

**Program Letter**

Bureau of Storage Tank Regulation  
September 1998

**Waste Oil Collection / Storage USTs  
Addendum to Waste Oil Brochure (SBD-10381-P)**

The federal EPA rules do not have exceptions or modifications to the technical upgrade requirements for waste oil USTs. Commerce, along with the Department of Natural Resources, is concerned that adequate waste oil collection points are maintained across the state; and that these collection points provide the groundwater protection safeguards intended by the implementation of the federal UST regulations.

A typical waste oil collection UST (not for public collection) has the following characteristics:

- ◆ Periodic transfer of used oil into the tank of 5 quarts to 5 gallon at a time.
- ◆ A short run of piping from transfer point to tank.
- ◆ Tank is located under building floor or located adjacent to building.
- ◆ Tank emptied of stored product by suction draw into tank truck.
- ◆ Systems that do not transfer product by pump or are not maintained under pressure if pump is used.
- ◆ Tank leak detection provided by manual tank gauging.
- ◆ Piping sloped at an angle that prohibits product from collecting in pipe.

The spill prevention requirement in the rule is intended to provide collection of excess product released from the transport hose after product has been delivered to the tank. The typical waste oil collection tanks are filled by periodic manual transfers. Spill prevention at the point of *suction transfer from the tank* to the truck will serve no significant purpose.

Overfill protection is designed to alert the transport driver that the transfer of product into the tank is nearing the threshold level. Common overfill protection devices designed for use on fresh product petroleum tanks will have a very low level of functionality on waste oil tanks. Manual tank gauging and routine scheduled waste oil pickup for recycle appears to be adequate to prevent overfill.

The threat of leakage from pipe corrosion appears to be minimal on the typical UST waste oil collection system installed with a significant pipe slope to the tank. The *waste oil tank* must be provided with corrosion protection and many owners are providing existing USTs with CP protection by impressed current systems, which will also protect the piping.

The Wisconsin UST program has made an upgrade provision for non-public waste oil tanks:

- ◆ Tank receiving product in 25 gallon or less quantities by manual transfer into the tank and suction transfer from the tank, will be excluded from spill and overfill requirements.
- ◆ Tank receiving product in 25 gallon or less quantities by manual transfer, having underground piping that is sloped at least a 30° angle, will be excluded from corrosion protection on the pipe. (Refer to diagrams at end of article.)

- ◆ *Individual waste oil storage tank system management and system design may dictate a more restrictive approach to the provisions mentioned.*

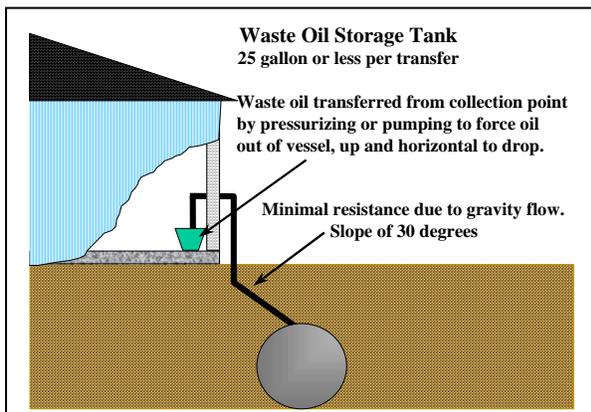
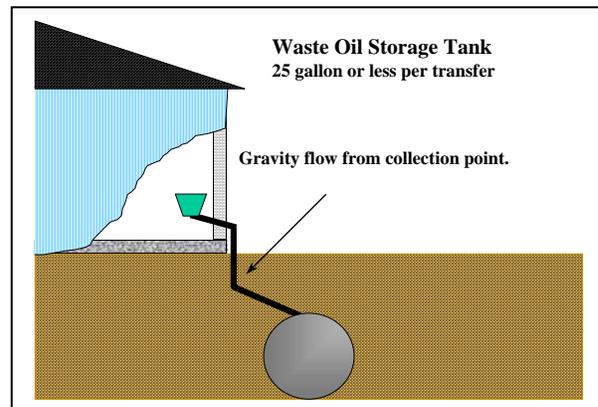
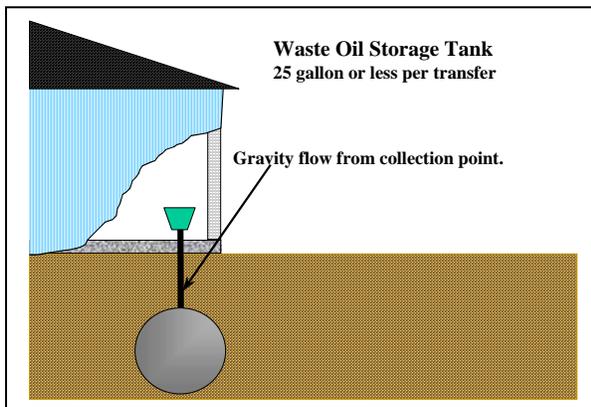
These provisions were developed after considering industry's discussion relating to the typical differences between waste oil collection systems and fuel transfer systems. The discussions included the logic of need in relation to functionality, cost, and intent of the federal rule. This provision *does not* reduce the UST owners liability or responsibility in the event of a leak and subsequent environmental contamination resulting from spillage or leakage.

The database and subsequent compliance inquiry has a default which does not recognize characteristics for waste oil tanks which are Wisconsin specific programmatic provisions. Unless some documentation or information is provided, the database will treat all waste oil tanks the same. The database will be modified to reflect the provisions, as documentation and UST inspections provide the necessary information. Documentation can be provided by the owner in the form of a letter on company stationary, that:

- ◆ describes how waste oil is introduced into the tank,
- ◆ includes the measurement from the underground transition point to the point the pipe enters the tank, and
- ◆ includes the burial depth measurement from grade to the top of the tank.

Tanks that are recorded as meeting these provisions, but determined not to meet these provisions through inspection by a Department or LPO inspector will be ordered to be immediately closed.

### Typical Waste Oil UST Configurations:



### How To Assess System For Adequate Pipe Slope:

The following guidelines are approximate dimensions for a 30 degree slope. This equates to a burial depth of at least 1 inch for every 1.75 inches of horizontal measurement from the transition point to the point where the pipe enters the tank. It is believed a margin of difference of 10% will still provide adequate drainage from the piping and meet the intent of the technical provisions of this program letter.

