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PSEG Used Oil Best Management Practices

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EXAMPLES

- PSEG used oil generated includes:
 - Crankcase oil (fleet vehicles)
 - Lubricating oil (turbine – old X726)
 - Mineral oil (transformers – old X727)
 - PCB contaminated oil (dechlor. or incineration)
 - Pipe cable oil (UG high-voltage transmission)
 - Oil/water (separators, tank cleanouts)
 - Hydraulic fluids (lift trucks, tools / equipment)
 - Compressor oil (A/C units, NG compressors)
 - Metal working oil (pipe cutting)

- Fuels that still have BTU value are products and not used oil



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CLASSIFICATION FOR RECYCLING

- When used oil is generated, do the following in order to ensure the material is properly classified for recycling:
 - confirm oil has not been mixed with a listed HW;
 - confirm if oil has been mixed with a non-'used oil' characteristic waste, that the mixture no longer exhibits the characteristic(s);
 - if analysis reveals > 1,000 ppm total halogens, pursue rebuttable presumption by confirming if oil was mixed with a listed waste and if the halogens are from a source other than a listed waste, (i.e. non-solvent refrigerants, constituents in the oil when it was manufactured, inorganic sources of halogens, such as salt, bleach, etc. - check the MSDS); and
 - confirm oil is destined for recycling



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WAYS TO "REBUT THE PRESUMPTION"

- ❑ Chlorofluorocarbons (CFCs) from refrigeration units [please note that CFCs from solvents such as R-113 are listed hazardous wastes, which makes the used oil a HW]
- ❑ Mixing the used oil with a D-characteristic waste, and the mixture no longer exhibits the characteristic(s) [if it does, then still HW]
- ❑ Constituents in the oil when it was manufactured such as chlorinated paraffins, using the MSDS
- ❑ Chemical compounds in the used oil that are not hazardous waste (involves sampling and analytical testing by a lab)



- Storage:
 - Label each container, AST, UST Fill Pipe “Used Oil”
 - Used Oil storage regulations
 - ❖ 40 CFR 279 – which references 40 CFR 264 & 265
 - ❖ UST - 40 CFR 280
 - ❖ SPCC – 40 CFR 112 as applicable)
- Normally oil not regulated by DOT
 - Transporters need EPA ID #



USED OIL RECYCLING FACILITY

- Due Diligence:
 - Perform site inspection/audit (Use EPA audit checklist)
 - ❖ Check Waste Acceptance Criteria / Testing Results
 - ❖ Enforcement record, status of permits
 - Alternatively, obtain / purchase third – party audit report
 - Master Contract indemnification / insurance provisions
 - Audit Master Contract Supplier's Self-Audit Program
 - Require Master Contract Supplier Field Screens (every container)
 - It only takes one HW drum to contaminate a full tanker



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QUESTIONS?

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