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Details:

(FORM UPDATED: 08/11/2010)

**WISCONSIN STATE LEGISLATURE ...
PUBLIC HEARING - COMMITTEE RECORDS**

2009-10

(session year)

Assembly

(Assembly, Senate or Joint)

**Committee on ... Natural Resources
(AC-NR)**

COMMITTEE NOTICES ...

- Committee Reports ... **CR**
- Executive Sessions ... **ES**
- Public Hearings ... **PH**
- Record of Comm. Proceedings ... **RCP**

INFORMATION COLLECTED BY COMMITTEE FOR AND AGAINST PROPOSAL

- Appointments ... **Appt**
- Clearinghouse Rules ... **CRule**
- Hearing Records ... bills and resolutions
(**ab** = Assembly Bill) (**ar** = Assembly Resolution) (**ajr** = Assembly Joint Resolution)
(**sb** = Senate Bill) (**sr** = Senate Resolution) (**sjr** = Senate Joint Resolution)
- Miscellaneous ... **Misc**

* Contents organized for archiving by: Mike Barman (LRB) (Sept/2010)

Assembly

Record of Committee Proceedings

Committee on Natural Resources

Assembly Bill 258

Relating to: the disposal of used automotive engine oil filters and oil absorbent materials and providing a penalty.

By Representatives Hubler, Black, Jorgensen, Hraychuck, A. Ott, Kaufert, Townsend, Lothian, Berceau, Spanbauer and Ripp; cosponsored by Senators Harsdorf and Taylor.

May 08, 2009 Referred to Committee on Natural Resources.

June 3, 2009 **PUBLIC HEARING HELD**

Present: (15) Representatives Black, Danou, Molepske Jr.,
Steinbrink, Hraychuck, Hebl, Mason, Milroy, Clark, J.
Ott, Gunderson, Huebsch, LeMahieu, Mursau and
Nerison.

Absent: (0) None.

Appearances For

- Rep. Mary Hubler, Rice Lake — 75th Assembly District
- Sen. Sheila Harsdorf, River Falls — 10th Senate District
- John Reindl, Madison — Council on Recycling
- Brian King, Woodville — CRI Recycling Service
- Adam Snippen, Green Bay — UW-Green Bay
- Dave Feemster, Stratford — Rock Oil Refining, Inc.
- Gary Antoniewicz, Madison — Midwest Equipment Dealers
Association
- Chris Snyder, Madison — Wisconsin Auto & Truck Dealers
- Laura Krist, Bancroft
- Suzanne Bangert, Madison — DNR

Appearances Against

- None.

Appearances for Information Only

- None.

Registrations For

- Monica Groves Batiza, Madison — Wisconsin Counties Association
- Jennifer Giegerich, Madison — WLCV
- Dave Krahn, Waukesha — Waukesha County

Registrations Against

- None.

Registrations for Information Only

- None.

June 10, 2009

EXECUTIVE SESSION HELD

- Present: (14) Representatives Black, Danou, Molepske Jr., Steinbrink, Hebl, Mason, Milroy, Clark, J. Ott, Gunderson, Huebsch, LeMahieu, Mursau and Nerison.
- Absent: (1) Representative Hraychuck.

Moved by Representative Black, seconded by Representative Hebl that **Assembly Substitute Amendment 1** be recommended for adoption.

Ayes: (14) Representatives Black, Danou, Molepske Jr., Steinbrink, Hebl, Mason, Milroy, Clark, J. Ott, Gunderson, Huebsch, LeMahieu, Mursau and Nerison.

Noes: (0) None.

Absent: (1) Representative Hraychuck.

**ASSEMBLY SUBSTITUTE AMENDMENT 1 ADOPTION
RECOMMENDED, Ayes 14, Noes 0**

Moved by Representative Molepske Jr., seconded by Representative Milroy that **Assembly Bill 258** be recommended for passage as amended.

Ayes: (14) Representatives Black, Danou, Molepske Jr., Steinbrink, Hebl, Mason, Milroy, Clark, J. Ott, Gunderson, Huebsch, LeMahieu, Mursau and Nerison.

Noes: (0) None.

Absent: (1) Representative Hraychuck.

