<u>Used Oil Regulation and Enforcement:</u> <u>The DTSC Perspective</u>



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Introduction

- Objectives
- Agenda



- Used Oil Generator Requirements
- -The Used Oil Process
- -Waste Used Oil Filter Management



Topics of Discussion

- Cradle to Grave
- Used Oil Generator requirements
 - Household Hazardous Waste Collection Facilities (HHWCF)
 - Used Oil Collection Centers (UOCC)
 - Householders
 - Businesses
 - Other collection locations
- Disposal options for householders

<u>Cradle to Grave</u>: The Big Picture



<u>Cradle to Grave Process</u>: The Key Players

"Generator" or

"Producer" means any person, by site, whose act or process produces hazardous waste identified or listed in chapter 11 of this division or whose act first causes a hazardous waste to become subject to regulation.

title 22 66260.10

"Transporter" means a person engaged in the offsite transportation of hazardous waste by air, rail, highway or water.

title 22: 66260.10

"Designated facility"

means a hazardous waste transfer, treatment, storage or disposal facility which has received a permit or a facility with interim status.

title 22: 66260.10

Used Oil Generator



Used Oil Transporter



Used Oil Destination Facility



Responsibilities of a Generator: An Overview

Generator:



Generator Requirements:

Monthly Generation Limit

HW Determination

ID #

Accumulation Time Limits

Labeling

Storage Requirements

Containers

Tanks

Contingency Plan

Emergency Procedures

Personnel Training

Manifest

Record Keeping

Generator status:



66262.34 (d), 66262.34 (a), 40 CFR 262.34 and HSC 25123.3 (b)

Non-Household Generators:

Businesses Generating Used Oil

Collection Centers

Required to Meet GENERATOR Requirements

(C.C.R., title 22, sections 66279.20, 66279.21, Chap 12 generator standards, , 67450.25 ,67450.4and HSC 25218)

Business Generating Used Oil Example

Mobile Maintenance Operator:



Generator:

Mobile Maintenance Operations:

[HSC, §25250.12]

Used oil generated during maintenance operations may be transferred from its point of generation to the maintenance person's place of business, other than a residence, for the purpose of consolidation in a tank or container, without meeting the requirements of §§25160, 25163, and 25201, and if the material is to be recycled at an authorized offsite hazardous waste facility and if all the following conditions are met:

No used oil taken back to residence

Generator:

Mobile Maintenance Operations: [HSC, §25250.12]

- (a) The generator transports the used oil in a vehicle owned by the generator or owned by an employee of the generator.
- (b) Not more than 55 gallons are transferred in the vehicle at any one time.
- (c) The used oil is managed in accordance with all laws concerning storage and handling of hazardous wastes upon consolidation at the maintenance person's place of business.
- (d) The used oil is deemed to be generated at the point of consolidation upon consolidation.

** Only used oil-not for used antifreeze coolant

Back to Used Oil Generator Requirements

Generator Status

LQG is defined as a generator of hazardous waste in quantities of: >1,000 kg/month >1 kg/month of acute hazardous waste >100 kg/month of acute spill residue or soil

SQG [40 CFR §260.10 and §66260.10] <1000 kg of HW in a calendar month

- Includes "CESQG." DTSC did not adopt the CESQG exemptions from 40 CFR, §261.5 (a)
- < 100 kg of HW in a calendar month
- No more than 1kg of acutely or extremely HW per month
- California law does not exempt CESQGs from generator requirements (e.g., ID#, accumulation time limits, manifests)

§66262.34 (d); §66262.34 (a), 40 CFR 262.34; H&SC 25123.3 (b)

Hazardous Waste Determination For Used Oil

- Generator responsibility
- Generator knowledge
- Analytical knowledge
- See HSC 25250 and Title 22 section 66279
 - Mixtures of oil and hazardous waste
 - Recycled oil
 - Exempt used oil
 - Testing for halogens

66262.11,HSC 25250, 66279.20 and 66279.21

Hazardous Waste ID Number

[CCR, Title 22 §66262.12]

- Generator shall not dispose of, transport or offer for transport, HW without having received an ID number
- Not for households
- Site specific
- Generator identified on tracking documents such as manifests

