



Division of Waste Management and Radiation Control
USED OIL TRANSFER FACILITY PERMIT



Permittee: Nelson Scrap Metals Services, Inc.

Permittee Mailing Address: 14248 South 6600 West
Herriman, UT 84096

Permittee Phone Number: (801) 834-6168

Permittee Contact: Kimberly Nelson - Owner
Office – (801) 834-6168
Cell – (801) 755-2882
Email: kimberlynelson5@yahoo.com

Facility Address: 625 South Iron Rose Place
Salt Lake City, UT 84104

Facility Contact: Kimberly Nelson
(801) 834-6168

Type of Permit: Used Oil Transfer Permit

Permit #: UOP-0136

EPA ID #: UTR000012773

Signature: _____ Date: _____
Scott T. Anderson, Director
Division of Waste Management and Radiation Control

MODULE I
General Transfer Facility Requirements

I.A. GENERAL OPERATIONS

I.A.1. Nelson Scrap Metals Services, Inc. (hereafter referred to as “the Permittee”) is hereby authorized to operate a Used Oil Transfer Facility. The Permittee shall operate its facility, located at 625 South Iron Rose Place, Salt Lake City, Utah, in accordance with all applicable requirements of R315-15 of the Utah Administrative Code (UAC) and the Used Oil Management Act (the Act) 19-6-701 et. seq., Utah Code Annotated and this permit.

I.B. PERMIT REVOCATION

I.B.1. Violation of any permit condition or failure to comply with any applicable provision of the applicable statutes and rules may be grounds for imposing statutory sanctions, 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 to 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 is approved. Implementing a 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 Director may modify this permit as necessary to protect human health and the environment or because of statutory or regulatory changes.

I.D. MAINTENANCE AND SPILL PREVENTION

I.D.1. The Permittee shall maintain and operate all used oil equipment and facilities to minimize the possibility of fire, explosion or sudden or non-sudden release of used oil to air, soil or surface water, which could threaten human health and the environment.

I.E. RECORD RETENTION

I.E.1. The Permittee shall maintain all applicable used oil records required by both R315-15 UAC and this permit at 625 South Iron Rose Place, Salt Lake City, Utah for a minimum of three years. Records may be in a hard copy or electronic format and shall be readily accessible for inspection by the Division of Waste Management and Radiation Control.

VI.

I.F. REBUTTABLE PRESUMPTION/ANALYSIS PLAN

I.F.1. The Permittee shall follow all sampling and analytical procedures in Module II.H., Rebuttable Presumption/Analysis Plan when conducting used oil analytical testing to meet the requirements of R315-15 UAC and this permit.

I.G. PROHIBITED WASTE

I.G.1. The Permittee shall not mix or commingle used oil with hazardous waste so that the resulting mixture may not be recycled or used for other beneficial purposes.

I.G.2. Used oil that has been mixed with hazardous waste, as defined by R315-1 and R315-2 UAC or PCBs as defined by R315-301-2(53) UAC shall be managed in accordance with applicable hazardous waste and PCB waste rules.

I.G.3. Used oil shall not be stored in tanks, containers or storage units that stored hazardous waste unless these tanks, containers and storage units have been cleaned in accordance with R315-2-7 UAC.

I.H. WASTE DISPOSAL

I.H.1. All wastes generated during used oil operations shall be handled according to the procedures outlined in Module II.F. The wastes shall be taken to a facility permitted to handle the type of waste generated.

I.I. USED OIL STORAGE

I.I.1. The Permittee shall store used oil in totes, drums or other containers with sufficient secondary containment to prevent used oil from migrating to soil, groundwater or surface water.

I.J. EMERGENCY CONTROLS/SPILL PLAN

I.J.1. The Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are necessary to protect human health and the environment. The Permittee shall comply with all applicable requirements of R315-15-9 UAC.

I.J.2. In the event of a release of used oil, the Permittee shall comply with the Emergency Controls required by R315-15-9 UAC and the Permittee's Emergency Spill Plan (Attachment 2).

