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Running a Mobile Oil Changing Business? Know Your Ohio EPA Regulations . . .

Mobile oil changing services generate used oil, used oil filters and other wastes that, if not properly managed, can pose an environmental threat and lead to violations. Therefore, it's important that mobile oil changing services understand and comply with the environmental requirements. This fact sheet will help you understand the regulations that might apply to your used oil changing business. Terms in bold are defined in the glossary at the end of this fact sheet.



What regulations apply to my mobile oil changing business?

Mobile oil change businesses must comply with the used oil regulations found in Chapter 3745-279 of the Ohio Administrative Code (OAC). Mobile oil changers are defined as "generators" of used oil. Most generator requirements relate to good housekeeping practices and proper on-site management of used oil. Other activities, including transportation and used oil storage, may also be regulated. The regulations also require used oil to be sent to a recycling or disposal facility; recycling is the recommended option.

After I change oil at a customer's business, I want to transport it. What regulations apply to me?

If you transport less than 55 gallons of used oil from your customers' sites to either your business or a **used oil collection center**, you do not need to register with Ohio EPA as a transporter. If you take used oil back to your business, this would be considered a used oil **aggregation point**. If you take used oil to a collection center, the center must be registered with Ohio EPA. In these situations, Ohio EPA's regulations do not require you to complete shipping papers to pick up the used oil. If you want to do so, though, it's a good idea.

If you transport more than 55 gallons of used oil, or take it somewhere besides your business location or a collection center, then you need to register with Ohio EPA as a transporter. You must also comply with other transporter regulations, including completing shipping papers and having procedures in place to respond to spills.

IMPORTANT:

Under Ohio EPA's regulations, you CANNOT dispose of used oil by throwing it on the ground, down a septic system or into the trash! Also, you CANNOT put used oil on the ground to control weeds or suppress dust on your property.

What are my basic responsibilities as a used oil generator?

Once you change oil at a customer's business, you become a used oil generator. As a used oil generator:

- Containers and tanks must be in good condition and labeled with the words "used oil." This applies to containers/tanks that you transport used oil in and containers/tanks that you store used oil in at your business.
- If a spill occurs, clean it up and properly manage wastes or residues generated from the cleanup. You need to evaluate these materials to see if they are hazardous before disposal. All oil spills must be cleaned up, regardless of the amount spilled.
- Ensure that used oil is not mixed with waste or other materials that might cause it to become a hazardous waste such as solvents, gasoline or other chemicals.
- If you have a transporter pick up used oil from your business, they must have an identification number from Ohio EPA's Division of Hazardous Waste Management (DHWM).

For questions on these general requirements, or to check if your transporter has an identification number, you can contact DHWM at (614) 644-2917.

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Do I have to comply with the Spill Prevention Control and Countermeasure (SPCC) requirements?

If you store used oil at your business, you may need to comply with the Spill Prevention Control and Countermeasure (SPCC) regulations. You are subject to the SPCC rules if you have a total aboveground on-site storage capacity of more than 1,320 gallons.

The SPCC rules apply to used oil and oil products stored at your business. The total capacity of your tanks or containers must be considered, not the actual amount of oil stored or the portion commonly used. If you are storing oil in containers that are less than 55 gallons in size, you do not need to include these in calculating your SPCC storage capacity.

Under the SPCC rules, you must develop a spill prevention plan and provide secondary containment for storage areas. Contact Ohio EPA's Division of Emergency and Remedial Response (DERR) at your local district office for more information on the SPCC rules. See the resource list at the end of this fact sheet for links to more information on SPCC requirements.

If you store used oil in an underground tank, you must comply with the Bureau of Underground Storage Tanks Regulations (BUSTR), State Fire Marshal's Office.

What are the options for managing used oil?

Once you collect used oil, you are required to send it off-site for recycling or disposal. The used oil regulations encourage recycling used oil through reconditioning, re-refining, reusing or burning for energy recovery. For a list of used oil recyclers, visit www.epa.state.oh.us/ocapp/recycle.html.

If you decide to send your used oil off-site to a disposal company versus a recycler, you must still comply with the used oil management requirements described above. You must also evaluate the used oil to determine if it is a hazardous waste before sending it off-site for disposal. If the used oil is hazardous, you must also comply with the hazardous waste regulations (e.g., labeling, placarding, manifesting, etc.). To avoid the hazardous waste regulations, you must send your used oil to a recycling facility. Again, recycling is the best option.

Can I pick up other wastes from my customers, like spent solvents?

No. If you pick up other wastes like spent solvents, you'll likely meet the definition of a hazardous waste transporter. In addition, under the regulations you are not allowed to pick up any hazardous waste and take it back to your business location. If you do this, you would be subject to the hazardous waste permitting requirements. In addition, you could face violations or penalties for illegally storing hazardous waste on-site.

After I change out the oil, can I just leave it with my customer?

Yes, you can leave used oil at your customer's business if they agree to take responsibility for it. However, you are considered a "co-generator" and share responsibility for the used oil. Therefore, it's important that you know the used oil will be properly managed by a disposal or recycling company.

My local quick lube shop collects used oil. Can I take used oil there?

