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**DISPOSAL OF OIL AND GAS WASTES
AT MUNICIPAL LANDFILLS PERMITTED BY THE
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
(formerly the TEXAS WATER COMMISSION)**

January 1, 1994

An oil and gas operator must obtain a minor permit issued by the Railroad Commission of Texas under Statewide Rule 8(d)(6)(G) to dispose of oil and gas waste at a landfill permitted by the Texas Natural Resource Conservation Commission or TNRCC (formerly the Texas Water Commission), unless the waste is considered inert as defined by Rule 8. A minor permit from the Railroad Commission for such disposal will contain the condition that the oil and gas operator obtain permission for the disposal from the landfill operator and the Texas Natural Resource Conservation Commission.

Attached is a guide to disposal of oil and gas waste at a landfill permitted by the TNRCC. This guide is the result of coordination between the Railroad Commission and the Special Waste Branch of the Texas Natural Resource Conservation Commission to make landfill operators and oil and gas operators aware of the requirements for and restrictions on disposal of oil and gas waste in a landfill. The guide lists oil and gas wastes commonly taken to a landfill for disposal, and, for each waste, indicates whether or not the waste is exempt from federal hazardous waste regulations under RCRA, whether a Railroad Commission minor permit is required for disposal of the waste, what treatment or testing is required for the waste, and whether or not written approval is required from the Texas Natural Resource Conservation Commission.

Recycling should be considered before requesting permission to dispose of an oil and gas waste at a landfill. Please contact Bart Sims at (512)463-5405 with the Railroad Commission's Source Reduction and Recycling Program for information on recycling. Or you may call the Texas Natural Resource Conservation Commission's toll-free number to call for information on recycling of all types of wastes (1-800-64TEXAS).

The attached guide is subject to revision. We would welcome your comments on the guide concerning any suggested additions or revisions. We hope this is helpful. If you have any questions about this guide, call (512)463-6789.

DISPOSAL OF OIL AND GAS WASTES AT TNRCC LANDFILLS - JANUARY 1, 1994

DESCRIPTION OF WASTE ITEMS	RCRA EXEMPT STATUS	RRC MINOR PERMIT REQ'D FOR DISPOSAL AT LANDFILL	TREATMENT OR TESTING REQUIRED	WRITTEN APPROVAL OF TNRCC FOR LANDFILL DISPOSAL (at TNRCC sites)
glycol filters	YES	YES	Drain, air dry 48 hrs, TPH**, total benzene*	YES
dehydration filter media	YES	YES	Drain, air dry 48 hrs, TPH**, total benzene*	YES
gas condensate filters	YES	YES	Drain, air dry 48 hrs, TPH**, total benzene*	YES
molecular sieves	YES	YES	Cool in nonhydrocarbon, inert atmosphere, hydrate in ambient air 24 hrs, TPH**, total benzene*	YES
amine filters	YES	YES	Drain, air dry 48 hrs, TPH**, total benzene*	YES
iron sponge	YES	YES	Allow to oxidize completely to prevent threat of combustion.	YES
saltwater filters	YES	YES	Drain, air dry 48 hrs, pH, chlorides**, TPH**	YES
cooling tower filters	YES	YES	Drain, air dry 48 hrs, total chromium*	YES
ferrous sulfur, elemental sulfur & soil contaminated with sulfur	YES	YES	If uncontaminated, recover & sell as raw material. If contaminated, requires case-by-case approval.	YES
water treatment backwash solids, and filters	YES	YES	Total metals*, NORM	YES
produced sand	YES	YES	TPH**, total benzene*, NORM	YES
pipe scale & other deposits removed from piping & equipment	YES	YES	TPH**, TOX**, total metals*, NORM	YES
hydrocarbon bearing soils (crude oil)	YES	YES	TPH**, total benzene*	YES
hydrocarbon bearing soils (tube oil)	NO	YES	Determine if hazardous, TPH**, total benzene*, PCB**	YES
pigging waste from gathering lines	YES	YES	TPH**, total benzene*, total metals*, NORM, MSDS sheets for common inhibitors	YES
pigging waste from transmission lines	NO	YES	Test to determine if hazardous, TPH**, total benzene*, Total arsenic*, NORM, MSDS for corrosion inhibitors	YES