PASSAGE AS AMENDED RECOMMENDED, Ayes 14, Noes 0

John Maycroft
Committee Clerk





Wisconsin County Solid Waste Managers Association

William Casey, Co-Chair
Steve Hodgen, Co-Chair

JUN 08 2009

~~May 27, 2009~~

The Honorable Shelia Harsdorf
Room 19 South
State Capital
P.O. Box 7882
Madison, WI 53707-7882

In The
AB 258
Folder

Dear Senator Harsdorf:

The Board of Directors of the Wisconsin Counties Solid Waste Management Association (WCSWMA), a non-profit association of municipal solid waste and recycling professionals, wishes to extend to you their resounding support for **SB186**. The members of the WCSWMA board are incredibly pleased that you have taken the initiative to bring this critical issue solid waste resource issue to the forefront.

WCSWMA members have a long tradition, through practical application and formally through its bylaws, of promoting effective, efficient and environmentally sound solid waste management systems and resource recovery efforts. Therefore we view used oil filter and oil absorbents are a valuable resource that do not belong in landfills.

SB186 is a much-needed and logical follow-up to the recommendations of the June 2005 Department of Commerce Report on the Disposal of Oil Filters and Other Oil-Absorbent Materials in Wisconsin. If SB186 becomes law, then millions of gallons per year of oil-containing resources, such as oil filters and absorbents, will not be lost to landfilling. If SB186 becomes law, then a precious and limited resource will realize its highest and best use through recycling and reuse. If SB186 becomes law, then the once problematic oil-containing materials will no longer pose a risk to Wisconsin's environment.

Thank you for your efforts in working to make SB186 a shining example of "effective, efficient and environmentally sound solid waste management" and "resource recovery."

Best regards,

William Casey
Co-Chairperson
Wisconsin Counties Solid Waste Management Association
P.O. Box 370
Portage, WI 53901
608-742-6651

C.c.: Rep. Spencer Black-Chair, Assembly Natural Resources Committee





WISCONSIN AUTOMOTIVE AFTERMARKET ASSOCIATION

5330 Wall St., Suite 100 • Madison, Wisconsin 53718-7929
608-240-2065 • 800-856-9282 • FAX 608-240-2069

June 2, 2009

Representative Spencer Black
Chair
Assembly Committee on Natural Resources
State Capitol
P.O. Box 8952
Madison, WI 53708

Re: Position of Wisconsin Automotive Aftermarket Association on AB 258

Dear Chairman Black and Members of the Committee:

Wisconsin Automotive Aftermarket Association (WAAA), which represents the automotive industry, related products, and services (i.e. service stations and tire dealers) businesses in Wisconsin and would like to address AB 258 on their behalf. WAAA members are directly affected by this legislation as engine service and repairs are a large part of their business. WAAA has concerns over part, but not all, of this proposal.

1. Oil Filters

For the most part, WAAA members do not dispose of used oil filters in solid waste disposal facilities. Oil filters are generally drained, crushed and recycled and the industry has voluntarily addressed this issue. Facilities to dispose of oil filters for recycling are readily available. For this reason, WAAA does not oppose this part of the legislation.

2. Oil Absorbent Materials

WAAA has a different view towards this second part. There are many fewer alternatives as to "oil dry" materials and rags which may have oil residue. Generally, rags are washed and cleaned and oil dry is generally swept up. There are few alternatives available on the market. Further, we are not sure what the term "oil absorbent materials" includes.

Serving Wisconsin's retail gasoline dealers, service repair businesses, and independent tire dealers...

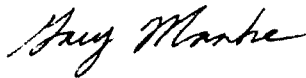
Our understanding is that the U.S. EPA does not consider such materials to be a hazardous waste providing there is no free flowing oil. Further, we are not aware of any sites contaminated by non-free flowing oil in such small quantities.

WAAA understands that other groups have proposed amending the bill to exclude shop rags, paper towels and floor sweeping absorbent compounds. WAAA would support such an amendment.

CONCLUSION

WAAA does not believe that free-flowing oil belongs in solid waste disposal facilities and does not oppose the banning of used oil filters from such facilities. WAAA is concerned about other absorbent materials and supports an amendment to AB 258 in this regard.

