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Antifreeze Waste Considerations

The department developed this guidance document to provide Nebraskans information to help soundly manage spent antifreeze and to comply with the applicable hazardous waste regulations. [Title 128 – Nebraska Hazardous Waste Regulations](#) is Nebraska’s regulation document that governs hazardous waste requirements pertinent to spent antifreeze management.

Title 128 may be obtained on the NDEE website at <http://dee.ne.gov> by clicking on “Laws and Regulations”

This discussion will use the term “spent antifreeze” because it clearly describes the waste as well as having a distinct regulatory meaning. In Title 128 “spent” means a material that has been used and as a result of contamination can no longer serve the purpose for which it was produced without processing.

All waste generators **are required** to determine if any of their waste streams are listed hazardous wastes or are characteristic as a hazardous waste (Ignitable, Corrosive, Reactive, or Toxic). See Title 128, Chapter 3, and Chapter 4, §002. The NDEE has developed an Environmental Guidance Document titled [Waste Determinations & Hazardous Waste Testing](#) to help you do the waste determination. See Attachment 1 of that document for very specific information on spent antifreeze. You can view this document on the NDEE website by clicking on “Publications & Forms”. There are no Title 128 exemptions or exclusions that apply specifically to spent antifreeze.

Wastes generated by and from households are excluded from hazardous waste regulations through the Household Hazardous Waste (HHW) Exemption. This means that spent antifreeze generated by household do-it-yourselfers doing their own vehicle maintenance is not regulated a hazardous waste.

Wastes that pass through a sanitary sewer system to a Publicly Owned Treatment Works (POTW) are excluded from being a hazardous waste. The DEE strongly recommends that a spent antifreeze generator first coordinate with their POTW before disposing of its spent antifreeze to a sanitary sewer. There may be circumstances depending on the POTW design or capacity that make this disposal method impermissible in your area.

Never dispose of spent antifreeze into a storm sewer or onto the ground.

Never dispose of spent antifreeze into a septic system.

Spent antifreeze determined to be a hazardous waste can be recycled in a number of ways. Your generator status will usually dictate how to arrange this. See NDEE guidance document, “Comparison of Hazardous Waste Generator Requirements”, on the department website. On-site recycling is always allowed by Title 128. This can be performed in the generator’s equipment or by a service provider that

comes to your site to do the recycling. Off-site recycling is also allowable but the generator status drives how to do it. Conditionally Exempt Small Quantity Generators (CESQGs) can send their spent hazardous waste antifreeze off-site for recycling without using any hazardous waste paperwork or hazardous waste transporters. Small and Large Quantity Generators (SQGs & LQGs) can have their hazardous waste recycled off site but the spent antifreeze, if hazardous waste, is subject to full SQG or LQG regulations.

Note: If you are a SQG or LQG and your spent antifreeze is hazardous waste, that spent antifreeze comes under substantive hazardous waste regulation from the point of generation and must be fully and correctly managed as per Title 128, Chapter 9 for SQGs or chapter 10 for LQGs while being accumulated prior to recycling. The recycling process itself is exempt from Title 128 regulations.

Consider reducing the amount of spent antifreeze your operation generates by replacing standard antifreeze with extended-life antifreeze.

RESOURCES:

- NDEE Home Page <http://dee.ne.gov/>

Contacts:

- NDEE Main Line (402) 471-2186
- NDEE Toll Free Number (877) 253-2603
- NDEE Hazardous Waste Compliance Assistant (402) 471-8308
- Email questions to: ndee.moreinfo@nebraska.gov

NDEE Publications:

- NDEE Guidance Document – Comparison of Hazardous Waste Generator Requirements
- NDEE Guidance Document – Waste Determinations & Hazardous Waste Testing
Guidance is available on the NDEE Home Page under “Publications & Forms”
- [Title 128 – Nebraska Hazardous Waste Regulations](#)
Titles are available on the NDEE Home Page under “Laws/Regs & EQC”, “Rules & Regulations”

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