<u>Accumulation Time Limit for</u> <u>Non-Acute HW</u>

CCR Title 22, §66262.34 (d), § 66262.34 (a), 40 CFR 262.34; H&SC 25123.3 (b)



<u>Labeling</u>

CCR, Title 22 § 66262.34 (f)

Containers accumulating used oil must be labeled with the following:

- Name and address of the generator
- Accumulation start date
- Include the words "USED OIL" 66279.21(b)
- Hazardous properties of the waste
- Composition & physical state of the waste

66262.30 - 66262.33, 66262.34 (f), 66279.20, 66279.21

Labeling





§66262.30 - 66262.33, §66262.34 (f), §66279.20, §66279.21



<u>Used Oil is typically stored in:</u>

- Containers (e.g., drums)
- Tanks
 - ASTs
 - USTs







40 CFR §262.34 (d)(2),(3),(4) & §66262.34 (a)(1), §66279.20, §66279.21

Containers

- Used oil stored in containers in good condition
- Containers holding hazardous waste shall be closed during transfer and storage except when necessary to add or remove waste
- Inspect for leaks, corrosion and deterioration



§66262.34 (f); 40 CFR 265.173(a); 40 CFR 265.171; 40 CFR 265.174; §66279.20; §66279.21

Containers

Secondary containment not required but it's a good idea







- * See **HSC 25359.4** Release of reportable quantity of hazardous substances
- * Significant release or threatened release contact OES State Warning Center at: (800) 852-7550

<u>Tanks</u>



Owner or operator ensures tank system:

- 1) No leaks
- 2) Sufficient structural strength
- 3) Corrosion protection measures
- 4) Tightness against leaks
- 5) Ancillary equipment supported
- 6) See regs for additional standards

Tank System Integrity Assessment

- Some questions to ask yourself:
- 1) What type of hazardous waste is stored/accumulated in tank?
- 2) RCRA or Non-RCRA?
- 3) Is the tank new or is it an existing tank?

Existing: §66265.191 New tank: §6265.192 and above

40 CFR 265.201; §66265.190-202 (except for 66265.197 (c) and §66265.200); §66279.20; §66279.21

Contingency Plan (LQG's)

- Emergency Response Plan for releases, fire or explosion should include:
 - How to respond to a fire, explosion and/or release
 - Agreements with emergency responders
 - Spill Prevention, Control, and Countermeasures (SPCC) in accordance with CFR 40 Part 112 or 40 CFR Part 1510
 - Name, address, phone # of emergency contact
 - Including both home and work
 - Emergency equipment list and location
 - Evacuation routes
 - California Office of Emergency Services (aka CalEMA Cal OES) 1-800-852-7550



40 CFR 262.34 (d)(5)(i) and (ii); §66265.51- 66265.54; §66262.34(a)

Emergency Procedures

- Duties of emergency coordinator or designee include:
 - Carry out contingency plan
 - Activate internal facility alarms
 - Notify appropriate State or local agencies
 - Assess possible hazards resulting from release, fire or explosion
 - Take measures to ensure release, fires or explosions don't spread
 - Notify DTSC within 15 days of incident with written report

Personnel Training - (LQG's)

Teach personnel effective emergency response procedures to problems that may arise.

- Written training plan
- Timeframe to complete initial training
- Annual review of training received
- Retention of personnel training records

40 CFR 262.34 and §66265.16

<u>Manifest</u>

- A document and set of procedures to track hazardous waste from cradle to grave
- Businesses that are generators are subject to manifest rules
- SQGs may be eligible to use consolidated manifesting procedures [**H&SC 25160.2**]
 - H&SC 25160.2(b)(9) states that all other manifesting requirements must be met unless exempted by this section
- Consolidated Manifest- transporter picks up waste, leaves receipt for generator
 - Transporter will put their name as generator and transporter on actual manifest.

