



2011

Cutting/Cooling Oil Mixture Disposal Guidance

Hazardous waste determinations of all wastes are the responsibility of the generator.

Some cutting/cooling oil mixtures contain flecks or burs of metal generated during the cutting process. Facilities need to research and determine if the mixture may contain heavy metals or other contaminants prior to recycling or disposal.

Working in partnership with the transporter, determine if the cutting/cooling oil contains enough recoverable oil to be recycled.

- **If Yes**, there is enough oil to be recovered by legitimate recycling practices, then ...
 - Request the transporter provide "proof," by email, letter or certificate, the oil will be recovered. Maintain records.
 - Conduct a used oil determination. A list of labs is available at http://des.nh.gov/organization/divisions/waste/orcb/fms/uomp/documents/labs_uoa.pdf. The oil must meet at least the off-specification used oil maximum standards: arsenic 18 ppm, cadmium 10 ppm, chromium 35 ppm, lead 1,000 ppm, flash point 100° F and test for halogens.
 - If cutting/cooling oil **passes the used oil determination**, manage as used oil for recycle.
 - If cutting/cooling oil **does not pass the used oil determination** conduct a hazardous waste determination. Manage as hazardous waste using NH01 and other hazardous waste characteristic codes.
- **If No**, there is not enough oil to be recovered by legitimate recycling practices, then ...
 - Conduct hazardous waste determination. Request a TCLP test, at a minimum for the eight RCRA metals, from an environmental laboratory. Call a couple of labs for a quote. A list of labs is available at http://des.nh.gov/organization/divisions/waste/hwcb/documents/labs_hw.pdf.
 - If the cutting/cooling oil **does not exhibit a hazardous waste characteristic**, manage as non-hazardous through a hazardous waste transporter, a septic hauler, or receive permission to discharge to sewer from local waste water treatment plants.
 - If the cutting/cooling oil **does exhibit a hazardous waste characteristic**, manage as a hazardous waste.

For questions on hazardous waste determination, contact the Hazardous Waste Compliance Section at (603) 271-2942 or hwcomp@des.nh.gov.