

Peeved about PCBs Impacts on Used Oil Collection Programs

MRW Coordinator Meeting
April 17, 2014



Used Oil Collection

Limited Sites

Year	# of Limited Sites	Pounds Collected @ Limited Sites	% Contaminated
2005	337	8,876,374	0%
2006	330	8,315,776	.08%
2007	316	7,381,935	.002%
2008	298	7,077,729	.64%
2009	275	6,185,669	.18%
2010	276	6,639,291	.25%
2011	268	6,431,181	.04%
2012	256	5,644,259	.03%

Used Oil Collection

Fixed Facility Sites

Year	Pounds Collected at Fixed Facilities	% Contaminated
2005	1,839,002	9.7%
2006	1,682,675	3.0%
2007	2,183,414	11.4%
2008	1,604,265	4.7%
2009	3,032,397	7.2%
2010	2,578,775	8.4%
2011	1,391,360	25.2%
2012	1,773,435	7.8%

Chapter 70.95I RCW

- Requires inclusion of used oil recycling element in plan
- A plan to reach goals established in local plans
- Compliance with sign and container requirements
- Education

Toxic Substances Control Act

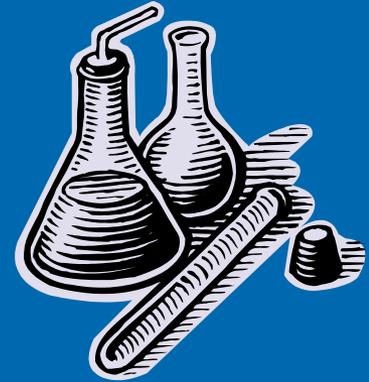
Part 761 PCBs

Declares that distributing items with PCB concentrations of 50 ppm or greater presents an unreasonable risk of injury to health within the United States.



Current Practices

- Conduct a Chlor-d-TECT
- Arrange pump-out with service provider
- Service provider takes samples
- Service provider sends samples to lab when problem is detected in their tanks
- Local governments liable for contaminated oil



Local Government Perspective

- City of Tacoma
 - Charlene Gallagher

- Franklin County
 - Sally McKenzie



RCW 70.95I Used Oil Recycling

- Senate Bill 6501 (concerning used oil recycling) was signed by Governor Inslee on March 31, 2014
- Ecology Responsibilities
- Local Government Responsibilities

Ecology Responsibilities - BMPs

- By July 1, 2015 Ecology must develop BMP's for preventing and managing PCB contamination at public used oil collection sites. BMP's must include:
 - Tank testing requirements
 - Contaminated tank labeling and security measures
 - Contaminated tank cleanup standards
 - Proper contaminated used oil disposal as required under Chapter 70.105 RCW and 40 C.F.R. Part 761
 - Spill control measures
 - Model contract language for contracts with used oil collection vendors

Ecology Responsibilities - Guidelines

- By July 1, 2015 Ecology must update guidelines establishing statewide equipment and operating standards for public used oil collection sites. These guidelines must include:
 - The BMP's developed for preventing and managing PCB contamination at public used oil collection sites.
 - A process for how to petition the legislature for relief of extraordinary costs incurred with the management and disposal of contaminated used oil.



Ecology Responsibilities – Petition Process

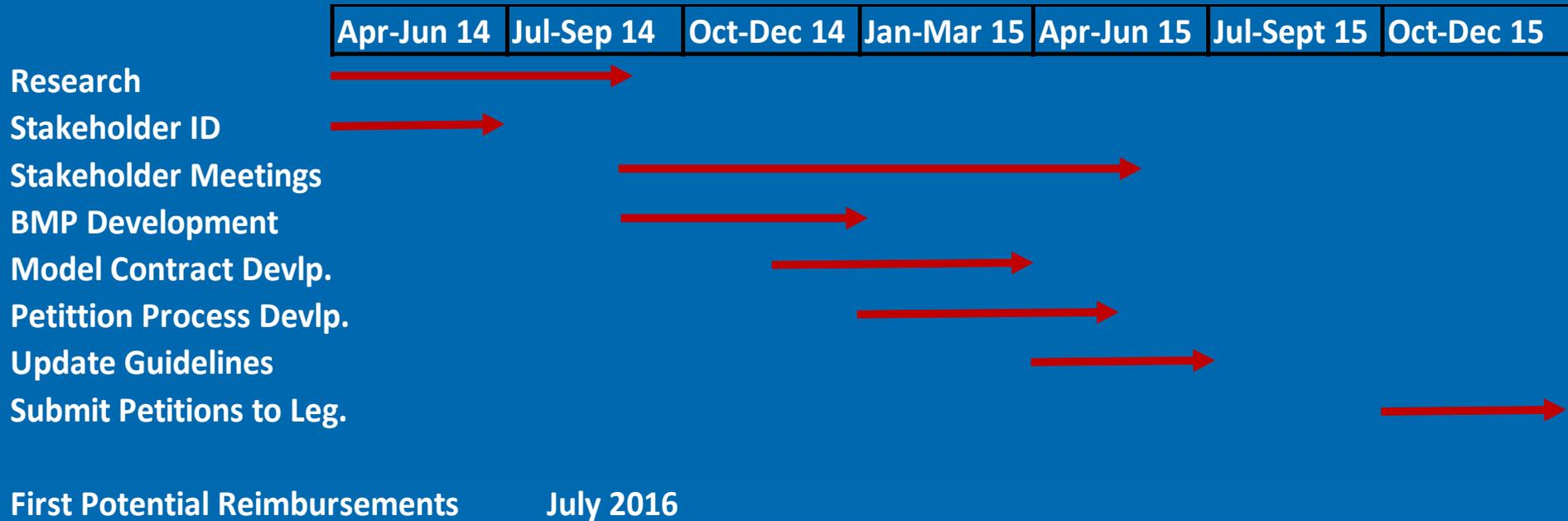
- Ecology, in consultation with city and county MRW coordinators, the EPA, and other stakeholders, must process and prioritize city and county petitions that meet the following:
 - BMP's have been met by the city or county
- Ecology must also determine:
 - If costs are “extraordinary”
- Before January 1st of each year, Ecology will develop and submit a prioritized list of submitted petitions to the legislature.



RCW 70.95I Local Government Responsibilities

- Assist Ecology In the development of BMP's to prevent and manage PCB contamination at public used oil collection sites.
 - Update local hazardous waste or combined solid waste management plans with a plan for addressing the BMP's developed.
 - Submit petition to Ecology for reimbursement if necessary.
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Proposed Timeline



First Potential Reimbursements

July 2016

Open Discussion

- Questions?
- Other counties' experiences?
- Actions being taken by counties?

Stay tuned! Contact: Megan Warfield
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