



WASTE MANAGEMENT  
& RADIATION CONTROL

## USED OIL PROCESSOR PERMIT



**Permittee Name:** Sump and Trap Cleaning, Inc.

**Permittee Mailing Address:** 618 South 4050 West  
Salt Lake City, UT 84104

**Permittee Phone Number:** (801) 595-8151

**Permittee Contact:** **Shane Adolf, Owner**  
(801) 595-8151 office  
(801) 949-4934 cell  
Email: shane@stcutah.net

**Facility Address:** 618 South 4050 West  
Salt Lake City, UT 84104

**Facility Contact:** **Shane Adolf, Owner**  
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**Type of Permit:** Used Oil Processor Permit

**Permit #:** UOP-0142

**Original Issue Date:** June 9, 2014

**EPA ID #:** UTR000012286

Signature: \_\_\_\_\_ Date Issued: \_\_\_\_\_

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

**I.A. Effect of Permit**

- I.A.1 Sump and Trap Cleaning, Inc. (hereafter referred to as “Permittee”) is hereby authorized to operate as a used oil processor 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 the requirements of R315-15-15 of the Utah Administrative Code. This Permit shall be reviewed by the Director five years after the Permit’s effective 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 Sections I and II 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 applicable 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.B.2 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’s business activity in order to maintain compliance with the conditions of this Permit and its attachments.

**I.C. Permit Modification**

- I.C.1 The Permittee may request modifications to any item or operational 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 a decision by the Director on the modification request. Implementing a modification prior to the Director’s written approval constitutes a violation of this Permit and may be grounds for enforcement action or permit revocation.
- I.C.2 Changes in operational activities include any expansion of the facility beyond the areas designated, alteration of processing operational parameters, changes in the type or number of storage tanks, piping, other processing equipment and changes to the contingency plan. The Director may require the Permittee to submit additional information when reviewing permit modification requests to ensure the safe handling of used oil at the processing facility in accordance with 19-6-710 (3)(b)(xii) of the Utah Administrative Code.

- I.C.3. The Director may modify this Permit as necessary to protect human health and the environment or because of statutory or regulatory changes.
- I.C.4. The Permittee shall notify the Director, in writing, of any non-substantive changes, such as changes in the contact person, within 20 days of the change.

**I.D. Facility Maintenance and Emergency Equipment**

- I.D.1 The Permittee shall maintain and operate the Processor Facility to minimize the possibility of fire, explosion or sudden or non-sudden release of used oil to air, ground, soil, surface and groundwater and sewer systems that could threaten human health and the environment.
- I.D.2. The Permittee shall have communication systems, fire alarms and fire suppression equipment and processing alarms in place and operational at the facility, as well as arrangements with local emergency response teams (i.e. fire, police and hospital) in accordance with R315-15-5.3 of the Utah Administrative Code.
- I.D.3. The Permittee shall have written documentation of the inspection and maintenance of used oil processing equipment, containers, tanks, fire suppression systems (portable and fixed) and testing of emergency alarms for fire and other operational alarms set for processing equipment. The Permittee shall determine, document in writing and adhere to the scheduled frequency for inspections, maintenance and alarm testing to ensure safe operation in accordance with the Permittee's Inspection and Maintenance Schedule, Attachment 8.
- I.D.4. To prevent access by unauthorized persons or vehicles during hours when the facility is closed and authorized personnel are not present, the Permittee shall secure the facility, lock the entrance security gate and maintain adequate perimeter fencing.
- I.D.5. The Permittee shall maintain functional fire extinguishers in process areas.
- I.D.6. The Permittee shall maintain a minimum of four spill kits at the facility in process and storage areas. The kits shall contain the spill materials found in Table 3.

**I.E. Spills and Contingency Plan**

- I.E.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. In the event of a release of used oil, the Permittee shall immediately take appropriate actions to comply with R315-15-9 of the Utah Administrative Code and this Permit, Attachment 2, Emergency Controls and Contingency Plan.
- I.E.2. A secondary containment system for used oil process and storage tanks, piping and ancillary equipment shall be constructed and maintained for the facility in accordance with R315-15-5.5(c) of the Utah Administrative Code. The joints between the concrete floor and the tank pads shall be sealed to prevent migration of oil to the soil and groundwater.

- I.E.3. Used oil, water or other liquids that may accumulate in the secondary containment system or any ancillary facility sumps shall be removed within 24 hours of discovery to prevent the possible migration to soil, ground or surface waters.
- I.E.4. The Permittee shall document the inspections of the secondary containment system at least weekly. Inspection documents shall include inspector's name, date, areas inspected, any problems found, and the subsequent actions taken by the facility to maintain system integrity.
- I.E.5. 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 for smaller releases that pose a potential threat to human health or the environment in accordance with R315-15-9 of the Utah Administrative Code.
- I.E.6. 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.
- I.E.7. All information required by R315-15-9.4 of the Utah Administrative Code shall be included in the report. The report shall also include a description of actions taken by the Permittee to prevent future spills.
- I.E.8. The Permittee shall document and maintain analytical and disposal records for a minimum of three years. The Permittee shall also characterize waste generated during the spill cleanup to determine if the waste is hazardous or non-hazardous in accordance with R315-15-8 of the Utah Administrative Code.
- I.E.9. The Permittee shall notify the Director within 24 hours of any used oil found at the facility with PCB concentrations greater than or equal to 50 parts per million (ppm).

**I.F. Records**

**I.F.1. Retention**

I.F.1.a The Permittee shall maintain all used oil records required by R315-15 of the Utah Administrative Code and this Permit at the Permittee's Processor facility located at located at 618 South 4050 West, Salt Lake City, Utah. Records may be in hard copy or in an electronic format and shall be readily accessible for inspection by authorized representatives of the Director. The Permittee shall maintain, for a minimum of three years, all applicable used oil processor associated records required by R315-15 of the Utah Administrative Code and this Permit, with the exception of the operating record, which shall be kept until facility closure.

**I.F.2. Operating Record**

I.F.2.a. The Permittee shall maintain an operating record (paper or electronic) until final closure of the facility. The operating record shall include the date, the name of the

processing facility equipment operator, the processing system start-up and shut-down times, any upset condition (e.g. alarms, mechanical failure, or any event that requires implementation of the facility's Contingency Plan), records and results of used oil analyses, daily tank storage volumes and the daily volume of oily water processed through the system, including the wastewater discharge records.