I.J.3. It shall not constitute a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the Permittee business activity in order to maintain compliance with the conditions of this permit and Attachment 2.

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I.K. USED OIL TRAINING

I.K.1. The Permittee shall train used oil handlers and record keepers in the applicable regulatory requirements of R315-15-4 UAC, Module II.D and Attachment 1 (Oil Filter Processing Training Manual).

I.L. LIABILITY/FINACIAL REQUIREMENTS

I.L.1. The Permittee shall maintain general liability and the third-party environmental pollution liability coverage for any liability resulting from the Permittee's operations as required by R315-15-10 UAC and Module II.G.

I.L.2. The Permittee shall be financially responsible for cleanup and closure costs, general worker compensation, facility liability and third-party environmental pollution liability coverage for sudden accidental spills or mismanagement of used oil and damage to third parties arising from any operations at the Transfer Facility as required by R315-15-10 UAC and Module II.H.

I.M. USED OIL HANDLER CERTIFICATE

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

I.N. INSPECTION AND INSPECTION ACCESS

I.N.1. Any duly authorized officer of the Director may, at any reasonable time, upon presentation of appropriate credentials, enter upon and inspect the Permittee's property, premise or place for ascertaining compliance with applicable provisions of R315-15 UAC and the Used Oil Management Act (19-6-701, et. seq.).

I.N.2. Where such an inspection involves entry to the Permittee's property, the duly authorized officer shall provide the Permittee an opportunity to have a representative of the facility be present.

I.N.3. Authorized officers may have access to and the right to copy any records relating to used oil activities. Authorized officers may use any reasonable means to document inspection activities (e.g., photographic, videotape, or electronic). In addition, the authorized officers may collect environmental soil, groundwater or surface water samples to evaluate the impact of the Permittee's used oil operations.

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I.N.4. Failure to allow reasonable access to the property, by authorized officers may constitute “denial of access” and maybe grounds for enforcement action or permit revocation.

I.O. ANNUAL REPORT

I.O.1. As required by R315-15-13.4 UAC, the Permittee shall prepare and submit an Annual Report to the Director by March 1 of each calendar year. The “Annual Report for Used Oil Transfer Facilities” (Form UO 004) shall be submitted annually until the Permittee has ceased operations and closure requirements are met in accordance with Module II.H.

I.P. OTHER LAWS

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

I.Q. TRANSFER OF PERMIT

I.Q.1. This permit may not be transferred to another party or parties without prior written approval of the Director.

I.R. EFFECTIVE DATE

I.R.1. This permit shall become effective on the date signed by the Director.

MODULE II

Transfer Facility Operations

II.A. FACILITY OPERATIONS

- II.A.1. The Permittee may receive non-terne oil filters (filters) for processing from permitted used oil transporters. The Permittee shall process the filters using a commercial steel filter crusher designed to crush, drain and bale the metal filters into 8-inch-by-8-inch filter cubes. The baled filter cubes shall be hot drained for minimum of twenty-four hours in a tilt hopper designed to recover any remaining used oil after the crushing process.
- II.A.2. Storage of uncrushed filters and bulk used oil shall not exceed 35 days.
- II.A.3. Once the metal filters are hot drained and crushed, the metal filters are no longer subject to the used oil regulations.

II.B. USED OIL STORAGE

II.B.1. Green Storage Container #1 (GSC #1)

- II.B.1.a. GSC #1 is an 8-foot by 40-foot sealed steel shipping container, which provides secondary containment for uncrushed filter containers. The Permittee shall only accept delivery of filters in leak-proof containers properly labeled with the words “Used Oil” and securely closed. Containers with uncrushed filters shall be placed immediately in GSC #1 or the Warehouse Processing Storage Area (WPS). The Permittee may store a maximum of 160 containers of uncrushed filters in GSC #1. Placement of GSC #1 in the facility yard shall ensure that any oil spills from GSC #1 will be contained within the facility boundaries.
- II.B.1.b. The GSC #1 access door shall remain closed, unless personnel are loading or unloading containers. The Permittee shall lock the access door if personnel are not present at the facility.
- II.B.1.c. The Permittee shall maintain a weekly inspection log for GSC #1 with the inspector’s name, time, date and condition of the storage containers. Issues identified by the inspector (e.g., leaking drums) and their resolution will be documented in the inspection log.

