

Managing Used Antifreeze

OVERVIEW

Under the authority of Nevada Revised Statutes (NRS) 459.485, used antifreeze is regulated a non-hazardous waste IF it is being recycled. The actual recycling can be performed at the businesses where the antifreeze is generated or at a permitted antifreeze recycling facility. If the used antifreeze is not being recycled, a Nevada business is responsible for making the waste determination on the used antifreeze and disposing of it according to the waste determination results.

Traditionally, under the Federal EPA regulations, a business was required to make a waste determination on their used antifreeze (submit a sample of the waste to a laboratory to test it using the Toxicity Characteristics Leaching Procedure). In many cases, the results of the waste determination indicated the used antifreeze was testing as a hazardous waste due to lead contamination. The lead contamination was derived from the lead soldering applied to older radiators. The state of Nevada, in an effort to promote recycling determined if a business insured their used antifreeze was being recycled (either on-site or off-site), no waste determination would be required on the used antifreeze

Used antifreeze that is being picked up by a used oil hauler, mixed in with the used oil, and being burned off with used oil is not recycling. The generator of the used antifreeze is technically illegally disposing of a waste unless they have documentation that their used antifreeze is not a hazardous waste. If a business generates used antifreeze and is contracting with another business to dispose of their used antifreeze, request documentation as to where the used antifreeze is ultimately being recycled

STORING USED ANTIFREEZE ON-SITE

There are minimum requirements for storing used antifreeze on-site prior to recycling. While used antifreeze is being stored on-site, ensure the following:

- Used antifreeze should be stored in containers that are in good condition (not rusted or leaking).
- All containers storing used antifreeze should be labeled "Used Antifreeze." If the antifreeze is being recycled, it is not considered a hazardous waste and the business does not need to have the words "Hazardous Waste" on the container.
- All containers storing used antifreeze must be closed at all times when waste is not being added or removed.
- Secondary containment around used antifreeze storage containers is required per [NAC 444.8886](#). Placing a spill kit (a trash can with floor dry and a scoop) near the storage area is also recommended. Preventing a spill from entering a floor drain or contaminating soil can save a business time, bad public relations, and money in the long run.

RECYCLING USED ANTIFREEZE

Under the Nevada regulations, if a generator of used antifreeze is having their antifreeze recycled at their business ("on-site") or hauled away to a permitted antifreeze recycling facility ("off-site"), the used antifreeze is not considered a hazardous waste, and therefore not "counted" when a business is determining their generator status. A business' generator status is the amount of hazardous waste generated at their facility per calendar month.

ON-SITE RECYCLING

A Nevada business that generates used antifreeze may purchase an antifreeze distillation or filtration unit to recycle, recover and reuse their antifreeze. No permit from the EPA is required for a business to recycle its own used antifreeze; the regulations are much more stringent if a business wants to recycle other businesses used antifreeze. Companies **selling** antifreeze recycling equipment include:

Automotive Equipment Las Vegas, NV (702) 791-0177	Hi-Tech Industries Las Vegas, Nevada (702) 878-4948 www.hi-techind.com	Mac Tools (800) 622-8665 www.mactools.com	Automotive Service Equipment www.asedeals.com (800) 229-6218
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Another option for any Nevada business is to contract with a mobile antifreeze recycler. In this case, a mobile antifreeze recycler will come to the facility where the used antifreeze was generated, use their antifreeze recycling equipment to recycle the used antifreeze, and leave this recycled antifreeze with the business for reuse. If a business elects to hire a mobile antifreeze recycler, they need to ensure the following requirements are met:

- The mobile antifreeze recycler shall have a "written determination" issued by the Nevada Division of Environmental Protection, and be able to provide a copy of this determination to any business requesting it.
- The generator of the used antifreeze should maintain a written contract with the mobile antifreeze recycler; this contract shall discuss who (the business generating the used antifreeze or the mobile antifreeze recycler) is responsible for managing any waste filter or sludge (still bottoms) generated from the antifreeze recycling process;
- The mobile antifreeze recycler shall maintain written records (receipts) highlighting the name/address/EPA ID# (if any) of the used antifreeze generator, the date and quantity of used antifreeze recycled, and signatures by to the generator and the mobile antifreeze recycler.

As of March, 2014, there are two active **mobile** antifreeze recyclers that have obtained a written determination from the Nevada Division of Environmental Protection: https://ndep.nv.gov/bwm/Docs/WD_List_2014March.pdf

A-1 Recycling Service Reno, NV (775) 745-1974	Z Freeze, LLC (Masse Performance) 2803 State Route 208 Wellington, Nevada 89444 (775) 465-9600
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OFF-SITE RECYCLING

A generator of used antifreeze may transport, without notifying as a transporter to EPA, up to 350 gallons of used antifreeze, provided the antifreeze is transported in a vehicle owned by the business that generated the used antifreeze or a vehicle owned by an employee of that business. The 350 gallon threshold only applies to a business transporting their own used antifreeze that was generated at their own business; anyone in the business of collecting or transporting used antifreeze from other businesses must comply with much more stringent requirements

Any business having their used antifreeze picked up and transported off-site to a permitted antifreeze recycling facility must maintain documentation (receipts) containing the following information for a minimum of three years from the date of transport

- Name/address/EPA ID# (if any) of the business generating the used antifreeze;
- Name/address/EPA ID# of the antifreeze collection center (where the antifreeze is being transported to for temporary storage) and/or the permitted antifreeze recycling facility;
- The amount of used antifreeze being transported; and
- Date/signature from the collection center or recycling facility

As of January, 2011, there are two antifreeze recycling facilities in the state of Nevada that have obtained a written determination from the Nevada Division of Environmental Protection:

https://ndep.nv.gov/bwm/Docs/WD_List_2014March.pdf

Roadrunner Recycling

Henderson, NV
(702) 379-7179

Thermo Fluids

Reno & Las Vegas
(702-642-9994

www.thermofluids.com

Free and Confidential Assistance for Nevada's Businesses and Communities
BEP Toll-Free Assistance (800) 882-3233 | www.unrbep.org

DISCLAIMER: This guidance document is intended as general information and is not provided nor intended to act as a substitute for legal advice or other professional services. BEP advises the regulated community to read all applicable regulations set forth in both US Code of Federal Regulations (Title 40 C.F.R. Parts 260-279) and the Nevada Hazardous Waste Regulations and to keep informed of all subsequent revisions or amendments to these regulations. This guidance document was developed by BEP with funding support provided by the Nevada Division of Environmental Protection.



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**ENVIRONMENTAL
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AT THE UNIVERSITY OF NEVADA, RENO