

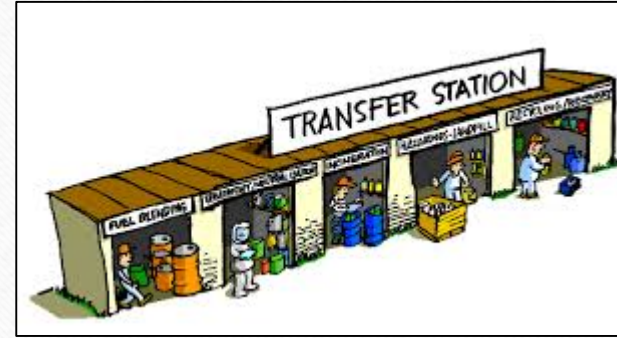
PCB Contamination of Waste Oil Collected by Municipalities



Ross Bunnell, CT DEEP



Recent Incident at a Municipal Transfer Station



- A MTS in CT unknowingly received PCB-contaminated waste oil.
- 1,000 gallons pumped into hauler's truck, which also picked up other loads.
- Waste oil was tested for total halogens prior to shipment off-site.
- Used Clor-D-Tect 1000 Field Test Kit.
- Waste oil “passed” the test kit (< 1,000 ppm total halogens).
- Hauler took oil to a recycling facility – put in a 15,000 gallon tank with other oil.
- PCBs detected at recycling facility and traced back to the MTS.

Consequences



- Disposal of 15,000 gals as PCB waste (~\$110,000).
- Loss of revenue at recycling facility while tank was out of service (~\$15,000).
- Removal of contaminated tanks at MTS and decon of storage areas (~\$35,000).
- Purchase and installation of a new waste oil tank at MTS (~\$8,000).
- Costs incurred by hauler (> \$37,000).
- Hauler now requires PCB testing on all loads that they pick up.

Is Testing Required?



- MTSGP has no specific testing requirement, but...
 - CT Used Oil Regulations apply to waste oil collected by municipalities.
 - These regulations require testing for total halogens.
 - If $> 1,000$ ppm – presumed to be contaminated with hazardous waste.
- Federal and State PCB regulations do not specifically require testing, but...
 - Waste oil with PCBs > 50 ppm are subject to special federal disposal requirements.
 - Used oil that is burned as a fuel is subject to special requirements (down to 2 ppm).
 - Waste oils with PCBs > 1 ppm are subject to state PCB rules (CR01).
 - **Non-compliance with any of the above can result in enforcement and penalties.**

How to Prevent Contamination Incidents

- RCSA Section 22a-241b requires municipalities to provide for the recycling of “waste oil” generated by residents:
 - Does not apply to waste oil from non-residences (e.g., businesses, etc.).
 - PCBs more likely to be found in waste oil from businesses, etc.
 - “Waste Oil” is defined as crank case oil from internal combustion engines.
 - Other types of oil are not required to be collected, and are more likely to be contaminated than crank case oil.
 - MTS collection tank is not the only option for “providing for recycling” of waste oil.



Prevention, Part 2

- Testing:
 - Only way to ensure your waste oil isn't contaminated with PCBs is to test it prior to shipment off-site.
 - Total halogen and other field test kits can provide information about PCB contamination, but are not accurate or sensitive enough.
 - EPA Method 8082A, or other EPA-approved laboratory test.
 - Cost is typically < \$100.
 - Think of it as an insurance policy.



Prevention, Part 3

- How you store waste oil:
 - Tanks vs. containers.
 - One tank or multiple tanks.
- Hauler/Recycler issues:
 - “Milk Runs.”
 - Retain samples.
 - Sampled for PCBs prior to recycling?



Prevention, Part 4



- Screening of waste oil dropped off at MTSs:
 - Diligently follow MTS GP requirements re security of tanks/containers, addition of oil to tanks/containers, etc.
 - Prohibit non-residential users or keep their waste oil separate from residential.
 - Ask people dropping off waste oil if it is contaminated.
 - Use sign-in logs or certifications.
 - Be on the lookout for high-risk items: dielectric oils, old hydraulic oils, Heathkit “Cantennas.”
- Check to see if your insurance would cover a contamination incident.

Questions?

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