

Knauss, Elizabeth

From: Knauss, Elizabeth
Sent: Tuesday, August 30, 2016 4:11 PM
To: 'Noble, Ron'
Subject: Used Oil Specifications
Attachments: July RIN - 50 FR 49163-49211

I'm back from the field, and wanted to follow up on my note from this morning.

In addition to the missing arsenic, cadmium, chromium and lead analysis, the total organic halogen result would only be acceptable for rebutting the presumption that a halogen level over 1,000 ppm in used oil was due to mixing with hazardous waste.

The used oil specification of 4,000 ppm is based on total halogen content, both organic and inorganic. Please see page 20 of the attached federal register notice.

The analysis you submitted for total organic halogens involves washing the sample to remove inorganic chloride, and is not acceptable for specification analyses.