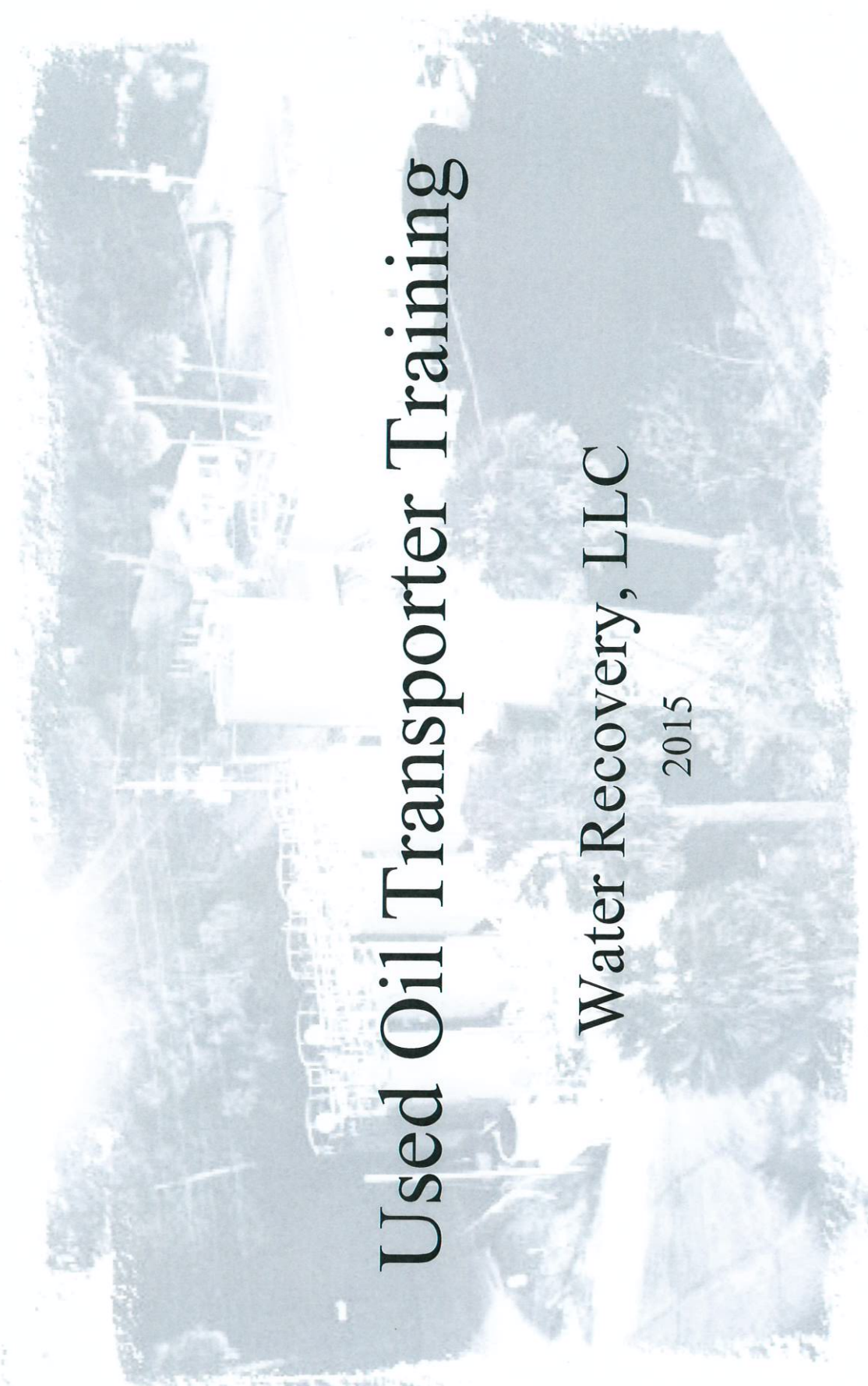




Used Oil Transporter Training

Water Recovery, LLC

2015

*Water Recovery, LLC
Used Oil Transporter Training*

Training Purpose

To assure that WRI employees engaged in the handling, transporting, manifesting, sampling, or processing of used oil are familiar with:

- SAFETY
- Regulatory Compliance
- Handling procedures
- Spill response procedures

Regulatory Definition

Used Oil - Any oil which has been refined from crude oil or synthetic oil and as a result of use, storage, or handling, has become unsuitable for its original purpose due to the presence of impurities or loss of original properties, but which may be suitable for further use and is economically recyclable.

