

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 7, 1997

MEMORANDUM

SUBJECT: Applicability of used oil management standards to vegetable oil and animal oil

FROM: Michael Shapiro, Director
Office of Solid Waste

TO: Rich Vaille, Chief
State Programs & Compliance Branch

This is in response to your December 5, 1996 memorandum concerning the regulatory status of vegetable oil and animal oil under the used oil regulations at 40 CFR 279. Your memorandum requests clarification on whether the definition of used oil includes animal and vegetable oils.

The used oil management rules define "used oil" in 40 CER § 279.1. as "any oil that has been refined from crude oil, or any synthetic oil that has been used and as a result of such use is contaminated by chemical or physical impurities." Since animal and vegetable oils are not synthetic or derived from crude oil, they are not regulated as used oil under the used oil management standards. A more detailed discussion of the definition of used oil may be found in the preamble discussion to the used oil management standards in the September 10, 1992 Federal Register (57 FR 41566, 41573 - 41574).

I hope this information is helpful to you. For further information regarding the used oil regulations, please call Rita Cestaric at (703) 308-0769.