

ENVIRONMENTAL SERVICES & LOGISTICS, INC.

Used Oil Training Manual

ES&L, Inc.

8/1/2012

This manual covers the Federal and State rules and regulations as they pertain to used oil management, transportation and handling.

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1.0 Purpose

The purpose of this program is to ensure that all ES & L employees have an understanding of the Used Oil Management regulations required by the Federal Government and State of Florida. This training will provide ES & L employees a working knowledge of the regulations as it applies to the handling and transportation of used oil and petroleum products. All employees will receive this training module no later than 90 days after being hired and will have a refresher on this training once every year. Documentation of the training, with employee signatures and dates, will be maintained in the employees personnel file for a minimum of 3 years and will be available for review upon request by any governmental regulatory agency.

2.0 Definitions (F.A.C 62-710.201)

“Oily Waste” – means those materials which are mixed with used oil and have become separated from that used oil. Oily wastes also mean materials, including wastewaters, centrifuge solids, filter residues or sludges, bottom sediments, tank bottoms, and sorbents which have come into contact with, and have been contaminated by, used oil

“Processing” – means chemical or physical operations designed to produce from used oil, or to make used oil more amenable for production of fuel oils, lubricants, or other used oil-derived products. Processing includes, but not limited to: blending used oil with virgin petroleum products, blending used oils to meet fuel specification, filtration, simple distillation, chemical or physical separation and re-refining.

“Used Oil” – means any which has been refined from crude oil or synthetic oil and, as a result of use, storage, or handling, has become contaminated and unsuitable for its original purpose due to the presence of physical or chemical impurities or loss of its original properties.

“Used Oil Fuel Marketer” – means any person who conducts either of the following activities: (1) Directs a shipment of off-specification used oil from their facility to a used oil burner; or (2) First claims that used oil that is to be burned for energy recovery meets the used oil fuel specifications.

“Used Oil Transporter” – means any person who transports for hire used oil over public highways in shipments greater than 55 gallons at one time.

3.0 Applicability (F.A.C. 62-710.300)

Anyone who handles used oil is subject to Federal (40 CFR Part 279) and State of Florida (F.A.C. 62-710 & F.S. Chapter 403) law on the management of used oil and pollution. Listed below are the entities that are regulated by their handling of used oil:

- Generators of used oil
- Private and Public used oil collection centers and aggregation points
- Used oil transporters and transfer facilities
- Burners who burn off-specification used oil for energy recovery
- Marketers

4.0 Prohibitions (F.A.C. 62-710.401)

Handlers of used oil (e.g. Generators, Transporters, and Processors) have to comply with Federal (40 CFR 279.40) and State of Florida (F.A.C. 62-710 & F.S. Chapter 403) laws when managing used oil (e.g. Used Oil Transporter Permit, Annual reporting). Used oil has to be handled correctly to ensure proper management and to minimize the risk to the environment.

State and Federal environmental regulations prohibit the unauthorized discharge or management of used oil in a way that could harm the environment. Listed below are some of the prohibitions:

No used oil or oily waste can be discharged into:

- Soils
- Sewers
- Drainage systems
- Septic tanks
- Surface or ground waters
- Watercourses
- Marine water

Mixing or commingling used oil with solid waste that is to be disposed of in a landfill or disposing of used oil in landfills is prohibited.

No person may mix or commingle used oil with hazardous substances that make it unsuitable for recycling or beneficial use.

Used Oil will not be used for:

- As a dust suppressant
- Weed abatement
- Any use that has the potential to release used oil into the environment

Storage of Used Oil:

- Tanks or containers clearly marked or labeled with the words “Used Oil” and are in good condition with no visible signs of oil leakage.
- If tanks and containers are not stored inside a structure, the contents shall be closed, covered or otherwise protected from the weather.
- If tanks or containers are not double-walled, they shall be stored on an oil impermeable surface such as sealed concrete or asphalt, and must have secondary containment which has the capacity to hold 110% of the volume of the largest tank or container within the containment area.

