

Summary of State Used Oil Regulations in the Northeast

February 2021

Compiled by the members of NEWMOA's Hazardous Waste Program

State	Is Used Oil Regulated as a HW in the State?	Does Your State Require Generators Shipping "Used Oil" from Out-of-State to Do So on a HW Manifest?	Does Your State Require Out-of-State Used Oil Generators to Have an EPA ID #?	Notes
Connecticut	No	No	No	In the past, DEEP has been told that generators sending used oil to a facility in MA would have to use a HW manifest, but could enter "CT" plus their full, 10-digit telephone number in the generator EPA ID Number box. However, DEEP has also heard that facilities in MA may demand an actual EPA ID #, so DEEP plans to issue temporary EPA ID #s to generators in such cases (these can be readily identified because they have the prefix "CTP").
Maine	No, except when contaminant concentrations exceed certain levels	Yes	No	-All waste oil transported into Maine from out-of-state, whether destined for a waste oil storage facility or an end-user, must be accompanied by a manifest or UBOL that includes the contaminant concentrations. -Maine DEP intends to update their waste oil management rules to require an EPA ID to be accompanied with each manifest in the near future.
Massachusetts	Yes	Yes, or on a Bill of Lading (BOL) for waste oil shipped as a Regulated Recyclable Material, RRM	Yes, if shipped on a hazardous waste manifest.	Though MassDEP allows shipments of waste oil/RRM on a BOL to MA TSDFs without an EPA ID, MA receiving facilities (TSDFs) may require a valid EPA ID# regardless of type of transportation paperwork used.

New Hampshire	Yes (waste code NH01), but it may be managed under less stringent requirements when recycled and does not exceed specified concentrations for certain contaminants	NH requires a Bill of Lading to ship Used Oil for Recycle; If NH01 hazardous waste, then a manifest would be required	If the used oil meets NH's standards for UOFR, then no. If it is NH01 being shipped on a manifest, an EPA ID would be required.	Historically, NH has used a generic EPA ID, NHD999999998, for NH generators shipping out of state when a manifest has been required by the receiving state. However, it seems that more generators have been required to obtain a site specific EPA ID, so NH will issue either permanent or temporary site specific EPA IDs depending on how frequently the generator expects to ship.
New Jersey	No	No	No	Used oil can be shipped under a bill-of-lading.
New York	No	No	No	DEC's position is that a generator would need to meet the requirements of both DEC and the receiving state. If a receiving state has more stringent requirements that mandate the use of an EPA ID number and hazardous waste manifest by a generator shipping used oil to the receiving state, DEC would tell them to do so. DEC has the ability to enforce this, if necessary, under 6 NYCRR 372.6(b) . DEC does not issue ID numbers and is not aware of EPA Region 2 issuing special generic EPA ID numbers for these types of situations.
Rhode Island	No	No	No	To address shipments of used oil to a State that requires the completion of a HW manifest, RIDEM developed a policy to codify "generic" Temporary EPA Identification Numbers based on the type of waste being shipped out of state. The generic number for used oil is RI0 000 000 000. In circumstances where the transporter requests a unique ID number for use in the E-Manifest system to track the shipment, RIDEM will issue individual Temporary ID Numbers.
Vermont	No	No	No (though most used oil generators are	Regulated under Subchapter 8 of the Vermont HW Management Regulations (VHWMR) which are similar to the 40 CFR Part 279 used oil regulations, but more

			HW generators subject to notification)	stringent in areas. VT used oil regulations exempt the subcategory of “used oil fuel” if basic burning, marking, & container management standards are met. VT regulates waste materials containing $\geq 5\%$ petroleum (including used oil) as HW under the VT02 HW code.
--	--	--	--	--