If the shop is registered with Ohio EPA as a used oil collection center, you can deliver the used oil yourself if you transport less than 55 gallons at a time to the shop. In this situation, you do not need to register as a used oil transporter. If you want to take the used oil to a collection center, you'll likely need to contact them ahead of time to arrange this.

Be aware that not all quick lube shops that collect used oil are registered with Ohio EPA. To get a list of registered collection centers, contact DHWM at (614) 644-2917.



Although these drums are in good condition, they're not labeled with the words "used oil." Make sure your used oil drums are labeled.

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Can I burn the used oil in a space heater at my business?

Yes. Under the used oil rules, generators can burn used oil in a space heater, if all the following conditions are met:

- You can only burn used oil generated from your business;
- The heater cannot have a burning capacity of more than 0.5 million BTUs per hour; and
- All combustion gases from the heater must be vented outside.

If you want to burn used oil in something other than a space heater (e.g., a boiler or industrial furnace), additional requirements may apply. For more information on used oil burning, see Ohio EPA's fact sheet "Regulation of Used Oil Burners," at www.epa.state.oh.us/dhwm/pdf/Used_Oil_Burner_Guidance.pdf.

Can I take used oil filters from my customers?

Yes, you can take used oil filters from your customers. However, there are some specific requirements that apply to filters.

Under Ohio's used oil regulations, you do not need to handle used oil filters as hazardous waste, provided the filters are not terne-plated and are properly drained of used oil. The regulations outline four acceptable methods for "hot-draining" filters. Any oil drained from the filters must be managed under the used oil rules. Acceptable hot draining methods include:

Gravity Draining

The filter is placed gasket-side down in a drain pan. If the filter has an anti-drain valve, the "dome end" of the filter is punctured so oil can flow freely. The filter needs to drain for 12 (minimum) to 24 hours.

Crushing

The filter is crushed by a mechanical, pneumatic, or hydraulic device to squeeze out the used oil. The remaining filter material is compacted.

Disassembly

The filter is separated into its different parts using a mechanical device. Then, metal, rubber and paper can be recycled separately.

Air Pressure

The filter is placed in a device where air pressure forces the used oil out.

Once you have drained non terne-plated filters, you can send them to a scrap metal recycling facility, or dispose of them with your other solid waste. Make sure to properly drain your filters using one of the methods described above. Don't throw undrained filters into your trash dumpster.

To get a list of filter recyclers, visit www.epa.state.oh.us/ocapp/recycle.html.

NOTE:

Terne-plated filters are used more commonly with heavy-duty vehicles such as buses and trucks. They can be hazardous because of lead. Don't take these types of filters back to your business unless you are planning to drain them and send them to a scrap metal recycler.



Don't throw undrained used oil filters in your dumpster.

Are there any other regulations I should know about?

If your business involves other used oil activities such as marketing, blending or reprocessing, additional regulations apply to these activities. Contact DHWM for more information.

Any spill of used oil needs to be cleaned up under the used oil regulations. If you spill more than 25 gallons of oil, or if the spill causes a sheen on a waterway, you must also report it to Ohio EPA at (800) 282-9378.

Where can I get more help?

This fact sheet is a starting point to help you identify the regulations that may apply to your mobile oil changing business. If you have questions about the used oil regulations, contact the Division of Hazardous Waste Management at (614) 644-2917 or your local Ohio EPA district office.

You can also contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) for help. OCAPP is a non-regulatory office of Ohio EPA with a goal of helping small businesses

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comply with environmental regulations and permitting requirements. If you are operating a small business with fewer than 100 employees, we can help you! For more information, contact OCAPP at 800-329-7518, or visit our Web site at www.epa.state.oh.us/ocapp/sb/.

Glossary

Aggregation point: A business or location that accepts used oil from other sites that it owns or operates. Shipments of used oil to an aggregation point must be in quantities of 55 gallons or less. Aggregation points can also accept used oil from household do-it-yourself oil changers.

Do-it-yourself used oil collection centers: A facility that accepts used oil only from household do-it-yourself oil changers.

Used oil collection center: A facility that accepts used oil from used oil generators in shipments of 55 gallons or less. These centers can also accept used oil from household do-it-yourself oil changers. Used oil collection centers must be registered with Ohio EPA.

Resource Links

Regulation of Used Oil Generators (fact sheet)
www.epa.state.oh.us/dhwm/pdf/Used_Oil_Generators_Guidance.pdf

Spill Prevention, Control and Countermeasure (SPCC) Program (fact sheet)
www.epa.state.oh.us/ocapp/sb/publications/spcc.pdf

Bureau of Underground Storage Tank Regulations (BUSTR) Web site
www.com.state.oh.us/sfm/bustr/

CDO Central District Office
50 W. Town St. Suite 700
Columbus, OH 43215
(614) 728-3778

NEDO Northeast District Office
2110 E. Auroa Rd.
Twinsburg, OH 44087
(330) 963-1200

NWDO Northwest District Office
347 N. Dunbridge Rd.
Bowling Green, OH 43402
(419) 352-8461

SEDO Southeast District Office
2195 Front St.
Logan, OH 43138
(740) 385-8501

SWDO Southwest District Office
401 E. Fifth St.
Dayton, OH 45402-6357
(937) 285-6357

OhioEPA District Offices

