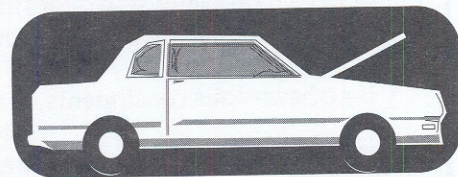


AUTOMOBILE DEALERS

FACT SHEET

Handling and Disposal of Oil-Water Separator Sludge



What is oil-water separator sludge?

"Oil-water separator sludge" refers to the material that settles out over time and accumulates at the bottom of a separator unit. This sludge is a semi-solid to liquid material (e.g., high solid, low liquid content) and may consist of "dirt" particles, oils, solvents, and other materials. The makeup of the sludge depends on the types and quantities of materials that are put in to the separator for processing.

How is oil-water separator sludge typically disposed?

Many facilities have their oil-water separator sludge collected for disposal by septic tank companies, separator manufacturers, remediation contractors, or major waste management companies. Others test the sludges and have the waste either drummed and shipped as hazardous waste (if it tests as hazardous) or dried and disposed in a landfill (if it tests as nonhazardous). Some sludges are sent for energy recovery in soil burners, cement kilns, or other types of units.

Is oil-water separator sludge hazardous waste?

Under federal law, oil-water separator sludge is nonhazardous and should be managed as used oil if it is recycled and meets the following criteria: (1) the oil in the oil-water separator sludge meets EPA's used oil definition, (2) it has not

been mixed with hazardous waste, and (3) total halogens are less than 1,000 parts per million (ppm).

For oily wastes that do not meet the definition of used oil, sludges should be tested using the toxicity characteristic leaching procedure (TCLP) to determine whether they exhibit a hazardous waste characteristic. The presence of hazardous constituents in sludge may result from the intentional or inadvertent input of solvents and/or other hazardous materials into the separator. In addition, the storage of volatile chemicals such as solvents, aerosols, and gasoline near a separator may cause hazardous constituents to be

"picked up" by the oil and eventually end up in the sludge.

Some states have adopted federal guidelines and do not require testing since used oil is not considered hazardous. Many states, however, consider separator sludge to be potentially hazardous and require it to be tested for hazardous waste characteristics prior to disposal as nonhazardous waste. In states where used oil is a special waste, nonhazardous sludge would be characterized as a special waste (e.g., *Illinois*). In states where used oil is a hazardous waste, the sludge would then be characterized as hazardous waste (e.g., *Massachusetts, Vermont*).

DOES OIL-WATER SEPARATOR SLUDGE TYPICALLY TEST AS HAZARDOUS OR NONHAZARDOUS?

- The U.S. Postal Service's TCLP data indicate that oil-water separator sludge is generally nonhazardous once pollution prevention measures, such as the elimination of halogenated solvents, are implemented. Without these measures, the data show that the sludge generally tested as hazardous. Test results varied by facility, largely due to varying types of chemical products and handling procedures used at each facility.
- Data collected by one major waste management company also indicate that results depend on the processes and materials used at the facility. Another major waste management company's testing of oil-water wastes from various vehicle maintenance shops in one state resulted in a nonhazardous waste profile.
- One state environmental agency noted that oil-water separator sludge does not typically test as hazardous, especially from new car dealerships, unless it is mixed with other compounds such as solvents. Their data did indicate that facilities where older cars are serviced more frequently generate sludges that test hazardous.

RECOMMENDED BEST MANAGEMENT PRACTICES

- Minimize the input of hazardous materials into the oil-water waste stream. Perform regular separator maintenance.
- Determine whether oil-water separator sludge is hazardous or "special" under state environmental law or policy. If oil-water separator sludge is not hazardous or "special" in your state, determine whether any hazardous constituents were purposely or inadvertently added to the oil-water waste stream.
- If no hazardous constituents were added, the sludge is nonhazardous under EPA's used oil definition.
- If hazardous constituents were added, and/or if your state agency requires, have the sludge TCLP tested periodically for the eight listed heavy metals, benzene, and cresols.
- If TCLP results show that the sludge is not hazardous, or if no testing was performed because the waste stream can be managed under the used oil regulations, properly dispose the sludge at a local sanitary landfill, send to a waste water treatment facility, or recycle the sludge through landspreading.

How should dealerships dispose of oil-water separator sludge?

Hazardous oil-water separator sludge must be disposed in accordance with hazardous waste regulations. If the sludge is considered nonhazardous, it may be dried and disposed at a local sanitary landfill, sent to a wastewater treatment facility, or used for land application.

Contact your state environmental agency, since states often have more stringent restrictions than federal law. Disposal requirements for nonhazardous sludge vary by state. In some states, landfills may have special requirements for accepting sludge materials, or may require (industrial) landfills to be specially permitted. In addition, many states have their own regulations on the landspreading of nonhazardous industrial waste. Generators supplying sludge for land application must ensure that all applicable requirements are met.

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How can dealerships minimize oil-water separator sludge disposal costs and liability?

- Keep "hazardous" materials out of the oil-water waste stream (e.g., halogenated solvents, volatile chemicals).
 - Minimize the use of hazardous materials.
 - Collect and store volatile chemicals, including gasoline, away from the separator.
 - Use separate drip pans for different fluids.
 - Immediately capture and clean up all liquid spills.
 - Use only mild soaps to clean up oil spills and shop floors.
- Prevent oil drips and spills from reaching floors.
 - Use funnels or fill tubes when transferring oils.
 - Place drip pans under leaking vehicles.
 - Place oil-laden parts on drip pans.
 - Store drip pans carefully to avoid oil spills.
- Perform regular separator maintenance, including removal of sludge, to minimize the potential for accumulation of high levels of hazardous contaminants.

Do you need more information?

Contact your state environmental agency or state dealer association for state-specific regulatory interpretations. Some pollution prevention/recycling/reuse practices encouraged in some states are not allowed in others. For more information on successful best management practices and for state agency contacts, call your state automobile dealers association or:

National Automobile Dealers Association

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