II.B.2. Warehouse Processing Storage Area (WPS)

- II.B.2.a. A maximum of 140 containers of uncrushed filters may be stored for processing in the WPS.
- II.B.2.b. The Permittee will maintain a weekly inspection log for containers stored in the warehouse area, with the inspectors name, time, date, and condition of the storage containers. Issues will be documented (e.g. leaking drums) on the inspection log and the actions taken by the Permittee to resolve any issues.

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II.B.3. Eastern Loading Dock (ELD) Processed Used Oil Storage

- II.B.3.a. Bulk used oil generated from filter crushing operations shall be stored in 250-gallon plastic totes. The Permittee may store a maximum of 3,000 gallons of bulk used oil generated from filter processing on the eastern loading dock (ELD). The ELD bulk storage area shall have a secondary containment capacity of 5,591 gallons.
- II.B.3.b. The Permittee shall maintain a weekly inspection log for the catchment sump and totes stored on the ELD with the inspector's name, time, date and condition of the storage containers. Issues identified by the inspector (e.g., leaking totes, sump cleaning) and their resolution shall be documented in the inspection log.
- II.B.3.c. The Permittee shall clean up and immediately remove any used oil spilled during transfer from the crusher to ELD storage containers, including the catchment sump.

II.C. RECORDKEEPING

- II.C.1. The Permittee shall document the unique container identification numbers of uncrushed filter containers received and track the amount of bulk oil distributed by the Permittee to and from transporters. Each used oil delivery and distribution record shall also document the transporter's name, address, EPA identification number, date of acceptance or distribution and the signatures of both the transporter and the Permittee's authorized representative.
- II.C.2. The container tracking system shall provide documentation that used oil received by the Permittee is not stored longer than 35 days.

II.D. EMPLOYEE TRAINING

- II.D.1. The Permittee shall train used oil record keepers and handlers using a written training program (e.g. syllabus and training materials). Training shall include identification of used oil, recordkeeping requirements, facility procedures for handling, storing and processing used oil, analytical screening methods, emergency response, spill reporting and personal safety.
- II.D.2. The Permittee shall train new employees in the handling of used oil within 14 days of employment. New employees may not manage or process used oil without a trained employee, until used oil training is completed.
- II.D.3. 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.

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II.D.4. 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. A written training syllabus outlining the topics covered during training shall be attached to each employee's training records.

II.E. GENERAL EMERGENCY RESPONSE

II.E.1. Spill Cleanup

II.E.1.a. The Permittee shall immediately clean up drips, spills and releases of used oil. The Permittee shall be responsible for all costs associated with cleanup.

II.E.1.b. The Permittee shall maintain a written Emergency Spill Plan (Attachment 2) at the facility that includes, but is not limited to, used oil spill control, containment, clean up, waste disposal, recordkeeping and reporting procedures.

II.E.1.c. The Permittee shall contact the local fire departments and provide them with information on used oil operations and storage capacity at the facility. The Permittee shall comply with all state, county and city fire codes.

II.E.1.d. The Permittee shall maintain spill clean-up kits in the warehouse and the GSC storage areas.

II.E.2. Release Reporting

II.E.2.a. The Permittee shall notify the Utah Department of Environmental Quality, 24-hour Answering Service, (801) 536-4123, for used oil releases exceeding 25 gallons or smaller releases that pose a potential threat to human health or the environment (See R315-15-15-9.1(b) UAC). All relevant information, including but not limited to, date, time and location, personnel involved and emergency response actions taken by the Permittee or other emergency responders shall be included.

