

We make things work for the environment.

PSEG Used Oil Best Management Practices

Presentation at the NJDEP Universal Waste & Used Oil Seminar May 6, 2009

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

© PSEG We make things work for you. 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

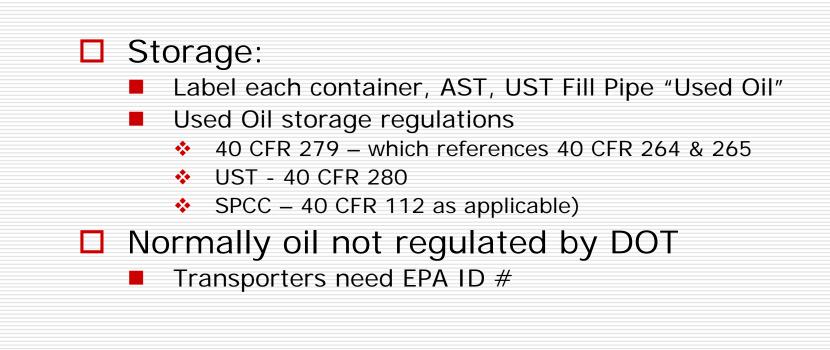


WAYS TO "REBUT THE PRESUMPTION"

- 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





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





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