

Used Antifreeze Management

Purpose

The Department is concerned that the burden faced by generators in determining what constitutes a representative sample of various antifreeze wastestreams, and the expense of conducting analytical analyses for hazardous waste determinations impedes recycling efforts. The purpose of this guidance is to encourage environmentally sound recycling of used antifreeze and promote antifreeze management activities that are protective of human health and the environment. Generators may follow the best management practices outlined in this guidance to ensure compliance with the State's hazardous waste regulations.

Based on available analytical studies the Department finds that used antifreeze generated from motor vehicles, motorized equipment, industrial/commercial processes and deicing activities, that is recycled and managed according to the best management practices outlined herein, generally does not exhibit hazardous waste characteristics.

Therefore, used antifreeze managed according to these best management practices will be presumed to be managed in accordance with the State's hazardous waste regulations.

To promote recycling the Department intends to adopt rules to allow an alternative management program for antifreeze that is recycled. In the interim, this guidance is adopted to provide guidance regarding used antifreeze management.

Applicability

This guidance is applicable to generators and recyclers of used antifreeze. Used antifreeze is defined as a solution of ethylene glycol or propylene glycol, water and additives, which has been used as a coolant in motor vehicles or motorized equipment (either stationary or mobile), industrial/commercial processes, or as a deicing material. For purposes of this guidance, qualifying recycling activities include the filtering, distillation, and

addition of additives to processed antifreeze to make a useable glycol product.

This guidance statement is intended solely as guidance for employees of the Department of Environmental Quality (DEQ). It does not constitute rulemaking by the Environmental Quality Commission and may not be relied upon to create a right or benefit, substantive or procedural, enforceable by law or in equity, by any person.

Discussion

Used antifreeze that is recycled on-site or off-site shall be presumed to be managed in accordance with 40 CFR 262 - 270 and OAR Chapter 340 Division 100 - 106, provided the following best management practices are employed to ensure protection of human health and the environment. Used antifreeze that is to be recycled does not count toward monthly hazardous waste generator totals.

Used Antifreeze Best Management Practices

1. Immediately contain used antifreeze and store it in compatible containers that are in good condition and labeled "Used Antifreeze."
2. Used antifreeze must not be mixed with any waste or other material (e.g., solvents, cooling system flushes, used oil, motor fuels).
3. Antifreeze collection, storage and transport containers or tanks must be dedicated solely to the transfer and storage of antifreeze, in order to minimize the risk of cross-contamination.
4. Used antifreeze containers must be kept closed, except when emptying or filling, to minimize the potential for spillage.



State of Oregon
Department of
Environmental
Quality

Hazardous Waste

700 NE Multnomah St.,
Suite 600

Portland, OR 97232-4100

Phone: 503-229-5696

800-452-4011

Fax: 503-229-5675

<http://www.oregon.gov/DEQ/>

5. Used antifreeze containers must be located in a secure area and properly maintained so that they do not leak, rupture, or tip over when being opened, handled, or stored.
6. Spills of used antifreeze must be cleaned up immediately and appropriately managed. (Non-recyclable spill cleanup wastes must undergo a hazardous waste determination prior to disposal.)
7. Volumes of accumulated used antifreeze should be minimized by routinely recycling to reduce the potential for environmental harm. Used antifreeze shall not be stored for longer than 12 months prior to recycling.
8. Proof of recycling (e.g., a log for on-site recycling or an invoice or bill of lading for off-site recycling) must be maintained by the generator and recycling facility.
9. Generators shall inform employees who handle or otherwise manage used antifreeze of proper handling and spill response procedures.

Used antifreeze that is not legitimately recycled according to all of the above best management practices is subject to applicable regulation under 40 CFR Parts 260 - 270 (OAR Chapter 340 Divisions 100-106 and 111). Used antifreeze mixed with other waste or material, such as mixing automobile antifreeze with caustic radiator flushing chemicals, or mixing antifreeze with used oil for the purpose of burning for energy recovery, is not considered legitimate recycling under this guidance. Generators are responsible for conducting hazardous waste determinations for these used antifreeze wastes. If the waste is determined to be a hazardous waste it must be managed and properly disposed of as such.

Transportation of Used Antifreeze

Used antifreeze destined for recycling as delineated by this guidance is presumed to be managed in accordance with the state's hazardous waste management requirements. Transportation of used antifreeze that has been managed by a generator in accordance

with this guidance does not require a hazardous waste manifest in Oregon. Generators may self-transport their antifreeze to a collection or recycling facility. Generators transporting used antifreeze outside of Oregon must comply with the laws of the receiving state(s).

Antifreeze Recycling Facilities

Generators may recycle their antifreeze on-site or transport it to an off-site facility approved to process used antifreeze by the EPA or the State authority for the facility's location. A hazardous waste determination must be made on any antifreeze waste which is not recyclable and any residues from the distillation/recycling of used antifreeze, including still bottoms and filters generated from recycling process equipment.

Off-site commercial antifreeze recycling facilities in Oregon are required to obtain and operate in accordance with a site-specific solid waste permit. Recycling facilities must maintain records adequate to document that received antifreeze has been recycled, including information regarding shipments and quantities received, amounts treated, wastes generated, waste shipped, product recovered, and product shipped. Commercial recycling facilities will not be required to conduct a hazardous waste determination on used antifreeze received provided the recycling facility manages and legitimately recycles the antifreeze in accordance with these best management practices and the operating permit.

Alternative formats

Documents can be provided upon request in an alternate format for individuals with disabilities or in a language other than English for people with limited English skills. To request a document in another format or language, call DEQ in Portland at 503-229-5696, or toll-free in Oregon at 1-800-452-4011 or email deqinfo@deq.state.or.us.