II.E.2.b. In accordance with R315-15-9.1(b) UAC, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil. All relevant information including the amount of waste generated from cleanup efforts, the characterization of the waste (e.g. hazardous or non-hazardous), final waste determination and disposal records shall be included. The report shall also include actions taken by the Permittee to prevent future spills.

II.F. WASTE CHARACTERIZATION

II.F.1. The Permittee shall document and maintain records showing proper handling and disposal for all used oil related waste, including oily wastewater.

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II.F.2. The Permittee shall properly characterize the waste to ascertain if the waste is hazardous or non-hazardous in accordance with R315-15.-8 UAC.

II.G. FINANCIAL REQUIREMENTS

II.G.1. Financial Responsibility

II.G.1.a. The Permittee shall be financially responsible for cleanup and closure costs, general liabilities (e.g. public, employees, and contractors) and environmental pollution legal liability for bodily or property damage to third parties resulting from sudden release of use oil in accordance with R315-15-10 through 12 UAC.

II.G.1.b. Documentation of financial responsibility, environmental pollution legal liability, and general liability coverage shall be provided to the Director annually for review and approval.

II.G.2. Environmental Pollution Legal Liability

II.G.2.a. The Permittee shall procure and maintain sudden used oil pollution, liability insurance for the facility in accordance with R315-15 UAC.

II.G.2.b. The Permittee shall submit documentation of sudden used oil-pollution liability insurance to the Director by March 1 of each reporting year.

II.G.3.c. The Permittee shall notify the Director of any changes to the extent and type of liability coverage in accordance with R315-15-10 UAC.

II.G.3. Facility Closure Cost Financial Assurance

II.G.3.a. The Permittee shall establish and maintain a financial assurance mechanism in accordance with R315-15-12 UAC to assure proper clean up and closure of the facility.

II.G.3.b. The Permittee shall submit an annual report to the Director, by March 1 of each year that updates closure financial responsibility information, including a yearly cost adjustment for inflation in accordance with R315-15-12.4 and R315-15-11.2(a)(4) UAC.

II.G.3.c. The Permittee shall annually review and evaluate the face value of the financial assurance mechanism for closure costs. Permit modifications resulting in changes to the facility's design, storage capacity and processing operations or a determination by the Director that current closure estimates are inaccurate shall require an additional review by Permittee and the Director to determine if an increase is required in the face value of the established financial mechanisms.

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- II.G.3.d. The Permittee shall submit a written update of cleanup and closure costs to the Director for approval within 60 days following a modification that causes an increase in the financial assurance amount required under R315-15-10 UAC.
- II.G.3.e. Within 30 days of the Director's written approval of the updated closure costs, the Permittee shall provide the Director with evidentiary documentation of increased closure cost estimates, the type of financial mechanism and the account number in accordance with R315-15-10 UAC.

II.H. FACILITY CLOSURE

II.H.1 Implementation of Closure Plan

- II.H.1.a. The Permittee shall implement the closure plan in Attachment 3 of this permit and evaluate potential impacts of used oil operations on the surrounding soil, groundwater and surface water in accordance with R315-15-11 UAC. The Permittee shall be responsible for any cleanup of any used oil contamination that has migrated beyond the facility property boundaries in accordance with R315-15-11(d) UAC.
- II.H.1.b. The Permittee shall implement the closure plan within 90 days after the Permittee receives the final volume of used oil or when the Director revokes the Permittee's Transfer Facility Permit (UOP-0136) in accordance with R315-15-11.3 UAC.
- II.H.1.c. Closure shall include, but not be limited to, used oil storage areas, loading docks, sumps, ancillary equipment and piping and the oil water separator. Table II.H.1 provides estimated closure cost for soil and groundwater investigation (Task 1), Plant Decommissioning (Task 2) and Closure Certification (Task 3).

II.H.2. Closure Certification

- II.H.2.a. Within 60 days of completion of cleanup and closure, the Permittee shall submit to the Director, by registered mail, certification that the facility has been closed in accordance with the approved closure plan. An independent, Utah-registered professional engineer and the Permittee shall sign the closure certification.
- II.H.2.b. Additional sampling and remediation may be required by the Director to verify that cleanup and closure has been completed in accordance with R315-15 UAC.