5.0 Registration and Notification (F.A.C. 62-710.500)

The following entities shall register on an annual basis with the State of Florida before handling used oil and submit a report of the used oil activities for the previous year:

- Used oil transporters and transfer facilities
- Used Oil processors
- Used oil fuel marketers who sell used oil fuels
- Used oil burners of off-specification used oil

6.0 Recordkeeping and Reporting (F.A.C. 62-710.510)

ES & L utilizes a manifest/bill of lading system to track used oil/non-hazardous waste pickups from customers. Each transaction **must** be accompanied with a manifest/bill of lading. Each manifest/bill of lading must include the following information:

- The name, business address, telephone number and EPA identification number of the transporter
- The generator of the used oil/non-hazardous waste, including the name and street address of the generator and the EPA identification number of the generator, if the generator has one
- The total number of gallons of used oil/non-hazardous waste received from the generator

- The type of used oil/non-hazardous waste received
- The date of receipt
- The destination or end use of the used oil/non-hazardous waste
- Documentation of halogen screening, as applicable

These records will be maintained for a minimum period of three (3) years. The records shall be kept at the street address of Environmental Services & Logistics, Inc. and will be available for inspection by Federal and State Regulators.

7.0 Certification of Used Oil Transporters (F.A.C. 62-710.600)

Any used oil transporter that transports over public highways more than 550 gallons of used oil annually, not including oily waste, shall become certified pursuant to F.A.C. 62-710.600.

To become certified and maintain certification, used oil transporters shall:

- Register annually with the Florida Department of Environmental Protection and comply with the annual reporting and recordkeeping pursuant to Rules 62-710.500 and 62-710-510 F.A.C.
- Show evidence of familiarity with applicable state laws and rules governing used oil transportation and proper used oil management practices
- Utilize a standard operating procedure for halogen testing and procedures for handling loads that exceed the 1000 ppm limit for halogens.
- An introduction of each new employee to the applicable laws and rules before unsupervised driving of a used oil transportation vehicle
- Documentation that all company personnel handling or transporting used oil have successfully completed this training program no later than 90 days after beginning employment
- Maintain a record of all training in the company's operating record and the individual personnel files along with the dated signature of those receiving and providing the training. These records shall be retained for a minimum of (3) three years and be available for review by Federal and State Regulators upon request.

8.0 Florida Laws governing pollution and used oil management relevant to used oil transporters

As an employee of ES & L it is important to understand the seriousness and responsibility one has in the handling and transportation of used oil/non-hazardous material. All companies that transport used oil, non-hazardous and hazardous material are regulated under Federal and State Law. In the State of Florida used oil management, in particular transporters of used oil, is governed by Chapter 403 of the Florida Statutes and Florida Administrative Code 62-710 . It is imperative that as an employee, you read and understand the responsibility that the company and the public place in your hands when transporting a potential contaminant to the environment and the public in general.

Chapter 403 of the Florida Statutes covers the laws that are relevant to the transportation of used oil and its' laws are as follows:

1. **403.121** Damages to Air, Water and Property-DEP may recover damages for any injury to the air, waters or property of the State. DEP may impose a \$10,000 penalty for each offense.
2. **403.141** Joint and Several Liability-Anyone who pollutes may be held jointly and severally liable (anyone involved in the chain of custody, from the generator through the final destination can be held liable for the pollution.
3. **403.161** Causing Pollution (careless or reckless; willful; non-compliance)-It is a violation of state law to cause pollution, fail to comply with any laws or rules, make false statements regarding these laws and rules or fail to report discharges. There are three (3) types of violations: a) anyone who willfully pollutes is guilty of a third degree felony, punishable by \$50,000 and /or 5 years imprisonment for each offense; b) anyone who pollutes, due to reckless indifference or gross disregard, is guilty of a second degree misdemeanor, punishable by \$5,000 and/or 60 days in jail for each offense; and c) anyone who fails to comply with any laws or rules is guilty of a first degree misdemeanor, punishable by \$10,000 and/or 60 months in jail.
4. **403.708(1 & 14)** Prohibitions (Solid Waste, Special Waste)- (1) No person shall deposit any solid waste in or on the land or waters located within the State. (14) No person shall dispose of used oil in landfills.

5. **403.751** Prohibited Actions (Used Oil)- No person may manage used oil in any manner which endangers public health or welfare. No person may discharge used oil into any storm drain, sewer, septic body or body of water. No person may mix used oil with solid waste that is to be disposed of in a landfill. No person may mix used oil with a hazardous substance. Used Oil shall not be used for road oiling, dust control, weed abatement or other similar activities that have potential to harm the environment.
6. **403.754** Registration of Used Oil Handlers-Used Oil transporters and transfer facilities must register annually, keep appropriate records and report to the Department.
7. **403.7545** Regulation of Used Oil as a Hazardous Waste- Nothing shall prohibit the Department from regulating used oil as a hazardous waste. (If violations occur, and the used oil portion of the mismanagement, spill more contaminated site is considered a hazardous waste, fines are automatically \$50,000 per offense).
8. **403.767** Certification of Used Oil Transporters- Anyone who transports more than 500 gallons of used oil over public highways must be certified by the Department. Certification includes demonstration of adequate training and insurance.