**I.F.3. Tracking Records**

- I.F.3.a. The Permittee shall keep documentation of each used oil load received, transferred and delivered, including volumes, locations and dates.
- I.F.3.b. The Permittee shall document the permitted transporter's name, address, EPA identification number, the name of the receiving entities, date and time of acceptance and signatures of both the transporter and authorized representative receiving facility.
- I.F.3.c. The Permittee shall document the permitted receiving facility's name and signature (dated upon receipt), address and EPA identification number.
- I.F.3.d. The Permittee shall only accept and deliver used oil using a Utah permitted used oil transporter.

**I.G. Sampling and Analysis Plan**

- I.G.1. The Permittee shall follow all sampling and analytical procedures in Sections II.E and II.F, Used Oil Sampling and Analytical Procedures, 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. Prohibitions**

- I.H.1. The Permittee shall not manage used oil in surface impoundments or waste piles unless the units are subject to regulation under R315-265 or R315-264 of the Utah Administrative Code.
- I.H.2. Used oil shall not be placed, discarded or otherwise disposed of in any solid waste disposal facility operated by a political subdivision or a private entity or in sewers, drainage systems, septic tanks, surface or ground waters, watercourses or on the ground.
- I.H.3. The Permittee shall not place, manage, discard or otherwise dispose of used oil in any manner specified in R315-15-1.3 of the Utah Administrative Code.
- I.H.4. 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.5. Used oil shall not be stored in tanks, containers or piping that have previously stored hazardous waste, unless the tanks, containers and piping are emptied as described in R315-261-7 of the Utah Administrative Code prior to storing or transferring used oil.
- I.H.6. The Permittee shall not accept used oil for processing with a PCB concentration greater than or equal to 2 mg/kg (ppm).
- I.H.7. Used oil shall not be stored in tanks, containers or piping that have previously stored PCB contaminated materials at or above 50 mg/kg (ppm), unless the tanks, containers and piping or storage units are decontaminated as described in 40 CFR 761 Subpart S prior to storing or transferring used oil. Any used oil that was mixed with the PCB-contaminated material shall be managed in accordance with R315-15-18 of the Utah Administrative Code and 40 CFR 761 Subpart S, as applicable.

**I.I. Waste Management**

- I.I.1. The Permittee shall determine through characterization, before disposal, if used oil or solid waste generated from spills or operational activities is hazardous or non-hazardous waste.
- I.I.2. The Permittee shall document and maintain records showing proper characterization, handling and disposal for all used oil related waste, including oily wastewater if sent for disposal.
- I.I.3. The Permittee may dispose of non-hazardous used oils in accordance with R315-15-1.3 and R315-15-8.2(b) of the Utah Administrative Code.
- I.I.4. The Permittee shall not utilize used oil as a dust suppressant, weed suppressant, for road oiling or for other similar uses that have the potential to release used oil into the environment.
- I.I.5. The Permittee shall follow the Waste Management Plan in Attachment 7 of this permit for proper characterization and disposal of wastes.

**I.J. Liability and Financial Assurance Requirements**

- I.J.1. The Permittee shall be financially responsible for cleanup and closure costs, general liabilities 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 of the Utah Administrative Code and this Permit.
- I.J.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.J.3. The Permittee shall receive written approval from the Director for any changes in the extent, type (e.g., mechanism, insurance carrier or financial institution),

or amount of the environmental pollution legal liability or financial assurance mechanism for coverage of physical or operational conditions at the facility that change the nature and extent of cleanup and closure costs. The Permittee shall receive approval from the Director prior to implementation of changes.

**I.K. Cleanup and Closure Plan**

- I.K.1. The Permittee shall evaluate closure plan cost estimates in Attachment 10 that ensures the removal of all used oil and used oil residues and the remediation of any releases of contaminants to surface waters, groundwater and soils.
- I.K.2. The Permittee shall update its closure plan cost estimates and provide the update estimated to the Director, in writing, within 60 days following a facility modification that causes an increase in the amount of the financial responsibility required under R315-15-10 of the Utah Administrative Code. Within 30 days of the Director's written approval of a permit modification for the cleanup and closure plan that would result in an increase cost estimate, the owner or operator shall provide to the Director the information specified in R315-15-11.2(b)(2) of the Utah Administrative Code.
- I.K.3. The Permittee shall initiate closure of the facility within 90 days after the Permittee receives the final volume of used oil or after the Director revokes the Permittee's Processor Permit in accordance with the requirements of R315-15-11.3 of the Utah Administrative Code and this Permit.
- I.K.4. Within 60 days of completion of cleanup and closure, the Permittee shall submit to the Director, by registered mail, a certification that the facility has been closed in accordance with R315-15-11.4 of the Utah Administrative Code and the specifications of the approved cleanup and closure plan. An independent, Utah-registered professional engineer and the Permittee shall sign the closure certification.
- I.K.5. Additional sampling and remediation may be required by the Director to verify that cleanup and closure has been completed according to R315-15 of the Utah Administrative Code.

**I.L. Used Oil Training**

- I.L.1. The Permittee shall train employees that handle used oil in the applicable regulatory requirements of R315-15 of the Utah Administrative Code and the requirements of this Permit.
- I.L.2. The Permittee shall implement a written training plan, Attachment 5. Employee training shall include identification of used oil, recordkeeping requirements and facility used oil procedures for the handling, storing, processing, sampling and analysis of used oil, emergency response, spill reporting and personal safety.
- I.L.3. The Permittee shall train new and existing employees in the handling of used oil and PCB-contaminated used oil. New employees may not manage or process used oil without a trained employee present until their used oil training is completed.

I.L.4. Employees authorized to test used oil shall demonstrate competence to lock-down the tank/container, collect a representative used oil sample, screen used oil for halogens using a Clor-D-Tect kit (EPA method 9077) or prepare required documentation to submit sample to the laboratory for analysis.

I.L.5. The Permittee shall provide, at a minimum, an annual used oil-training refresher course for employees handling used oil. Additional training is required when the Permittee changes used oil-handling operational procedures.

I.L.6. 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.

**I.M. Used Oil Handler Certificate**

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

**I.N. Inspection and Inspection Access**

I.N.1. Any duly authorized representative of the Director 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 representative may collect soil, ground water or surface water samples to evaluate the impact of the facility's used oil operations.