II.H.3. Soil and Groundwater Testing (Task 1)

- II.H.3.a. Soil and groundwater samples shall be tested for PCBs, Oil and Grease, Diesel Range Organics (DRO), Gasoline Range Organics (GRO) and RCRA characterization parameters including total metals, semi-volatiles and volatiles using test methods listed in Module II.I. The Permittee shall submit a Level IV analytical data package with the

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Transfer Facility Operations

testing results from a Utah certified laboratory within 30 days of receipt to the Director for review and approval.

II.H.4. Plant Decommission and Certification (Task 2 & 3)

II.H.4.a. The total task cost estimates for plant decommission and closure certification are identified in Table II.H.1. Specific requirements include removal of all used oil and other media from all tanks, containers, piping, pumps, filters and other ancillary equipment.

II.H.4.b. A permitted used oil transporter shall remove untested bulk used oil to a recycling facility or a waste disposal facility approved by the Director.

II.H.4.c. Rinsate water generated from used oil cleaning operations shall be transported to a recycling facility or a waste disposal facility approved by the Director.

Table II.H.1: Itemized Task Closure Costs for Financial Assurance

Task	TASK DESCRIPTION	COMPANY	UNITS	RATE	COST
1	Site Sampling and Analytical				
	Collect representative soil samples	Third-Party	2	\$112.00	\$224.00
	Collect representative water samples	Third-Party	2	\$112.00	\$224.00
	Drilling for soil and groundwater sample collection	Third-Party	1	\$1200.00	\$1200.00
	Soil Samples – Analytical Testing	Third-Party	2	\$200.00	\$400.00
	Water Samples – Analytical Testing	Third-Party	2	\$200.00	\$400.00
	Site Sampling and Analytical Sub-Total				
2	Plant Decommission				
	Remove residual oil and water (gal)	Third- Party	3000/gal	\$0.08/gal	\$240.00
	Disposal of possibly contaminated oil (gal)	Third- Party	250	\$0.41/gal	\$102.50
	Disposal of containers of used oil filters	Third - Party	150	\$65/drum	\$9750.00
	Decontaminate and Clean Equipment	Third - Party	1	\$340/hour	\$340.00
	Disposal of cleaning rinsate (gal)	Third-Party	200	\$0.45/gal	\$90.00
	Contaminated soil removal (tons)	Third-Party	2	\$22.00 ton	\$44.00
Plant Decommission Sub-Total					\$10566.50
3	Final Closure Verification				
	Independent P.E. Verification	Third-Party	1	\$500.00	\$500.00
	Division of Waste Management and Radiation Control Review	Third-Party	5.5 hrs.	\$90.00	\$500.00
Final Closure Verification Sub-Total					\$1000.00
Total Closure Costs					\$14,014.50

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II.I. SAMPLING AND ANALYTICAL METHOD REQUIREMENTS

II.I.1. The Permittee shall follow the used oil sampling preparation and analytical methods in Table II.I when sampling results are submitted to the Director to determine compliance with R315-15 UAC and this permit.

II.I.2. Sample Collection Requirements for Containers

II.I.2.a. The Permittee shall document that the transporter screens the used oil for halogens prior to the collection and loading of the used oil. If the total halogen content is greater than 1,000 parts per million (PPM), the oil is presumed to be hazardous waste, unless the generator can rebut the presumption in accordance with Condition II.I.4. Screening results shall be documented in the Permittee's records.

II.I.2.b. Before sampling, the used oil storage container to be tested shall be locked down. Additional used oil shall not be placed in or removed from the container.

II.I.2.c. The Permittee shall collect a representative sample in clean sample containers from the locked down used oil storage container.

II.I.2.d. The Permittee shall collect samples from each storage container (e.g. drum and totes), if required, using a drum thief. Composite samples are not allowed.

