State of Utah

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Department of
Environmental Quality

Alan Matheson
Executive Director

DIVISION OF WASTE MANAGEMENT
AND RADIATION CONTROL
Scott T. Anderson
Director

August 29, 2016

Jared McDonald, Vice President
Environmental Management of KC, LLC
861 South 66th Terrace
Kansas City, Kansas 66111

RE: Utah Used Oil Transporter Permit # UOP-0163
KSR000012526

Dear Mr. McDonald:

The Division of Waste Management and Radiation Control has completed its review of the Environmental Management's application to operate as a used oil transporter in Utah. A draft permit was prepared and subjected to a fifteen-day public comment period which commenced on July 26, 2016 and closed on August 9, 2016. No public comments were received.

Enclosed is a hard copy of the Used Oil Transporter Permit (UOP-0163) and a compact disc with an electronic version of the permit. Also enclosed is the Used Oil Handler Certificate (T-50), valid through December 2016. Please reference Permit UOP-0163 on all future correspondence sent to the Division.

If you have any questions, please call Michelle Weis at (801) 536-0256.

Sincerely,

Scott T. Anderson, Director
Division of Waste Management and Radiation Control

STA/MAW/kl

Enclosures: Used Oil Transporter Permit, UOP-0163 (DSHW-2016-011204)
Used Oil Handler Certificate, T-50 (DSHW-2016-012365)

DSHW-2016-012364

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Mailing Address: P.O. Box 144880 • Salt Lake City, UT 84114-4880
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Division of Waste Management and Radiation Control

USED OIL TRANSPORTER PERMIT

Permittee Name:	**Environmental Management of KC LLC**
Permittee Mailing Address:	861 South 66th Terrace Kansas City, Kansas 66111
Permittee Phone Number:	(913) 287-1575
Permittee Contact:	**Jared McDonald** **Vice President** (913) 909-7132 (cell) Email: jared.mcdonald@emiofkc.com
Facility Address:	861 South 66th Terrace Kansas City, Kansas 66111
Facility Contact:	**Jared McDonald** **Vice President** (913) 909-7132 (cell) Email: jared.mcdonald@emiofkc.com
Type of Permit:	**Used Oil Transporter Permit**
Permit #:	**UOP-0163**
EPA ID #:	**KSR000012526**

Signature: _____ Effective Date: 29 August 2016

Scott T. Anderson, Director
Division of Waste Management and Radiation Control

I.A. Effect of Permit

I.A.1. Environmental Management of KC, LLC. (hereafter referred to as "Permittee") is hereby authorized to operate as a used oil transporter in accordance with all applicable requirements of R315-15 of the Utah Administrative Code and of the Used Oil Management Act (the Act) 19-6-701 et. seq., Utah Code Annotated and this Permit.

I.A.2. This Permit shall be effective for a term not to exceed ten years in accordance with R315-15-15 of the Utah Administrative Code. This Permit shall be reviewed by the Director five years after the date of issuance or when the Director determines that the Permit requires review.

I.A.3. Attachments incorporated by reference are enforceable conditions of this Permit, as are documents incorporated by reference into the attachments. Language in this Permit supersedes any conflicting language in the attachments or documents incorporated into the attachments.

I.B. Permit Revocation

I.B.1. Violation of any permit condition or failure to comply with any provision of the applicable statutes and rules shall be grounds for enforcement actions, including revocation of this Permit. The Director shall notify the Permittee in writing of his intent to revoke this Permit.

I.C. Permit Modification

I.C.1. The Permittee may request modifications of any item or activity covered by this Permit by submitting a written permit modification request to the Director. If the Director determines the modification request is substantive, a public hearing, a 15-day public comment period or both may be required before the modification request may be approved. Implementing a substantive modification prior to the Director's written approval constitutes a violation of the Permit and may be grounds for enforcement action or permit revocation.

I.C.2. The Permittee shall notify the Director in writing of any non-substantive changes, such as changes to the contact person, within 20 days of the change.

I.C.3. The Director may modify this Permit as necessary to protect human health and the environment, because of statutory or regulatory changes or because of operational changes affecting this Permit.

I.D. Spill Prevention

I.D.1. The Permittee shall maintain and operate all used oil transportation vehicles and associated equipment to minimize the possibility of fire, explosion or sudden or non-sudden release of used oil to the air, ground, soil, surface and groundwater and sewer systems.

