

<u>SUBJECT</u>		<u>DATE</u>
1320.	Treated Hazardous Waste Used as Dust Suppressant	FEB 28, 2019
1321.	Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE MAR 7, 2019
1322.	Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE MAR 14, 2019
1323.	Decharacterized Wastes, ≤90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE MAR 21, 2019
1324.	Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE MAR 28, 2019
1325.	PCB Decontamination Standard with No Decontamination Performed	ENCORE APR 4, 2019
1326.	PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required?	ENCORE APR 11, 2019
1327.	PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel	ENCORE APR 18, 2019
1328.	PCB Concentrations and Micrograms per Centimeters Squared (µg/cm <sup>2</sup> )	ENCORE APR 25, 2019
1329.	Operating Record vs. Operating Log	ENCORE MAY 2, 2019
1330.	Operating Records Not Referenced in the “Operating Record” Regulations	ENCORE MAY 9, 2019
1331.	Washington State Used Oil and Mixtures with Other Materials	ENCORE MAY 16, 2019
1332.	Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE MAY 23, 2019
1333.	Printed Circuit Board Recycling – Shredded vs. Whole	ENCORE MAY 30, 2019
1334.	Universal Waste Alkaline Batteries and Self-Transportation	ENCORE JUN 6, 2019
1335.	Universal Waste Lithium Batteries and Self-Transportation	ENCORE JUN 13, 2019
1336.	RCRA Hazard Labeling – A Random Scenario	ENCORE JUN 20, 2019
1337.	Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch	ENCORE JUN 27, 2019
1338.	Unused Paraformaldehyde - U Listed Hazardous Waste or Not?	ENCORE JUL 3, 2019
1339.	The Hazardous Waste Characteristic of Reactivity (D003)	ENCORE JUL 11, 2019
1340.	Central Accumulation Areas and Signage Requirements	ENCORE JUL 18, 2019
1341.	RCRA EPA Identification Numbers – Site Specifics	ENCORE JUL 25, 2019
1342.	RCRA EPA Identification Numbers – Transporters	ENCORE AUG 1, 2019
1343.	Paint Wastes and the Applicability of the F001-F005 Listings to Ingredients	ENCORE AUG 8, 2019
1344.	F Listings and Ingredients in Commercial Chemical Product Formulations	ENCORE AUG 15, 2019
1345.	PCB Containers and ≥50 ppm	ENCORE AUG 22, 2019
1346.	CERCLA Hazardous Substances – The Petroleum Exclusion	ENCORE AUG 29, 2019
1347.	PCB Concentration Assumptions for Use vs. PCB Disposal	ENCORE SEP 5, 2019
1348.	RCRA LR One-Year Storage Prohibition vs., PCB One-Year Disposal Time Limit	ENCORE SEP 12, 2019
1349.	Regulatory Status of PCB Remediation Wastes Disposed Prior to April 18, 1978	ENCORE SEP 19, 2019
1350.	Regulatory Status of PCB Remediation Wastes Disposed Prior to April 18, 1978 – A Follow-Up	ENCORE SEP 26, 2019
1351.	PCB Waste Regulation and April 18, 1978 vs. July 2, 1979	ENCORE OCT 3, 2019
1352.	PCB Waste Storage Limitations and the One-Year Extension	ENCORE OCT 10, 2019
1353.	PCB Waste Storage Limitations and the PCB Radioactive Waste Exemption	ENCORE OCT 17, 2019
1354.	LDR One-Year Storage Prohibition and Generator Permitted Storage	ENCORE OCT 24, 2019
1355.	LDR Notification/Certification and Generator Permitted Storage	ENCORE OCT 31, 2019
1356.	Disposing of PCB Ballasts with PCB Potting Material	ENCORE NOV 7, 2019
1357.	Fluorescent Light Ballasts and PCB Annual Reporting	ENCORE NOV 14, 2019
1358.	Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents	ENCORE NOV 21, 2019
1359.	Multiple Characteristic and Listed Hazardous Waste Codes and the “in lieu of” LDR Principle	ENCORE NOV 26, 2019
1360.	Universal Waste Lamps and Prohibition on Crushing	ENCORE DEC 5, 2019
1361.	Used Oil and Weekly Inspections	ENCORE DEC 12, 2019
1362.	Used Oil and Keeping Containers Closed – Washington State vs. the Feds	ENCORE DEC 19, 2019
1363.	’Twas the Night Before Christmas – The Twenty-Sixth Annual Edition	ENCORE DEC 24, 2019
1364.	Generator Weekly Inspection Log Documentation – Federal vs. WA State	ENCORE JAN 2, 2020
1365.	PCB Reporting and Recordkeeping Relief	ENCORE JAN 9, 2020
1366.	Satellite Accumulation and Product Vessel Cleanouts	ENCORE JAN 16, 2020
1367.	TSDF Requirements When Shipping Dangerous Waste to another TSDF	ENCORE JAN 23, 2020
1368.	The Hazardous Waste Manifest Instructions – Where did they go?	ENCORE JAN 30, 2020
1369.	The Mixtures Rule – Washington State vs. The Feds	ENCORE FEB 6, 2020
1370.	Used Oil and the Rebuttable Presumption	ENCORE FEB 13, 2020
1371.	Used Oil, Secondary Containment and Response to Spills	ENCORE FEB 20, 2020
1372.	Used Oil Eligibility for Animal and Vegetable Oils	ENCORE FEB 27, 2020

## 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:** FEBRUARY 27, 2020

<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>
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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 55-gallon drum of used oil from maintenance associated with their fleet of catering vans. The company would like to send the 15-gallon pail of animal and vegetable oil with the 55-gallon 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" ([RO 14018](#)), 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 caterer cannot manage animal and vegetable oil 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 because 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](mailto:Paul.W.Martin@rl.gov) or at (509) 376-6620.

## 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# 14018