The following product is offered for your information, and is not an endorsement of the company or their product; CHLOR-D-TECT 1000 or CHLOR-D-TECT Q4000 (available from Dexsil Corp, Hamden, CT, [www.dexsil.com](http://www.dexsil.com)).

- Keep records of used oil collection.

If only used oil generated on-site is stored in the tank or container, no state permits are needed to install an above ground collection tank, but check with your municipality because local permits might be needed.

CT-DEP discourages installation of new underground storage tanks (UST). Since November 1985, it has been illegal to install any nonresidential UST component which is neither fiberglass-reinforced plastic (i.e., noncorrosive) nor which has a manufacturer-applied anti-corrosive coating and cathodic protection. Registration with CT-DEP is required. Contact CT-DEP's UST Program at (860) 424-3374 for more information.

### *If a Marina Accepts Used Oil That Boaters Generate, How Should it be Managed?*

Many marinas collect used oil from customers as a client service. Manage this oil in the same way as oil generated by the marina itself.

It may make sense to separate the waste area where you are collecting wastes from boaters from those generated by the marina, since you have more control over the wastes generated by your staff than by your clients. Used oil contaminated with a hazardous substance is much more costly to dispose of than unadulterated used oil. Educate your staff about the importance of keeping used oil from being contaminated with hazardous substances.

If you collect customers' oil, remind boaters not to:

- mix used oil with antifreeze or hazardous waste, i.e. waste gasoline.
- burn used oil in residential boilers or space heaters.
- dump used oil overboard.
- pour used oil into sewers or storm drains.
- dump used oil on the ground, use it for weed control, or to keep dust down.

### *How Do Used Oil Rules Apply When a Vessel is at the Dock?*

Used oils which are generated on board boats and personal watercraft become subject to CT-DEP's used oil regulations at the time that the used oil is actually transferred ashore. Depending on the relationship between the owner/operator of the vessel and the dock at which used oil is being off-loaded, the used oil regulations may apply differently, as outlined in the following three examples:

- (1) *The owner/operator of the vessel is the same as the owner/operator of the facility receiving and storing the used oil.* In this case, the marina is simply acting as a generator of used oil, and is not required to have a permit to transfer this used oil ashore or store it prior to shipping it off-site for proper disposal.
- (2) *The owner/operator of the vessel is different from the owner/operator of the facility, but the used oil is generated as the result of maintenance performed by the facility.* In this case, the used oil is generated as part of maintenance activities performed by the port or dock facility. Therefore, the owner/operator of the vessel and marina are considered "co-generators" of the used oil. Although the marina usually assumes this

responsibility for compliance with the generator requirements for this used oil, both are considered equally responsible for ensuring that the used oil is properly managed.

- (3) *The marina collects used oil from do-it-yourselfers.* In this case, the dock facility is acting as a “do-it-yourselfer used oil collection center” which is subject to the same rules as used oil generators. No permit is required for this activity as long as all used oil that is collected was generated on-site.

### ***Can Used Oil Be Mixed with Diesel Fuel, as Recommended by the Manufacturers of Some Diesel Engines?***

The manufacturers of certain diesel engines recommend that you add used oil to your diesel fuel. If you have a diesel engine of this type, you may mix your used oil with virgin diesel fuel according to the manufacturer’s instructions. However, up until the point that the used oil is actually mixed with the diesel fuel, it must be handled exactly the same as any other used oil.

Please note that this exemption applies only to your used oil and only if it is used in your own diesel engines. You may not add your used oil to diesel fuel that will be used in someone else’s diesel engines. You may also not accept used oil from someone else to put into your diesel fuel.

### ***How Should Used Oil Absorbent Material Be Disposed?***

Materials that *contain* or are *contaminated with* used oil can also fall under the definition of used oil. The most common of these materials are used oil *absorbent pads, rags and wipers*, and *absorbents* (such as kitty litter, speedi-dri, and absorbent pigs).

Boaters or marina staff doing work on customers’ boats dockside can dispose of oil absorbent materials generated while conducting maintenance by double-bagging the absorbent material and disposing in the regular trash. Boaters can also take their waste oil absorbents to a household hazardous waste collection facility for disposal or to a collection area provided by the marina.

Marina staff that produce waste oil absorbent material as a result of maintenance of marina-owned or customer’s vessels in the marina’s maintenance shop, must collect all used oil absorbent material, test for hazardous constituents, and transport either as hazardous waste or used oil, depending on the test results. However; if the absorbents do not have free-draining oil and are not going to be burned for energy recovery, they are no longer subject to regulation as used oil. In this case, these soaked absorbents must have a hazardous waste determination and be disposed of as hazardous or CT-Regulated waste. See Appendix B for more information.

### ***Are There Any Other Requirements?***

On-board air conditioning systems may also generate used oils which are contaminated with refrigerants (such as freon). This type of used oil must be recycled for its freon content. See fact sheet on “Refrigerants” for more information.

Spills of used oil (or any other petroleum liquids, chemicals, or hazardous waste) must immediately be reported via CT-DEP’s 24-hour spill reporting number: (860) 424-3338.