Oily Wastes - Materials which are mixed with used oil and have become separated from that used oil. Oily wastes also means 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 with used oil.

WRI Interpretation

- All waste manifested with the description “used oil,” “petroleum contact water,” or “oily wastewater” are handled as used oil regardless of oil content
- All wastes containing greater than 90% oil are handled as used oil regardless of description

Applicable Regulations

- EPA (40 CFR Part 279) – Standards for the Management of Used Oil
 - Sets standards for “on-specification” used oil
 - Flash >140
 - TOX <1000 mg/L
 - Limits for metals (arsenic, cadmium, chromium and lead)
- FDEP (FAC 62-710) – Used Oil Management
 - Includes EPA Regulation by reference
 - Is the regulation under which WRI is permitted

40 CFR Part 279

Title 40: Protection of Environment

PART 279—STANDARDS FOR THE MANAGEMENT OF USED OIL

§ 279.11 Used oil specifications.

Used oil burned for energy recovery, and any fuel produced from used oil by processing, blending, or other treatment, is subject to regulation under this part unless it is shown not to exceed any of the allowable levels of the constituents and properties shown in Table 1. Once used oil that is to be burned for energy recovery has been shown not to exceed any allowable level and the person making that showing complies with §§279.72, 279.73, and 279.74(b), the used oil is no longer subject to this part.

Table 1— USED OIL NOT EXCEEDING ANY ALLOWABLE LEVEL SHOWN BELOW IS NOT SUBJECT TO THIS PART WHEN BURNED FOR ENERGY RECOVERY ¹

Constituent/property	Allowable level
Arsenic	5 ppm maximum.
Cadmium	2 ppm maximum.
Chromium	10 ppm maximum.
Lead	100 ppm maximum.
Flash point	100 °F minimum.
Total halogens	4,000 ppm maximum. ²

Note: Applicable standards for the burning of used oil containing PCBs are imposed by 40 CFR 761.20(e).

¹The allowable levels do not apply to mixtures of used oil and hazardous waste that continue to be regulated as hazardous waste (see §279.10(b)).

²Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under §279.10(b)(1). Such used oil is subject to subpart H of part 266 of this chapter rather than this part when burned for energy recovery unless the presumption of mixing can be successfully rebutted.

Regulatory Requirements

- Annual Registration
- Record keeping
 - Load information (archived in the WRI Database)
 - Oil sale information
- Annual Reporting – due every March
- Permitting – WRI #79677-HO-07
- Annual Training of Employees

New Employee Training

- Every new employee of Water Recovery, LLC who may transport used oil during their employment must be trained within one week of employment.
- Training will cover all federal and state rules governing used oil, spill control and halogen screening.
- Records of employees who have completed this training will include the employees name, the date of training completion and signatures of the employee and the trainer.

Federal Rules

All Used Oil Transporters should be familiar with the following federal rules governing used oil transportation:

- 40 CFR, Part 279.40 This section describes the used oil management standards which are applicable to used oil transporters and transfer facilities
- 40 CFR, Part 279.41 Transporters cannot process used oil
- 40 CFR, Part 279.42 Transporters must have an EPA Identification number
- 40 CFR, Part 279.43 Transporters must deliver used oil to another transporter, processor or burner which has an EPA Identification number. All discharges must be managed by taking immediate action to protect human health and the environment

Federal Rules cont'd

- 40 CFR, Part 279.44 The transporter must either use product knowledge or testing to determine whether the halogen content of the used oil to be picked up is above or below 1,000 ppm
- 40 CFR, Part 279.45 Used Oil Transporters are subject to all applicable Spill Prevention, Control and Countermeasures requirements
- 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

Florida Law

- S403.121 The FDEP 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, each day of violation being a separate offense.
- S403.141 Anyone who pollutes may be held jointly and severally liable (anyone involved in the chain of custody, from the generator to the final destination).
- S403.161 It is a violation of state law to cause pollution, fail to comply with any laws or rules, make false statement regarding these laws and rules or fail to report discharges.

Florida Law contd...