Sincerely,



Gary Manke CAE
Executive Director





Fourth Floor
1 South Pinckney Street
P.O. Box 927
Madison, WI 53701-0927

Phone • (608) 257-9521
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Gary L. Antoniewicz
Direct Dial Number • (608) 283-1759
gantoni@boardmanlawfirm.com

June 2, 2009

Representative Spencer Black
Chair
Assembly Committee on Natural Resources
State Capitol
P.O. Box 8952
Madison, WI 53708

Re: Position of Midwest Equipment Dealers Association on AB 258

Dear Chairman Black and Members of the Committee:

Our firm represents the Midwest Equipment Dealers Association (MEDA) which has asked us to address AB 258 on its behalf. MEDA members are directly affected by this legislation as engine service and repairs are a large part of their business. MEDA has concerns over part, but not all, of this proposal.

1. Oil Filters

For the most part, MEDA members do not dispose of used oil filters in solid waste disposal facilities. Oil filters are generally drained, crushed and recycled and the industry has voluntarily addressed this issue. Facilities to dispose of oil filters for recycling are readily available. For this reason, MEDA does not oppose this part of the legislation.

2. Oil Absorbent Materials

MEDA has a different view towards this second part. There are many fewer alternatives as to "oil dry" materials and rags which may have oil residue. Generally, rags are washed and cleaned and oil dry is generally swept up. There are few alternatives available on the market. Further, we are not sure what the term "oil absorbent materials" includes.

Page 2
June 2, 2009

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MEDA understands that other groups have proposed amending the bill to exclude shop rags, paper towels and floor sweeping absorbent compounds. MEDA would support such an amendment.

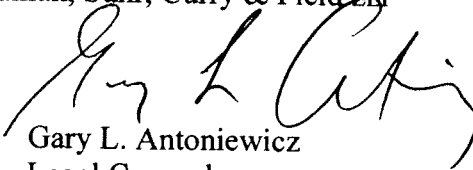
CONCLUSION

MEDA does not believe that free-flowing oil belongs in solid waste disposal facilities and does not oppose the banning of used oil filters from such facilities. MEDA is concerned about other absorbent materials and supports an amendment to AB 258 in this regard.

Sincerely,

Boardman, Suhr, Curry & Field LLP

By



Gary L. Antoniewicz
Legal Counsel

GLA/jmc

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State Senator Sheila Harsdorf

Date: June 3, 2009

To: Assembly Committee on Natural Resources

Fr: Senator Sheila Harsdorf

Re: Assembly Bill 258 – Oil Filter Recycling

Chair Black and Committee members:

I would like to thank you for holding a public hearing and allowing me to testify in support of Assembly Bill 258, which would prohibit the disposal of used oil filters and oil absorbent materials in Wisconsin landfills.

I first worked on this issue as a member of the State Assembly in 1997. At that time, the Council on Recycling was tasked by the State Legislature with reporting on the status of oil filter recycling in Wisconsin and providing recommendations on increasing oil filter recycling. The Council at that time estimated that 15% of oil filters were recycled in Wisconsin, which the Council found to be a “waste of resources” and a “serious groundwater” hazard.

Given the report by the Council to the Legislature, I authored legislation in 2003 that created a study committee within the Department of Commerce to establish goals for recycling oil filters and to suggest measures if these goals were not met. At that time, the study committee found that approximately 25% of oil filters used in Wisconsin were being recycled, based upon survey data. The study committee also determined that 53.5 million pounds of oil absorbent materials were disposed in Wisconsin landfills, while only 1.3 million pounds of oil absorbent materials were recycled. The study committee estimated that millions of gallons of oil were being released into our landfills due to the discarded oil filters and oil absorbent materials.

As a result of the study committee’s findings, the committee voted to set a 60% recycling goal for oil filters by 2008 and progressive goals for recycling oil absorbent materials beginning with 10% in 2008 and rising thereafter. The study committee also recommended that if these goals were not met, a prohibition on these filters and materials should be enacted. In 2008, the University of Wisconsin-Green Bay revisited this study and found that recycling of oil filters had decreased between 2005 and 2007, while the recycling of oil absorbent materials had increased slightly.

This legislation seeks to enact the recommendations set forth by the Department of Commerce and the oil filter disposal study committee. Given that these items can now be effectively recycled, this legislation will serve to protect our groundwater and provide other environmental benefits by recycling these resources and keeping toxic substances out of our landfills.

Currently, our neighboring states of Illinois, Iowa, and Minnesota have prohibitions on the disposal of oil filters.

Wisconsin was a leader in implementing a statewide recycling law in the early 1990's in order to minimize materials going into our landfills and to protect our groundwater and resources. We have banned numerous materials from landfills knowing they were contaminants. While we have banned oil from our landfills, we continue to put used oil filters and oil absorbents in landfills. With the technology to recycle oil filters now readily available, it is time to act to keep these contaminants out of our landfills.

