APPENDIX C

LIST OF E&P WASTES: EXEMPT AND NONEXEMPT
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EXEMPT AND NON EXEMPT

The lists below are not complete lists of exempt wastes and non exempt wastes. Additional wastes may be discovered during your day-to-day E&P operations. It is important to remember that a material that is unique to E&P operations must be used in primary field operations to gain exemption as a waste. Chapter 3 of this manual and the references cited in Chapter 3 can provide guidance in determining the waste’s regulatory status. Please note, however, the Commission or the EPA should be contacted for guidance in the event the regulatory status of a waste is in doubt.

EXEMPT WASTES

Activated charcoal filter media

Basic sediment and water (BS&W) - see Tank bottoms

Caustics, if used as drilling fluid additives or for gas treatment

Condensate

Cooling tower blowdown

Debris, crude oil soaked

Debris, crude oil stained

Deposits removed from piping and equipment prior to transportation (i.e., pipe scale, hydrocarbon solids, hydrates, and other deposits)

Drilling cuttings/solids

Drilling fluids

Drilling fluids and cuttings from offshore operations disposed of onshore

Gas dehydration wastes:
   a. Glycol-based compounds
   b. Glycol filters (see process filters), filter media, and backwash
   c. Molecular sieves

Gas plant sweetening wastes for sulfur removal:
   a. Amines (including amine reclaiming bottoms)
   b. Amine filters (see process filters), amine filter media and backwash
   c. Amine sludge, precipitated
   d. Iron sponge (and iron sulfide scale)
   e. Hydrogen sulfide scrubber liquid and sludge

Gases removed from the production stream (i.e., H₂S, CO₂, and VOCs)

Liquid hydrocarbons removed from the production stream but not from oil refining

Liquid and solid wastes generated by crude oil and tank bottom reclaimers

Oil, weathered

Paraffin

Pigging wastes from producer operated gathering lines

Pit sludges and contaminated bottoms from storage or disposal of exempt wastes

Process filters
EXEMPT WASTES (Continued)

Produced sand

Produced water

Produced water constituents removed before disposal (injection or other disposal)

Produced water filters (see Process filters)

Rigwash

Slop oil (waste crude oil from primary field operations and production)

Soils, crude oil-contaminated

Sulfacheck/Chemsweet waste

Tank bottoms and basic sediment and water (BS&W) from: storage facilities that hold product and exempt waste (including accumulated materials such as hydrocarbons, solids, sand, and emulsion from production separators, fluid treating vessels, and production impoundments).

VOCs from exempt wastes in reserve pits or impoundments or production equipment

Well completion, treatment, and stimulation, and packing fluids

Workover wastes (i.e., blowdown, swabbing and bailing wastes)
NONEXEMPT WASTES

Although the wastes listed below are not exempt from RCRA Subtitle C, they are not necessarily hazardous or necessarily subject to hazardous waste regulation. Use process knowledge or testing to determine the waste characteristics prior to management.

<table>
<thead>
<tr>
<th>Waste Type</th>
<th>Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>Batteries: lead acid</td>
<td>Methanol, unused</td>
</tr>
<tr>
<td>Batteries: nickel-cadmium</td>
<td>Oil, equipment lubricating (used)</td>
</tr>
<tr>
<td>Boiler cleaning wastes</td>
<td>Paint and paint wastes</td>
</tr>
<tr>
<td>Boiler refractory bricks</td>
<td>Pesticide and herbicide wastes</td>
</tr>
<tr>
<td>Caustic or acid cleaners</td>
<td>Pipe dope, unused</td>
</tr>
<tr>
<td>Chemicals, surplus</td>
<td>Radioactive tracer wastes</td>
</tr>
<tr>
<td>Chemicals, unusable (including waste acids)</td>
<td>Refinery wastes (e.g., unused frac fluids or acids)</td>
</tr>
<tr>
<td>Compressor oil, filters, and blowdown waste</td>
<td>Sandblast media</td>
</tr>
<tr>
<td>Debris, lube oil contaminated</td>
<td>Scrap metal</td>
</tr>
<tr>
<td>Drilling fluids, unused</td>
<td>Soil, chemical-contaminated (including spilled chemicals)</td>
</tr>
<tr>
<td>Drums/containers, containing chemicals</td>
<td>Soil, lube oil-contaminated</td>
</tr>
<tr>
<td>Drums/containers, containing lubricating oil</td>
<td>Soil, mercury-contaminated</td>
</tr>
<tr>
<td>Drums, empty (and drum rinsate)</td>
<td>Solvents, spent (including waste solvents)</td>
</tr>
<tr>
<td>Filters, lubrication oil (used)</td>
<td>Thread protectors, pipe dope-contaminated</td>
</tr>
<tr>
<td>Gas plant cooling tower cleaning wastes</td>
<td>Vacuum truck rinsate (from tanks containing nonexempt waste)</td>
</tr>
<tr>
<td>Hydraulic fluids, used</td>
<td>Waste in transportation pipeline related pits</td>
</tr>
<tr>
<td>Incinerator ash</td>
<td>Well completion, treatment and stimulation fluids, unused</td>
</tr>
<tr>
<td>Laboratory wastes</td>
<td></td>
</tr>
<tr>
<td>Mercury</td>
<td></td>
</tr>
</tbody>
</table>
QUESTIONABLE STATUS WASTES

These wastes were not specifically listed by EPA as exempt; however, they do appear to be exempt based on the Regulatory Determination\textsuperscript{6} and Clarification\textsuperscript{7} provided by EPA.

- Cement slurry returns from the well and cement cuttings (unused cement slurries would be nonexempt)
- Gas plant sweetening unit catalyst
- Natural gas gathering line hydrotest water
- Produced-water-contaminated soil
- Sulfur recovery unit wastes

SPECIAL CATEGORY WASTES

Special category wastes are subject to waste specific regulations.

Naturally occurring radioactive materials (NORM):

The possession, use, transfer, transport, and/or storage of NORM or the recycling of certain NORM-contaminated materials is regulated by the Texas Department of Health (TDH). Disposal of oil and gas NORM waste and operations incidental to disposal are regulated by the Railroad Commission. Disposal of all other NORM is regulated by the TNRCC.

Polychlorinated biphenols (PCBs) and PCB-contaminated soils:

Regulated under the federal Toxic Substances Control Act (TSCA). At the state level, oil and gas wastes contaminated by PCBs are regulated by the Railroad Commission.

Asbestos:

Regulated under the National Emissions Standards for Hazardous Air Pollutants (NESHAP). At the state level, asbestos waste from oil and gas operations is regulated by the Railroad Commission of Texas (regarding oil and gas waste), the Texas Department of Health (regarding NESHAPS), and the Texas Natural Resource Conservation Commission (regarding disposal in landfills).