I.N.2. Failure to allow reasonable access to the property by authorized employees is a "denial of access" and may be grounds for enforcement action or permit revocation.

**I.O. Annual Report**

I.O.1 As required by R315-15-13.4 of the Utah Administrative Code, the Permittee shall prepare and submit an Annual Report to the Director by March 1 of the following year. The Annual Report shall describe the Permittee's used oil activities in Utah and document financial assurance using Form UO 004, Annual Report for Used Oil Processor Facilities.

**I.P. Other Laws**

I.P.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.Q. Enforceability**

I.Q.1. Violations documented through the enforcement process pursuant to Utah Code

Annotated 19-6-112 may result in penalties assessed in accordance with R315-102 of the Utah Administrative Code.

**I.R. Effective Date**

I.R.1. The permit is effective on the date of signature by the Director.

*Draft Mod for Public Comment*

**II.A. General Operation**

- II.A.1 The Permittee is authorized to process used oil in accordance with R315-15-5 of the Utah Administrative Code at 618 South 4050 West, Salt Lake City, Utah.
- II.A.2 The Permittee shall have a current process and instrument diagram (PID), certified by a Utah professional engineer, depicting all used oil storage and processing equipment.
- II.A.3 The Permittee shall only store used oil in tanks, containers or units subject to regulations under R315-265 or R315-264 of the Utah Administrative Code and maintain tanks, containers, associated piping, pumps and valves in good operational condition.
- II.A.4 The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of used oil to air, soil, surface water or groundwater that could threaten human health or the environment.
- II.A.5 The Permittee is authorized to store a maximum of 12,000 gallons of used oil in tanks and containers described in Section II.C and Attachment 1 of this Permit.
- II.A.6 The Permittee may only accept used oil from a Utah-permitted used oil transporter or deliveries of exempted oily wastewater from waste haulers that maintain all required permits or registrations with the State, counties, or municipalities.

**II.B Processing Description**

- II.B.1 The Permittee shall process used oil in accordance with Attachment 1 of this Permit.

**II.C. Used Oil Storage**

- II.C.1. The Permittee shall only use the tanks specified in Table 1:

**Table 1: Facility Tanks**

<b>Tank Designation &amp; Location</b>	<b>Capacity (gal)</b>	<b>Tank Use</b>
Tank CC-1 Canopy Containment	3,200	Extra capacity tank (wastewater/fuel)
Tank CC-2 Canopy Containment	3,200	Extra capacity tank (wastewater/fuel)
Tank CC-3 P-2 Canopy Containment	10,000	Secondary / Sedimentation Tank
Tank CC-4 P-1 Canopy Containment	10,000	Main Discharge Tank/Sedimentation
Tank P-3 Canopy Containment	10,000	Secondary / Sedimentation Tank and Oil/water separator
Tank CC-5 Canopy Containment	1,000	Petroleum / Oil / Lubes (POLs) and Used Oil Collection Tank
Tank TF-1 Tank Farm (POLs Bulk Storage)	3,000	Used Oil Collection Tank
Tank TF-2 Tank Farm (POLs Bulk Storage)	3,500	Used Oil Collection Tank
Tank TF-3 Tank Farm (POLs Bulk Storage)	10,000	Extra capacity tank (not used oil)

Tank TF-4 Tank Farm (POLs Bulk Storage)	5,000	Slop Fuel Collection Tank
Tank TF-5 Tank Farm (POLs Bulk Storage)	3,500	Slop Fuel Collection Tank

II.C.2. The Permittee shall only store containers and drums of used oil in the Small Container Storage area on the northern end of the Tank Farm (POLs Bulk Storage) and the Canopy Containment, as described in Attachment 1 of this Permit.

II.C.3. The Permittee shall conduct inspections of used oil storage containers, tanks and secondary containment systems in accordance with Attachment 8 of this Permit. The Permittee shall record the inspector’s name, the time and date of the inspection and the condition of the tanks, storage containers and secondary containment systems. The Permittee shall document in the inspection log any issues discovered during the inspections (e.g. leaking tanks or water accumulation) and any actions taken by the Permittee to resolve these issues.

II.C.4. The Permittee shall label used oil storage tanks, piping, drums and containers with the words “USED OIL.”

II.C.5. The Permittee shall keep drums and containers of used oil closed except while removing or adding used oil.

**II.D. Used Oil Loading and Unloading Requirements**

II.D.1. Prior to loading, the used oil shall be tested for halogen content in accordance with Conditions II.E and II.F of this Permit.

II.D.2. The Permittee shall ensure the used oil transport drivers have secured the vehicle by positioning wheels chocks and applying the emergency brakes before loading or unloading used oil.

II.D.3. The Permittee shall inspect all used oil collection equipment (e.g., vehicles and associated pumping equipment) for any damage prior to use.

II.D.4. The Permittee shall place buckets or other containers under piping connections to collect drips of used oil during loading and unloading operations.

II.D.5. The Permittee shall ensure the amount of used oil to be loaded into the tanks will not exceed their capacity. The Permittee shall utilize a calibrated gauging instrument to measure used oil volume in each collection vehicle.

II.D.6. The Permittee shall cleanup any spills and drippings from the used oil transfer and properly manage the cleanup materials.

II.D.7. Shipping documents shall be maintained at the Permittee’s facility.

II.C.8. During loading and unloading operations, the trained operator shall remain at the transfer location and maintain control of the operations throughout the entire used oil transfer.

II.D.9. The Permittee shall not load or unload used oil from a railroad tanker without the written approval from the Director.

**II.E. Used Oil Sampling**

**II.E.1. Sample Collection Requirements**

II.E.1.a. Sampling personnel shall be trained on appropriate sampling methods for each type of container and matrix in accordance with Attachment 5.

II.E.1.b. To screen for halogens, the Permittee shall collect a representative sample from incoming tanks, totes, drums or other containers.

II.E.1.c. Samples collected from containers greater than 55 gallons shall be individual samples, not composite samples.

II.E.1.d. The Permittee may composite samples from up to four drums or containers with 55 gallons or less of used oil so long as the source of the used oil is from the same generator and process.

II.E.1.e. A COLIWASA shall be used to collect samples from drums or containers less than or equal to 55 gallons. The entire COLIWASA contents shall be place in one container.