Florida Administrative Code 62-710 (F.A.C. 62-710) is the set of rules used by the Florida Department of Environmental Protection to regulate and enforce the used oil industry in Florida. The following rules are pertinent to the transportation of used oil in the State of Florida:

1. **62-701.200**—Training should include definitions of (85) oily wastes and (129) used oil.
2. **62-701.300 (8b)**—No person shall dispose of used oil in a landfill. **(11)** No person may comingle used oil with solid waste that is to be disposed of in a landfill.
3. **62-710.401 (4)(5)**-- Prohibitions: No person may mix or comingle used oil with hazardous substances (exception found in 40 C.F.R. 279.10(b)(3)); used oil shall not be used for pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release oil into the environment.
4. **62-710.500**-- Used Oil transporters and transfer facilities must register with Department.
5. **62-710.510**—Used Oil transporters must, on the appropriate forms, keep records (for 3 is refused pick-up due to suspected mixing with hazardous waste (halogens above 1000 parts per million) must be recorded; a copy of this record must be left with the generator.

6. **62-710.600**—Used oil transporters who transport over 500 gallons per year over public highways must be certified by the Florida Dept. of Environmental Protection by showing evidence of adequate training and insurance.
7. **62-710.850**—Persons involved in the management of used oil filters must comply with this section.
8. **62-710.901(2)**—This Used Oil Record Keeping Form, or another form with the same information, must be used and maintained on-site for three years.

9.0 Federal Rules-Code of Federal Regulations-40 C.F.R.

1. **40 CFR, Part 279.40**—This section (Subpart E) describes the used oil management standards which are applicable to used oil transporters (persons who transport used oil) and transfer facilities (facilities which store used oil for over 24 hours, but less than 35 days).
2. **40 CFR, Part 279.41**—Transporters cannot process used oil.
3. **40 CFR, Part 279.42**—Transporters must have an EPA identification number.
4. **40 CFR, Part 279.43**—Transporters must deliver used oil to another transporter, processor, or burner which has an EPA identification number. All discharges of used oil must be managed by taking immediate action to protect human health and the environment.
5. **40 CFR, Part 279.44**—The transporter must either show product knowledge or testing to determine whether the halogen content of the used oil to be picked up is above or below 1,000 parts per million.
6. **40 CFR, Part 279.45**—Used oil transporters are subject to all applicable Spill Prevention, Control and Countermeasures (40 CFR, Part 112) in addition to the requirements of this subpart.
7. **40 CFR, Part 279.46**—Transporters must keep records of all used oil accepted and delivered for three years. The records must include the name, address EPA identification number and signature of the person who provided or accepted the used oil, the quantity of used oil handled and the date of delivery.

Used oil must be stored at a transfer facility which has notified (has an EPA identification number) and has secondary containment. Used oil cannot be stored at a transfer facility longer than 35 days. (40 CFR, Part 279.45(a))

Containers and aboveground tanks used to store used oil at transfer facilities must be labeled clearly with the words "Used Oil" (40 CFR, Part 279.45(g)).

10.0 Spill Prevention Controls and Countermeasures (40 CFR 279.45)

As a transporter of used oil as defined in 62-701.200 F. A. C and 40 CFR Part 279.40, it is the responsibility of ES&L to ensure a spill prevention plan and company protocol is in place to not only meet the requirements of 40 CFR 279.43 but to also be good public citizens, protect the general public and the environment in case an accident might occur. In case of an accident where any material that is being transported by ES&L might discharge into the environment, please familiarize yourself with the following Standard Operating Procedures:

Driver Accidents and Spill Procedures:

If a driver is ever involved in an accident or spill of cargo, the driver must notify the ES&L Corporate Office immediately for assistance. All drivers are issued a cellular phone that should be kept in their possession at all times.

The driver should inform Management of the situation and seriousness of the accident. The driver should then do whatever possible to protect human life, health, and the environment.

If the spill or accident is such that emergency help is needed then the driver, if possible, should call 911 Emergency before contacting management. This will get emergency help in route to the accident. (Police Dept., Fire Dept., Emergency Assistance, etc.)