- S403.708 (1) No person shall deposit any solid waste in or on the land or waters located within the State and no person shall dispose of used oil in landfills.
- S403.751 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 tank 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 the potential to harm the environment.
- S403.754 Used oil transporters and transfer facilities must register annually, keep appropriate records and report to the FDEP.

Florida Law contd...

- S403.7545 Nothing shall prohibit the FDEP from regulating used oil and hazardous waste
- S406.767 Anyone who transports more than 500 gallons of used oil over public highways must be certified by the FDEP. Certification includes demonstration of adequate training and insurance.

Department Rules

- 62-701.200 Trainee shall be aware of the definition of “Used Oil” & “Oily Wastes.”
- 62-701.300 (8b) No person shall dispose of used oil in a landfill. No person shall commingle used oil with solid waste that is to be disposed of in a landfill.
- 62-710.401 (4)(5) No person may mix or commingle used oil with hazardous substances. Used oil shall not be used for pavement oiling for dust control, weed abatement or other uses that have the potential to release used oil into the environment.
- 62-710.500 Used oil transporters and transfer facilities must register with the FDEP.
- 62-710.510 Used oil transporters must, on the appropriate forms keep records for three years and provide an annual report to the department. Any shipment of used oil which is refused pick-up due to suspected mixing with hazardous waste must be recorded.

Department Rules contd...

- 62-710.600 Used Oil transporters who transport over 500 gallons per year over public highways must be certified by the FDEP by showing evidence of adequate training and insurance
- 62-710.850 Persons involved in the management of used oil filters must also comply with this section
- 62-710.901(2) A Used Oil Record Keeping form must be maintained on-site for three years