**II.F. Used Oil Analytical Requirements**

II.F.1. The Permittee shall document the used oil was screened for halogens using either Method 9077, Utah-certified laboratory analyses, or supply documentation to support generator knowledge if the used oil was not tested.

II.F.2. Prior to accepting used transformer oil, the Permittee shall obtain analytical data confirming the PCB concentration of the used oil is less than 2 mg/kg (ppm) in accordance with Table 2.

**Table 2: PCB Sample Preparation and Analytical Methods**

Sample Preparation	Analytical Procedure	Analytes	
		PCB CAS RN	PCB Aroclor
3580A	<ul style="list-style-type: none"> <li>PCB Analytical Method-8082A<sup>®</sup></li> <li>Analyses of the Aroclors<sup>®</sup> bolded in the last column are mandatory.</li> </ul>	<b>12674-11-2</b>	<b>1016</b>
		147601-87-4	1210
		151820-27-8	1216
		11104-28-2	<b>1221</b>
		37234-40-5	1231
		11141-16-5	<b>1232</b>
		71328-89-7	1240

<ul style="list-style-type: none"> <li>Additional Aroclors<sup>®</sup> should be analyzed if the oil typically contained that specific Aroclor<sup>®</sup>.</li> </ul>	<b>53469-21-9</b>	<b>1242</b>
	<b>12672-29-6</b>	<b>1248</b>
	165245-51-2	1250
	89577-78-6	1252
	<b>11097-69-1</b>	<b>1254</b>
	<b>11096-82-5</b>	<b>1260</b>
	37324-23-5	1262
	11100-14-4	1268

### II.F.3 Halogen Field Screening Methods

II.F.3.a Prior to accepting used oil or oily water subject to R315-15 of the Utah Administrative Code from a used oil transporter, the Permittee shall verify or screen the used oil in accordance with the following:

II.F.3.a.i. CLOR-D-TECT<sup>®</sup> halogen test kit (EPA Method 9077) for oil containing less than 20% water; or

II.F.3.a.ii. HYDROCLOR-Q<sup>®</sup> test kit if the oil contains between 20 and 70% water using the following conversion formula:

$$\text{True Halogen Concentration} = \text{Reading Syringe} + [(10 + \text{ml oil in sample})/10]$$

**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:

$$2,000 \text{ ppm} [(10 \text{ ml} + 4 \text{ ml})/10] = 2,800 \text{ ppm}; \text{ or}$$

II.F.3.a.iii HYDROCLOR-Q<sup>®</sup> test kit without correction, for oil containing greater than 70% water.

II.F.3.b. The Permittee shall document on acceptance records the screening results to determine if the total halogens concentration of the incoming used oil is less than 1,000 ppm.

II.F.3.c. Results of all halogen field screening results shall be recorded on the shipping document such as a bill of lading and results initialed by the sampler.

II.F.3.d. 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<sup>®</sup> kits (Method 9077 of SW846) and is not required for each load collected. Documentation shall be recorded on the bill of lading or manifest.

**II.F.4. Halogen Laboratory Analytical Methods**

II.F.4.a. In lieu of screening with a CLOR-D-TECT® kit, method 9077, the Permittee may collect and submit representative used oil samples to a Utah-certified laboratory to analyze for total halogen concentrations using EPA method 9076 or another equivalent method approved by the Director prior to placing used oil into the tanks or processing system.

**II.F.5. PCB Contaminated Used Oil**

II.F.5.a. The Permittee shall not accept for storage or processing used oil with PCB concentrations greater than or equal to 2 mg/kg.

II.F.5.b. Records of any laboratory test results used to demonstrate PCB concentrations shall be attached to the transportation record.

II.F.5.c. Used oil may not be diluted to avoid any provision of any federal or state environmental regulation.

**II.F.6. Rebuttable Presumption**

II.F.6.a. Used oil that fails the halogen screen or analytical results with concentrations greater than 1,000 ppm is presumed to have been mixed with a hazardous waste.

II.F.6.b. 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 EPA CFR 40, Part 261.

II.F.6.c. 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.F.6.d. The rebuttable presumption does not apply to metalworking oils/fluids containing chlorinated paraffins if they are processed through a tolling arrangement as described in Subsection R315-15-2.5(c) of the Utah Administrative Code to reclaim metalworking oils/fluids. The presumption does apply to metalworking oils/fluids if such oils/fluids are recycled in any other manner or disposed.

II.F.6.e. 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.F.6.f. Used oil that exceeds the halogen content of 1,000 ppm is presumed to be a hazardous waste and shall not be placed into the facility tanks, vehicles or storage vessels unless the Permittee rebuts the hazardous waste presumption in accordance with the rebuttable presumption requirements above.

## **II.G. Facility Closure**

- II.G.1. At time of closure, the Permittee shall implement the approved closure plan found in Attachment 9 of this Permit and evaluate potential impacts of used oil operations on the surrounding soil, groundwater and surface water at the facility in accordance with R315-15-11 of the Utah Administrative Code and this Permit. The Permittee shall be responsible for any cleanup of any used oil contamination of soil, groundwater and surface waters on the property and contamination that has migrated beyond the facility property boundaries in accordance with R315-15-11(d) of the Utah Administrative Code.
- II.G.2. Closure of the facility shall include, but not be limited to, used oil tanks, storage areas, loading docks, sumps and other ancillary equipment and piping. Attachment 10 provides the estimated closure cost for soil and groundwater investigation.
- II.G.3. In addition to requirements found in Section [II.G], the Permittee shall follow the cleanup and closure plan in Attachment 9 of this Permit.
- II.G.4. **Closure Certification**
- II.G.4.a. The Permittee shall, within 60 days of completion of cleanup and closure, submit to the Director, by registered mail, a certification that the used oil facility has been cleaned and closed in accordance with R315-5-11 of the Utah Administrative Code.
- II.G.5. **Soil and Groundwater Testing**
- II.G.5.a. At time of the closure of the facility, the Permittee shall sample the soil and groundwater to determine potential contamination from operational activities. The Permittee shall submit a Level IV data validation analytical package from a Utah-certified laboratory, within 30 days of receipt, to the Director for review and approval.
- II.G.6. **Plant Decommission Certification**
- II.G.6.a. Unless otherwise approved by the Director, plant decommission at time of closure requires removal of all used oil. Other media shall be recovered from all containers and any other ancillary equipment.
- II.G.6.b. The Permittee shall characterize the used oil at time of closure to determine the proper method for recycling or disposal.
- II.G.6.c. Rinsate water and solids generated from used oil cleaning operations shall be transported to an appropriately permitted recycling or waste disposal facility.
- II.G.7. **Closure Certification Costs**
- II.G.7.a. Closure of the facility in accordance with the requirements of this Permit shall be certified by a Utah certified independent Professional Engineer (P.E.) that the facility has been cleaned and closed in accordance with the specifications in the approved closure plan.