<u>Manifests</u>

Consolidated Manifesting (H&SC 25160.2)

- Transporter picks up waste, leaves receipt for generator
- Transporter puts their name as generator and transporter on manifest
- Transporter provides generator with legible copy of receipt for each quantity/load of used oil received

<u>Manifests</u>

Consolidated Manifesting (H&SC 25160.2)

- Receipt must contain the following information:
 - Generator's name, address, EPA ID number, contact person, and telephone number
 - ⁻ Generators signature or signature of generator representative
 - ⁻ Date of shipment
 - Manifest number (pre- printed on manifest)
 - Volume, waste code(s) and shipping description of each type of used oil received
- Generator must maintain receipts for 3 years
- Transporter is required to make a copy of the "generator copy" of the manifest and send it to DTSC

§66262.20; H&SC 25160.2

<u>Manifests</u>

Full Hazardous Waste Manifests:

Generator:

- Signs manifest
- Keep one copy (the "generators copy")
- Within 30 days of shipment, make a copy of the manifest and mail it to DTSC:
 - **DTSC Generator Manifests**
 - P.O. Box 400
 - Sacramento, CA 95812-0400

§66262.20; H&SC 25160.2

Manifest & Bill of Lading Examples

Bill of Lading

Some waste codes: ▶ 221: Waste Oil and Mixed Oil

222: Oil/Water Separation Sludge

223: Unspecified Oil-Containing Waste

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Used Automotive Antifreeze Non-RCRA Eazardeus	CA134	· · · · · · · · · · · · · · · · · · ·	1	Gal		-	
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Oil & Water, Non-RCRA Hazardous Waste Liquid	CA221			Gal			
Wasto Solids and Studges				Ga			
Truck Wash Out				Each			
Drained Used Oil Filters			ism	⊐rum	• •		
Non-RCEA Hazardous Waste Solids (oity debris)	CA352			Drum			
Emply Drums				Drum			
Transportation				Hrs			
Fuel Surcharge		1		1			
Non-Hazardous Waste Water				Gal			
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K < 1925, pt
Bill of Lading

Some waste codes: ▶ 221: Waste Oil and Mixed Oil

222: Oil/Water Separation Sludge

223: Unspecified Oil-Containing Waste



<u>Uniform</u> Hazardous

<u>Waste</u> Manifest

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7. Tr	anaporter 2 Company Name					U.S. EPAID	Number			
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8. D	esionated Facility Name and Site Addres	· ·				U.S. EPAID	Number			
Faci	nys mone:INOLEGCOD, CH 983	81 (323) 776-6233								
9a. HM	9b. U.S. DOT Description (including and Packing Group (if any))	Proper Shipping Name, Hazar	d Class, ID Number,	10. C	ontainers	11. Total Quantity	12. Unit	13.	Waste Codes	
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<u>Uniform</u> <u>Hazardous</u> <u>Waste</u> <u>Manifest</u>

(may not be current version)

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	WASTE MANIFEST									
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17.1	Transporter 2 Company Name					U.S. EPA ID	Number			
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Record Keeping



§66262.21(f) ; §66262.23 (a)(4); §66262.23 (b); §66263.20 (f); §66264.71 (a)(1)(F); H&SC 25160 (a)(3)

Record Keeping



§66262.21(f) ; §66262.23 (a)(4); §66262.23 (b); §66263.20 (f); §66264.71 (a)(1)(F); H&SC 25160 (a)(3)

Some citations to get you started:

- Title 22 CCR Division 4.5

- H&SC Division 20

Monthly generation limit	CCR, Title 22 §66262.34 (d), §66262.34 (a); 40 CFR 262.34; H&SC 25123.3 (b)
HW determination	§66262.11; §66279.20; §66279.21; H&SC 25250
ID #	§66262.12
Accumulation time limits	§66262.34 (d); §66262.34 (a); §66262.34 (g); §66262.34 (h); H&SC 25123.3 (c)
Labeling	§66262.30 - §66262.33; §66262.34 (f); §66279.20; §66279.21
Storage requirements	40 CFR 262.34 (d)(2),(3) and (4); §66262.34 (a)(1); §66279.20; §66279.21
Containers	<pre>§66262.34 (f); 40 CFR265.173(a); 40 CFR 265.171; 40 CFR 265.174; §66279.20; §66279.21</pre>
Tanks	40 CFR 265.201; §66265.190-202 (except for 66265.197 (c)); §66265.200; §66279.20; §66279.21
Contingency Plan	40 CFR 262.34 (d)(5)(i) and (ii); §66265.51 - §66265.54; §66262.34(a)
Emergency Procedures	40 CFR 262.34 (d)(5)(V); §66265.55 - §66265.66
Personnel Training	40 CFR 262.34; §66265.16
Manifest	§66262.20; H&SC 25160.2
Record keeping	§66262.21(f); H&SC 25160 (a)(3)

