

RCRA/SUPERFUND HOTLINE MONTHLY REPORT
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2. Tracking Requirements for Used Oil

The used oil regulations require marketers and processors/re-refiners to keep records of all used oil shipped off site (40 CFR Sections 279.56(b) and 279.74). In addition, used oil processors/re-refiners and burners must maintain records of all used oil received from off site (Sections 279.56(a) and 279.65(a)). Used oil transporters must also track used oil accepted for shipment as well as used oil deliveries (Section 279.46). Must a hazardous waste manifest accompany each used oil shipment in order to satisfy these tracking requirements?

A hazardous waste manifest does not need to accompany each shipment of used oil. Used oil transporters, burners, processors/re-refiners, and marketers must maintain records documenting the acceptance and delivery of each used oil shipment. Records for each shipment include information such as the name, address, and EPA identification number of the transporter and the facility that provided the used oil for transport; the quantity and date of shipment; and the EPA identification number of the receiving facility (Sections 279.46, 279.56, 279.65, and 279.74). These records may take the form of a log, invoice, manifest, bill of lading, or other shipping document. The tracking record, however, does not need to accompany physically each used oil shipment (57 FR 41592; September 10, 1992). For example, a used oil marketer may send an invoice incorporating all necessary information to the used oil recipient ahead of the used oil shipment instead of including the invoice with the used oil shipment. Used oil transporters, processors/re-refiners, burners, and marketers must maintain copies of these invoices or other shipping papers at their facility for at least three years (Sections 279.46(d), 279.56(c), 279.65(b), and 279.74(c)). Note, however, that used oil that meets the definition of a hazardous material under the Department of Transportation hazardous materials regulations (49 CFR Parts 100-185) may be subject to additional tracking requirements.