

## Used Grease Disposition Environmental Management Bulletin

7 August 2014

The Staff Judge Advocate provided a legal determination that used petroleum and synthetic greases, used to lubricate vehicles and equipment, must be managed as used oil. Used oil is regulated by Federal, State, Local, and Army Environmental regulations. These regulations prohibit the disposal of used oil in solid waste disposal sites and landfills.

Used oil destined for recycling is not classified as a hazardous waste in the State of Missouri. However, used oil that cannot be recycled and will be disposed of must be manifested, transported, and managed according to the Federal, State, Local, and Army regulations for hazardous waste.

### Fort Leonard Wood (FLW) Guidelines

1. Currently, generators have two options available to manage used grease:
  - a. Reuse. This is the preferred method as it requires less paperwork and less regulatory procedures to comply. Greases can be reused to lubricate fifth wheel plates.
  - b. Disposal/Fuel Blending
2. Storage Containers.
  - a. Storage containers must be at a minimum five (5) gallons with an open top. To use any other type of container, approval must be obtained by the Directorate of Public Works (DPW) Environmental Division. Containers must be in good condition and free of holes with a water tight lid.
  - b. Containers must be labeled "USED OIL (GREASE ONLY)" in letters at least 1 1/2 inches high. The container must be placed on a hardstand (i.e. concrete or asphalt) and kept closed except when adding grease.
  - c. No other fluids or used oil may be mixed with used grease. No absorbent material, oil filters, or shop rags should be disposed of in the used grease container. Recommend generators refer to the Environmental Management Bulletin for Used Oils, Fuels, Antifreeze, and Solvents located on the [DPW Environmental Division Website](#).
3. Disposal Requirements.
  - a. Used grease destined for disposal can be classified as a hazardous waste in the State of Missouri and possibly by the Resource Conservation Recovery Act. The following disposal requirements apply for turn in of used grease:
    - (1) Used grease on FLW, if not reused, can only be turned in to the Hazardous Waste Disposal Contractor at 573-329-8532.
    - (2) Arrangements can be made to pick up used grease at any location.
    - (3) Used grease will then be shipped to a state licensed recycle/fuels blending facility.
    - (4) A material safety data sheet (MSDS) corresponding to the grease must be obtained by the generator. The MSDS must match the exact stock number, name of item, and manufacturer of the grease being turned in to the Hazardous Waste Disposal Contactor.
    - (5) Two copies must accompany the grease.
  - b. If procedures are not followed, delays in the final disposal could occur and subject the generator to legal violations.
4. For more information or questions, contact the Hazardous Waste Program Manager at the DPW Environmental Division at 573-596-0882.

**Fort Leonard Wood Directorate of Public Works Environmental Branch**

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