Disposal Options for Householders

- Individuals who generate household do-it-yourself used oil are not subject to regulation under the article **§66279.20**
- However, illegal disposal is prohibited by law: H&SC 25250.5 (a)

"The disposal of used oil by discharge to sewers, drainage systems, surface water or groundwater, watercourses, or marine waters; by incineration or burning as fuel; or by deposit on land, is prohibited, unless authorized under other provisions of law. (b) The use of used oil or recycled oil as a dust suppressant or insect or weed control agent is prohibited unless allowed under another applicable law, but only to the extent that use as a dust suppressant or insect or weed control agent is consistent with the federal act."

Disposal Options for Householders

- Householders are limited to transporting no more than 5 gallons of liquid hazardous waste



* Operated by a public agency or its contractor; authorized by a public agency; meets certain requirements in: H&SC 25218; §67450.25;§67450.4, for example

Recap on Generator Requirements:

- Cradle to Grave
- Used Oil Generator requirements
 - HHWCFs
 - UOCC
 - Householders
 - Everybody else
 - Mobile maintenance facilities

Options for householders

Resources & Help

• **DTSC webpage**: www.dtsc.ca.gov

• State Regulations:

https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofR egulations?guid=I6F56A7E1D4B611DE8879F88E8B0DAAAE&originationContex t=documenttoc&transitionType=Default&contextData=(sc.Default)&bhcp=1

• Health and Safety Code:

http://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?t ocCode=HSC&division=20.&title=&part=&chapter=&article=

• Federal Regulations:

https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofR egulations?guid=I6F56A7E1D4B611DE8879F88E8B0DAAAE&originationContex t=documenttoc&transitionType=Default&contextData=(sc.Default)&bhcp=1

• <u>CalCUPA</u>: www.calcupa.com

The Used Oil Process

Cradle to Grave



A Look At The Past...



Look How Far We Have Come!



DTSC's role vs. CalRecycle's role

<u>DTSC</u>

- Oversees regulatory program
- Conducts inspects and enforcement actions on used oil haulers, transfer stations and recycling facilities
- California Health & Safety Code

CalRecycle

- Oversees used oil recycling incentive program
- Provide payments for local governments for used oil recycling programs.
- Public Resources Code

Top 3 DTSC Wastestreams



Contaminated Soil Used Oil Inorganic Solid Waste

GALLONS

<u>Haulers</u>

- Approximately 850 hazardous waste haulers in CA
 - 130-150 dedicated used oil haulers
- Prior to 2009, haulers were inspected once every 25 years
- Since 2009, haulers are inspected once every 10 years



Transfer Facilities

• Approximately 14 used oil transfer facilities

Prior to 2009, transfer facilities were inspected once every 5 years

Currently inspected at least once every two years

Recycling Facilities

 Approximately 7 dedicated used oil recycling facilities

 Used Oil Recycling Facilities are inspected at least once a year.



<u>Enforcement</u>

- Highest enforcement rate out of all DTSC waste streams
 - All other inspections result in about 25% enforcement overall
- Enforcement rate from 2009 to Current:
 - 50% for transfer facilities
 - 30% for haulers
 - 16% for recycling facilities



- Complaints
- Certified Collection Center site visits
- Out-of-State Used Oil Testing and Reporting Agreements
- CalRecycle reporting
- Respond to used oil questions

Used Oil Generator



DTSC's Role in the Transport Process



Transport (cont.)

Waste oil is withdrawn from an AST or UST by:
 > Stinger
 > Hose

- Waste oil is pumped into the truck
- Sludge is left in the tank
 - The tank can be filled up to 30% of its capacity until it is cleaned out.

