



PADEP Classifications

Collaborate with MAX Environmental compliance experts to better understand the changes that the PADEP has made to the Classification System for Oil & Gas Wastes and TENORM Tracking.

In December 2015, the Pennsylvania Department of Environmental Protection (PADEP) changed the Classification System for wastes generated by the Oil & Gas industry. These changes include expanding the list of classification codes from 10 to 13, as well as reducing the previous 'multiplier of 3' for certain types of Technologically Enhanced, Naturally Occurring, Radioactive Material (TENORM) waste. The multiplier 1.5 will be used going forward.

Additionally, the PADEP has modified its requirements for tracking the monthly volumes of TENORM waste accepted at landfills, and has altered the Reporting Form for TENORM waste rejection by a landfill.

All of these changes went into effect January 1, 2016. While these changes and reclassifications can be confusing, the industry compliance experts at MAX Environmental are completely informed and ready to help.

CALL TODAY

To discuss these changes and what they mean for your business – please contact one of our technical and compliance representatives at 412-343-4900.

Or email:

info@maxenvironmental.com



PADEP Classification Code Update

A major change has been the reclassification of hydraulic fracturing fluid waste under code 805 and introducing sludge and related waste from oil and gas wastewater treatment operations under code 804. PADEP also introduced filter socks under new code 812. 804, 805, and 812 wastes are generally considered to be TENORM wastes. A facility accepting those wastes for disposal had to apply a multiplier of 3 when tracking those wastes under a monthly allotment system established by PADEP. This had the effect of reducing the volume of TENORM waste a facility could accept each month. PADEP has reduced this multiplier in half thus allowing facilities to potentially accept more TENORM waste each month.

MAX Environmental can help you with proper waste classification, testing and processing/disposal approval. Please call us at 412-343-4900 for all of your oil and gas waste management needs.

The previous classification code list for Oil & Gas waste:

801 Drilling Fluids – Residuals (other than those under 802-810; includes drill cuttings from monitoring well and drinking water well construction)

802 Brine – (natural salt water separated at oil and gas wells)

803 Drilling Fluid Waste – (oil and gas drilling mud, other drilling fluids other than fracturing fluid and spent lubricant)

804 Fracing Fluid Waste – (oil and gas drilling fracturing fluid, flow-back fracturing fluid, flow-back fracturing sand)

807 Basic Sediment – (oil and gas production storage impurities, sediment from produced oil at storage tank battery)

808 Servicing Fluid – (oil and gas production well maintenance/work over fluids, oil/water-based mud and foam)

809 Spent Lubricant Waste – (spent oil and gas drilling lubricants, spent plug drilling lubricants)

810 Drill Cuttings – (oil and gas drill cuttings)

The new classification code list for Oil & Gas wastes:

801 Non-Oil & Gas Well Drilling Waste – includes drilling fluids, residuals, and drill cuttings from monitoring well and drinking water well construction

802 Produced Fluid – includes natural salt water, brine and formation fluids generated at oil and gas wells after the 30-day flow-back period.

803 Drilling Fluid Waste – oil and gas drilling mud, other drilling fluids other than fracturing fluid and spent lubricant.

804 Wastewater Treatment Sludge – sludge generated during the processing of any oil and gas-related wastewater including any sediment generated during storage of oil and gas-related wastewater. Mixed loads of wastewater treatment sludge with other waste for disposal purposes, such as filter socks (RWC 812), will be coded as RWC 804. **New waste category!**

805 Fracturing Fluid Waste – oil and gas fracturing/stimulation fluid waste, flow-back fluid and flow-back fracturing sand recovered from the well bore within 30 days following the release of hydraulic fracture stimulation pressures. **New code!**

806 Synthetic Liner Materials – includes well site liners, liners used in pits or other approved storage structures, freshwater impoundments, centralized impoundments, or used in conjunction with primary containers. **New code and waste category!**

807 Sediment from Production Storage – sediment from storage of marketable oil and gas product. Does not include sediment from oil and gas-related wastewater storage.

808 Servicing Fluid – oil and gas production well maintenance/work over fluids, oil/water-based mud and foam and well cellar cleanout waste.

809 Spent Lubricant Waste – (spent oil and gas drilling lubricants, spent plug drilling lubricants)

810 Drill Cuttings – oil and gas drill cuttings

811 Soil Contaminated by Oil & Gas-related Spills – soil contaminated by spills of RWCs 802, 803, 805, 807, 808, 809 and 810. Soil contaminated by spills of RWC 804 will be coded using RWC 804. Soil contaminated by spills of RWC 812 will be coded using RWC 812. **New code and waste category!**

812 Filter Socks – Filters, filter socks and other media used to filter any oil and gas-related wastewater. Does not include filter socks used in conjunction with erosion and sedimentation controls, which are captured under RWC 216, or filter socks mixed with RWC 804 for disposal purposes. Except where filter socks are mixed with RWC 804 and coded as RWC 804, mixed loads of RWC 812 with other waste for disposal purposes, such as drill cuttings, will be coded as RWC 812. **New code and waste category!**

899 Other Oil & Gas Wastes – all remaining oil and gas wastes other than those already covered under existing RWCs. Includes containment water. **New code and waste category!**

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