I would like to thank you for holding a public hearing on AB 258 and urge your support and passage of this legislation.





Mary Hubler

State Representative

Hubler Testimony on Assembly Bill 258

Disposal of oil filters and oil absorbent materials

Assembly Committee on Natural Resources

June 3, 2009

Thank you, Chairman Black and committee members for receiving my testimony on Assembly Bill 258.

We must preserve space in our landfills while making them as environmentally sound as possible. That is why I have joined Senator Sheila Harsdorf in offering AB 258 and its Senate companion, SB 186.

AB 258 prohibits the disposal of oil filters and oil absorbent materials in landfills. Oil and oil-based products are ubiquitous and pose a serious threat to groundwater. While landfills are engineered and built to protect the groundwater, the safest strategy is to eliminate fluids and substances that could destroy an irreplaceable and necessary resource – our water.

The disposal of free flowing oil in Wisconsin landfills has been banned since 1991, under the state recycling law. A survey in 2005 found that between 840,000 and 880,000 gallons of used oil was being released annually into our landfills in oil filters, along with 53.3 million pounds of oil absorbent materials.

Oil filters and absorbent materials can now be effectively recycled, and they ought to be.

In 2003, the Legislature created a study committee within the Department of Commerce to establish goals for recycling oil filters and to suggest measures if these goals are not met. One of the recommended measures was to establish a ban on oil filters in Wisconsin landfills if the oil filter recycling goals were not met.

The goals have not been met. The 2005 survey showed that 27 percent of oil filters were being recycled. In the summer of 2008, a follow-up survey by UW-Green Bay showed that the rate of recycling had declined to about 20 percent. The goal set by the committee is 60 percent.

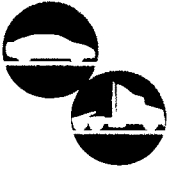
The Iowa Legislature unanimously passed a statewide landfill ban on used oil filters as of July 2008. A statewide ban in North Carolina is set to begin this year.

The price of oil has been up and there is profit to be made in the reprocessing of used oil. It is time that Wisconsin joined the leading states and enacted this ban.

While I believe it is important to strengthen groundwater protection immediately, the prohibitions in the bill would take effect a year after the bill is enacted. It seems reasonable to allow time for the public to learn about the new law and for individuals and businesses to find ways to adapt.

Thank you again for giving my bill a hearing.





Wisconsin Automobile & Truck Dealers Association

WILLIAM A. SEPIC
President

150 E. Gilman Street --- Level A
Madison, WI 53703
(608) 251-5577 FAX: 251-4379

Mailing Address:
P.O. Box 5345, Madison, WI 53705-0345
www.watda.org

June 3, 2009

To: Assembly Natural Resources Committee

From: The Wisconsin Automobile and Truck Dealers Association

Re: AB 258 Oil Filter Disposal

Dear Chairman Black and Committee members ,

The Wisconsin Automobile and Truck Dealers Association supports the recycling of used oil filters, but requests that the current proposed bill (AB 258), be amended to exclude shop rags, paper towels and floor sweeping absorbent compounds.

The disposal of used oil filters has been federally regulated for quite some time and Wisconsin auto and truck dealers have not only been complying with those regulations but many (and a growing number) have taking it upon themselves to recycle those filters. In fact an all of our dealers either recycle and/or reuse the used motor oil.

However the bill, as proposed creates practical day to day compliance problems. The bill requires absorbent materials to be recycled, but there is no definition for absorbent materials. Shop rags, paper towels and sweeping absorbent compounds are routinely used for minor drips leaks and spills. Shop rags are sent out for cleaning and reused. Paper towels and sweeping absorbent compounds do not pose the same threat to land fills as the filters themselves.

In the bill (AB 258), there is a definition of "Oil absorbent materials" We would propose that it states

"Oil absorbent materials" means materials that are used to absorb spilled or used oil, but does not include shop rags, paper towels or floor sweeping absorbent compounds.

Over the years we have opposed mandating of recycling used oil filters. We have supported the market place taking care of this issue on its own. In other words, if there is a market for the scrap metal and what little residual oil is left in a used filter, then those companies seeking those materials would emerge. As more and more of our members voluntarily choose to recycle **we can support the concept of recycling used oil filters provided that the mandate is practical and works with business and not against it.**



DNR Testimony
Before the Assembly Committee on Natural Resources
AB 258
June 3, 2009

Good morning. Thank you for the opportunity to testify in support of Assembly Bill 258, pertaining to the disposal of oil filters and absorbents. My name is Suzanne Bangert and I am the Deputy Administrator of the Air & Waste Division at the Department of Natural Resources.

The 1990 Wisconsin Recycling Law which provides a statutory ban on used or waste oil in landfills has been very successful in keeping bulk engine oil out of landfills. Effectively, this ban promotes the reuse and reclamation of oil for productive uses such as energy recovery and re-refining into oil products, which in turn conserves resources and potentially creates jobs in Wisconsin. The 1991 ban also reduces the toxic impacts of oil contaminated landfill leachate.

AB 258 would take the current landfill ban and oil recycling efforts one step further by prohibiting the disposal of used oil filters and oil absorbent material in landfills. Why is it important to take this additional step if the 1991 ban has been effective in diverting bulk engine oil from landfills? Is it worth the effort to capture a relatively small amount of additional oil? Yes! You may be surprised to learn that a 2008 study by the University of Wisconsin (UW) - Green Bay, estimates that between 200,000 and 900,000 gallons of oil from oil filters and about 1.6 million gallons of oil from absorbents are placed into Wisconsin landfills each year. These are significant quantities of oil that can be easily recycled for productive use. In addition, the steel from the filters can be collected for reuse or recycling. In fact, other steel materials were included in the 1995 landfill ban.

Can other measures be taken to encourage the recycling of oil filters and absorbent short of prohibiting these materials from landfills? Voluntary approaches are not working to significantly recover the oil and steel from these filters and absorbents. A landfill ban is needed to successfully reclaim these materials and resources.

The department does recommend consideration of a minor amendment to the proposed bill language. Under the current language, any amount of oil absorbent material is prohibited from landfill disposal. This may not be practical for small amounts of oil absorbent that are generated infrequently. We respectfully suggest that the bill acknowledge that it would be impossible to stop the occasional oily paper towel or individuals who clean up their garage floors with kitty litter from getting into the waste stream. We would be happy to work with the bill sponsors on such a change.

In conclusion, the department supports AB 258 because it provides consistency related to landfill bans, conserves natural resources, provides better protection for the environment and has the potential to create recycling jobs in Wisconsin. I'd be happy to answer any questions you might have.





COUNTY OF MARATHON

18500 EAST HIGHWAY 29

RINGLE, WI 54471-9762

SOLID WASTE MANAGEMENT
(715) 446-3339

LANDFILL
(715) 446-3101

FAX
(715) 446-2906

E-MAIL: ~~solidwas@co.marathon.wi.us~~

June 8, 2009

Representative Spencer Black
Chair-Assembly Natural Resources Committee
Room 210 North-State Capitol
P.O. Box 8952
Madison, WI 53708

JUN 15 2009

In The
AB 258
Folder

RE: AB187: On-site disposal of structural practice burn ash

Dear Representative Black:

The Marathon County Solid Waste Management Board (SWMB), owners and operators of a licensed sanitary landfill, wish to register their resounding opposition to AB187, regarding the disposal of ash resulting from the practice burning of a structure for purpose of firefighter training. The SWMB is a county legislative body with statutory authority under Section 69.70(2) and for decades has been involved in promoting effective, efficient and environmentally sound solid waste management systems and resource recovery efforts

Currently, the Department of Natural Resources requires "ash resulting from the burning of a structure for practice or instruction of fire fighters or the testing of fire fighting equipment be disposed of in a landfill licensed by DNR" for a reason – environmental protection. When ash is inappropriately disposed of outside of a licensed landfill, infiltration from surface waters and atmospheric precipitation will cause the leaching of potentially hazardous and toxic compounds into the groundwater. WCSWMA believes this is an unnecessary and unreasonable risk to cast upon Wisconsin's citizens and their environment.

