

<u>SUBJECT</u>		<u>DATE</u>
1056. Hazardous Waste Tanks and the Less than 90-Day Accumulation Time Limit	ENCORE	APR 23, 2015
1057. Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE	APR 30, 2015
1058. Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE	MAY 7, 2015
1059. Decharacterized Wastes, <90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE	MAY 14, 2015
1060. Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE	MAY 21, 2015
1061. Hazardous Debris Macroencapsulation and Size Reduction	ENCORE	MAY 28, 2015
1062. Universal Waste Lamps and Prohibition on Crushing		JUN 4, 2015
1063. F003 Listed Hazardous Waste and the 10% Rule	ENCORE	JUN 11, 2015
1064. F001 - F005 Listed Hazardous Waste and the 10% Rule	ENCORE	JUN 18, 2015
1065. Macroencapsulation of Hazardous Debris and Presence of Free Liquids	ENCORE	JUN 25, 2015
1066. DOT Shipping of Damaged, Defective or Recalled Lithium Batteries		JUL 1, 2015
1067. Used Oil Eligibility for Animal and Vegetable Oils		JUL 9, 2015

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TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

FROM: PAUL W. MARTIN, RCRA Subject Matter Expert
CHPRC Environmental Protection, Hanford, WA

SUBJECT: USED OIL ELIGIBILITY FOR ANIMAL AND VEGETABLE OILS

DATE: JULY 8, 2015

<u>CHPRC Projects</u>	<u>CH PRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Tania Bates Ty Blackford Bob Cathel Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Jim McGrogan Stuart Mortensen Anthony Nagel Dean Nester Dave Richards Phil Sheely Connie Simiele Roni Swan Michael Waters Jeff Widney	Brett Barnes Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Rick Engelmann Ted Hopkins Jim Leary Dale McKenney Jon McKibben Rick Oldham Linda Petersen Fred Ruck Jennie Seaver Ray Swenson Wayne Toebe Lee Tuott Daniel Turlington Dave Watson Joel Williams	Jerry Cammann Jeff Ehlis Garin Erickson Lori Fritz Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Jon Perry Thomas Pysto Christina Robison Don Rokkan Lana Strickling Lou Upton	(TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Cliff Clark Mike Collins Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Greta Davis Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Dan Kimball Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Mandy Pascual Kirk Peterson Jean Quigley	Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Kyle Webster Jeff Westcott Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: Used Oil Eligibility for Animal and Vegetable Oils

Q: A large-scale catering company has collected a 15-gallon pail of animal and vegetable oil. The company has also collected a partially full 55-gallon drum of used oil from maintenance associated with their fleet of catering vans. For convenience, the company would like to combine the 15 gallons of animal and vegetable oil with the drum of used oil for recycling. Can animal and vegetable oil be managed as used oil under [40 CFR 279](#), “Standards for the Management of Used Oil”?

A: Per an EPA guidance memo dated February 7, 1997, “[Applicability of used oil management standards to vegetable oil and animal oil](#)”, it stated:

"The used oil management rules define 'used oil' in 40 CFR § 279.1, as 'any oil that has been refined from crude oil, or any synthetic oil that has been used and as a result of such use is contaminated by chemical or physical impurities.' Since animal and vegetable oils are not synthetic or derived from crude oil, they are not regulated as used oil under the used oil management standards."

Therefore the animal and vegetable oil cannot be managed as used oil since the definition of used oil includes any oil refined from crude oil or synthetic oils, as opposed to oil collected from animals or vegetables.

SUMMARY:

- Used oil is any oil refined from crude oil, or any synthetic oil that has been used and as a result of such use is contaminated with chemical or physical impurities.
- Animal and vegetable oils are not refined from crude oil and are not synthetic oil.
- Therefore, animal and vegetable oils are not eligible for management as used oil.

The February 7, 2007 EPA memo is attached to the e-mail. If you have any questions, please contact me at "Paul_W_Martin@rl.gov" or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 7/9/15

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Used Oil Eligibility for Animal and Vegetable Oils

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

FEB 7, 1997

MEMORANDUM

SUBJECT: Applicability of Used Oil Management Standards to Vegetable Oil and Animal Oil

FROM: Michael Shapiro, Director
Office of Solid Waste

TO: Rich Vaille, Chief
State Programs & Compliance Branch

This is in response to your December 5, 1996 memorandum concerning the regulatory status of vegetable oil and animal oil under the used oil regulations at 40 CFR 279. Your memorandum requests clarification on whether the definition of used oil includes animal and vegetable oils.

The used oil management rules define "used oil" in 40 CFR § 279.1. as "any oil that has been refined from crude oil, or any synthetic oil that has been used and as a result of such use is contaminated by chemical or physical impurities." Since animal and vegetable oils are not synthetic or derived from crude oil, they are not regulated as used oil under the used oil management standards. A more detailed discussion of the definition of used oil may be found in the preamble discussion to the used oil management standards in the September 10, 1992 Federal Register (57 FR 41566, 41573 - 41574).

I hope this information is helpful to you. For further information regarding the used oil regulations, please call Rita Cestaric at (703) 308-0769.

Faxback#

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FROM: Paul W. Martin

DATE: 7/9/15

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