

## **RAIDER ENVIRONMENTAL WASTE ANALYSIS PLAN USED OIL TESTING**

This section of the manual is to comply with 40CFR 279.55. This analysis plan will describe the procedures that will be used to comply with the analysis requirements of 40 CFR279.53 (rebuttal presumption for used oil) and to 279.72 (specifications for used oil) when applicable.

### **Route Drivers:**

1-When a driver reaches any destination or any customer location on a route, the driver must first attempt to park his vehicle in an area that will not disturb the business flow of traffic in and out of the customer's station or facility.

2-Before the driver attempts to check the tank or pump the customer's tank, the driver must seek out the contact person that is listed on his route sheet or the person in charge and inform the customer that they are to check the amount of used oil in their used oil storage tank and pump it if necessary.

If the customer informs the driver that it not a good time, the driver must then inform the customer of our next scheduled route for his facility and that there may be a possible off route pick-up charge if they need to be picked up prior to the next scheduled service. The driver should then notify dispatch of any problems.

3-After the driver has checked with the contact person at each facility, and has been approved to service the facility; the driver will then follow these pick-up procedures:

A-The driver will stick the customers tank and determine by the size of the tank and the amount of oil projected to be at the stop, which is listed on the drivers route sheet, to determine whether the customer needs to be pumped or not.

B-If the driver determines that the customer's tank needs pumping, the driver will then use a halogen sniffer to sniff the air space of the storage tank or use the top to bottom sampling method that consist of a small pipe with a check valve on the end that allows the operator to sample the tank from top to bottom. This is a sample method that has been shown to be equivalent to that in (APPENDIX 1 of 40CFR 261 and 260.20 and 260.21). The driver will then run the halogen sniff test on the oil to determine whether the oil is contaminated with any halogenated solvent.

This halogen sniff test consist of a halogen leak detector device that will be used to determine the presence of halogens. The driver must calibrate the sniffer using a calibration standard on each day.

(Raider's Compliance and Transportation Management staff does training on calibration).

If the sniff test fails, the driver will run a second test using the Dexsil Chlor-D-Tech Q4000 test kit to determine whether the used oil is over a 1000 ppm halogen. If this kit test fails, the driver

is required to inform the customer that a halogenated waste may have been mixed with the used oil. If there are multiple containers and further kit tests are needed to determine the source of contamination or if only part of the used oil might not be contaminated with halogens.

**40 CFR 279.55(ii)**

This test will be done and these procedures shall be followed on every pick-up of used oil and shall be done on site at the generator's location.

**40 CFR 279.55 (iii)**

This test method is approved by EPA and listed as EPA SW-846 Method Number 9077.

If the oil fails the Dexsil Kit Test, showing the presence of halogens over 1000ppm, the driver will then inform the customer that his oil is presumed to be contaminated with a hazardous waste and must be regulated as a hazardous waste. Or, rebut the presumption and provide an analysis to prove otherwise. If the customer wants to rebut the assumption that hazardous waste has been mixed with the used oil in question, the driver should then take a top to bottom sample of the used oil and label the sample. Then the sample must be brought back to the plant with a completed manifest where the customer was charged for the GC Analysis. The sample should be submitted to RES's lab to be sent out to a third party lab for the GC analysis.

(Note: the GC Analysis results should be attached to the Customer's manifest when billed)

If the customer does not desire us to have the GC analysis run on his used oil, the driver must then instruct the customer to get in contact with our office for assistance in disposing of the used oil that is contaminated with a hazardous waste. After notifying the customer of the condition of his used oil under hazardous waste regulations, the driver will also be required to immediately notify our office and let management know what customer on his route has failed the Dexsil Test Kit analysis, also, if there were any other problems or information that may be helpful to management as we assist the customer in disposing of his potential hazardous waste.

C- Any customers that fail our halogen analysis that does not rebut the presumption by the GC analysis or other acceptable rebuttal options must be reported to State regulatory agency.

**40 CFR 279.53 (Rebuttal Presumption)**

If the customer chooses to rebut the presumption under 279.53, it will be the policy of Raider Environmental Services, Inc. to use an analytical method from SW-846, Edition III to show that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in APPENDIX VIII of 40 CFR 261. The Gas Chromatography method will be the method Raider Environmental Services will use when rebutting such presumption.

If the customer chooses to exempt any halogenated waste mixed with the used oil by way of the conditionally exempt small quantity generator rules at 40 CFR 261.5, the customer must provide

Raider Environmental Services, Inc. with a written and signed certification that the generator has generated less than 100kg of hazardous waste during the previous and current calendar month.

Prior to pick up, the President of Raider or his designee must approve acceptance of any material under this exemption.

D- IF the used oil that is tested passes the analysis showing that the amount of halogen is under 1000ppm, the driver will then stick his truck tank and look on his chart that shows how many gallons per inch goes in his truck, and then proceed to pump the customer's tank calculating the gallons going into the tank truck with the chart that each driver has on board his vehicle.

The customer must certify that there has not been any hazardous waste mixed into the waste water/antifreeze being disposed of. The wastewater will usually be picked-up at the time of normal used oil service.

Wastewater and antifreeze should be tested with the halogen sniffer using the same procedures as used oil. If this testing fails, drivers should report to Raider Environmental Services, Inc. management for further instruction.

If the driver is operating one of the multi compartment trucks, the water/antifreeze can be pumped on the spot. However, the driver should always let the customer know that water is present. The driver should also assist the customer in locating the source of the water to avoid future contamination.

E-After the driver has pumped the used oil from the customers storage tank, the driver will determine the amount of gallons that he pumped by measuring the tanker truck before and after pumping, using the tank chart to calculate correct gallons. The driver will then fill out a used oil pick-up manifest, taking the data off his route sheet, filling the manifest out completely. The driver must be sure to check the box showing that the used oil being picked-up was under 1000 ppm halogen.

The purpose of this documentation is to have proper records for any state or federal regulatory inspections that may occur in the future. After the customer has signed the pick-up manifest, the driver will leave the top original copy with the generating facility and proceed on to his next route stop.

(Be sure that the tanker dome lid is closed and secured between stops)

F-After the driver has run his route and he has a full truckload of use oil ready to be unloaded, the driver will proceed to the unloading facility designated by management.

G- The plant will then take the composite sample of each tank compartment of the used oil collected and the drivers detailed truck report to the plant lab and the driver will report to the office. The following test shall be performed on each incoming truckload shipments of used oil to Raider Environmental Services, Inc. plant facility.

### **Test Method**

Halogen (SW-846 9077 or 9075)

Water Distillation

Flash Point ASTM closed cup)

PCB's GC (batched sample)

If the sample fails the halogen test then to rebut the presumption under 279.53 it will be the policy of Raider Environmental Services, Inc. to use an analytical method from SW-846, Edition III to show that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in APPENDIX VIII of 40 CFR part 261. This used oil should be segregated until testing and approval of results is completed.

The gas Chromatography method will be the method Raider Environmental Services, Inc. will use when rebutting such presumption. Only the President of Raider or his designee can approve other rebuttal options.

These are the basic procedures for our analysis plan. There may be changes from time to time, however all changes to Raider Environmental Services, Inc. plan must be approved by the President or his designee prior to changes being made.

If the President or his designee are not available to approve a shipment prior to rebuttal, then management should segregate material for testing, using his or her best judgment. But all incoming used oil must be tested at our plant facility before a shipment of used oil is accepted and unloaded.