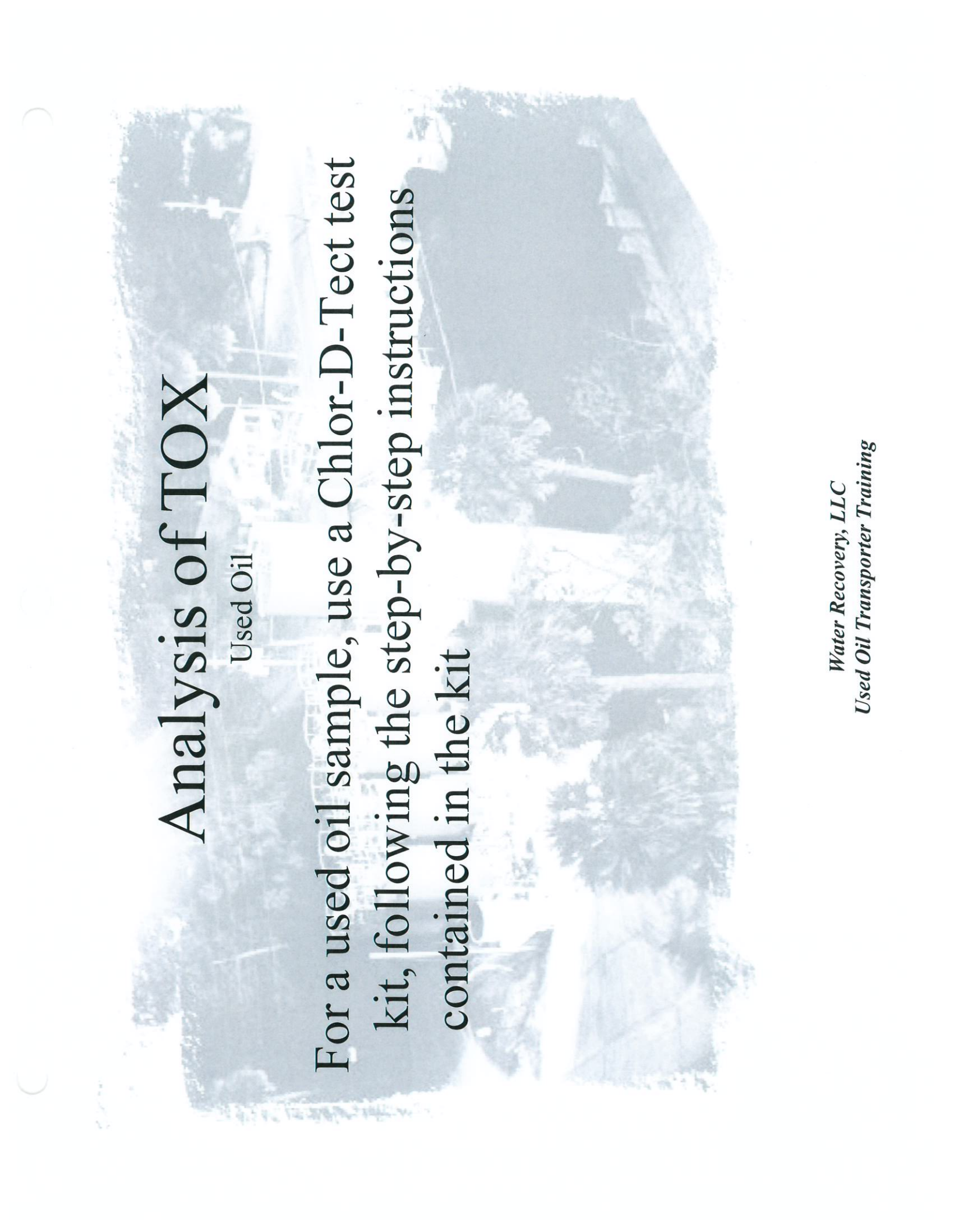
Halogen Screening

- Each load of used oil must be screened for halogens at the pickup location before any of the material is loaded into the tanker with a Hydrochlor-Q test kit.
- Records of the halogen screening must be kept on file at Water Recovery, LLC

Sampling

Analysis of TOX

- An analysis of the TOX of every load of used oil and PCW should be performed by the plant chemist
- The analysis is to be done with a Chlor-D-Tect test kit following the step by step instructions contained in the kit
- The chemist should be protected with safety glasses, gloves and a hood to dissipate the hydrogen gas formed.



Analysis of TOX

Used Oil

For a used oil sample, use a Chlor-D-Tect test kit, following the step-by-step instructions contained in the kit

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Analysis of TOX

PCW

For a PCW sample, if a significant organic layer is present, use the Chlor-D-Test test kit, taking the sample from the organic layer.

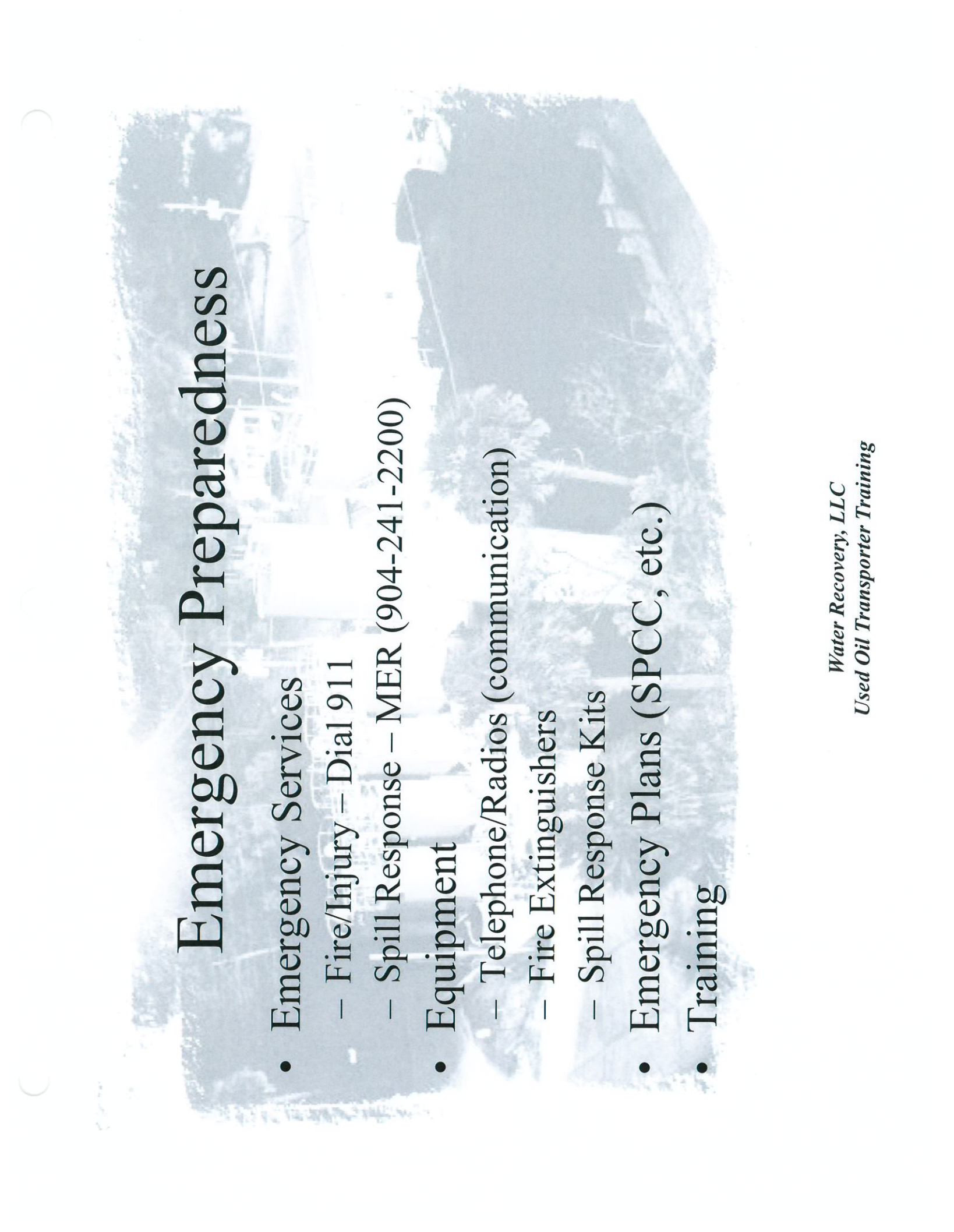
If only a thin layer of fuel is present, use the Hydrochlor-Q test kit, following the step-by-step instruction contained in the kit.