I.E. Record Retention

I.E.1. The Permittee shall maintain all used oil records required by R315-15 of the Utah Administrative Code and this Permit at the Permittee's facility located at 861 South 66th Terrace, Kansas City, Kansas.

I.E.2. All records shall be readily accessible for review by representatives of the Director. Records may be in a hard copy or electronic format. Records shall be maintained for a minimum of three years.

I.F. Tracking

I.F.1. The Permittee shall keep written transportation records for both the collection and delivery of used oil. Collection and delivery records may be a log, invoice, manifest, bill of lading or other shipping document.

I.F.2. For collections, the records shall include the Permittee's name, address, EPA identification number, the facility's vehicle number, driver name, date of collection, the volume of used oil collected and the type of collection (i.e., bulk oil in tankers or containerized, specifying container types and numbers). Additionally, the used oil records shall include the generator's, transporter's, transfer facility's, off-specification burner's or processor's name and signature (dated upon receipt), address and EPA identification number.

I.F.3. The halogen content from screening tests or analytical laboratory testing shall be documented on the used oil record/bill of lading at each used oil collection location prior to loading for transportation.

I.F.4. The Permittee shall record the PCB concentration, based on analytical results of used transformer oil, prior to collection/transport in accordance with Condition II.F.

I.F.5. The delivery records shall include the Permittee's name, address, EPA identification number, vehicle identification number, driver name, date of delivery, the volume of used oil delivered and the type of delivery (i.e., bulk oil in tankers or containerized, specifying container types and numbers). Additionally, the used oil records shall include the receiving transfer facilities', off-specification burner's, processor's or other transporter's name and signature (dated upon receipt), address and EPA identification number.

I.F.6. The Permittee shall create a new delivery record for internal transfers between the Permittee's transportation vehicles.

I.G. Sampling and Analyses

I.G.1. The Permittee shall follow all sampling and analytical procedures in Conditions II.D through II.F, when conducting used oil sampling and analytical testing to meet the requirements of R315-15 of the Utah Administrative Code and this Permit.

I.H. Waste Management

I.H.1. Used oil that has been mixed with hazardous waste as defined by R315-261 of the Utah Administrative Code or PCBs as defined by R315-301-2(53) of the Utah Administrative Code shall no longer be managed as used oil and shall be subject to applicable hazardous waste and PCB-contaminated waste rules.

I.H.2. Used oil shall not be stored in tanks, containers or storage units that previously stored hazardous waste unless these tanks, containers and storage units have been cleaned in accordance with R315-261-7 of the Utah Administrative Code.

I.H.3. The Permittee shall not place, manage, discard or otherwise dispose of used oil in any manner other than specified in R315-15-1.3 of the Utah Administrative Code.

I.I. Waste Disposal

I.I.1. The Permittee shall document and maintain records showing proper characterization, handling and disposal for used oil related wastes, including oily wastewater.

I.I.2. The Permittee shall properly characterize used oil related wastes to determine if the wastes are hazardous or non-hazardous in accordance with R315-15-8 of the Utah Administrative Code. All wastes generated during used oil operations shall be handled in accordance with this Permit and R315-15 of the Utah Administrative Code. The wastes shall be taken to an appropriate facility permitted to handle the type of waste generated.

I.J. Used Oil Storage

I.J.1. The Permittee shall not store used oil longer than 24 hours without first obtaining a transfer facility or processor permit for that storage location. This includes storing used oil in vehicles at loading and unloading docks and parking areas.

I.J.2. The Permittee shall notify the Director if the 24-hour storage is exceeded due to mechanical failure of the Permittee's transportation vehicle prior to exceeding the 24-hour storage requirement.

I.K. Liability and Financial Requirements

I.K.1. The Permittee shall procure and maintain general liability and sudden used oil third-party environmental pollution liability coverage for the Permittee's operations as required by R315-15-10 of the Utah Administrative Code.

I.K.2. The Permittee shall provide documentation of financial responsibility, environmental pollution legal liability and general liability coverage annually to the Director for review and approval by March 1 of each reporting year or upon request by the Director.

I.K.3. The Permittee shall notify the Director immediately of any changes to the extent and type of liability coverage in accordance with R315-15-10 of the Utah Administrative Code.