**II.H. Emergency Spill Response and Remediation**

- II.H.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 smaller spills if it poses a threat to human health or the environment.
- II.H.2. Responders shall take action to prevent spill from spreading by utilizing absorbent, dirt, booms, pads, rags, etc.
- II.H.3. Once the material is containerized, a waste determination shall be made to determine the material's disposition.
- II.H.4. The Director may require additional cleanup action to protect human health or the environment.
- II.H.5. All costs associated with the cleanup shall be at the expense of the Permittee.
- II.H.6. Spill kits shall contain, at a minimum, the equipment listed in Table 3 of this Permit.

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**Table 3: Spill Kit Requirements**

Equipment Description	Quantity
Shovel	(throughout facility)
Buckets	(throughout facility)
Salvage drums	95 gal
Salvage drums	55 gal
Spill pad	1 bag
Granulated absorbent	25 lb. bag
3" containment sock	1
8" containment sock	1
Spill Plan with Emergency Contact Numbers	1

**II.G. Used Oil Release Notification and Reporting**

II.G.1 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) of the Utah Administrative Code). 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 in the notification.

II.G.2. In accordance with R315-15-9.1(b) 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.

- II.G.3. 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 shall be included. The report shall also include actions taken by the Permittee to prevent future spills.
- II.G.4. 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 or 202-426-2675. 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.

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## Attachment 1

### Processing Description

The Sump and Trap (STC) facility is to be used for the recovery of water contaminated petroleum, oil, and lubes (POLs) for recycling, fuel blend, and resource recovery. STC's facility is not intended to be a hazardous or toxic waste facility and all prospective sources are inspected and, as needed, tested by qualified personnel and laboratories to verify the contents of the materials prior to acceptance for processing.

#### Description of Process:

The recovery process makes use of current technology in the natural separation of POLs from water and sludge. This is accomplished in a six-stage system for oil/water separation, passive filtration, a Rotary Drum Vacuum Filter (RDVF) to further remove suspended POLs and solids, and Activated Carbon Filtration for organic removal.

STC reserves the right to upgrade equipment.

All waste materials are handled, transported, stored and disposed of in accordance with prevailing federal, state and local regulations.

Upon natural separation of oil and water, the POLs are vacuumed off and placed in approved containers to be transported to a permitted recycling facility.

Stage One Primary: Material received via vacuum truck, tanker, and/or drums. POLs will be recovered during this stage. Sedimentation will occur in this stage.

Stage Two Secondary: Further POL recovery and sedimentation.

Stage Three: At this point 98% of POL removal is accomplished via natural separation; solids have been removed by sedimentation.

Stage Four/Five: Chemicals are added as needed for further flocculation, sedimentation, pH balance.

Stage Six: The RDVF process removes suspended solids from the water portion of the oil/water solutions by vacuum filtration through diatomaceous earth. Filtrate water is then filtered via Carbon Filtration and is then discharged to the POTW.

Dry filter cake residues from the RDVF process are stored on-site in approved and labeled containers until sufficient quantity is collected to make it cost effective for disposal, i.e., a drum vs. container load, sampled and analyzed at the disposal facility, and, once profiled, transported to that facility for disposal.

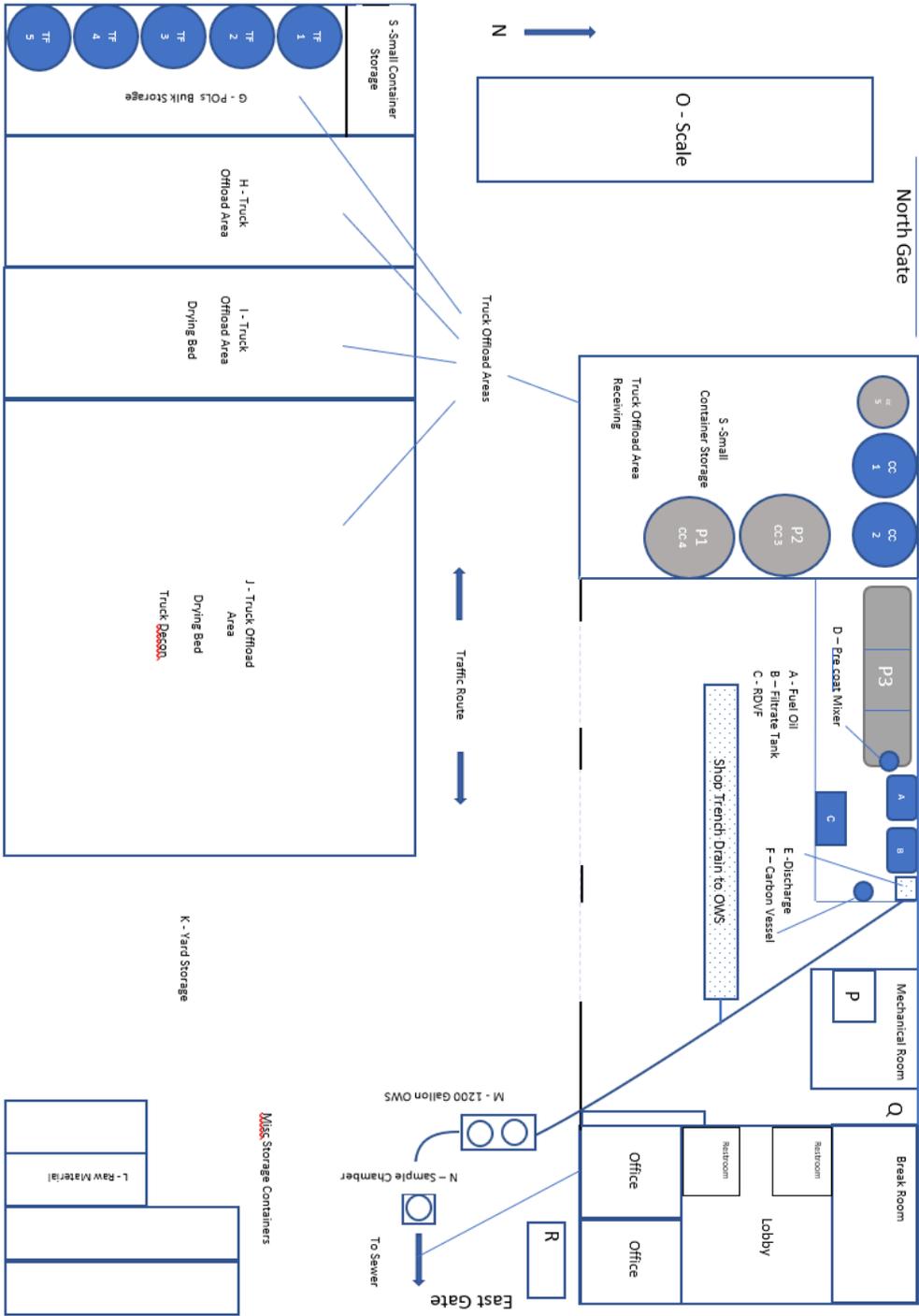
Filtered waste water is then discharged into the POTW under an approved industrial waste water discharge permit (SLC Permit SLC-0021).

