

3199

Kathy Cooper

From: ecomment@pa.gov
Sent: Tuesday, March 13, 2018 1:18 PM
To: Environment-Committee@pasenate.com; IRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; apa@lake@pasen.gov
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: Administration of the Storage Tank and Spill Prevention Program

RECEIVED
IRRC
2018 MAR 13 P 12:44



Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Administration of the Storage Tank and Spill Prevention Program.

Commenter Information:

Stephen Klesic
United Environmental Group Inc. (pimueg@aol.com)
241 McAleer Road
Sewickley, PA 15143 US

Comments entered:

Under the Definitions you need to clarify what "Used Oil / Waste Oil" is. In other regulatory definitions it is defined as:

USED OIL - A petroleum-based or synthetic oil which is used in an internal combustion engine as an engine lubricant, or as a product used for lubricating motor vehicle transmissions, gears or axles which through use, storage or handling has become unsuitable for its original purpose due to the presence of chemical or physical impurities or loss of original properties.

It is also important to clarify that USED OIL is not the waste being generated from the cleaning of MOTOR FUEL tanks such as Gasoline, Aviation Gas, Diesel, Jet Fuel etc. in addition it is not the recovered product and wastewaters collected from releases from these tanks.

Far too often to avoid the added reporting and handling requirements associated with the removal of MOTOR FUEL tanks I have seen contractors identify the wastes from these removal as USED OIL / WASTE OIL when in reality this is a hazardous waste that should require manifests, generator ID's, licensed transporters, and licensed disposal facilities. While many of the reviewed closure reports claim this material as USED OIL to avoid the added cost of proper handling and claim to the PADEP that USED OIL is any material derived from crude oil. For reasons unknown the PADEP seems more than willing to accept this fraudulent claim and is allowing this material to go to used oil recycling facilities rather than to proper hazardous waste recycling/disposal facilities. If you would need any further clarification or documented proof of these claims I can be reached at 412-855-1763

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov