

# Used Oil Management Plan

Uchiyama Manufacturing America LLC



# Used Oil Management Plan

Properly managing used oil is important for four main reasons:

- To protect the environment
- To protect human health
- To protect against liability for environmental damages
- To reuse, rather than waste, a valuable resource

Used oil, even when not classified as a hazardous waste under RCRA, can have harmful effects if it is released into the environment. In addition, people's health can be affected if used oil is not handled properly.

Superfund regulations allow the federal government to hold any party that created or contributed to the creation of a hazardous waste site (including some used oil) financially responsible for cleanup costs.

Used oil is a valuable resource because it has lubrication value and heat value. When treated to remove contaminants, the used oil can be used as a base stock to produce new lubricating oil. Because used oil has heat value, it can be burned as fuel. Properly burning the used oil keeps its heat value from being wasted and saves the virgin heating oil that would be burned instead.

## **Purpose**

This plan provides one source of written documentation for used oil records for Uchiyama Manufacturing America LLC. In addition, this plan will inform interested persons, including company and contractor employees, about this company's compliance with Environmental Protection Agency (EPA) requirements (found at 40 CFR 261.11). This plan provides a written description of used oil management procedures, disposal methods, and transportation requirements. We encourage any suggestions that our employees have for improving our written plan for used oil management, as we are committed to developing and maintaining an effective protocol. We strive for clear understanding, environmentally sound practices, and involvement in the plan from every level of the company.

## **Administrative Duties**

Projects, Environmental Safety Manager is responsible for developing the written used oil management plan; for ensuring that our written plan is complete, kept up to date, and made available to applicable or required authorities; and for maintaining used oil management records. A copy of our used oil management records. A copy of our used oil management plan may be reviewed by employees. It is located on the floor computers for all employees to review.

## **Used Oil Defined**

The EPA defines used oil as "any oil that has been refined from crude oil or any synthetic oil that has been used as a result of such use is contaminated by physical or chemical impurities." Used oil can be generated during "do-it yourself" projects, from automotive sources, or during industrial operations. This includes oils that are used as hydraulic fluid as well as oils that are used to lubricate automobiles and other machinery, cool engines, or suspend materials in industrial processes. Oils used for these purposes can become contaminated with physical materials (such as metal particles from engine wear) or chemical contaminants (such as gasoline combustion products, like toluene)

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## Used Oil Management

At this facility, we generate used oil from Motor Oil changes and related maintenance activities associated with the Preventive maintenance to machines such as Molding machines, air compressors, extruding machines etc.. Operations. It is likely to contain the following contaminants: water and the possibility of some  
UMA adheres to the following practices:

- Never dumps or disposes of used oil in the trash, in sewers, or on the ground.
- Makes sure our collection and storage set-up is leak-proof, spill proof, and that tanks have lids or are covered to prevent water from entering.
- Uses lockable fills to prevent dumping of materials into the tank when it is not supervised.
- Maintains our collection containers regularly, comply with local fire and safety regulations, and avoid leaks and spills.
- Labels storage tanks "Used Oil."
- Cleans up any used oil spills or leaks. This includes providing soak-up material (Spillfix) for minor spills. It keeps the area clean and helps prevent personal injury.
- Keeps records of used oil sent to burners.

## Storing Used Oil

Our facility stores used oil in tanks. We have tank and barrel storage of our used oil because we accumulate a relatively large amount of used oil each month, and we accumulate used oil from sources which do not need segregation because of contaminants. This facility follows these storage practices:

- We never mix used oil in tanks. This facility keeps gasoline, solvents, degreasers, paints, and so on, from making the used oil a hazardous waste and increasing collection costs.
- Have constructed secondary containment around our drums/tanks with a capacity for 100 percent of the contents of the drums we store; the base of the containment area is sloped so that any spilled oil may be recollected and removed.
- Equip storage containers with wide -mouth, long-necked funnels to reduce spills during filling
- Equip storage containers with a pressure relief valve to reduce spills during filling
- Keep sorbent materials such as SPILL FIX and oil pig mats around in case of a spill.
- Keep the area near the devices neat and clean.

## Recycling Used Oil

Recycling used oil cashes in on either its lubricating value or heat value. We use this method of management whenever possible because it is easier to do and more cost effective than properly disposing of used oil.

## Responding to Releases of Used Oil

Even though all steps have been taken to prevent leaks or spills from occurring, this company is also prepared to respond to spills of used oil. We instruct workers to use the following protocol to manage spills of used oil and provide necessary equipment.