Under Resource Conservation Recovery Act (RCRA), disposal is defined as "the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste *or any constituent thereof* may not enter the environment or be emitted into the air or discharged into any waters, *including groundwater*." If AB187 is allowed to become law, who or what organization would be responsible for any long-term care of the disposal site and for any environmental damage? Therefore, the SWMB feels that current statute and regulation regarding the disposal of ash from practice burns provides that protection and should not be circumvented by AB187

The SWMB understands and appreciates the fact the practice burns are a necessary part of ensuring the highest standards of firefighter training. Further, the SWMB board realizes that budgetary constraints may make on-site disposal of ash appear to be cost-effective. However, the SWMB board cannot support this short-sighted, environmentally destructive method of ash disposal.

Best regards,

Roger Zimmermann
Chairperson
Marathon County Solid Waste Management Board

C.c.: Al Shea-WIDNR
Rep. Friske, Mursau, Petrowski, Seidel, Suder, Vruwink & Williams
WI Counties Assn. Environment & Land Use Steering Committee



The Honorable Shelia Harsdorf
N6627 County Road E.
River Falls, WI 54022

In The
AB 258 Folder

Date?

Dear Senator Harsdorf,

The undersigned parties were both part of the 2005 committee coordinated by the Wisconsin Department of Commerce to study oil filter and absorbent recycling. We are writing in full support of LRB-0856, proposing a ban on landfilling oil filters and absorbent materials.

SB
186

When the committee met in 2005, the first step was to determine how much oil was trapped in absorbents and oil filters, even after proper handling and draining. The committee also had the University of Wisconsin - Green Bay conduct a study on recycling rates for oil filters and absorbents. Using this information, the committee gave a recommended recycling goal of 60 percent for oil filters within two years of the recommendation date or July 1, 2008, whichever came first. If the goal was not met by then, a total landfill ban by both commercial and residential generators was recommended. The recycling rates for absorbents had a longer implementation schedule, but stated that a landfill ban should be enacted if any of the deadlines came and the corresponding recycling goal was not met.

Last year, 2008, the University of Wisconsin - Green Bay completed a follow up study to once again estimate the recycling rates for oil filters and absorbents. The study was a duplication of the original study done in 2005. This study indicated that the recycling rate for oil filters had actually declined. The amount of oil absorbents recycled has gone up slightly, however this may be due to an increase in the overall amount of absorbents used in Wisconsin, which was extremely difficult to estimate in the both the previous study and the recently completed study. Overall, the study shows that using a best case scenario for oil filters that are currently not being recycled, there would be approximately 196,783 gallons of oil per year released into landfills. The study also showed that using a best case scenario for oil absorbents that are not currently being recycled there would be approximately 1,590,518 gallons of oil being released into landfills.

Given that the deadlines have passed and none of the recycling goals have been met for oil filters or absorbents, and given that all of the individual components of oil filters (steel container, paper media and oil) are currently banned from landfills, we feel a total landfill ban should be mandated.

Sincerely,

Laura M. Krist
Associated Recyclers of Wisconsin (AROW)

Professor John F. Katers
University of Wisconsin-Green Bay



ROCK

OIL REFINING, INC.

8

Date?

Collection and Recycling of:
Used Oil / Oil Absorbents / Fuel Oil / Oil Filters / Anti-freeze
Oily Water Management

Dave Feemster
Partner
C4522 Hwy. 97, P.O. Box 105
Stratford, WI 54484

CELL 715-574-2156
715-687-4198
FAX 715-687-2259
EPA/DNR Licensed
EMAIL dfeemster@rockoilrefining.com

Assembly Bill 258

David Feemster
Rock Oil Refining Inc.
Stratford, WI 54484

Rock Oil has been recycling Used Oil Filters since 1990.

On average we have found Used Oil Filters to contain:
Free Flowing Used Oil 13% by weight
Filter Media 30% by weight
Metal 57% by weight

On average one ton of used oil filters produces:
Free Flowing Used oil 260 lbs or 35 gal
Filter media 600 lbs
Metal 1140 lbs

Currently the risk to the environment involves land filling filters without proper pre-treatment: hot-draining, crushing or dismantling to release free flowing oil and to remove oily components.

85% of spin-on filters used today on vehicles contain anti-drain valves which trap oil inside the filter.

These types of filters pose the greatest threat and risk to our landfills / environment.

Cost to the installer to recycle oil filters:
Passenger / light truck vehicles on average \$.10 per filter
Heavy duty truck on average \$.25 per filter

Closing statement

Allowing land filling of used oil filters will carry used oil into our landfills. The question of how much oil is highly debatable and dependent on maintenance operators and users who are currently land filling used oil filters.