PSEG Used Oil
Best Management Practices

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By Dave Potts & Don Bowman
PSEG Environment, Health & Safety
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
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
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)
LABELLING/MARKING

□ 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
QUESTIONS?

☐ Dave Potts
  Resource Recovery Manager
  (856) 224-1635
david.potts@pseg.com

☐ Don Bowman
  Environmental Policy Manager – Waste
  (856) 224-1640
donald.bowman@pseg.com