I.L. Used Oil Handler Certificate

I.L.1. In accordance with R315-15-4.1 of the Utah Administrative Code, the Permittee shall not operate as a used oil transporter without obtaining annually a Used Oil Handler Certificate from the Director. The Permittee shall pay a used oil handler fee, pursuant to Utah Code 63J-1-504, by December 31 of each calendar year to receive certification for the upcoming calendar year.

I.M. Inspection and Inspection Access

I.M.1. Any duly authorized employee of the Director may, at any reasonable time and upon presentation of credentials, have access to and the right to copy any records relating to used oil and to inspect, audit or sample. The employee may also make record of the inspection by photographic, electronic, audio, video or any other reasonable means to determine compliance.

I.M.2. In addition, the authorized employees may collect soil, groundwater or surface water samples to evaluate the facility's compliance.

I.M.3. Failure to allow reasonable access to the property by an authorized employee may constitute "denial of access" and may be grounds for enforcement action or permit revocation.

I.N. Annual Report

I.N.1. As required by R315-15-13.4 of the Utah Administrative Code, the Permittee shall prepare and submit an Annual Report of its used oil activities for the calendar year to the Director by March 1 of the year following the reported activity (Form UO 004 (Annual Report for Used Oil Transporter Facilities). The Annual Report shall also include all financial assurance documentation required by Form UO 004.

I.O. Other Laws

I.O.1. Nothing in this Permit shall be construed to relieve the Permittee of his obligation to comply with any Federal, State or local law.

I.P. Enforceability

I.P.1. Violations documented through the enforcement process pursuant to Utah Code Annotated 19-6-112 may result in penalties in accordance with R315-102 of the Utah Administrative Code.

I.Q. Effective Date

I.Q.1. This Permit is effective on the date of signature by the Director.

II.A. Transportation Operations

II.A.1. The Permittee is authorized to transport used oil and deliver the used oil to another permitted transporter, transfer facility, processor and re-refiners or used oil burners in accordance with R315-15-4.4 of the Utah Administrative Code.

II.A.2. Used oil recovered from oily water shall be managed as used oil in accordance with R315-15 of the Utah Administrative Code and this Permit.

II.A.3. The Permittee shall only accept used oil or oily water, subject to R315-15 of the Utah Administrative Code that has halogen concentrations less than 1,000 ppm unless rebutted in accordance with Condition II.G.

II.A.4. The Permittee shall comply with TSCA regulations when transporting used oil with PCB concentrations greater than or equal to 50 mg/kg.

II.B. Transport Vehicle Requirements

II.B.1. The Permittee shall only transport used oil in the types of vehicles listed in Table II.B.

Table II.B: Vehicle Description

Type of Vehicle	Used Oil Capacity (gallons)
Bulk tanker trailers	6,400

II.B.2. All used oil transport vehicles operated by the Permittee shall have the words "USED OIL" on both sides of the transport vehicle in a contrasting color that is distinguishable from the background color and at least three inches tall. These designations shall be in place at all times the transport vehicle is transporting or storing used oil.

II.B.3. All Permittee's vehicles which transport used oil shall have a copy of the Permittee's Used Oil Emergency Spill Plan maintained in the vehicle at all times.

II.B.4. The Permittee shall maintain Emergency Spill Cleanup materials in all vehicles used to transport used oil as specified in Condition II.I of this Permit.

II.C. Used Oil Loading and Unloading Requirements

II.C.1. The Permittee shall secure the vehicle by positioning wheel chocks and applying the emergency brakes before loading or unloading used oil.

II.C.2. The Permittee shall inspect all used oil collection equipment, if applicable, (e.g., vehicles and associated pumping equipment) for any damage prior to use.

II.C.3. The Permittee shall place buckets or other containers under piping connections to collect drips of used oil during loading and unloading operations.

II.C.4. The Permittee shall ensure the amount of used oil to be loaded into the transport vehicle will not exceed the carrying capacity. The Permittee shall utilize a

calibrated gauging instrument to measure used oil volume in each collection vehicle (tankers).

II.C.5. The Permittee is not authorized to perform used oil rail car transfers.

II.D. Used Oil Sample Collection

II.D.1. The Permittee shall ensure a representative sample is collected from tanks, totes, drums or other containers, if required, using sampling method in accordance with the procedures in Attachment 1. Sampling personnel shall be trained on appropriate sampling methods for each type of container and matrix.

