

New Inspector Training: Used Oil Overview

Note: Most, if not all, of this audience will be dealing with Used Oil questions at the generator level... small business such as auto service and repair, light industry, maybe car dealerships, possibly boat yards. You talk can focus, for the most part, on generator standards. Some minimal transporter/transfer facility concerns may come up. You have only 30 minutes to fill, and will probably have less actual time than that. These folks usually have real life anecdotes they want to talk about, to the extent that I'm sure you could fill your allotted time just with Q & A. If you want.. take the NORA presentation and just use the last slide with my contact and internet info on it.. keep it up in the background. If anything ugly comes up, just say nothing, smile and point to it.

Used Oil Management Standards Which are Effective in Florida

Federal EPA: Chapter 40, Part 279 of the Code of Federal Regulations

Florida Statutes: Chapters 403.75-403.769 (404.751 FS: Prohibitions)

DEP: Rule 62-710, Florida Administrative Code (F.A.C.)

Used Oil Management Standards

GENERATORS

The used oil management standards for generators are minimal, found in 40 CFR 279, Subpart C.

Used oil should be stored in a tank in good condition, not leaking, compatible material, labeled with the words Used Oil. Ensure proper response to releases (stop it, clean it, fix it)

Generators can burn used oil in space (or water) heaters, provided:

- they burn only their own, or household generated used oil
- unit does not exceed 500,000 Btu's per hour
- combustion gases are vented to ambient air

Generators can perform minimal processing operations prior to burning on-site.

Burning used oil, in any way shape or fashion, in a "burn barrel" DOES NOT qualify

Generators can transport their own used oil, provided they transport no more than 55 gallons at one time in an enclosed portion of their own vehicle.

Generators MUST have their used oil managed by a Used Oil Transporter that is (in most cases) certified by DEP.

Generators SHOULD keep records. They are NOT required to do so, but this is the only way they can demonstrate that the used oil was transported by a registered/certified transporter.

A DEP guide to "Questions a used oil generator should ask their used oil transporter" is available on the internet or from the Used Oil program coordinator.

OTHER ISSUES

PUOCC's must meet generator standards, including storage.

CESQG hazardous waste can be mixed with used oil and the resultant mixture managed as used oil. Be sure CESQG status is properly determined (waste profile on record).

Used Oil Transporters **MUST** be registered with DEP. If transporting >500 gallons per year (which most commercial transporters do), they must be certified (insurance and training).

Used oil filters: Proper storage and labeling, proper management (nearly identical to that of used oil). Generators must have their used oil filters

NEW AMENDMENTS TO RULE 62-710, FAC, effective June 9, 2005

New generator used oil storage standards (equal to existing filter storage standards): Must be sealed or protected from the weather, on secondary containment with an impermeable surface.

CESQG mixing will be allowed, but the record keeping for transporters regarding CESQG status and halogen levels are being strengthened. While generators are **NOT** required to keep records, transporters **WILL BE** required to leave a record with the generator.

Mobile lube operators are regulated as Generators. They **SHOULD** have a spill control plan.