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OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

APR 23 1991

Mr. Chris L Gansel
Test Engineer
Robert Sun Company
240 Great Circle Road, #344
Nashville, TN 37228

Dear Mr. Gansel:

This is in response to your letter of March 21, 1990 to Denise Wright concerning the burning of compressor oil with ammonia in space heaters. You asked whether there are any regulations prohibiting the burning of such oil.

There are no federal hazardous waste regulations specifically restricting the burning of ammonia contaminated used oils in space heaters. Our regulations under 40 CFR 266.41 governing used oil burning allow off-specification used oil to be burned in space heaters provided three conditions are met:

- (1) The heater burns only used oil that is generated by the owner/operator of the space heater or used oil from do-it-yourself oil changers who generate the used oil as a household waste;
- (2) The heater has a maximum design capacity of no more than 0.5 million BTU per hour; and
- (3) The heater's combustion gases are vented to the ambient air.

Thus, if your space heater model Sun 2 meets these design and use criteria, it may be used for the burning of off-specification used oils, including those that may be contaminated with ammonia, according to the federal regulations. Some States, however, have different regulations governing used oil and we recommend your checking with the respective States.

Sincerely yours,

Original Document signed

David Bussard, Director
Characterization and Assessment Division