

DEPARTMENT OF HEALTH SERVICES

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April 9, 1990

TO: Distribution List and Interested Parties

SUBJECT: USED AUTOMOTIVE OIL FILTERS

The Alternative Technology Division (ATD) within the Department of Health Services (DHS) performed an evaluation of used automotive oil filters to determine the appropriate disposal method of these filters. Used automotive oil filters which have been drained of all free-flowing oil or crushed to remove the residual oil may be managed as nonhazardous waste. DHS recommends a 24-hour drain period; however, the intent is to drain all free-flowing oil from the filter regardless of the time required to do so. The drained oil is a hazardous waste and must be managed accordingly. This policy covers filters from passenger vehicles only. Passenger vehicle is defined in Section 465 of the California Vehicle Code as "a 'passenger vehicle' is any motor vehicle, other than a motor truck or truck tractor, designed for carrying not more than 10 persons including the driver, and used or maintained for the transportation of persons." This policy is not meant to include filters from motor trucks which are vehicles designed, used or maintained primarily for transporting property or filters from truck tractors which are vehicles designed and used primarily for hauling other vehicles. Filters from motor trucks and truck tractors, as well as heavy machinery equipment, were outside the scope of our evaluation.

As a related issue, DHS learned through recent conversations with the Land Disposal Restriction Branch of the U.S. Environmental Protection Agency (EPA) in Washington, D.C. that the EPA has proposed to list used oil as a federal hazardous waste. The EPA is currently collecting samples of various used oils for independent analyses. Evaluation of the data and a final decision are not expected until at least early 1991. If the EPA lists used oil as a hazardous waste, it will impact the State policy, unless the EPA excludes used oil filters from the listing. In the absence of a final rule from the EPA, DHS finalizes the State policy of allowing used automotive oil filters which have been drained of all free-flowing oil or crushed to remove the residual oil to be managed as nonhazardous waste.

Distribution List

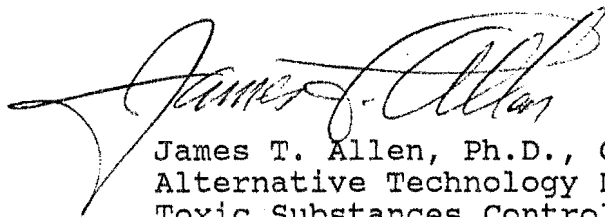
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When a final rule regarding used oil is promulgated by the U.S. EPA, DHS will evaluate this policy for conformance to the final rule. The final disposition of the filters remains subject to any requirements imposed by the Regional Water Quality Control Boards and local regulatory agencies.

For the purposes of the State land disposal restriction program, used automotive oil filters will be considered solid wastes containing metals. Following the implementation date of the land disposal restriction for this wastestream, which is proposed to be May 8, 1992, used automotive oil filters will be subject to any applicable treatment standard prior to land disposal.

If you have questions concerning this letter, you may contact the Waste Evaluation Unit at the letterhead address or telephone number.



James T. Allen, Ph.D., Chief
Alternative Technology Division
Toxic Substances Control Program

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