

City of Tacoma Used Oil Program Update

City of Tacoma

Environmental Services Department

Infrastructure, Planning and Sustainability
Committee

November 13, 2013



History & Background

- Two tanks at Transfer Station Recycling Center
- 5 tanks throughout community at auto parts stores
- Over 1,400,000 gallons collected since 1993
- Now collecting approximately 60,000 gal/year in the DIY tanks



PCB Contamination

- May 4, 2012 - Vendor pumps 750 gallons from DIY used oil tanks at the Recycling Center.
 - Oil passes standard Chlor-D-Tect test
 - Testing protocol that is used statewide for collection of DIY used oil
- May 11 - Notified by Vendor that PCBs were found in their bulk tank. Samples collected from both Tacoma tanks.
- May 15, PCBs were found at 95.8 ppm in one of Tacoma's tanks.

TSCA Primer

- What is TSCA?
- Toxic Substances Control Act
 - Targets specific materials and wastes
 - Administered mostly by EPA
 - Very narrow household exemptions
 - Strict liability regulation



Tacoma TSCA Violations

- Failure to Notify EPA of PCB Waste Handling Activities
 - Needs to be done before shipment or removal by vendor
- Failure to Prepare a PCB Waste Manifest
 - Needs to be done when shipping waste oil before shipment or removal by vendor
- Distribution of PCB in Commerce

Liability

- Disposal liability – extra costs for disposal of contaminated oil
 - Always have this liability
 - Several instances in the past of different types of contamination, usually less than \$4,000/tank
 - Can reduce but not eliminate with tank testing
- Regulatory liability – much higher potential liability for Tacoma

Current Actions

- Working with Department of Ecology to address system wide regulatory issues
- Addressing State Solid Waste Advisory Committee to inform others of the issue
- Setting up testing program for landfill tanks

Long Term Options

- Option 1 – Increased sampling program at Transfer Station tanks and eliminate offsite tank locations
 - Capital and increased operational cost very high to implement this sampling program at offsite locations
 - Collect sample and lock tank that is sampled
 - Send sample to lab to perform laboratory analysis for PCB
 - Pump and re-open tank if lab results are acceptable
 - Two tanks are needed because of problems when you lock a tank
 - Significantly reduces regulatory liability, reduces disposal liability to about 25% compared to untested tanks

Long-Term Options

- Option 2 – Share disposal liability with vendor
 - Only covers liability for costs to dispose of correctly
 - Does not address regulatory liability for added TSCA violations
 - Not likely that vendors will share liability without significant cost
- Option 3 – Regulatory relief; eliminate TSCA violations for those collecting DIY oil
 - Does not address disposal liability

Summary

- Option 1 Chosen
- Next Steps
 - Start removing tanks at beginning of year
 - Implement tank testing at landfill
 - New RFP for used oil collection and processing
 - Continue working on regulatory relief

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