II.D.2. Drums or containers of used oil from different sources or processes shall be sampled individually at each generator's facility.

II.D.3. Composite sampling is only allowed for a maximum of 500 gallons from containers of used oil that are generated from the same source or process at each generator's facility.

II.E. **Halogen Verification Methods**

II.E.1. Halogen Field Screening Methods

II.E.1.a. The Permittee shall screen for halogens in the field, prior to acceptance or delivery of used oil or oily waste water subject to R315-15 of the Utah Administrative Codes as specified in Condition II.E.

II.E.1.b. The Permittee shall screen the generator's used oil to verify halogen concentration, when applicable, using a halogen field screening method in accordance with the following requirements:

II.E.1.b.i Used oil that contains less than 20% water shall be screened for halogens with a CLOR-D-TECT® halogen test kit (EPA Method 9077).

II.E.1.b.ii Used oil that contains between 20% and 70% water shall be screened for halogens with a HYDROCLOR-Q® test kit. The resulting halogen concentration must be corrected using the following conversion formula to calculate true halogen concentration.

True Halogen Concentration = Reading Syringe + [(10 + ml oil in sample)/10]

Example: sample contains 6 ml water and 4 ml oil (60% water) and the syringe reading is 2,000 ppm, then the true concentration is:

2,000 ppm [(10 + 4)/10] = 2,800 ppm

II.E.1.b.iii Used oil that contains greater than 70% water shall be screened for halogens with a HYDROCLOR-Q® test kit. Correction of the halogen screening results is not required.

II.E.1.c. The requirement for a quality control sample (duplicate) may be satisfied by testing prior to off-loading from permitted vehicles in accordance with the

CLOR-D-TECT® kits (EPA Method 9077) and is not required for each load collected at individual generators.

II.E.1.d. The Permittee shall document on acceptance records or bill of lading the screening results.

II.E.2 Halogen Laboratory Analytical Methods

II.E.2.a. The Permittee shall submit a representative used oil sample to a Utah-certified laboratory to analyze for total halogen concentrations using EPA Method 9076 or other equivalent method approved by the Director.

II.E.2.b. The Permittee shall attach a copy of the analytical results to the transportation document such as a bill of lading or manifest.

II.E.3. Halogen Generator Knowledge Method

II.E.3.a. The Permittee shall have information on file, (e.g., analytical testing, industry process knowledge) which is sufficient, as determined by the Director, to support the use of generator knowledge.

II.E.3.b. The Permittee may not use a material safety data sheet (MSDS) or safety data sheets (SDS) as the sole source in making a halogen concentration determination.

II.E.3.c. The Permittee shall document on the acceptance record "Generator Knowledge" with an appropriate identifier, e.g., profile ID for used oil collected.

II.E.3.d. Used oil with halogen concentrations between 1,000 ppm and 4,000 ppm may be accepted for transport, if the Permittee rebuts the hazardous waste presumption (Condition II.G.) or has documentation (analytical data) from a prior used oil handler that the used oil is not a hazardous waste. The Permittee shall attach any analytical results used to rebut the hazardous waste presumption to the shipping documents.

II.E.3.e. Used oil determined to be on-specification by a Utah-registered marketer can be collected and transported without further testing. Bills of lading, manifests or other used oil transportation records shall include copies of the analytical results for reference.

II.F. PCB Contaminated Used Oil

II.F.1. The Permittee shall not accept for transport used oil with PCB concentrations greater than or equal to 50 mg/kg. Used oils containing PCB concentrations greater than or equal to 50 mg/kg are subject to TSCA regulations 40 CFR 761. Used oils containing PCB concentrations greater than or equal to 2 mg/kg but less than 50 mg/kg are subject to both R315-15 of the Utah Administrative Code and 40 CFR 761.

II.F.2. The Permittee shall obtain analytical results of dielectric oil used in transformers and other high voltage devices, verifying the PCB concentrations are less than 50 mg/kg prior to loading the used oil into the transportation vehicle.

II.F.3. The Permittee shall determine the PCB concentration of other used oils not specified in II.F.2 through written certification from the generator or laboratory testing.

II.F.4. Used oil may not be diluted to avoid any provision of any federal or state environmental rules.

II.F.5. If PCB concentrations greater than or equal to 2 mg/kg have been transported, the Permittee shall assume that all subsequent loads of used oil are contaminated with PCBs and has a quantifiable PCB concentrations of 2 mg/kg or greater unless the equipment has been decontaminated as described in 40 CFR761 Subpart S.