Loads >1,000 ppm

Used oil containing more than 1,000 ppm total halogens is presumed to be hazardous waste because it has been mixed with halogenated hazardous waste listed in subpart D of 40 CFR Part 261. Persons may rebut this presumption by demonstrating that the used oil does not contain hazardous waste by using analytical methods from SW-846, Edition III, to show that the used oil does not contain significant amounts of halogenated constituents listed on Appendix VIII of 40 CFR Part 261.

WRI Specific Information

- All incoming used oil loads (including PCW) are tested for flashpoint and TOX
- Petroleum Contact Water (PCW) is only offloaded into Tank 7P or Hydrocarbon Recovery Pilot
- Construction cones and grounding strap are required for all PCW offloads
- Used oil is only offloaded into Tanks 1P-10P (black tanks)



Emergency Preparedness

- Emergency Services
 - Fire/Injury – Dial 911
 - Spill Response – MER (904-241-2200)
- Equipment
 - Telephone/Radios (communication)
 - Fire Extinguishers
 - Spill Response Kits
- Emergency Plans (SPCC, etc.)
- Training

Emergency Response

Upon Discovery of a Dangerous Situation:

- Assess the danger
- Evacuate if necessary
- Communicate the danger
- If you can **SAFELY** respond, do so
 - ❖ Isolate the danger (valves, circuit breakers, etc.)
 - ❖ Use fire extinguishers or spill equipment

Reportable Quantities

- The state of Florida has an ordinance requiring reporting on 25 gallons or more on an impervious surface.
- Duval County has stricter requirements we must follow. Duval County requires reporting on 10 gallons of oil or more regardless of the surface and whether or not the spill is confined to the secondary containment. They also require reporting if any oil gets into a storm drain that leads to public waters or produces a sheen.
- Spills should be reported immediately to The Florida Department of Environmental Protection (FDEP) at 904-255-7171.

