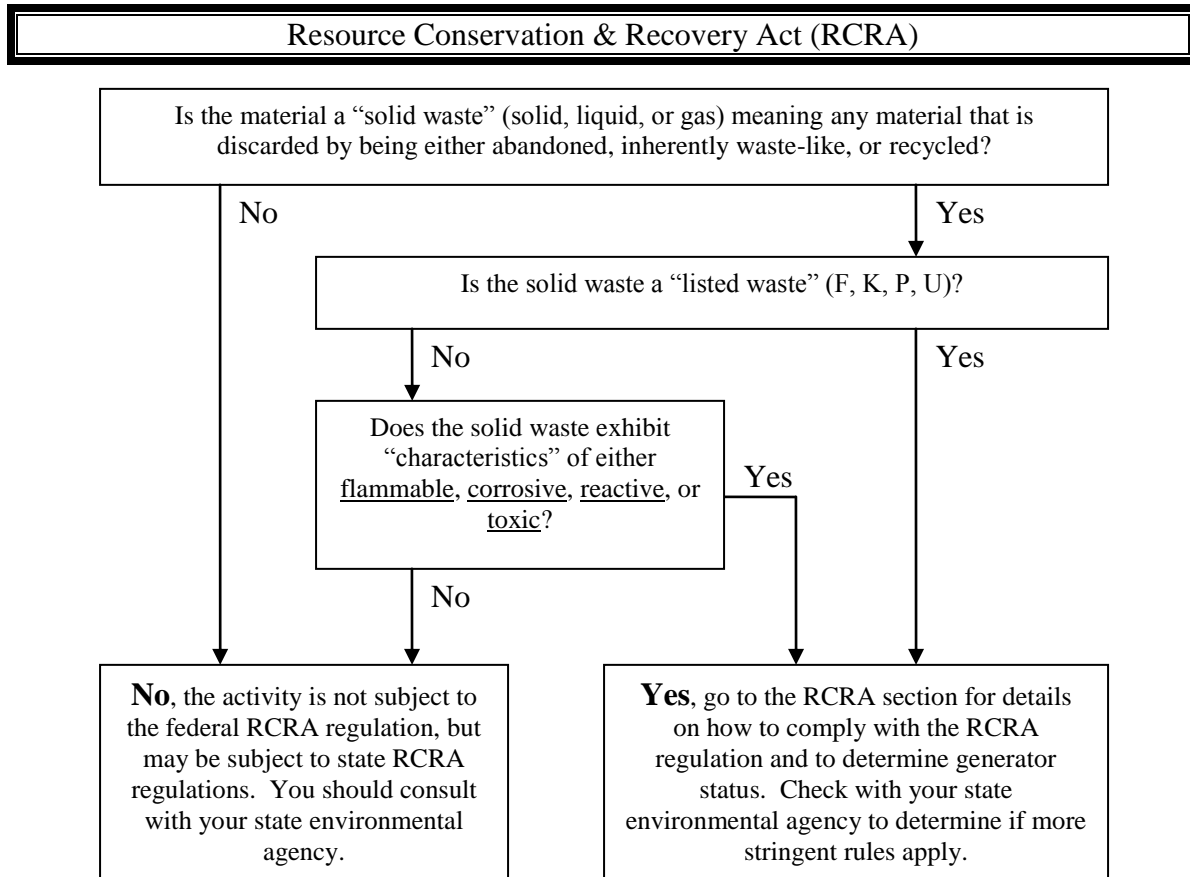




RCRA Applicability Chart



Universal Waste / Recycled Used Oil

Universal waste (UW) status is to encourage recycling and reduce the regulatory burden for the following 4 categories: batteries; pesticides; lamps; mercury containing equipment. The requirements depend on how much UW is accumulated at any one time (e.g. less than 11,000 lbs. or greater than 11,000 lbs.) and can not be accumulated for more than one year. General requirements include:

- Date container with start date of first accumulation day
- Label with words "Universal Waste"
- Containers must be sufficient to fully hold UW
- Must prevent releases to the environment, respond to releases, train staff on UW handling and emergency response
- Greater than 11,000 lbs. must do all the above and in addition must keep shipping records; obtain EPA RCRA ID number; and stricter employee training

Recycled used oil has certain unique properties that make it distinct from most hazardous waste streams – it is generated from a wide range of entities and is easily recyclable. Therefore RCRA has a specific set of management requirements for used oil handlers. Only when used oil is disposed of or sent for disposal would that trigger the more stringent RCRA requirements. The following are the basic used oil requirements:

- Store used oil in containers or tanks
- Label with the words "Used Oil"
- Keep containers and tanks in good condition and respond to leaks/releases.