II.F.6. Table II.F lists required laboratory PCB sample preparation and analytical methods.

Table II.F: PCB Sample Preparation and Analytical Methods

Methods	Analytical Methods:	Analytes	
		PCB CAS RN	*PCB Aroclor*
Sample Preparation Methods: 3580A and 3665A (Cleanup)	• 8082A • PCB Analytical Method • Analyses of the Aroclors bolded in the last column are mandatory. • Choose an additional two Aroclors from the last column for analysis which could be contained in the oil, which will make a total of seven Aroclors.	**12674-11-2**	**1016***
		147601-87-4	1210
		151820-27-8	1216
		11104-28-2	**1221***
		37234-40-5	1231
		11141-16-5	**1232***
		71328-89-7	1240
		53469-21-9	**1242***
		12672-29-6	**1248***
		165245-51-2	1250
		89577-78-6	1252
		11097-69-1	**1254***
		11096-82-5	**1260***
		37324-23-5	1262
		11100-14-4	1268

II.G. Rebuttable Presumption

II.E.1. Used oil with total halogen concentrations greater than 1,000 parts per million (ppm) is presumed to have been mixed with a hazardous waste and shall be managed as a hazardous waste unless the Permittee successfully rebuts the presumption.

II.G.2. The Permittee may rebut the hazardous waste presumption in accordance with R315-15-4.5 of the Utah Administrative Code if the Permittee can demonstrate that the used oil does not contain significant concentrations of any of the halogenated hazardous constituents listed in Appendix VIII of CFR 40, Part 261 which includes volatiles, semi-volatiles, PCBs, pesticides, herbicides and dioxin/furans.

II.G.3. If the additional tests show that used oil has been mixed with a listed hazardous waste identified in R315-261 of the Utah Administrative Code, the mixture is subject to regulation as a hazardous waste regardless of the level of halogenated constituents.

II.G.4. The rebuttable presumption does not apply to metalworking oils/fluids containing chlorinated paraffins if they are processed through a tolling arrangement as described in R315-15-2.5(c) of the Utah Administrative Code to reclaim metalworking oils/fluids. The rebuttable presumption does apply to metalworking oils/fluids if such oils/fluids are recycled in any other manner or disposed.

II.G.5. The rebuttable presumption does not apply to used oils contaminated with chlorofluorocarbons (CFCs) removed from refrigeration units if the CFCs are destined for reclamation. The rebuttable presumption does apply to used oils contaminated with CFCs that have been mixed with used oil from sources other than refrigeration units.

II.H. Used Oil Training

II.H.1. The Permittee shall train handlers of used oil in accordance with R315-15-4 of the Utah Administrative Code and the requirements of this Permit. New employees may not manage or transport used oil without a trained employee present until used oil training is completed.

II.H.2. The Permittee shall follow a written training program (Attachment 2 – Training Plan). Employee training shall include documentation that the following topics were covered: identification of used oil, recordkeeping requirements and facility used oil procedures for handling, transporting, sampling and analysis, emergency response, spill reporting and personal safety.

II.H.3. Employees collecting and performing field halogen testing shall be trained and demonstrate competence in collecting a representative used oil sample and testing for halogens using a CLOR-D-TECT® kit prior to fieldwork.

II.H.4. The Permittee shall provide, at a minimum, an annual used oil training refresher course for employees handling used oil. Additional training is required if the Permittee changes used oil handling procedures or this Permit is modified.

II.H.5. The Permittee shall keep training records for each employee for a minimum of three years. Employees and supervisors shall sign and date training attendance sheets to document class attendance.

II.I. Spill Response, Remediation and Reporting

II.I.1. In accordance with R315-15-9.1(a) of the Utah Administrative Code, the person responsible for the spill shall immediately take appropriate action to minimize the threat to human health and the environment and notify the DEQ Hotline at (801) 536-4123 if the spill is greater than 25 gallons or for smaller spills that pose threat to human health or the environment.

II.I.2. Responders shall take action to prevent spill from spreading by utilizing absorbent, booms, pads, rags, etc. (Attachment 3 – Emergency Controls Spill Plan).

II.I.3. Once the material is containerized, a waste determination shall be made to determine the material's disposition.

