

RCRA, SUPERFUND & EPCRA HOTLINE MONTHLY REPORT  
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**1. Used Oil Specifications for Metals: TCLP versus Totals Analysis**

*Used oil marketers must determine if used oil burned for energy recovery meets the specifications outlined in Table 1 of 40 CFR §279.11. Provided that the marketer complies with the notification and recordkeeping requirements of Part 279, Subpart H, used oil meeting the specification levels of Table 1 may be marketed as an on-specification fuel. The specifications include maximum concentrations for four metals: arsenic, cadmium, chromium, and lead. Should a used oil marketer use the Toxicity Characteristic Leaching Procedure (TCLP) to determine whether used oil meets the specification levels for these metals?*

When determining the levels of arsenic, cadmium, chromium, and lead in used oil that will be burned for energy recovery, the TCLP is not the appropriate test. The TCLP was developed to simulate leaching in a landfill, addressing the degree of mobility of waste streams (61 FR 11798, 11809; March 29, 1990). This attribute of the used oil is irrelevant if the used oil will be burned for energy recovery rather than land disposed.

Instead of a TCLP, a totals analysis should be performed on the used oil. Chapter Two of "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846)" offers guidance on selecting appropriate test methods for specific constituents in different matrices, such as used oil. For example, Table 2-35 of Chapter Two lists testing options for various metals, including arsenic, cadmium, chromium, and lead.