If the driver has to contact 911 for emergency assistance, the driver should be prepared to provide the following information:

- Name, address and telephone number of the person reporting.
- Exact location of the spill/accident
- Any injuries involved
- Company name and location
- Material spilled, estimated quantity and damage report
- Cause of spill/accident
- If a body of water is impacted or if material is in a storm drain or on a roadway
- Action taken for containment and clean up

In Case of an accident/spill contact the following:

Name	Title	Cell Number
Barbara Smith	Owner/President	772-201-1841
Jeff Smith	Operations Mgr.	772-249-6266

11.0 Accident Scene Procedures:

When geographically possible, a member of management will investigate the accident. If a member of management cannot reach the accident scene in a timely manner, the driver should assume these responsibilities:

- Make determination if area is secured. Keep unauthorized personnel out of the area.
- Make a determination as to the condition of anyone else involved in incident.
- Notify the local, county or state police/emergency personnel if they have not already been notified.
- Determine if the cargo is leaking from the trailer or fuel from the tractor.
- If leaking is observed, make a decision as to how to stop the leak.
- **If the leak is of such a magnitude (greater than 25 gallons) or that it requires a Spill Clean-up Contractor, Please Call Cliff Berry, Inc. at 1-800-899-7745.**
- Make an examination of the tractor/tanker to determine if they can be moved safely or turned upright with cargo on board.
- If it can be move contact ES&L management and a wrecker will be dispatched to the scene.
- Call in Standby truck to pump off cargo so the damaged unit can be safely moved to a laydown yard.

The basic thing is DO NOT PANIC!! Take your time if possible to make the best determination you can and keep the following principles in mind:

1. Safety Of Personnel in the area
2. Possibility of an explosion
3. Contamination of surface and groundwater
4. Secure the area
5. If possible, Stay with your vehicle

Every driver working for ES&L will be trained in spill control and countermeasure procedures and guidelines and notification procedures.

Monthly Safety Meetings will occur to maintain a clear working understanding of spill control and countermeasure as well as daily incidental prevention practices.

12.0 Spill Reporting Requirements

All Spills, regardless of how small, should be reported to your immediate supervisor. The supervisor will go to the scene of the spill and coordinate with the customer/regulatory agencies. In addition to the internal reporting requirements, the following reporting requirements apply depending on conditions:

Note: There are established time limits for notifying regulatory agencies. In some cases, notification must be made within one hour. Therefore, it is imperative that these reports are made in a timely manner. The report from the regulatory agency and its corresponding report number are very important for future verification.

Spill avoidance is the best approach from a common sense standpoint. Use your best judgment to determine the action to take. When loading the tanker or transferring cargo, the vehicle will be placed on an impervious surface, i.e. concrete pad with secondary containment or an asphalt surface. If this is not available at the customers site, you will utilize the spill containment bucket and have pads and booms available and in place prior to a transfer or receipt of cargo. This will allow the containment of any drips or small leaks during the connection and disconnecting of the hoses. In the event of a release of oil (spill or leak) you will do the following:

- Attempt to secure the source of the spill and begin initial containment procedures. The presence of an impervious liner beneath the tanker may allow much of the spill to be contained and recovered. Containment may also be initiated using sorbent materials such as “kitty litter”, spill pads, or oil socks or booms. If a small amount of oil should spill on the ground, you may remove the affected soil by shoveling it into a container until no more oil is present. It will be the customers responsibility for proper labeling and disposal.
- If the amount of oil spilled is more than 25 gallons ,management will immediately contact the State Warning Point at (850) 413-9911, or (800) 320-0519.
- Management will contact the DEP District Office nearest you and report the spill. The DEP would appreciate all spills be reported, even though the legal reportable quantity is

25 gallons. Ask the State Warning Point for technical assistance from the DEP if it is after normal business hours.

- Management will determine if the on-retainer Emergency Response Contractor will be needed for any further remedial action.