<u>Sludge</u>

Overview:

- Waste oil is pumped out first
- Sludge accumulates up to 30% of the capacity of the AST or UST prior to being cleaned out
- High pressure wash to "loosen" the sludge
- Wastewater generated is hauled off as oily water
- Possible issue with tank overfill

Transport



Transport (cont.)



Transport and Sampling



Hauler Reporting Requirements

Used Oil Haulers:

PRC §48672

Quarterly reporting of used motor oil and industrial oil volumes

H&SC 25250.10

Annual report to DTSC

H&SC 25250.17

Maintain shipping certification forms

Reporting Form

STATE OF CALIFORNIA CWMB-16 (REV. 6/01)

CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD



USED OIL HAULER REPORT FORM

A. PRINT LEGIBLY OR TYPE				
1. EPA Identification Number	2. Check if Applicable			
	Storage Facility D Transfer Facility			
3. Company Name				
	Reporting Period:			
4. Mailing Address				
	January 1– March 31, 2009			
5. Street Address (if different from above)	Due April 30, 2009			
6. Contact Person	7. Contact Person's Telephone Number			

B. TOTAL AMOUNT OF USED OIL TRANSPORTED TO A STORAGE FACILITY, TRANSFER FACILITY OR RECYCLING FACILITY

DO NOT INCLUDE FUEL OIL			
Source (Generator Type) Amount Specified in Gallons	Lubricating Oil (includes: motor oil, transmission fluids, oils used in internal combustion engines)	Industrial Oil (includes: hydraulic, compressor, turbine, bearing, refrigeration & metal working oils)]
Collection Stations	8.	16.]
Industrial	9.	17.	1
Marine	10.	18.	1
Agricultural	11.	19.	1
Government	12.	20.	1
Outside California	13.	21.	1
Transfer / Storage	14.	22.	24. Grand Total (add lines 15 + 23)
Total	15.	23.	

C. NAME, ADDRESS, PHONE NUMBER, AND EPA I.D. NUMBER FOR EACH FACILITY (STORAGI TRANSFER, RECYCLING) TO WHICH USED OIL WAS TRANSPORTED FOR THIS QUARTER					
25. EPA ID Number	26. Phone Number	31. EPA ID Number	32. Phone Number		
27. Name		33. Name			
28. Street Address		34. Street Address			
29. Mailing Address		35. Mailing Address			
30. Gallons Transported		36. Gallons Transported			
37. EPA ID Number	38. Phone Number	43. EPA ID Number	44. Phone Number		
39. Name		45. Name			
40. Street Address		46. Street Address			
41. Mailing Address		47. Mailing Address			
42. Gallons Transported		48. Gallons Transported			
49. EPA ID Number	50. Phone Number	55. EPA ID Number	58. Phone Number		
51. Name		57. Name			
52. Street Address		58. Street Address			
53. Mailing Address		59. Mailing Address			
54. Gallons Transported		60. Gallons Transported			

D. THIS SECTION TO BE COMPLETED BY PERSON AUTHORIZED TO PREPARE THIS REPORT

Certification:

I certify to the best of my knowledge that the submitted information is true, accurate, and complete

61. Print/ Type Name 62. Title 64. Date

63. Signature

Transfer Facility



Destination Facility

- Used Oil shall be transported an authorized facility, including:
 - In-State Recycling Facility
 - Transfer Facility
 - Out-of-State Recycling Facility



Recycler Reporting Requirements

- Recycling Facilities
- H&SC 25250.1 and PRC §48673
- Bi-Annual Reporting:
 - Must submit a report by March 1, listing total volume of oil received during the preceding year
 - Total volume of oil recycled [according to several categories]
 - Must maintain records for 3 years

Used Oil Generators







Utility Companies

- Used oil generated from transformers, circuit breakers and capacitors
- Issue: May contain PCB's
- Most utility companies claim used oil exempt.



