

**HAZARDOUS MATERIALS PROGRAM ENVIRONMENTAL FACT SHEET**

## Used Oil

### What is used oil and how is it regulated?

Used oil is defined as any oil that has been refined from crude oil or any synthetic oil which has been used and then contaminated by physical or chemical impurities. To be defined and managed as used oil, the oil must become contaminated as a result of being used. Used oil is a free-flowing liquid at standard temperature and pressure and has a flash point greater than 100 degrees (F).

The term “used oil” does not include materials refined from crude oil that are fuels (e.g., gasoline, jet fuel, and diesel fuel) or materials used as cleaning agents or solvents (e.g., naphtha or mineral spirits).

Used oils include:

- vehicle crankcase oils, transmission fluids, and power steering fluids.
- hydraulic, compressor, and straight cutting oils.
- tramp oil and oil drained from evaporators.

Used oil is regulated under the Used Oil Management Standards of Subchapter 8 of the Vermont Hazardous Waste Management Regulations (VHWMR). Do-it-yourselfers who produce used oil are exempt from the VHWMR and Subchapter 8 standards.

### What *can* be done with used oil?

- Send it off site to be fuel-blended and burned for energy recovery *or* re-refined for reuse as a lubricant.
- Reuse it to lubricate chains, tools, and other machinery; do not let it drip on the ground.
- Burn it on site in used-oil space heating equipment (*refer to the “Burning Used Oil Fuel” fact sheet for more information*), give it away, or sell it as used oil fuel.
- Check with the Solid Waste District in your area to see if they have a collection program for small businesses.

### What *cannot* be done with used oil?

- Used oil cannot be disposed of in a Vermont solid waste landfill.
- Used oil cannot be applied to roads for dust control.
- Used oil cannot be mixed with a hazardous waste, with the exception that used oil may be mixed with a waste that is hazardous only because it exhibits the characteristic of ignitability (e.g., ignitable-only mineral spirits), provided the resultant mixture is not ignitable.
- Used oil cannot be used for firefighter training.
- Used oil cannot be released into the surface or groundwater or onto the land of the state.

### How can used oil be stored?

Used oil may be stored in containers that are:

- in good condition and made of or lined with compatible material.

- kept closed, except when adding or removing the used oil.
- labeled with the words “Used Oil”.
- located on an impervious surface (e.g., concrete).
- within a structure that sheds rain and snow.

Used oil may be stored in aboveground tanks that are:

- installed and operated in accordance with Vermont Aboveground Tank Rules: (<https://dec.vermont.gov/waste-management/storage-tanks>).
- clearly marked with the words “Used Oil” or “Used Oil Fuel”.
- managed in a manner to prevent a release to the environment.
- If managed in tanks located outdoors, the tanks must be equipped with secondary containment capable of holding the contents of the tank.

Note: A permit is required to store used oil in an underground storage tank (UST). Contact Vermont’s UST Program at (802) 828-1138 for assistance.

### **How Can Used Oil be Transported?**

Used oil generators can self-transport their own used oil without obtaining a transporter permit provided:

- no more than 55 gallons are transported at any one time to a used oil collection facility or to an aggregation point.
- containers meet the Department of Transportation (DOT) standards.
- used oil is transported in a vehicle owned by the generator or an employee.

Additionally, used oil generators who provide used oil or used oil fuel to an off-site facility shall retain records which document the amount of used oil or used oil fuel provided, the date of each shipment, and the name, address, and telephone number of the facility to which the used oil or used oil fuel was provided for a period of three years.

To transport more than 55 gallons of used oil at one time, contact the Waste Management & Prevention Division to obtain either a list of permitted hazardous waste transporters or a hazardous waste transporter permit application. Below is the link for more information:

<https://dec.vermont.gov/sites/dec/files/wmp/SolidWaste/Documents/Permit%20Brochure%20for%20ANR%20Online.pdf>

### **What else do I need to know?**

**Notification:** Facilities that generate used oil, but don’t generate any hazardous waste and don’t accept used oil from off site, are not required to notify. Most facilities that manage used oil do, however, generate some hazardous waste (e.g., oily sorbent or debris) and therefore must notify the

Waste Management & Prevention Division of its hazardous waste activity using the **Hazardous Waste Handler Site ID Form** (EPA form 8700-12):

<https://dec.vermont.gov/sites/dec/files/wmp/HazWaste/Documents/Forms/EPAFORM8700-12Form.pdf>

Note: Facilities that accept used oil from off site or burn used oil must notify as a used oil collection facility.

**Hazardous Waste Generator Category:** Facilities that generate both used oil and hazardous waste should *not* count the volume of used oil generated when calculating their hazardous waste generator category (based on the amount of hazardous waste generated each month). If a business *chooses* to manage used oil as hazardous waste (i.e., under the VT02 hazardous waste code), then the business must count that waste toward its generator category.

**Hazardous Waste Manifest:** A hazardous waste manifest shipping document *is not required* when transporting used oil from any generator category (very small quantity, small quantity, or large quantity). If a business *chooses* to ship used oil using a manifest, or if a hired transporter requires the use of one, the used oil should be identified on the manifest using the VT99 code for non-hazardous waste. Additionally, if a business *chooses* to manage used oil as hazardous waste, those registered as a small or large quantity generator must ship the used oil under the VT02 hazardous waste code on a manifest. However, a very small quantity generator is not required to ship hazardous waste on a manifest.

**Federal Planning Requirements:** The U.S. EPA requires a Spill Prevention, Control, and Countermeasure (SPCC) plan for any facility that has above-ground petroleum storage capacity exceeding 1,320 gallons (*refer to the “SPCC” fact sheet for more information*).

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***For more information regarding used oil, or if you have other hazardous waste management questions, please contact:***

Hazardous Materials Program – Hazardous Waste Section  
Waste Management and Prevention Division  
Vermont Department of Environmental Conservation  
1 National Life Drive – Davis 1  
Montpelier, VT 05620-3704  
802-828-1138  
<https://dec.vermont.gov/waste-management/hazardous>