

Interpretive Memo

Requirements for Used Oil Collection Centers and Aggregation Points

Used oil includes oil refined from crude oil and synthetic oil that has been used and has become contaminated. It does not include vegetable or animal oil, petroleum-derived products like antifreeze or petroleum distillates used as solvents. The used oil management standards [6 CCR 1007-3 Part 279] were written under the presumption that all used oil will be recycled. If recycled, used oil is generally not regulated as hazardous waste unless it is mixed with hazardous waste such as solvents use for cleaning or degreasing activities (e.g., engine or carburetor cleaning).

To facilitate recycling, the management standards allow collection centers and aggregation points to accumulate and store used oil from facilities that generate small quantities of used oil as part of their business. Collection centers and aggregation points are also encouraged to accept used oil from household do-it-yourselfers that change the oil in their own vehicles.

Used Oil Management Requirements

Do-it-yourselfer Used Oil Collection Center	Used Oil Collection Center	Aggregation Point
Collection Options		
	Aggregates and stores used oil collected from other sites owned or operated by the owner of the collection center	Aggregates and stores used oil collected ONLY from other sites owned or operated by the owner of the aggregation point
	Aggregates and stores used oil collected from other used oil generators	
Aggregates and stores used oil collected ONLY from household do-it-yourselfers	May also accept used oil from household do-it-yourselfers	May also accept used oil from household do-it-yourselfers
Regulatory Requirements		
Must comply with used oil generator standards ¹	Must comply with used oil generator standards ¹	Must comply with used oil generator standards ¹
	Must notify the Department and receive an EPA Identification Number as a used oil collection center	
Recycling Options		
May be burned in a space heater without testing	Must be determined to be on-specification before it can be burned in a space heater	May be burned in a space heater without testing

¹ 6 CCR 1007-3 Part 279 Subpart C, available at <http://www.cdphe.state.co.us/regulations/hazwaste/10073279hazwasteusedoil.pdf>

Used Oil Generator/Storage Standards

All collection centers and aggregation points are required to comply with the use oil generator standards. In essence, these include:

- tanks, containers, drain pans and fill ports leading to remote storage tanks must be labeled with the words “Used Oil”
- tanks and containers must be kept closed if stored outside
- tanks and containers must be in good condition (no severe dents, not rusted, not leaking)
- spills must be cleaned up promptly. Cleanup steps include stopping and containing the release, properly managing and disposing of not only the used oil but other impacted media such as soil, and taking steps as necessary to prevent recurrence of the release.

A used oil generator can self-transport up to 55 gallons of their own used oil at a time to a used oil collection center or aggregation point in a vehicle that they own or that is owned by one of their employees. If the generator transports more than 55 gallons of used oil at a time, they are a used oil transporter and must comply with the used oil transporter requirements found in 6 CCR 1007-3 Part 279 Subpart E, available at <http://www.cdphe.state.co.us/regulations/hazwaste/10073279hazwasteusedoil.pdf>.

When the accumulated used oil is shipped offsite from the recycling center or aggregations point for recycling, the owner or operator of the collection center or aggregation point must ensure that the oil is transported by a used oil transporter that has a valid EPA identification number. A used oil transporter can only deliver the used oil to another used oil transporter, a processor/re-refiner or to an off-specification or on-specification burner.

Note: If you store used oil in an underground storage tank with capacity greater than 110 gallons or in an aboveground storage tank with capacity greater than 660 gallons, your tank must be registered with the Division of Oil and Public Safety at the Colorado Department of Labor and Employment (ph. 303-318-8547 or <http://oil.cdle.state.co.us>).

Burning Used Oil in a Space Heater

A used oil generator can burn their own used oil and used oil that they received from household do-it-yourselfers in a shop space heater as long as the heater has a capacity of 500,000 BTU per hour or less and combustion gases are vented to the outside. Used oil collection centers that aggregate used oil from other generators cannot burn this oil unless it has been determined that the used oil is on-specification. This involves laboratory analysis of the oil to show that it meets the used oil specifications. The first one to declare that used oil meets the used oil specifications must also meet the requirements for a used oil fuel marketer (6 CCR 1007-3 Part 279 Subpart H), including notification to the Colorado Department of Public Health and Environment and detailed record keeping. Off-specification used oil can only be burned for energy recovery in a permitted industrial furnace, boiler or hazardous waste incinerator.

Used Oil Specifications

Constituent/property	Allowable level
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Flash point	100 deg F minimum
Total halogens	4000 ppm maximum (if successfully rebutted ²)

² Used oil containing more than 1000 ppm total halogens is presumed to have been mixed with hazardous waste and is regulated as hazardous waste. A used oil generator can challenge (rebut) this assumption by using analytical or other means to demonstrate that the used oil doesn't contain hazardous waste.

For More Information

Management Standards for Used Oil Generators Guidance Document (www.cdphe.state.co.us/hm/oilgen.pdf)

Management Standards for Used Oil Transporters Guidance Document (<http://www.cdphe.state.co.us/hm/oiltrans.pdf>)

Contact the Customer Technical Assistance Program at 303-692-3320 (888-569-1831 ext. 3320 toll-free) or email comments.hmwm@state.co.us

