Orrco™
The oil recycler.

October 19, 2016

Mr. Brian Allen
RCRA Compliance Inspector
Hazardous Waste Program – Eastern Region
475 NE Bellevue Drive
Suite 110
Bend, Oregon 97701

Dear Mr. Allen:

At DEQ's request in your letter dated August 19th, 2016 ORRCO has ceased burning anything in our energy recovery furnace - including oil filters. In order to continue processing filters, ORRCO purchased an Oberg SB-300 filter cuber/baler. It is an excellent machine and removes more than a half-gallon of oil from each bale crushing it with 180,000 pounds of force. However, the bales remain oily and continually drain small amounts of oil for a long time. We have contacted several metal processors and only found one who has accepted oily filter bales. They have a lot of problems with the oil mess created and they are reviewing if they will accept them at all. Therefore, we do not have a solution for the metal filters at this time. Even if they do accept them, the used oil has a potential adverse environmental impact that can easily be avoided by burning the residual oil.

With Thermofluid's filter burning operation having been shut down, there is a growing crisis in Oregon: are there environmentally sensible options for managing used oil filters?

ORRCO is a recycling company and we are eager to work together with the DEQ to develop appropriate solutions within the regulations. ORRCO collected over 2,500 drums of filters last year and is on track for even more this year. We have an efficient collection system in place to discourage our customers from landfilling their filters. Burning the filter bales is a much better solution for the environment. It removes all the free oil plus the metal is then high-grade scrap that any metal processor will be happy to accept. Before processing, the filters are placed onto a draining table and hand sorted so only metal filters are included in the bales. By processing the filters into bales/cubes, far more oil is removed than using the puncture and hot draining process, or crushing them individually. The bales/cubes are approximately 85% metal. We did some initial testing and the average amount of oil removed from one bale was 0.92 gallons. We did a lab-test burn on one cube and the mass reduction was 5 pounds, 32 pounds before burning and 27 pounds after. There were approximately 5 bales per drum.

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In May 1997, EPA promulgated a provision that excludes scrap metal from regulation as a solid waste , for both recycled and processed materials. (See attached EPA letter). The energy recovery furnace in Klamath Falls is capable and ready to burn only metal filters for scrap metal recovery. While the solid waste rules are being interpreted and the status of burning other used oil materials continues (and to address concerns about water evaporation in our scrubber requiring a solid waste permit), we will calculate our air emissions for burning only oil-filter cubes without the water scrubber. The calculation will be based on ORRCOs past and projected volume of filters collected. Assuming minimal increase in air emissions, ORRCO requests permission to start burning metal filter bales, crushed metal filters, and crushed metal drums for scrap metal recovery immediately before the backlog creates more landfill waste.

I look forward to discussing this and other problems in person with you so that we may be able to find possible solutions that fit our needs and are still in compliance with DEQ regulations. I can meet you at your office in Bend or at the Klamath Falls plant.

Sincerely,

Scott Briggs

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