

Machine Shop Checklist #1: Metalworking Fluid Disposal Options



You must know the disposal status of your shop's spent metalworking fluids (MWFs) to properly manage and dispose of them.

Step One: Identify your fluids

Write the **fluid name** (safety data sheet product label name) and **date** of the MWFs used in your shop:

Fluid name _____ Date _____ Disposal status _____

Fluid name _____ Date _____ Disposal status _____

Fluid name _____ Date _____ Disposal status _____

Fluid name _____ Date _____ Disposal status _____

Step Two: Find the disposal status of your fluids

Review the tables in [Metalworking Fluid Selection by Score](#)¹ (*MWF by Score*) to find the disposal status of your shop's unused MWFs. Your spent MWF will fall into one of the four categories below.

1. Used oil

The fluid's disposal status is listed as "used oil" in *MWF by Score*.

You can manage this fluid as used oil, provided:

- You mix your spent used oil MWF **only** with other used oil waste streams.

If your tapping fluids are chlorinated, your options are:

- If possible, stop using chlorinated tapping fluids.
- If you can't stop, do a Chlor-De-Test test or total halogens test for HOCs (halogenated organic carbons).
 - **Are HOCs less than 1,000 ppm?** If yes, then manage as used oil.
 - **Are HOCs greater than 1,000 ppm and less than 10,000 ppm?** If yes, you have two options:
 - A. Manage the spent fluid as DW.
 - B. Rebut the presumption that the used oil has been mixed with other DW chlorinated solvents. **Note: the tests required for proof would likely be prohibitively expensive.** Ask an Ecology representative if rebutting the presumption is necessary. If HOCs are less than 10,000 ppm and the presumption is rebutted, manage as used oil.
 - **Are HOCs greater than 10,000 ppm?** If yes, manage as DW with waste code **WP01**.

To manage as used oil

- Label container "Used oil only."
- Keep container bung closed.
- Clean up spills.
- Use secondary containment if a leak could contaminate soil or get to a floor drain.

¹ <https://apps.ecology.wa.gov/publications/SummaryPages/2104041.html>

- Have a spill kit handy.
- Ship off site with a used oil vendor (ask for a vendor list).

2. Dangerous waste

Your MWF is listed as “DW” in *MWF by Score*. Your options are:

- Switch to a MWF that is “used oil” or “not used oil, not DW” in *MWF by Score*. If you have another MWF in mind that is not listed, it could be evaluated and added to the list. Work with your Ecology contact and the fluid manufacturer.
- Manage the spent MWF as DW.
 - Label container “Dangerous Waste, Persistent.” Keep container bung closed, provide secondary containment, and ship off site with vendor (ask us for a vendor list).
- Test to show that it’s not dangerous waste.
 - Use Ecology’s [Designation Checklist](#)² and ask your Ecology contact if sampling and testing is necessary.

3. Not used oil, not dangerous waste

Your MWF is listed as “not used oil, not DW” in *MWF by Score*. Your options are:

- Switch to a MWF that can be managed as used oil or pick one you want evaluated.
- Assume your spent MWF is DW and manage it as DW. Label container “Dangerous Waste, Persistent.” Keep container bung closed, provide secondary containment, and ship off site with vendor (ask for a vendor list).
- Designate the spent MWF to show it is not DW when spent.

4. Unknown disposal status

The disposal status of your MWF is unknown, because it’s not listed in *MWF by Score*. Your options are:

- Manage your spent MWF as DW (see 2 above).
- Determine if your spent MWF can be managed as used oil, or if it contains vegetable oils and must be designated when spent, or if it contains HOCs or other DW constituents and must be disposed of as DW. Ask your Ecology contact for assistance. We will contact the manufacturer and help you determine how to manage the fluid.
- Select another MWF that can be managed as used oil (use *MWF by Score*). Or find a new fluid to evaluate—this involves asking the MWF manufacturer the right questions. Ask your Ecology contact for help.

Contact Information

Central Region: (509) 575-2490

Eastern Region: (509) 329-3400

Northwest Region: (206) 594-0000

Southwest Region: (360) 407-6300

Webpage: ecology.wa.gov/P2

ADA Accessibility

To request an ADA accommodation, email HWTRPubs@ecy.wa.gov, call (360) 407-6700, or dial 711 for relay services. Visit ecology.wa.gov/ADA for more information.

² <https://apps.ecology.wa.gov/publications/SummaryPages/1604028.html>