Spills On Navigable Waterways greater than 25 gallons:

The National Emergency Response Center (Federal Agency)

1-800-424-8802

State Warning Point:

1-800-320-0519

Spills On Land or Public Highways in Florida greater than 25 gallons

State Warning Point: 1-800-320-0519 or (850) 413-9911

ES&L Emergency Response Company for all Spills:

Cliff Berry, Inc 1-800-899-7745

When speaking to these agencies be prepared with the following information:

1. Name, address and telephone number of the person reporting
2. Exact location of the spill
3. Company name and location
4. Material spilled
5. Estimated quantity
6. Source of the spill
7. Cause of the spill
8. Name of body of water involved or the body of water nearest the spill
9. Action taken for containment and clean-up

13.0 Standard Operating Procedures for Used Oil/Non Hazardous Liquid pickup and Used Oil Halogen Testing

This section of the manual is to comply with 40 CFR 279.55. This analysis plan will describe the procedures that will be used to comply with the analysis requirements of 40 CFR 279.53 (rebuttable presumption for used oil) and to 279.72 (specifications for used oil fuel) when applicable.

Drivers:

When a driver reaches the customer for pickup of a load, the following procedures will be followed to ensure compliance with Federal and State regulations as well as ensure that the material that is to be picked up is representative of the identified material on the job sheet:

1. When a driver reaches any destination or any customer location, the driver must first attempt to park his vehicle in an area that will not disturb the business flow of traffic or the designated loading position at the facility.
2. Before connecting any hoses or making any attempt to receive the customers waste, the driver must seek out the contact person that is listed on the job sheet or the person in charge and inform the customer that they are at the facility to receive the load. If the customer is not prepared, at that time, to load the ES&L tanker please contact your supervisor immediately and note the time of arrival on the job sheet.
3. After the driver has checked with the contact person at the intended facility and has been approved to receive the load, the driver will then follow these pick-up procedures:
 - A. The driver will have the customer inspect the tanker to ensure that is empty and ready to receive their load
 - B. The driver will communicate the requested amount of waste for transport that is listed on the job sheet. Any discrepancy will be discussed. Issues that might arise should be communicated to the ES&L supervisor immediately.
 - C. **Determination of Material to be transported:** If the material to be transported is used oil an on-site halogen test is required. **This**

determination/testing must be conducted prior to loading the tanker!!! Request a copy of the analytical report on the used oil being received to ensure that it does not exceed the regulatory limits of 1000 ppm of halogens for used oil **and** conduct a field screening on a top to bottom sample of the tank of the used oil. This sample method has been shown to be equivalent to that in APPENDIX I of 20 CFR 261 and 260.20 and 260.21. The driver or the customer, in the presence of the driver, will then conduct a halogen screen using the Dexsil Chlor-D-Tech Q4000 or Q1000 test kit to determine whether the used oil is over the 1000 ppm halogen level. If this kit fails, the driver is required to inform the customer that a halogenated waste may have been mixed with the used oil. **When this occurs, the driver should not proceed with loading the used oil and should contact his immediate supervisor for further instructions.**

- D. If it is determined by the field screening method that the used oil is over the 1000 ppm threshold, the customer should be informed that ES&L will not load/transport the material. The Load Rejection Form will be filled out and **(See Attachment A)** and a copy left with the generator noting that in order for the material to be transported either an analysis conducted by a certified lab or a rebuttable presumption utilizing analytical Method 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 parts 261. Only after being presented with this documentation and upon approval by ES&L management will the material be picked up and transported. The original Load Rejection Form will be turned in to the office along with the Job Sheet and will be kept in the customer file for future reference.
- E. Open a dome lid on the trailer to ensure proper venting of the tank during loading.
- F. Hook up the hose that will be used to receive the material and ensure the camlock ears are secured properly utilizing a cotter pin.
- G. Open the Safety Valve and the main valve for the tanker then notify the customer you are ready to receive the material.
- H. **NEVER LEAVE THE TANKER UNATTENDED DURING THE LOADING PROCESS!! THE DRIVER IS RESPONSIBLE FOR EVERYTHING THAT HAPPENS TO THE LOAD DURING THE LOADING PROCESS!! ANY**

VIOLATION OF THIS POLICY MAY RESULT IN IMMEDIATE TERMINATION.

4. After the driver has loaded the used oil/non-hazardous waste into the tanker, the driver will determine the amount of gallons that were received by measuring the tanker using the tank chart to calculate the correct amount of gallons. The driver will ensure that the amount received does not exceed the GVW of 80,000 lbs. as regulated by the Florida DOT.
5. The driver will then fill out the manifest/bill of lading completely and ensure the customer reads and understands all conditions pertaining to the fact that the material is non-hazardous or that the used oil meets the halogen rules for non-hazardous material.
6. Ensure the customer signs the manifest/bill of lading, note the time you are leaving the facility and note any PO# that might be associated with the pick-up of the load on the manifest/bill of lading.
7. Give the correct copy to the customer (generator copy) for his records.
8. Transport the material to the designated T/S/D Facility noted on the manifest/bill of lading.

