



Environmental Protection Commission of Hillsborough County

TESTING OF WASTE ANTIFREEZE

Improper disposal of waste antifreeze can cause environmental problems. Antifreeze is made up of water and ethylene glycol. Neither of these ingredients is regulated as a hazardous waste. However, contaminants such as lead, tin, copper, iron, and zinc may accumulate through the corrosion process. Organics such as benzene, trichloroethylene and perchloroethylene have been found in waste antifreeze at levels that identify the waste as hazardous. Under the federal and state hazardous waste regulations, any waste containing regulated levels of heavy metals or organics is a hazardous waste.

Per 40 CFR 262.11, businesses that generate waste antifreeze must perform a waste determination to test waste antifreeze to determine if it is hazardous. The test to be initiated is the Toxicity Characteristic Leaching Procedure (TCLP) for lead, benzene, perchloroethylene and trichloroethylene. A "Totals" test may be used for initial screening purposes. The sample must be representative of the typical waste generated. Also, if the process or business procedures change in such a way that the waste antifreeze may change, testing must be repeated. In addition, the chosen laboratory should be operating under a Department of Health National Environmental Laboratory Accreditation Program (NELAP).

If the waste antifreeze is determined to be non-hazardous, it can be disposed of as a non-hazardous industrial waste. Be aware that non-hazardous antifreeze cannot be disposed of on the ground, in a septic tank, storm sewer, or in a dumpster. If the waste tests hazardous or if the generator chooses to use generator's knowledge (without testing) that it is hazardous, it will have to be handled and transported as a hazardous waste, per the requirements of 40 CFR, Parts 262 through 268. All receipts or manifests documenting recycling or disposal of waste antifreeze must be retained by the generator on site for a minimum of 3 years.

EPC strongly encourages businesses to seek methods to reduce or eliminate their hazardous waste. For example, businesses may wish to consider recycling their waste antifreeze on-site as opposed to disposing of it, thereby eliminating the need for testing. Further, in order to reduce the chances of your waste antifreeze being hazardous, EPC recommends the following Best Management Practices:

- **Use clean drain pans designated for waste antifreeze only.**
- **Use clean plastic storage drums designated for waste antifreeze only.**
- **Label all drums and drain pans clearly with words "WASTE ANTIFREEZE ONLY".**
- **Never mix other wastes with waste antifreeze.**

Contact the EPC Small Quantity Generator Section at (813) 627-2600 for additional information.