Spill Response

- In the event of a spill, first begin to attempt to stop the source of the spill and begin initial containment procedures. Oil dry and oil absorbent pads are always in full stock in the tool room.
- It is required that all spills over 25 gallons be reported to the local FDEP office and the State Warning Point Line at 850-413-9911
- You should have the following information available in making the report

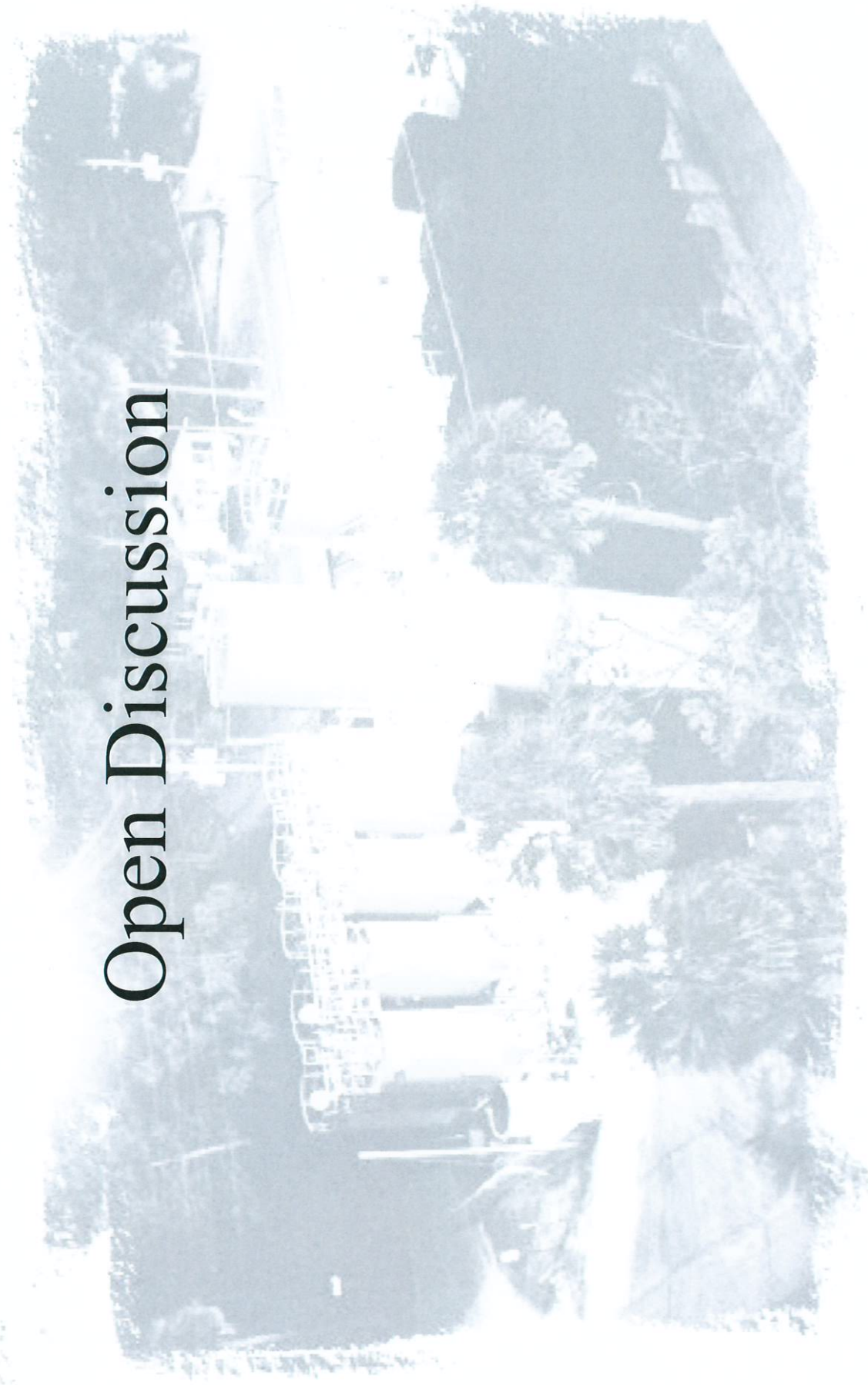
Spill Response

- Name, address and phone number of the person making the report
- Exact location of the spill
- Company name and location
- Material spilled
- Estimated quantity
- Source of the spill
- Cause of the spill
- Name of body of water involved, or the body of water nearest the spill area
- Action taken for the containment and clean up

WRI Used Oil Permit

- ✓ Waste Analysis Plan
- ✓ Sludge Disposal Plan
- ✓ Emergency Preparedness and Spill Control
- ✓ Unit Management (Inspections)
- ✓ Closure Plan
- ✓ Training Program
- ✓ Petroleum Contact Water (PCW)

Open Discussion



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Test Time



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