II.I.2.e. The Permittee shall generate a chain-of-custody record for all samples collected and analyzed by the Permittee. The Permittee shall record the time, date, initials of person collecting the sample and a unique sample number on each sample.

II.I.2.f. Samples shall be analyzed by a Utah-certified laboratory for the constituents required by R315-15-1.2 UAC using the methods listed in Table II.I.

II.I.2.g. The Permittee shall maintain all analytical records for a minimum of three years.

II.I.3. Halogen Screening Methods

II.I.3.a. The Permittee or transporter shall perform the screening on each tote with an unexpired Dextsil Clor-D-Tect® 1000 or Q4000 kit (Method 9077) on used oil containing less than 20 % water. The Permittee may use an equivalent Method 9077 if approved by the Director.

II.I.3.b. The Permittee shall document the sample results and quality control sample results in the facility operating record or on the bill of lading.

II.I.3.c. Transporters shall screen used oil containing 20% or more of water and/or antifreeze with a HydroClor Q kit.

II.I.3.d. Alternatively, the Permittee or transporter may collect an appropriate and representative used oil sample from each container and have a Utah-certified laboratory analyze the

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for total halogen concentrations using EPA Method 9076 prior to the Permittee relinquishing the oil.

II.I.4. Rebuttable Presumption

- II.I.4.a. Used oil samples that fail the halogen screen or analytical results with concentrations greater than 1,000 PPM are subject to regulation as a hazardous waste, as the regulatory presumption is that the used oil has been mixed with a listed hazardous waste. Regulations allow the Permittee to rebut the presumption that the used oil is hazardous waste.
- II.I.4.b. The Permittee may rebut the hazardous waste presumption in accordance with R315-15-4.5 UAC if he can demonstrate that the used oil does not contain significant concentrations of any of the halogenated hazardous constituents listed in Appendix VIII of EPA CFR 40, Part 261.
- II.I.4.c. If additional testing documents that used oil has been mixed with a listed hazardous waste (40 CFR 261.3(c)(2)(iv)), the mixture is subject to regulation as a hazardous waste regardless of the level of halogenated constituents.
- II.I.4.d. Halogenated compounds that must be considered in the rebuttable presumption are listed in 40 CFR 261 Appendix VIII, which includes volatiles, semi-volatiles, PCBs, pesticides, herbicides, and dioxin/furans.

II.I.5. Required Analytical Methods

- II.I.5.a Table II.I.1 lists the analytical laboratory methods required for testing specific analytical constituents in used oil.

II.I.6. Analysis Plan Review and Training

- II.I.6.a. All personnel involved in used oil activities shall be trained initially on sample collection and analytical requirements of R315-15 UAC and Module II.I and annually thereafter.
- II.I.6.b. The Permittee shall keep records of employee analytical training for a minimum of three years.

Table II.I.1: Sample preparation and Analytical Methods

Sample Preparation	Analytical Procedure	Analytes
5035A, 3500C	8260B	Volatile Organic Compounds

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3500C	8270D	Semi-Volatile Compounds	
3500C, 3580A	8082A <ul style="list-style-type: none"> 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 will make total of seven Aroclors. 	PCB CAS RN	PCB Aroclor
		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		
3500C	8081B	Pesticides	
3500C	8151A	Herbicides	
3500C	8280B, 8290A	Dioxin/Furans	

A. ACCEPTANCE OF INCOMING FILTERS

- A.1. New employees shall be trained on used oil handling, recordkeeping, applicable requirements of R315-15-4 UAC and this permit within 14 days of the hire date.
- A.2. A trained used oil operator shall inspect incoming containers of oil filters to ensure the containers are leak proof and lids are securely closed.

