

9494.1986(05a)

JUN 30 1986

Mr. Andy C. Ricci  
President  
Ricky's Oil Service, Inc.  
6330 West 16th Avenue  
Hialeah, Florida 33012

Dear Mr. Ricci:

This is in response to your May 27, 1986, letter regarding regulations applicable to used oil fuels. You indicate that your fuel burning customers will stop accepting used oil fuel after May 29 when the lead specification becomes effective.

There appears to be serious misunderstandings of the requirements of the November 29, 1985, rules. You, and many others as well, apparently believe the rule precludes the burning of off-speculation used oil fuel. As explained in the enclosed information bulletin we recently developed, off-specification used oil fuel may be burned in industrial burners; only the burning of off-specification used oil in nonindustrial boilers is prohibited. In order to burn off-specification used oil fuel, industrial burners need only notify the Environmental Protection Agency (EPA) and comply with two other minor paperwork requirements. Off-specification used oil fuel is not a hazardous waste and is not subject to storage standards. Although EPA proposed to list used oil as a hazardous waste and to apply storage standards to off-specification used oil fuel on November 29, 1985, we are still evaluating public comments on the proposals. We expect to make final decisions this fall and the final rules will be effective six months after publication.

I hope this clears up any misunderstandings you may have had. If you have other comments or questions, please contact Mike Petruska of my staff (202-382-7936).

Sincerely,

Marcia E. Williams  
Director

RO 12677

Office of Solid Waste (WH-562)

Enclosure

bcc: Karen Walker  
Eric Males  
Mike Petruska