Utility Companies

- If you claim your used oil exempt:
 - A) One time notification to DTSC per facility
 - B) Meet purity standards
 - Flashpoint
 - Metal scan: Lead, Arsenic, Chromium, Cadmium
 - Total Halogens
 - PCBs
 - C) Utility companies exempt from toxicity testing

Used Oil and PCB's

- Potential generators of PCBcontaminated waste:
 - Utility Companies transformers
 Aerospace Industry radars
 Gas Stations hydraulic lifts
Used Oil and PCB's

- 0 ppm to <5 ppm
 Meets used oil criteria
- 5 ppm to <50 ppm
 PCB-contaminated waste
- ≥ 50 ppm
 - TSCA waste
 - If the load reaches TSCA levels, it must either be:
 - Destroyed/incinerated; or
 - Encapsulated

Certified Collection Centers and Household Hazardous Waste Collection Centers

- Maintain retain samples for each load shipped by the hauler
- Maintain a copy of test results the hauler conducts onsite (ex. Halogens)
- Used oil received is typically mixed with solvents, gasoline, water and/or sludge

Manufacturing/Industrial

 Used oil generated from metal manufacturing companies

• Hydraulic oil used in machinery

 Shavings with oil get captured and sent for recycling



Auto Dealerships

- Used Oil generated from oil changes in service station
- Larger amounts generated than auto repair shops
- Generally larger companies practice good housekeeping
- Issues:
 - Sludge
 - Undrained oil filters



Plating Shops

- Metal parts coated with oil to prevent corrosion
- Used oil generated from skimming baths
- Small amounts generated
- Placed in small buckets

• Issues:

Open containers not labeled

Waste Used Oil Filter Management

What Started All Of This?

- Filter recyclers processing "drained oil filters" generated approximately 400-4,000 gal./day
- ≈ 8-10 gal. of oil/55 gal. drum of "drained oil filters"
- Various generators, transporters, and filter processors had free flowing oil in most of their "drained oil filters"
- None of them had the required permit from DTSC to process those undrained filters.

March 2016, Santa Monica



Title 22, California Code of Regulations (CCR) §66266.130

- Waste used oil filters must be managed as hazardous waste, unless properly drained, managed and recycled under §66266.130.
- Properly drained = no free-flowing oil.
- Free-flowing oil is a continuous stream of oil exiting the filter when the filter is inverted. Oil exiting drop by drop is not considered to be free-flowing. However....

<u>Title 22, CCR, §66266.130 – cont'd</u>

"... if the filter is equipped with a device (such as a rubber flap located just inside the filter opening) which impedes the drainage of used oil from the filter, that device shall be manipulated to allow the oil to exit the filter freely, or the filter punctured, crushed, opened, drained, or otherwise handled in a manner that will allow the used oil to exit the filter."

<u>Title 22, CCR, §66266.130 – cont'd</u>

- In addition, the drained filters must be properly contained, labeled and stored
- In rainproof, non-leaking container with tightly sealed lids
- Must be labeled "Drained Used Oil Filters"
- With the initial date of accumulation, or date of receipt at a second location

<u>Title 22, CCR, §66266.130 – cont'd</u>

Drained Used Oil Filter Storage

Maximum Periods:

 $< 1 \text{ ton} \rightarrow 1 \text{ year}$

 \geq 1 ton (3-4 drums) \rightarrow 180 days





Anti-Drain Device



Orange Colored Anti-Drain Valves



Free-Flowing Oil Videos

<u>\\Presentation\IMG_0384.MOV</u>

• \\Presentation\IMG 0404.MOV

** Note: Drum of crushed filters in background are OK.

DTSC Findings:

- When anti-drain valve is opened, pressed, punctured or manipulated:
 approx. 1 to 3 ounces exited filters (approx. 30 to 90 ml per filter)
- When punctured: approx. 5 ounces (150 ml) exited from each filter

(1 ounce is approx. 30 ml)

Undrained: 150 ml or 5 oz. Exits Filter



Undrained: 180 ml or 6 oz. Exits Filter



Undrained: 210 ml or 7 oz. Exits Filter



Undrained: 240 ml or 8 oz. Exits Filter



Undrained: 270 ml or 9 oz. Exits Filter



Anyone see a problem?



Internet Search Results

Draining Tool Examples:

- DTSC is <u>not endorsing</u> any company or product mentioned today.
- The following are for illustration only.

