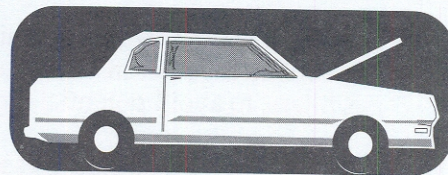


AUTOMOBILE DEALERS FACT SHEET

Handling and Disposal of In-Line Gasoline Filters



How are in-line gasoline filters typically disposed?

Some shops discard used fuel filters in the regular trash, generally after draining as much gasoline out as possible. Other shops include them in drums with used oil filters for recycling. Still other shops have gas filters picked up as hazardous waste.

Are gas filters hazardous waste?

In-line gasoline filters must either be disposed as hazardous or tested using the toxicity characteristic leaching procedure (TCLP). If TCLP testing results exceed regulatory levels for any toxicity characteristic (e.g., benzene) or meet the criteria for any other hazardous characteristic (e.g., ignitability), then hazardous waste disposal is required. If the filters are dry (and therefore, not ignitable) and no toxicity levels are exceeded, they may be disposed as nonhazardous.

In order to determine what disposal method is actually required at your facility, state environmental agencies must be consulted. There are no clear and consistent regulatory interpretations or guidelines for handling and

disposing gasoline filters. Several states are currently formulating policies concerning this issue.

In many states, in-line gasoline filters are required to be tested for hazardous waste characteristics, in line with general federal requirements for potentially hazardous materials. In other states, testing is not required if the filters are to be managed as hazardous waste.

A few states allow gasoline filters to be handled as nonhazardous if either the fuel trapped in the filter or the

paper and metal casing are destined to be recycled (e.g., *Florida*). The fuel, which is mixed with used oil and recycled through burning for energy recovery, must be drained and stored in an area that allows venting and prevents sparks. If, however, the gas is intended to be disposed and not recycled, then the filter is considered a solid waste and must be TCLP tested to determine if it is hazardous. Many oil filter recycling companies in *Florida* accept fuel filters along with oil filters, as long as they make up only a small percentage of the volume of each drum. Finally, some states require

DO GAS FILTERS TYPICALLY TEST AS HAZARDOUS OR NONHAZARDOUS?

- The U.S. Postal Service's TCLP data on gas filters show that some filters test as hazardous and some do not. "Hazardous" fuel filters show levels exceeding TCLP thresholds for benzene or lead, or are shown to be ignitable.
- Test data from two major waste management companies indicate that fuel filters may test as hazardous for benzene and sometimes for lead, and/or are ignitable.
- Testing results for gas filters vary from hazardous (usually for benzene, ignitability, or heavy metals) to nonhazardous. The inconsistency in results is due, in part, to varying amounts of gasoline remaining in the filter and differences in storage and handling conditions.

RECOMMENDED BEST MANAGEMENT PRACTICES

- Drain or crush filters, removing as much gasoline content as possible. Have metal cartridges recycled for scrap metal content and paper filter material (with any remaining gas residue) burned for energy recovery.
- If allowed by your waste handling company, recycle used gasoline filters with used oil filters. Store these filters together in a drum containing significantly more oil filters than gas filters (e.g., 10 percent gas filters, to avoid potential ignition of fuel residue).
- When storing and handling gasoline filters, prevent the build-up of potentially ignitable gas fumes and avoid any nearby ignition sources.
- If the above methods are not allowed in your state or are not possible, evaluate whether it makes best economic sense to either dispose as hazardous waste or test the filters for hazardous waste characteristics (e.g., ignitability and toxicity). Base this evaluation on waste volumes requiring testing, hazardous waste disposal costs in the area, and state rules.

disposal of these gasoline filters as special or hazardous wastes, even if TCLP tested as nonhazardous (e.g., Illinois, Vermont).

How should dealerships dispose of in-line gasoline filters?

Based on the inconsistency of available data, gasoline filters should be handled, at a minimum, as potentially hazardous waste. Have your in-line gasoline filters either picked up by a licensed hazardous waste hauler and disposed in accordance with hazardous waste regulations, or periodically TCLP tested to determine whether they can be disposed as nonhazardous industrial waste. Dispose nonhazardous gas filters in the regular trash, or a special waste landfill, depending on state regulations and disposal company/landfill acceptance requirements.

How can dealerships minimize in-line gasoline filter disposal costs and liability?

The following methods may be used to minimize the possibility of in-line gasoline filters being hazardous:

- Fully drain gas filters prior to disposal.
- Puncture filters to promote drainage of free-flowing gas.
- Crush filters to enhance gas removal, if possible (e.g., possibly using in-house fuel filter crushers).
- Recycle drained and/or crushed used filters as scrap metal and fuel residue and paper filter material for burning as fuel.

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:

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