14.0 Off-Loading Procedures:

1. Once at the T/S/D Facility meet up with the person in charge prior to off-loading and notify them of the load by showing them the manifest/bill of lading. After communication with the facility you can prepare to be off-loaded.
2. Once the driver has received acceptance of the load by the T/S/D Facility immediately open a dome lid to ensure venting of the tanker.
3. Hook up the receiving hose and notify the facility personnel that you are ready to be off-loaded.
4. After facility personnel have ensured that they are ready to receive your load, open the safety valve and the main valve to the tanker to begin the off-loading process.
5. **Stay with the tanker at all times during the off-loading procedure. Never leave the truck unattended during off-loading. THE DRIVER IS RESPONSIBLE FOR EVERYTHING THAT HAPPENS TO THE LOAD DURING THE UNLOADING PROCESS!! ANY VIOLATION OF THIS POLICY MAY RESULT IN IMMEDIATE TERMINATION.**
6. Once the tank is empty, disconnect the receiving hose, close the safety valve and main valve to the tanker.
7. Close the dome lid on the tanker
8. Have the manifest/bill of lading signed by the receiving T/S/D Facility and give them the T/S/D copy for their record.

9. Call the office to inform the office that you have completed the job for that particular job sheet and to inquire about any addition job requests. If there are no requests or instructions return to the office.

The purpose of these procedures and explanation of how the documentation is to be handled is to ensure that there are no mishaps or spills and to have proper records for any State or Federal Regulatory inspections that may occur in the future. All manifest/bill of lading documentation will be returned to the office and will be held on-file for three (3) years.

Standard Operating Procedures for Used Oil/Non Hazardous Liquid pickup and Used Oil Halogen Testing

When a driver reaches the customer for pickup of a load, the following procedures will be followed to ensure compliance with Federal and State regulations as well as ensure that the material that is to be picked up is representative of the identified material on the job sheet

Determination of Material to be transported: If the material to be transported is used oil an on-site halogen test is required. **This determination/testing must be conducted prior to loading the tanker!!!** Request a copy of the analytical report (from a certified laboratory) on the used oil being transported (if available) to ensure that it does not exceed the regulatory limits of 1000 ppm of halogens for used oil **and** conduct a field screening on a top to bottom sample of the tank of the used oil. This sample method has been shown to be equivalent to that in APPENDIX I of 20 CFR 261 and 260.20 and 260.21. The driver or the customer in the presence of the driver, will then conduct a halogen screen using the Dexsil Chlor-D-Tech Q4000 or Q1000 test kit to determine whether the used oil is over the 1000 ppm halogen level. The Dexil Field Screening Kits are a chemical reaction kit that are pre-packaged and sealed for the customers use. Before using the kits the expiration dates will be verified to ensure that the kits still current. **NO SNIFFER RESULTS WILL BE ACCEPTED FOR HALOGEN VERIFICATION.** If this kit fails, the driver is required to inform the customer that a halogenated waste may have been mixed with the used oil. **When this occurs, the driver should not proceed with loading the used oil and should contact his immediate supervisor for further instructions.**

If it is determined by the field screening method that the used oil is over the 1000 ppm threshold, the customer should be informed that ES&L will not load/transport the material. The manifest/bill of lading will have the results of the Dexil Test written on the bottom of the manifest/bill of lading in the comments section and a copy left with the generator.

Give the correct copy to the customer (generator copy) for his records.

The Transporter copy of the Manifest/Bill of Lading with the halogen level listed on the comments section of the document will be returned to the ES&L office where the records will be kept for any and all regulatory inspect for a minimum of three (3) years.

Employee Training Verification Form

Name _____ Hire Date _____

Description of Training Date Signature

Initial Orientation

Used Oil Training

HAZWOPER Training

Spill Response Training

HM126 Training

HM181 Training

CPR Training

Environmental Services & Logistics, Inc.

709 NW Bristol St.
Port St. Lucie, FL 34983

This is to certify and meet the reporting requirements of Rule 62-710.500 F.A.C that the Used Oil Training Program is still being utilized and adhered to for all new and existing employees. The Used Oil Training Program has been reviewed and updated to address the changes in the regulations. The modifications to the originally approved plan are as follows:

Barbara A. Smith
President