

RCRA, SUPERFUND & EPCRA CALL CENTER MONTHLY REPORT
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1. Testing Frequency for Specifications of Used Oil Burned for Energy Recovery

Any person who first claims that used oil that is to be burned for energy recovery meets the specifications outlined in 40 CFR Section 279.11 is a used oil marketer (Section 279.72). Must a used oil marketer test the used oil to determine the specifications? How often must a used oil marketer perform analysis of the used oil or update specification data to ensure that the used oil meets specification?

The specification determination may be made either by testing the used oil or by using historical analytical results, other handler's testing results, or personal knowledge of the source and composition of the used oil. The frequency of analysis of the used oil depends on a number of site-specific considerations. For example, if some action, mixing, or storage condition affects the physical or chemical composition of the used oil, a marketer must re-evaluate the specification of the used oil (Memo, Shapiro to Dixon; November 27, 1996). Used oil handlers making a specification claim should provide documentation of testing and sampling methods used as well as the frequency of sampling in the facility's records (57 FR 41566, 41597; September 10, 1992).