ATTACHEMENT 1

Oil Filter Processing Training Manual

- A.3. The operators shall not accept leaking containers or drums. Containers or drums containing materials other than “non-terne” oil filters shall be rejected and returned to the transporter. Non-terne oil filters are oil filters from lightweight vehicles. Large equipment used oil filters, fuel and transmission filters are not non-terne filters.
- A.4. If an operator discovers material other than non-terne filter in a container during processing, he shall stop processing the container of filters, set it aside, and notify his supervisor. The supervisor shall test the oil to determine if the oil is a hazardous waste. Only non-terne filters are exempt under R315-15 UAC as used oil.
- A.5. The operator may store a maximum of 300 containers of uncrushed filters in the approved storage areas as follows:
- A.5.a. Maximum of 160 containers in the Green Storage Container #1 (GSC #1)
- A.5.b. Maximum of 140 containers in the Warehouse Processing Storage Area (WPS)
- A.6. A unique identification number shall be assigned to each container, which will allow tracking of storage location, incoming date, processing date and collection date by a transporter.
- A.7. Any leaking drums discovered after delivery shall either be placed in an over-pack container or processed immediately by the facility.

B. RECORDKEEPING

- B.1. The operator shall sign for the receipt of the non-terne filters on delivery by the transporter.
- B.2. The operator shall record container weight, container number, acceptance date, transporter name and EPA identification number on the “Oil Filter Check-In” form.
- B.3. The operator shall submit the Oil Filter Check-In form to the office manager for customer payment.
- B.4. The office manager shall maintain these records for a minimum of three years to satisfy the permit container tracking requirements.
- B.5. Both the facility operator and the used oil transporter delivering the load shall sign delivery records of the processed bulk used oil in totes.
- B.6. Two operators shall be present when unloading and loading trucks. At least one operator shall have a communication device to contact facility management or local authorities in case of an emergency.

ATTACHEMENT 1
Oil Filter Processing Training Manual

B.7. Operators shall respond immediately to all spills in accordance with the Nelson Scrap Metals “Emergency Spill Plan” (Attachment 2).

C. PROCESSING FILTERS AND EXTRACTED USED OIL STORAGE

C.1. Operators shall track all containers of non-terne filters processed through the crusher.

C.2. Crushed filters cubes shall be placed immediately in the tilt hopper and hot drained for a minimum of 24 hours.

C.3. Two operators shall be present when oil is pumped from the crusher into bulk storage totes. Operators shall ensure that pumps and hoses are not leaking during oil transfer.

C.4. Operators shall immediately shut down used oil transfer equipment and stop all transfer activities if leaks are detected. Operators shall respond to used oil spills in accordance with the facility Emergency Spill Plan.

C.5. Once the cause of the leak has been identified and repaired, the pumping procedure may resume.

C.6. All processed used oil bulk storage containers shall be stored by the rear door in the cement box area designated as the Eastern Loading Dock (ELD). The ELD storage area is secondary containment for bulk storage containers. A maximum of twelve 250-gallon totes may be stored on the ELD.

Attachment 2 Emergency Spill Plan

A. EMERGENCY SPILLS

- A.1. In case of a used oil spill, Emergency Spill Plan shall be followed.
- A.2. The operator shall immediately assess the situation and determines if additional resources are needed (e.g. personnel, or emergency responders)
- A.3. The operator shall stop and contain the leak immediately if it can be done safely. The operator shall upright any overturned containers, shut off leaking valves and prevent used oil from draining into storm water drains if possible.
- A.4. The operator shall scan the facility for potential ignition sources and turn off welders, electrical machines or other ignition sources until the spill is controlled and cleaned up.
- A.5. The operator shall wear proper safety gear. Used oil is a skin irritant and fumes may cause discomfort when inhaled.
- A.6. The operator shall inform management immediately. Supervisory assistance shall be requested once the situation has been assessed, workers' safety secured and immediate actions to prevent further oil releases have been taken.

B. OIL SPILL CONTAINMENT

- B.1. If the oil or chemicals are near any storm drain, oil booms shall be used to seal off those areas first.
- B.2. If the spill is large enough to spread, the oil spill shall be surrounded with oil spill booms or socks. Areas of contamination of shall be enclosed.
- B.3. All exit points for the spillage shall be secured.

