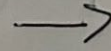


From: [Maria Rojas](#)
To: [Lynch, Sean C](#)
Subject: Used oil training
Date: Saturday, August 10, 2024 7:45:07 PM

EXTERNAL MESSAGE

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HALOGEN TESTING



1. Describe in detail the procedure to screen for halogens at each pick up location

I take a sample of the oil, and put some oil in test tube one. ~~B~~ Squeeze test tube shake for 30 sec.

Then Squeeze the top ampule, shake for like 20 sec. - 60 sec open both test tubes, Pair test tube 2 into 1 close it shake it for like 10 sec, slightly vent it then reshake for 10 sec.

2. Describe the instruments used

I use Dexsil CLO-D-Test test kit.

3. Describe how you calibrate your instruments and how often they are calibrated

My instruments of work are basic. They consist of a ~~vacuum~~ hose with connectors and a filtration system. I clean these out everyday.

4. Describe how you handle the loads testing in excess of 1000 ppm total halogens

If a load exceeds 1000ppm it is considered hazardous. I would not pick up that waste oil. I would contact the company that picks up my used oil and have them handle that situation.

5. Describe what kind of records do you keep for all loads tested

I keep the clients information like name, address, phone #, amount of oil picked up and testing results for halogen screening.

#1 Continued ...

Turn the tube put it on its head for 2 min. (i use a timer for this).

grab the filter funnel and place it in tube #2.

then open the little opening on the cap and pour just the liquid not the oil into tube #

2. Allow it to filter on its own.

Prepare the Titration ~~cap~~ Burette.

Place it inside Tube #2. Pop the

Bottom Ampule on tube #2 and

Shake, Start Putting the titrant drop by drop shaking after every drop. Looking for a purple color (light) thats the end point.

1. TRANSPORTER RESTRICTIONS:

Transporters can transport used oil — processing/treatment is not allowed.
Used oil may only be held/stored less than 24 hours.

Transporters need to have an EPA ID Number.

Transporters have to deliver the used oil to either:

1. Another approved used oil transporter.
2. An approved used oil processing/refining facility or burner; or
3. A RCRA permitted facility.

Containers that are used to transport used oil have to be US DOT specification and labeled with the words "Used Oil"

Transport vehicles must be equipped with spill control equipment and follow the FCI spill control plan in the event of a used oil release.

2. TRAINING REQUIREMENTS:

All employees must be familiar with all the used oil laws and regulations before driving unsupervised.

New employees have to complete the training approved used oil training program as soon as possible but no later than 90 days after employment.

Training program must be reviewed annually and updated to address regulatory or operational changes.

3. HALOGEN TESTING

Transporters have to determine halogen level by evaluating the used oil or applying knowledge of the material 's generating process.

Process knowledge may only be used where a generator's process does not change and must be in conjunction with periodic testing (annual).

Halogen testing is not required for used oil received from CESQGs or from Public Used Oil Collection Centers that are permitted by FDEP.

Per the "Rebuttable Presumption" if the total halogens are PPM it is presumed to be hazardous waste by having been mixed with hazardous waste.

Halogens include chlorinated compounds such as solvents and carburetor cleaner that may have been added to used oil (even unintentionally).

Used oil shall be evaluated for halogens using a Dexsil Clor-D-Test test kit.

4. RECORD KEEPING AND REPORTING:

Transporters must keep documentation of all used oil shipments including those reused due to suspected mixing with hazardous waste.

A copy of the following records must be left with the generator at pickup include:

1. FCI In-House Bill of Lading.
2. Dextil Clor-D-Tect results; and
3. Information on FDEP Form.

The transporter must maintain records on FDEP Form, or equivalent format that includes the following:

1. Transporter's name, business address, telephone, and US EPA ID No.
2. Source of used oil transported as identified by generator's name, address, and EPA ID Number, if applicable.
3. Total gallons and date received/shipped from each generator.
4. Type of used oil — use codes on Reporting Form.
5. Destination facility name, business address and EPA ID Number; and
6. Destination end use code — use codes on Reporting Form. Most likely, code will be "N" (Not an end use — shipment transferred to another facility).

Annual Report to FDEP

Transporter must submit by 3/1 a report summarizing the information contained on the Reporting Form for the preceding year. Transporters must submit this report even if no used oil was transported. Cannot re-register unless annual report has been submitted.

5. SHIPPING USED OIL:

Used oil must be shipped using a Bill of Lading or Non-Hazardous Manifest indicating:

1. Generator's name, mailing address, phone number, and EPA No. (if applicable).
2. Transporter's name and EPA ID Number.
3. Receiving facility's name, location address, phone number and EPA ID Number.
4. Description of the waste, and number of containers including type, quantity, and volume.
5. Results of field Clor-D-Tect test.
6. Printed name and signature of transporter and date received for transport.

A used oil transporter must deliver all used oil received and shipped to either:
Another approved used oil transporter having an EPA ID Number.

An approved used oil processing/refining facility or burner having an EPA ID Number.

A RCRA-permitted facility.

6. SPILL OR DISCHARGE:

Take immediate action to control the spill following the FCI Contingency Plan (a copy has to be in your vehicle).

If unable to control spill, call 9-1-1 immediately.

If spill is less than 25 gallons Immediately contact the Florida State Warning Point at (800) 320-0519,

Call your dispatch office who will contact the following agencies if necessary:

1. National Response Center at (800) 424-8802
2. US EPA IV at (404) 3474062.
3. Dispatch will arrange for an on-scene clean-up contractor if necessary.
4. Management will complete and submit written reports.
5. Spill debris and clean up materials (rags, absorbents, soil, plastic sheeting) have to be disposed of properly.

7. PROHIBITED ACTIONS:

Transporter Cannot manage used oil in any manner which endangers public health or welfare.

Transporter Cannot get rid of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, water courses, or marine waters.

Used oil shall not be used for road oiling, dust control, weed abatement, or other similar activities having potential to harm the environment.

Transporter Cannot mix used oil with solid waste that is to be disposed in landfills, or directly dispose of used oil in landfills in Florida unless

approved by the FDEP.

Transporter Cannot mix used oil with hazardous substances that render it unsuitable for recycling or beneficial reuse (CESQG waste is exempt).

8. VIOLATIONS & ENFORCEMENT:

It is a violation of Florida laws and regulations:

1. To cause pollution as to harm or injure human health or welfare, animals, plants, or property.
2. For failure to follow any laws or regulations, order, permits or certifications.
- 3 To knowingly make a false statement, representation or certification in any application, record report, plan or any other document filed or maintained by the transporter.

Anyone who willfully pollutes is guilty of a third-degree felony punishable by a fine up to \$50,000 and/or 5 years imprisonment for each offense.

Anyone who pollutes due to reckless indifference or gross careless discharge is guilty of a second-degree misdemeanor punishable by a fine up to \$5,000 and/or 60 days in jail for each offense.

Anyone who fails to comply with any laws or rules is guilty of a first degree misdemeanor punishable by a fine up to \$10,000 and/or 60 months in jail.

If used oil is not properly recycled, the FDEP has the right to regulate used oil as hazardous waste and impose fines of \$50,000 per offense.

Administrative Remedies and Penalties:

I. Notice of Violation and Administrative Orders.

2. Penalties from \$1,000 to \$50,000; and
3. Must request a hearing within 20 days of service and must be heard within 180 days of service.

State may establish and recover damages for any injury to air, waters, property, animal, plant, and/or aquatic life.

For any violation, the transporter is liable to the state for any damage caused and for civil penalties.

Violators may be held jointly and severally liable.

Anyone involved in the chain of custody from the generator through the destination may be held liable.