II.I.4. The Director may require additional cleanup action to protect human health or the environment.

II.I.5. All costs associated with the cleanup shall be at the expense of the Permittee.

II.I.6. Vehicle spill kits shall contain, at a minimum, the equipment listed in Table II.I of this Permit and shall be checked daily prior to collection activities.

II.I.7. The Permittee shall report all relevant information, including the amount of waste generated from cleanup efforts, the characterization of the waste (i.e. hazardous or non-hazardous), final waste determination and disposal records. The report shall also include actions taken by the Permittee to prevent future spills.

II.I.8. An air, rail, highway or water transporter who has discharged used oil shall give notice, if required by 49 CFR 171.15, to the National Response Center at http://nrc.uscg.mil/nrchp.html, (800) 424-8802. In addition to the notification above, a written report, as required in 49 CFR 171.16, shall be presented to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau located in Washington, D.C., 20590.

II.I.9. In accordance with R315-15-9.4 of the Utah Administrative Code, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil.

Table II.I: Spill Kit Equipment Requirements

Equipment Description	Quantity
Non-Sparking Shovel	1
Broom	1
Buckets	2
Spill Absorbent Pillows (18" X 18")	10
Granulated Absorbent Clay	2 ft^3
Absorbent Booms (3" X 18")	1
Spill Plan with Emergency Contact Numbers	1
Blank Spill Report Sheets	5
Disposable Salvage bags	2
First Aid Kit and Fire Extinguisher	1 each

ATTACHMENT 1

Sample Collection Procedures

Environmental Management of KC, LLC employees shall use the sampling procedures below to collect a representative sample from customers' tanks and containers when screening used oil for halogen content prior to collection.

Procedure 1: Containers - 375 gallons or less

Sampling Equipment: Oil thief sampler 175 ml, 39 inch, sample jar.

Step 1

Take oil thief sampler and dip into drum or tote make sure the tube fills up a good cross section before covering top hole with finger

Step 2

Open sample jar and dispense entire contents from drum thief into sample jar

Step 3

Screen sample using CLOR-D-TECT®, HYDROCLOR-Q® halogen test kit or prepare to ship the sample off to a Utah Certified Laboratory for analysis.

Step 4

Empty the sample in the bucket back into the used oil container/tank.

Procedure 2: Tankers/Pumper Trucks and Tanks/Containers ≥ 375 gallons

Sampling Equipment: Dip tube sampler (Polypropylene/ plastic type tube) sampler.

Step 1

Lower the sampling tube slowly into the liquid waste at a rate that allows the liquid level inside and outside the tube to equalize. Manways located at the top of the Tanker/Pump trucks will be used to collect samples.

Step 2

Slowly withdraw Dip tube from the liquid. Either wipe the exterior of the sampler tube with a disposable cloth or allow excess liquid to drain back into the used oil container/tank.

Step 3

Discharge the sample by placing the lower end of the Dip tube into a sampling bucket.

Step 4

Screen sample using CLOR-D-TECT®, HYDROCLOR-Q® halogen test kit or prepare to ship the sample off to a Utah Certified Laboratory for analysis.

Step 5

Empty the sample in the bucket back into the used oil container/tank.

ATTACHMENT 2

Training Plan

General Training

1.0. Employees will be trained on general used oil management procedures, sample collection procedures, halogen screening and laboratory analytical methods, rebuttable presumption testing, the appropriate use of "generator knowledge" when determining the halogen content, proper waste disposal, and the facility's Emergency Control Spill Plan.

2.0. New employees will be trained within 30 days of employment. Untrained employees will not be allowed to conduct used oil activities or transportation operations without the presence of a trained employee until training is completed.

3.0. Utah-specific used oil training will be conducted on an annual basis to all employees involved in used oil handling in Utah. The training will be provided during scheduled company safety/training meetings, or as appropriate. Refresher training will include identification of used oil and analysis requirements for used oil transportation in Utah, the "Emergency Controls/Spill Plan," spill reporting, and personal safety and protection.

4.0. The facility's health and safety manager or operations manager will maintain a written description of training activities and generate a training record for each employee to document employee training. Records of this training (date, employee name & signature, and items covered) will be kept and made available for inspection for three years, and a master copy will be kept in the company training file (Table 1).

