PCB Contamination of Waste Oil Collected by Municipalities

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Recent Incident at a Municipal Transfer Station

• A MTS in CT unknowingly received PCB-contaminated waste oil.
• 1,000 gallons pumped into hauler’s truck, which also picked up other loads.
• Waste oil was tested for total halogens prior to shipment off-site.
• Used Clor-D-Tect 1000 Field Test Kit.
• Waste oil “passed” the test kit (< 1,000 ppm total halogens).
• Hauler took oil to a recycling facility – put in a 15,000 gallon tank with other oil.
• PCBs detected at recycling facility and traced back to the MTS.
Consequences

• Disposal of 15,000 gals as PCB waste (~$110,000).
• Loss of revenue at recycling facility while tank was out of service (~$15,000).
• Removal of contaminated tanks at MTS and decon of storage areas (~$35,000).
• Purchase and installation of a new waste oil tank at MTS (~$8,000).
• Costs incurred by hauler (> $37,000).
• Hauler now requires PCB testing on all loads that they pick up.
Is Testing Required?

• MTSGP has no specific testing requirement, but…
  • CT Used Oil Regulations apply to waste oil collected by municipalities.
  • These regulations require testing for total halogens.
  • If > 1,000 ppm – presumed to be contaminated with hazardous waste.

• Federal and State PCB regulations do not specifically require testing, but…
  • Waste oil with PCBs > 50 ppm are subject to special federal disposal requirements.
  • Used oil that is burned as a fuel is subject to special requirements (down to 2 ppm).
  • Waste oils with PCBs > 1 ppm are subject to state PCB rules (CR01).
  • Non-compliance with any of the above can result in enforcement and penalties.
How to Prevent Contamination Incidents

• RCSA Section 22a-241b requires municipalities to provide for the recycling of “waste oil” generated by residents:
  • Does not apply to waste oil from non-residences (e.g., businesses, etc.).
  • PCBs more likely to be found in waste oil from businesses, etc.
  • “Waste Oil” is defined as crank case oil from internal combustion engines.
  • Other types of oil are not required to be collected, and are more likely to be contaminated than crank case oil.
  • MTS collection tank is not the only option for “providing for recycling” of waste oil.
Prevention, Part 2

• Testing:
  • Only way to ensure your waste oil isn’t contaminated with PCBs is to test it prior to shipment off-site.
  • Total halogen and other field test kits can provide information about PCB contamination, but are not accurate or sensitive enough.
  • EPA Method 8082A, or other EPA-approved laboratory test.
  • Cost is typically < $100.
  • Think of it as an insurance policy.
Prevention, Part 3

- How you store waste oil:
  - Tanks vs. containers.
  - One tank or multiple tanks.
- Hauler/Recycler issues:
  - “Milk Runs.”
  - Retain samples.
  - Sampled for PCBs prior to recycling?
Prevention, Part 4

• Screening of waste oil dropped off at MTSs:
  • Diligently follow MTS GP requirements re security of tanks/containers, addition of oil to tanks/containers, etc.
  • Prohibit non-residential users or keep their waste oil separate from residential.
  • Ask people dropping off waste oil if it is contaminated.
  • Use sign-in logs or certifications.
  • Be on the lookout for high-risk items: dielectric oils, old hydraulic oils, Heathkit “Cantennas.”
• Check to see if your insurance would cover a contamination incident.
Questions?

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