C. OIL SPILL CLEAN UP

- C.1. The operator shall place and continue replacing absorbent floor dry until the last drop of liquid is absorbed.
- C.2. All generated waste (e.g. absorbent floor dry, rags, or booms) shall be double-bagged in a plastic bag.
- C.3. Place all bags of waste shall be placed in a drum with a secure the lid. The drum shall be labeled or tagged as "used oil contaminated media"

- C.4. The operator shall contact his supervisor who will determine applicable regulatory requirements for proper handling and disposal of the contaminated media.

D. OIL SPILL REPORTING

- D.1. The operator shall complete the facility's oil spill reporting form for review by a supervisor before signing the document. Supervisors shall report spills that are over 25 gallons or any that may affect human health or the environment to the Department of Environmental Quality at (801) 536-4123 in accordance with the Used Oil Transfer Permit.

E. OIL SPILL DISPOSAL OF GENERATED WASTE

- E.1 The Permittee shall characterize site-generated waste to determine proper disposal in accordance with R315-15 UAC and the transfer facility permit. All site-generated waste shall be disposed at an approved facility.

Public Comment Period

Attachment 3 Closure Plan

Nelson Scrap Metals Services, Inc. (NSM) will perform the following activities during the closure associated with its used oil transporter permit:

- 1) NSM will remove all used oil from its used oil transfer facility operations using a permitted used oil transporter.
- 2) NSM will clean all used oil equipment, including the filter crusher, to remove free-flowing used oil and oily residue.
- 3) NSM will sample the soil and groundwater in two locations at the facility using a Geoprobe to produce 2-inch diameter bore holes for sampling.
 - a) The first sample boring (B1) will be located adjacent to (just west of) the “Green Storage Container #1” (GSC), which was formerly used to store crushed used oil filters.
 - b) The second sample boring (B2) will be located adjacent to (north of) the “Eastern Loading Dock” (ELD). B2 will be bored adjacent to the concrete pad.
 - c) The locations of B1 and B2 are shown in Figure 1 of this Closure Plan.
 - d) Soil samples will be logged according to soil type, moisture, color, petroleum odor, etc. from the surface to a maximum depth of 10 feet below grade. A sample from approximately 3 feet below grade will be retained for chemical analysis. If suspected contamination is encountered elsewhere in the bore column, that soil/water will also be sampled.
 - e) NSM anticipates that the water table will be at a depth of approximately 5 feet in this area. A water sample will also be extracted from each of the two borings and retained for chemical analysis.
 - f) Soil and groundwater samples will be refrigerated and transported under chain-of-custody to a Utah State certified laboratory for chemical analysis.
 - g) Samples will be analyzed for TPH-DRO/GRO per EPA Method 8015; Oil and Grease (O&G) per EPA Method 1664; BTEXN and MTBE per EPA Method 8260B; and volatile organic compounds (VOA) per EPA Method 8260 B.
 - h) Methods and procedures as well as the chemical analytical results will be summarized and documented in a Closure Report that will be submitted to the Division of Waste Management and Radiation Control. The report will include appropriate tables, boring/well installation logs, site map, laboratory analytical reports, and data interpretation.

- i) All sampling activities will be performed in accordance with generally accepted environmental engineering principles and practices.
 - j) If contamination from NSM's used oil transfer facility activities is discovered during the sampling, NSM will submit for review a written Remediation Plan Proposal to the Division within 60 days of that discovery.
 - k) NSM will notify the Division at least two working days prior to the sampling in order to provide it with the opportunity for inspectors to be present.
- 4) Within 60 days of completion of cleanup and closure, NSM shall submit to the Director, by registered mail, certification that the facility has been closed in accordance with this closure plan II.H of NSM's transfer facility permit, and the requirements of R315-15-11 UAC. An independent, Utah-registered professional engineer and the Permittee shall sign the closure certification.

Public Comment Period

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May 31, 2018

Figure 1, Site Map: Nelson Scrap Metal

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