Table 1: Example of Used Oil Training Record

Date	Name	Signature	Comments

ATTACHMENT 3

Emergency Controls- Spill Plan

General Procedures

In the event of a release of used oil, the Environmental Management of KC, LLC (EMI) employee will immediately take the following appropriate actions to contain and minimize the spill and the threat to life, health, environment and property:

1. EMI employee will attempt to control or stop the leak if it can be done safely.
2. Use absorbent material, booms, spill pads and dirt dams and dikes if necessary to control the material. If possible, keep spilled material out of storm drains and open waterways.
3. Contact 911 emergency responders if needed.
4. Contact his supervisor.
5. If necessary, the supervisor will contact an authorized waste remediation company for assistance with the clean- up.
6. Used oil spills exceeding 25 gallons, or that pose a risk to human health and the environment, shall be reported to EMI management, and to the Utah Department of Environmental Quality and any other applicable regulatory agency immediately after containment of the spill (Table 1).

Table: 1: Regulatory Agency Notification Numbers

Regulatory Agency	Contact Phone Number
National Response Center	(800) 424-8802 or 202-426-2675
Utah Department of Environmental Quality (within 24 hrs.)	(801) 536-4123
Utah State Highway Patrol	(801) 538-3400

7. The following information shall be provided by telephone to the Utah State Department of Environmental Quality's', 24-hour answering service at 801-536-4123:
    a. Name, telephone number and address of parties responsible for the release.
    b. Name, title and telephone number of individual reporting.
    c. Time and date of the release.
    d. Location of the release, as specific as possible including nearest town, city, highway or waterway.
    e. Description of released material found on the manifest or shipping document, along with the amount of material released.
    f. Cause of the release.
    g. Possible hazards to human health or the environment and the emergency action taken to minimize the threat.
    h. The extent of injury, if any

8. If a spill occurs on a highway or railway, employees should immediately stop the release if possible, secure the scene and contain the spill. EMI shall give notice, if required by 49 CFR 171.15 to the National Response Center (Table 1).

9. The EMI employee shall submit a completed spill report to a supervisor at or before the end of the shift. A spill report of used Oil spills exceeding 25 gallons, or that pose a risk to human health and the environment, shall be submitted to the Division of Waste Management and Radiation Control within 15 days of the spill in accordance with R315-15-9.1.

10. The driver/employee shall immediately notify the EMI emergency contacts in Table 2 below. If there are, injuries to personnel/public or the spill will require additional emergency responders to contain then all 911 to request help. The discharge notification form is included in this spill plan shall be completed immediately by the operator after containment of the used oil, notification to emergency responders (if applicable) and EMI management.

11. Employees are exempted from reporting de minimis drips to management that are immediately cleaned up by the responsible employee.

12. The EMI supervisor shall be responsible to initiate and complete any reporting and notification to the required Federal, State and local agencies

13. Used oil transport vehicles shall maintain absorbents and equipment to contain a leaking containers and spills. The Permittee's used oil transport vehicles shall be equipped, at a minimum, with in the equipment listed in Table 3.

Table: 2: Emergency Contacts List

Contact Person	Title	Contact Information
Jared McDonald	Vice President	Mobile: (913) 909-7132 Office: (913) 287-1575 Email: jared.mcdonald@emiofkc.com
Matt Collene	Operations Manager	Mobile: (913) 282-8143 Office: (913) 287-1575 Email: matt.collene@emiofkc.com
Fire Response (In case of fire or injury)	NA	911

Table 3: Spill Equipment List for Vehicles

Equipment Description	Quantity
Non-Sparking Shovel	1
Broom	1
Buckets	2
Spill Absorbent Pillows (18" X 18")	10
Granulated Absorbent Clay	2 ft^3
Absorbent Booms (3" X 18")	1
Spill Plan with Emergency Contact Numbers	1
Blank Spill Report Sheets	5
Disposable Salvage bags	2
First Aid Kit and Fire Extinguisher	1 each

WASTE MANAGEMENT
& RADIATION CONTROL

Utah Used Oil Handler Certificate

Environmental Management of KC, LLC

UOP-0163

is permitted as a Used Oil Transporter with the Utah Division of Waste Management and Radiation Control pursuant to Utah Code Annotated Section 63J-1-504

Effective Date: August 29, 2016

Expiration Date: December 31, 2016

Certificate No. T-50

Approved by: _____

Director, Division of Waste Management and Radiation Control