- Stop the release. This action will vary depending on why the release is occurring. For example, if the spill occurs because a 55-gallon drum has been knocked over, the drum should be righted to stop more oil from being

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- If the spill occurs because a valve on a storage device has been left open, the valve should be closed. If a leak is a result of a puncture in the tank or drum, rags or similar materials should be used to plug the leak.
- Contain the release. We strive to prevent the used oil that has been released from spreading. For example, a sorbent, such as Spill Fix, should be over the spilled used oil.
- Clean up the release. Depending on the extent of the release, cleaning up the used oil can be a simple or a complicated task. For small spills on the ground, the soil can be dug up and disposed of. (The soil must be tested to determine if it exhibits hazardous characteristics.) For larger spills where puddles of used oil have formed, vacuum-type machinery can be used to collect the used oil before the soil is dug up for disposal. Because releases that contaminate a great deal of soil or ground or surface water are very difficult to clean up, this company contacts professionals to conduct the cleanup operation.
- Properly manage the used oil that has been cleaned up. Any leaked or spilled used oil is managed just like any other oil under 40 CFR 279.
- Properly manage the solid materials generated during the clean up. We place solid materials used to clean up a spill of used oil in a sieve-like container to allow the used oil to drip from the solid materials into a storage device. In addition, we compact the materials to remove the used oil. (Removal is complete when there are no more signs of free-flowing oil.) Materials contaminated with used oil that are burned can be managed in the same manner as used oil.
- Contaminated materials that will not be burned for energy are tested to determine if they exhibit hazardous waste characteristics. If they do not test hazardous, they are disposed of in a RCRA subtitle D facility. If they are hazardous, they are disposed of in a RCRA subtitle C facility.
- Remove the storage device from service and repair or replace it.

## Managing and Disposing of used Oil Filters

Whenever this company changes the oil in a UMA vehicle, the oil filter is also changed to keep the solid contaminants of the old oil from immediately contaminating the new oil. Used oil filters can contain 10 to 16 ounces of used oil, therefore proper management of this source of used oil is a concern of this company. Used oil filters are not considered a hazardous waste under RCRA if they are not tern-plated and have been properly drained of oil.

When used oil filters are removed from a warm engine, UMA uses the Gravity draining method- when the filter is removed from the engine, it should be placed with its gasket side down in a drain pan. If the filter has an anti-drain valve, the "dome end" of the filter should be punctured with a screwdriver (or similar device) so that the oil can flow freely. The filter should then be allowed to drain for 12 to 24 We store our drained used oil filters in a covered, rainproof container to prevent used oil from being washed from the filters to the surrounding environment. Our used oil filters are then recycled or properly disposed of.

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## Shipping/ Transportation

The used oil management standards define a used oil transporter as any person who transports oil, any person who collects oil from more than one generator and transports the collected oil, and owners and operators of used oil transfer facilities. 'Uchiyama Manufacturing America LLC complies with all relevant used oil regulations, including keeping tracking records of where the used oil is collected and where it will be transported to. When working with our transporter, we:

- Know that the hauler has an EPA ID number
- Check our hauler's qualifications to make sure the hauler takes the oil to a reputable recycling operation.
- Make sure a company representative signs and dates the hauler's tracking sheets.
- Ask for a receipt from the transporter that states how much used oil was collected from our facility and where the used oil will be taken. (These records are not required under the used oil management standards, but may be useful should a problem arise.)
- Make sure that the hauler maintains storage tanks/containers; labels containers "Used Oil"; stores used oil over oil-impervious surfaces; has secondary containment structures in place; stores used oil for no more than 35 days; tests waste in out-of-service tanks containing hazardous waste according to EPA standards.

## Employee Training

Although training is not strictly required under the regulations, we have designated the Projects, Environmental and Safety Manager to train personnel who will handle the used oil. Direct any questions concerning oil management and the names of employees filling each job. We also keep records describing the type and amount of training provided.

Under this plan, employees are informed of used oil management procedures relevant to the positions in which they work. This training occurs both in the classroom and on the job.

We keep records of job titles and written job descriptions for all positions related to used oil management and the names of employees filling each job. We also keep records describing the type of training provided.

## Related Requirements

Related regulations that we must still comply with include:

- Spill Prevention control and Countermeasures requirements (40 CFR 11

Please see related documents for information on how this company meets these additional requirements

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## Record Keeping

Environmental, Health and Safety Manager are responsible for keeping the following records:

- Record of each acceptance and delivery of used oil shipments. These records come in the form of: log, invoice, manifest, bill of lading, and other shipping documents.

## Maintaining the Plan

Projects, Environmental and Safety Manager are responsible for:

- Conducting periodic site audits.
- Keeping records of all inspections and reports.
- Updating the plan as needed by incorporating any necessary changes resulting from major changes in our facility's operation or maintenance.