Used oil shall be stored in tanks and containers described in Sections II.A and II.C and Attachment 1 of this permit.

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Site Plan / Equipment Lay Out



Not to scale – For informational purposes only

Rev. 7/26/2018



Site Plan Information Key

**Key:**

TF = Tank Farm Tank

CC = Canopy Containment Tank

**Tank Sizes and Identification**

- CC-1 = 3,200 Gallon Tank (Additional Storage)
- CC-2 = 3,200 Gallon Tank (Additional Storage)
- CC-4 P-1 = 10,000 Gallon Main discharge tank
- CC-3 P-2 = 10,000 Gallon Secondary / Sedimentation tank
- P-3 = 10,000 Gallon 3 Stage Oil / Water Separator
- CC-5 = 1,000 Gallon POLs / Used Oil collection tank
- TF-1 = 3,000 Gallon Used Oil Collection Tank
- TF-2 = 3,500 Gallon Used Oil Collection Tank
- TF-3 = 10,000 Gallon Tank (Additional Storage)
- TF-4 = 5,000 Gallon Slop Fuel Collection Tank
- TF-5 = 3,500 Gallon Slop Fuel Collection Tank

**Identification of Equipment / Areas**

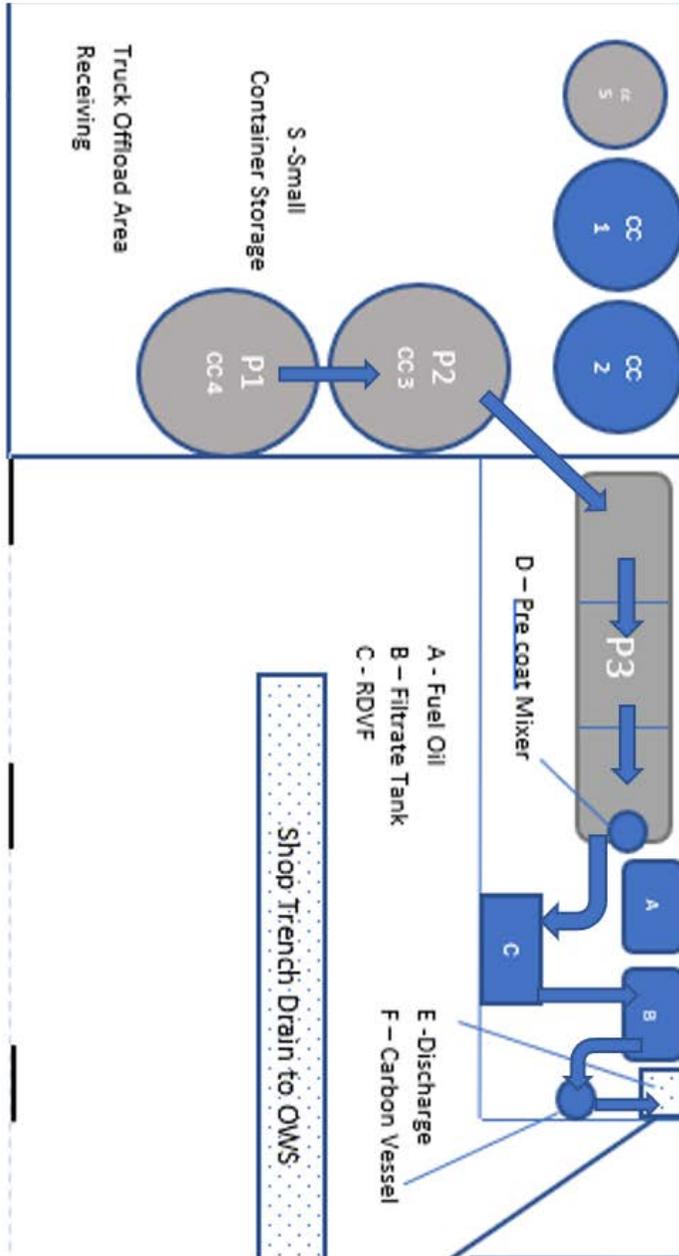
- A. 500 Gallon Fuel Oil to Heat Tank
- B. 500 Gallon Filtrate tank
- C. RDVF
- D. Pre-Coat Mixer
- E. Discharge Point
- F. Carbon Vessel
- G. POLs Storage
- H. Truck Offload Area
- I. Truck Offload Area / Drying Bed
- J. Truck Offload Area / Drying Bed
- K. Yard Storage
- L. Raw Material Storage
- M. 1,200 Gallon Oil / Water Separator
- N. Oil / Water Separator Sample Chamber MP-001
- O. 120,000 Pound Truck Scale
- P. Mechanical Room / Fuel Oil Fired Boiler
- Q. Electrical Connection
- R. Trash Bins
- S. Smaller Container (Drums, Totes)  
Storage / Receiving

Dr

Rev. 7/26/2018

### Example Diagram of Waste Process Flow

Example of waste process flow. Arrows reflect direction of material



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Attachment 2

**Emergency Controls and Contingency Plan**

**SPILL CONTINGENCY PLAN**

Employees wear the proper safety equipment, i.e., face masks, gloves, tyveks, when any processing is done. The exits are clearly marked and the necessary emergency equipment is on hand, i.e., first aid kit, fire extinguishers, etc., as shown on drawing “2.” In the event of an accident the employees are trained to take the necessary actions needed, i.e., evacuate the building in the instance of fire, and make necessary telephone calls for emergency help. The telephone numbers and addresses are posted in the appropriate places, i.e., by each telephone.