Draining Tool Examples:

Internet Search Results :

- DTSC is <u>not endorsing</u> any company or product mentioned today.
- The following are for illustration only.

Filter Drain Tool : Brian's Cool Tools

DTSC is not endorsing any of these businesses or tools Oil Filter Drain Tool video at: https://www.youtube.com/watch?v=F60Bxn82WmA

Took about 2:00 minutes to drain

Filter Drain Tool : Brian's Cool Tools

Installed on filter with a magnet before it's removed from vehicle



Draining Box Over a Drum



*******DTSC is not endorsing any of these businesses or tools.

DTSC is not endorsing any of these businesses

Oil

Filter wrench \$12

DTSC is not endorsing any business or tool in this presentation

Welding hammer \$7

DTSC is not endorsing any of these businesses or tools

08.07.2016 10:29

STEP 1:



STEP 2:



***DTSC is not endorsing any of these businesses or tools

Oil Filter Drain Systems \$65

DTSC is not endorsing any of these businesses or tools Oil Filter Drain Systems video at: https://www.youtube.com/watch?v=BrgMCNIWIzM

08.06.2016 07:38



This is what came out of three punctured filters!
DTSC Findings

- Gravity draining alone:
 - Is typically not effective or reliable because of the anti-drain valve.
 - May take several attempts to effectively drain one filter if anti-drain valve is present.
 - It's awkward, sometimes difficult, and time consuming – it can take 1-5 minutes per filter when holding the anti-drain valve open.

DTSC Findings: (cont'd)

- Puncturing (with two holes), and gravity draining through hole at low point is fast, easy and effective.
 - A larger hole works better, e.g., ¼ inch drill bit would drain a filter very quickly
- Crushing is also an effective means to drain filters

Easy to inspect and verify they've been drained



Opener/Crusher Example:

 Filters can also be opened (\$40-60) or crushed (\$265-\$1,000's)







- Do not have the same status as those with metal housings
- Must be segregated and managed separately from filters with metal housings <u>at the</u> <u>generator's site</u>.
- Must be managed as hazardous waste, transported using a registered hauler, and shipped using a hazardous waste manifest.

- What's the best way to verify that drained oil filters are not mixed with filter media cartridges or inserts?
 - Visually check the drums <u>before leaving the generator's</u> <u>site</u>.
- If found, segregate for transporter pickup to an alternate (permitted) facility <u>on a HW</u> <u>manifest</u>.

<u>Can Transporters Consolidate Oil Filters</u> <u>Without a Permit From DTSC?</u>

- Qualified Yes: Only when they are Properly Drained and Recycled!
- Undrained filters or filter media inserts -- No!
- Consolidating undrained oil filters or filter inserts requires a permit to store, handle, and transfer hazardous waste.
- Remember, transporters need registration and a manifest to transport undrained filters or filter inserts.

<u>Can Transporters Consolidate Multiple Drums</u> <u>Onto A Single Bill of Lading?</u>

- Qualified Yes: Only when they are Properly Drained and Recycled!
- A Consolidator of multiple drums of improperly drained filters (or filter inserts) onto a single bill of lading will be deemed the generator for any violations.

What's the best way to verify that they've been drained?

 \rightarrow Visual Inspection: punctured or crushed, and not mixed with filter media inserts <u>before leaving the generator site</u>.

<u>Information</u>

Department of Toxic Substances Control

→ www.dtsc.ca.gov

→ https://www.dtsc.ca.gov/InformationResources/upload/RAG_Used-Oil-Filters_Generators1.pdf

New Advisory is posted at:

→ https://www.dtsc.ca.gov/HazardousWaste/Documents/upload/Advisory-used-oilfilters_Final-v9-14-16.pdf

<u>CalRecycle</u>

- \rightarrow www.calrecycle.ca.gov
- → http://www.calrecycle.ca.gov/UsedOil/CertCenters/#Accepting

Contact RAO for Help

Regulatory Assistance Office (hotline and email)

- (800) 728-6942 within California
- (916) 324-2439 out-of-state

<u>RAO@dtsc.ca.gov</u>

Please leave a voicemail on our hotline with your name and phone number so that we can get back to you.

Thank you!



Contact Us:

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