USED OIL WASTE SYSTEM PLAN

Purpose:

The purpose of this plan is to establish specific procedures to be followed before collecting and before processing used oil waste systems. These procedures will allow us to identify waste streams that have been improperly characterized by the generator as non-hazardous used oil before they are collected and/or before they are off-loaded at our processing facility for recycling.

Generators will be divided into two categories:

1. Crankcase Oil Generators (COGs)
   Business or departments of businesses that generate only lubricating oils from engines, transmissions and gear boxes of equipment such as, but not limited to, automobiles, trucks, buses, motorcycles, locomotives, etc. Some examples of these types of business or departments would be auto and truck dealerships, trucking companies, transmission repair facilities, construction companies, quick lube change facilities and independent vehicle and equipment repair facilities and fleet maintenance garages, among others.

2. Manufacturing Oil Generators (MOGs)
   Businesses engaging in the production and manufacturing of products and all businesses or departments of businesses that do not fall into the category of "COG."

Acceptance Procedures:

1. Determine which category of used oil generator the business or department of a business falls into. That would be either COG or MOG.

2. If the generator is an MOG, a completed Used Oil Profile & Certification Form, along with a representative sample of the used oil must be submitted for review and approval before the initial pick up.

The Used Oil Profile & Certification Form will be reviewed and if the information provided indicates that the used oil is not a hazardous waste, the sample will be analyzed. The analysis will check to determine if the used oil contains <1000ppm of total halogens.
If the sample contains <1000ppm of halogens, the used oil will be approved for collection. If the used oil contains >1000ppm of total halogens it will be presumed hazardous despite a negative response to line 7 on the Used Oil Profile & Certification Form. If the used oil is presumed to be hazardous, the generator may elect to rebut the presumption (279.44) with further analysis. If the analysis determines that the halogens are not listed, the used oil will be approved for collection.

3. If the generator is a COG, the used oil may be collected.

Collection Procedures:

1. A retention sample of the used oil will be collected from all generators at the time of each individual collection.

2. After the driver has collected his sample, he will require the generator again (MOGs) or for the first time (COGs) certify that their used oil waste stream is a non-hazardous waste.

3. When the driver returns to the facility with a load of oil from generator(s), a composite sample of the load will be taken.

This sample will then be analyzed to determine if the halogen content is >1000ppm.

If the analysis determines the halogens content to be <1000ppm, the load will be off-loaded and processed.

If the analysis determines the halogens content to be >1000ppm total halogens, each individual retention sample will be analyzed to determine which generator submitted the high halogen used oil. If this used oil waste stream has previously and successfully rebutted, the load will be off-loaded for processing.

If it has not been successfully rebutted, the composite sample will be submitted for further analysis. If the analysis determines that the used oil can be successfully rebutted, and the generator signs the rebuttal form, the load will be off-loaded for processing.

If it is determined that the load is now hazardous waste, the responsible generator will be notified, and the load will be directed to an authorized, permitted facility for processing as a hazardous waste.