<u>Emergency Numbers</u>			
Fire Department	911 - 799-4321	Ambulance	911
Police Department	911 - 799-3000	Salt Lake County Health Dept.	(801) 580-6681
IHC	(801) 535-8163	POTW	(801) 799-4000

The control and spill contingency plan is as follows:

1. Assess the release and circumstances as to the ability to immediately stop and contain the material and take appropriate action.
2. If not a threatening circumstance, STC personnel will stop the release, i.e., if a drum tips over and bung comes out, tip the drum upright, or if a cam lock comes loose, shut off the valve and reinstall the cam lock, etc.
3. Implement containment procedure: Berm or spread sorbent material to stop the spread of free liquids, use a catch container on a ruptured line, etc.
4. Once the release is contained, the following procedures will be initiated:
  - a. Notify the necessary personnel (Health and Safety Coordinator), if it is a reportable quantity.

**EMERGENCY COORDINATOR CONTACT & TELEPHONE NUMBERS**

Office: (801) 595-8151      Home: (801)949-4934  
Contact: Shane Adolf

- b. Establish cleanup parameters
- c. Transfer remaining liquids to alternate container
- d. Cleanup spill area
- e. Containerize cleanup materials.

If it is a reportable quantity as specified by 40 CFR regulations, STC will submit the necessary reports with date, time, quantity of the spill, why the spill occurred, i.e., equipment failure, operator error, etc., and file the report with the Salt Lake County Health Department.

For releases exceeding 25 gallons, or smaller releases that pose a potential threat to human health or the environment, STC will immediately notify the Utah State Department of Environmental Quality (Division), 24-hour Answering Service, at (801) 536-4123, and provide the following information:

- (1) Name, phone number, and address of person responsible for the release.
- (2) Name, title, and phone number of individual reporting.
- (3) Time and date of release.
- (4) Location of release--as specific as possible including nearest town, city, highway, or waterway.
- (5) Description contained on the manifest and the amount of material released.
- (6) Cause of release.
- (7) Possible hazards to human health or the environment and emergency action taken to minimize that threat.
- (8) The extent of injuries, if any.

Within 15 days after any reportable release of used oil STC shall submit to the Division Director a written report that contains the information required by R315-15-9.4 of the Utah Administrative Code (UAC).

## Attachment 3

### **Loading and Unloading Operations**

#### **Handling and Transfer of Materials including USED OIL**

Liquid transfers will be made by pump systems or vacuum truck. Vacuum trucks are loaded and unloaded from the rear of the truck. STC personnel are trained to properly connect and double check connected equipment and hoses prior to use. In some cases, there will be a valve for the personnel to control remotely. All connections are checked prior to charging a line or moving product. Vehicle wheels must have chocks and parking brakes applied. Inspect used oil equipment prior to use including tanks, valves, trucks, connectors. Use of a drip bucket will be placed under all connections being removed.

#### **Loading, and Unloading:**

Incoming loads will be halogen screened, logged, and offloaded into the main discharge tank P1 (see equipment layout Processing and containment – P-1 - Main Discharge tank), and / or containers in the containment area located at the South West corner of the building. Used oil will be placed in appropriate labeled containers/tanks.

## Attachment 4

### Used Oil Sampling Procedures

#### Analysis Plan

- 1.0 To ensure the Permittee is not accepting hazardous waste and to satisfy the rebuttable presumption requirements outlined in R315-15-4.5 UAC, the Permittee shall employ one of the following procedures prior to collecting or accepting used oil in Utah.
- 1.1 Untested used oil. Each load of untested used oil collected directly from generators or other businesses will be tested for halogens. Prior to emptying used oil from the Permittee's vehicles into the Permittee's used oil containers, two halogen tests will be performed per method 9077. If the results do not agree, then a third test must be performed. The results of the two that agree will be reported. The Permittee will use a new, unexpired halogen test kit, including quality control samples (or equivalent method as approved by the Director), or the Permittee will obtain appropriate and representative Utah-certified laboratory results to screen for total halogen concentrations prior to acceptance.
- 1.2 Used oil will not be accepted for transportation if test results indicate a reading of 1,000 ppm or greater, unless the rebuttable presumption requirements have been satisfied. Test results (or equivalent) will be attached to the Bills of Lading or manifest.
- 1.3 On-specification used oil. Used oil determined to be on-specification for the parameters specified in R315-15-1.2 by a Utah-registered marketer can be collected and transported without further testing. Laboratory results will be attached, recorded, or referenced on the Bills of Lading or manifest.
- 1.4 Off-specification used oil. Used oil determined to be off-specification for the parameters listed in R315-15-1.2 may be transported by a permitted transporter, but must be designated as off-specification used oil on the Bills of Lading.
- 1.5 Used Oil which may contain PCBs. When accepting used transformer (mineral or dielectric), hydraulic or used oil which may contain PCBs, the Permittee will ensure that the oil has been certified with analysis from a Utah-accredited laboratory to contain PCB concentrations less than 2 mg/kg (ppm).
- 1.6 Prior to accepting used oil with PCB concentrations less than 2 mg/kg (ppm), the Permittee shall:

