

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

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: Used Oil Recycling

FROM: Elizabeth A. Cotsworth, Acting Director
Office of Solid Waste

TO: Margo T. Oge, Director
Office of Mobile Sources

Thank you for allowing us the continued opportunity to provide input and expertise for your evaluation of truck engine devices that continuously inject used oil from the engine's crankcase into the fuel system. As you are aware, most used oil is recycled by burning it for energy recovery (including used oil burned in diesel engines). There are also other limited options for used oil recycling including processing for reuse and re-refining. In your recent memo, you requested that the Office of Solid Waste (OSW) reassess the overall environmental and human health impacts associated with used oil recycling. We currently don't have sufficient resources to reevaluate used oil recycling, and I would like to set up a meeting with you to further discuss this matter.

Your office has expressed a general concern about the air emissions from burning of used oil for energy recovery, however no specific information that would help us determine that this is a high priority issue that WC should revisit has been provided. Currently, OSW's combustion related efforts are fully directed towards the combustion of hazardous wastes. I would like to schedule a meeting with you during January or February 1998 to discuss your office's concerns about used oil recycling. In this meeting, I would ask you to provide any information that your office may have that would suggest that combustion of used oil should be a high priority for our limited combustion regulation resources. I would also like to hear about any discussions you have had within the Office of Air and Radiation (OAR) as to whether OAR could assess and, if appropriate, regulate combustion of used oil under Maximum Achievable Control Technology rules, State Implementation Plans, or section 129 of the Clean Air Act. WC have been involved in OAR's current effort that is looking at whether to exempt used oil from section 129 of the Clean Air Act.

I would again like to thank you for the continued opportunity to provide input to your current efforts. For any information regarding used oil, your staff can contact Tom Rinehart of my staff directly at (703) 308-4309.