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Waste oil filters (1) entire unit is inside metal container (2) replaceable inside units (paper/fiber)	NO NO	YES YES	Separate & recycle oil & metal parts. Drain thoroughly of oil for 24 hours, total metals*	(1) subject to 31 TAC 330.136(e) (2) YES
plastic pit liners	YES	YES	Clean well.	NO
unused pipe dope	NO	YES	Recycle if possible. Otherwise, determine if hazardous, MSDS sheets.	YES
drill cuttings	YES	YES	Only cuttings, no fluids. MSDS sheets for additives, chlorides** may be a problem	YES
unused mud additives	NO	YES	Approval only for small quantities. Determine if hazardous, MSDS sheets	YES
sacks of unused drilling mud	NO	YES	Return to vendor or use at other site if usable. If unusable, determine if hazardous, MSDS sheets	YES
soilbat pads (crude oil & other exempt wastes)	YES	YES	TPH**, total benzene*	YES TPH usually too high for LF's, treatment needed
soilbat pads (lub oil & other non-exempt wastes)	NO	YES	Determine if hazardous, TPH**, total benzene*	YES TPH usually too high for LF's, treatment needed
uncontaminated concrete from production facilities	-	NO	None required unless contaminated.	NO if uncontaminated
contaminated concrete from gas plants, compressor stations & other oil & gas facilities	NO	YES	Testing determined on case-by-case basis.	YES
asbestos asbestos - contaminated waste material	YES (see TSCA)	YES	Comply with federal and state regulations for asbestos materials. Remove asbestos from steel pipe and boilers--recycle steel.	YES for sites approved to take asbestos (only)
paper, paper bags	NO	NO	Bags must be empty.	NO
soiled rags/gloves	NO	NO	None.	NO
wooden pallets	NO	NO	None unless contaminated.	NO

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detergent buckets	NO	NO	Must be empty--recycle if possible.	NO
grease buckets	NO	NO	Must be empty--recycle if possible (scrap metal)	NO
empty containers	NO	NO	Must be empty--recycle if possible (scrap metal)	NO
barrels/drums 5-gallon buckets	NO	NO	Recycle if possible.	NO
metal plate, metal pipe, metal cable	NO	NO	Recycle as scrap metal.	NO
junked pumps, valves, etc.	NO	NO	NORM, recycle	NO
uncontaminated brush & vegetation from clearing land	-	NO	None	NO
fiberglass tanks	NO	NO	Must be empty, cut up or shredded.	NO

EXPLANATION OF ABBREVIATIONS:

- MSDS Material Safety Data Sheet(s)
- NORM Naturally Occurring Radioactive Materials
- PCB Polychlorinated biphenyls [or polybrominated biphenyls]
- TSCA Toxic Substances Control Act
- TCLP Toxicity characteristic leaching procedure
- TOX Total organic halogen (halide)
- TPH Total petroleum hydrocarbons (EPA Method 418.1 with known standard)

* If a total analysis (i.e. Total Lead, Total Benzene, etc.) exceeds the limits listed below, then TCLP must be performed and the TCLP results must not exceed the stated limits:

Analyte	Total Limit	TCLP Limit
Benzene	10 mg/Kg	0.5 mg/L
Arsenic	36 mg/Kg	1.8 mg/L
Barium	2000 mg/Kg	100 mg/L
Cadmium	10 mg/Kg	0.5 mg/L
Chromium	100 mg/Kg	5.0 mg/L
Lead	30 mg/Kg	1.5 mg/L
Mercury	4 mg/Kg	0.2 mg/L
Selenium	20 mg/Kg	1.0 mg/L
Silver	100 mg/Kg	5.0 mg/L

ANALYTE	LIMIT
TPH	1500 mg/Kg (for most facilities)
TOX	50 mg/Kg
PCB's	< 50 mg/Kg
Chlorides	3000 mg/Kg

** Results of the following analyses must be within the limits stated for disposal in a municipal solid waste landfill:

NOTE:

State law mandates waste recycling rate of 40% by 1994 for municipal wastes (Senate bill 1340 72nd Legislature). State policy considers landfill disposal as the least desirable method of disposal. All metal items must be recycled whenever possible. Other wastes not listed above will be handled on a case-by-case basis. Wastes requiring a Railroad Commission minor permit and/or testing should be segregated from those wastes not requiring a minor permit or testing. TNRCC Watts Line for Information on Recycling: 1-800-647-TEXAS