- 1) Obtain appropriate and representative test results from a Utah-certified laboratory for each container of the used oil certifying that the used oil contains PCB concentrations less than 2 mg/kg (ppm); or
  - 2) Require the generator to provide appropriate and representative laboratory testing results from a Utah-certified laboratory for each container of the used oil certifying that the used oil contains PCB concentrations less than 2 mg/kg (ppm); or
  - 3) Ensure that the generator or provider of each container of the used oil certifies that it has not been mixed/blended/combined with other material or used oil for the purpose of dilution to avoid any provision specifying a PCB concentration in any federal or state environmental regulation or rule, and that the used oil contains PCB concentrations below 2 mg/kg (ppm). If this used oil is destined for energy recovery, then the Permittee will take a representative sample and provide or obtain an appropriate and representative test result from a Utah-certified laboratory confirming that it contains less than 2 mg/kg (ppm) PCBs prior to mixing/blending/combining it with other used oil or material.
- 2.0 The Permittee is not authorized to accept used oil with PCB concentrations greater than or equal to 2 mg/kg (ppm).
- 3.0 For purposes of this section of the analysis plan, the following conditions shall apply:
- 3.1 Records of any laboratory test results or certifications used to demonstrate PCB concentrations, or any certification used to show that any material was not mixed/blended/combined for the purposes of dilution to avoid any provision specifying a PCB concentration in any federal or state environmental regulation or rule, shall accompany the material;
- 3.1.1 PCB concentrations mean a record of information that describes the PCB concentration in mg/kg, for seven of the Aroclors® in the list below (analysis must include Aroclor® 1016, Aroclor® 1260, Aroclor® 1254, and Aroclor® 1242), and any Aroclor associated with a specific type of oil or total PCBs as sum of all congeners;
- 3.1.2 A Utah-certified laboratory means a laboratory that holds a current Utah Laboratory Certification issued by the Utah Department of Health for the methods used to determine the PCB concentration;

CAS RN	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

- 4.0 The Permittee, in addition to the above requirements and procedures, shall follow the procedures outlined below:
- 4.1 This plan is to ensure, that used oil collected and transported by the Permittee is used oil as defined by the standard and not a hazardous waste as outlined by R315-261.
- 4.2 All drivers will be trained in the purpose and use of halogen tests and method 9077, prior to field work.
- 4.3 During or prior to the first pick up of a new client's used oil, the driver or technical service representative will ensure that the generator has not mixed any other liquids or solids with their oil. Instructions will be provided to each client outlining why they may not mix their oil with other materials.
- 4.4 Regardless of the situation, all used oil collected and transported by the Permittee will be tested by drivers or technical service representative utilizing a new, unexpired halogen test kit. This test must be completed prior to pumping or picking up drums. The results of the halogen test and associated quality control samples will be documented on the Bill of Lading.
- 4.5 In the event that the halogen test results exceed 1,000 ppm, the used oil generator will be informed of the results. The halogen test results will be written onto the Bill of Lading or manifest.
- 4.6 Drum Sampling will be done using a drum thief. If the drums are from the same waste stream, a composite sample will consist of not more than four drums or 200 gallons,

whichever is less, per composite sample. If less than four drums or if the waste stream is from a different source, then each drum will be sampled as close to the center of the drum as possible. The composite samples will be taken and consolidated into one sample and the halogen test analysis will be performed on the one sample with appropriate quality control samples and documented on the Bill of Lading.

- 4.7 Totes or other containers larger than 55 gallons will be sampled individually, not composited. Samples from the same container may be taken for quality control purposes. Results will be documented on the Bill of Lading.
- 4.8 Used oil with 20% or more of water and/or antifreeze will be sampled using a HydroClor Q or sent to a Utah certified laboratory for analysis.
- 4.9 Halogen test quality control samples will be performed every tenth load per vehicle or daily if less than 10 loads are collected.
- 4.10 In all cases, the results shall be documented onto the Bill of Lading or manifest.

**Rebuttable Presumption for Used Oil**

- 1.0 R315-15-5.4 establishes the rebuttable presumption for Used Oil processors.
- 2.0 One of the following procedures should be used for the testing determination:

Sample Preparation	Analytical Procedures for Quantifying Total Halogens in Used Oil	Halogens Detected
none	9076-oxidative combustion & microcoulometry	Cl, Br, I
5050-Bomb Combustion	9075-x-ray fluorescence spectrometry	Cl
5050-Bomb Combustion	9056, anion chromatography	F, Cl, Br, I
	9253, Silver Nitrate Titrimetric Analysis	Cl, Br, I

- 3.0 Per the used oil management standards in Utah’s Rules R315-15, any used oil containing greater than 1,000 ppm of total halogens is presumed to have been mixed with a listed hazardous waste and therefore is subject to RCRA Subtitle C hazardous waste regulation. This presumption may be rebutted by demonstrating that the used oil does not contain hazardous waste. According to UAC R315-15-4.5, R315-15-5.4, and R315-15-6.4, to make this demonstration is to show that the used oil does not contain significant concentrations of any of the halogenated hazardous constituents listed in R315-261 Appendix VIII. A level of 100 ppm or higher of individual solvent compound is generally considered a significant concentration. Thus, one may try to rebut the presumption by

showing that less than 100 ppm of any individual hazardous halogenated constituent listed as a hazardous spent solvent in R315-261-31 is present.

- 4.0 The 100 ppm level applies only to concentrations of halogenated solvent constituents and cannot be applied to all hazardous halogenated compounds. Thus, showing that individual hazardous halogenated solvents are present at levels less than 100 ppm, also will not automatically rebut the presumption, as other site-specific factors must be considered in making such a determination. For example, if documentation shows that used oil has been mixed with a listed hazardous waste, that mixture would be considered hazardous waste pursuant to the mixture rule in R315-261-3, regardless of the level of halogenated constituents present.
- 5.0 The list of halogenated compounds that must be considered in the rebuttable presumption are listed in R315-261 Appendix VIII which includes Volatiles, Semi-volatiles, PCBs, Pesticides, Herbicides, and Dioxin/Furans.

Sample Preparation	Analytical Procedure	Analytes
5035A, 3585	8260B	Volatile Organic Compounds
3500C, 3580A	8270D	Semi-Volatile Compounds
3500C, 3580A	8082A	PCBs
3500C	8081B	Pesticides
3500C	8151A	Herbicides
3500C	8280B, 8290A	Dioxin/Furans

- 6.0 If the Permittee rebuts the total halogen result, testing must be performed for the individual constituents for the Appendix VIII halogenated organic compounds or you must have generator knowledge and documentation justifying your determination. The Permittee most likely will have both analytical data and obtain generator knowledge documentation for the sample.

## Attachment 5

### Training Plan

STC personnel will be trained in accordance with OSHA regulation 1910.120 and will take courses for the identification of hazardous materials and products. Training will be provided on availability of courses from local sources, as necessary.

STC personnel have certification in the following areas:

- 40 Hour Training
- 8 Hour Annual Update
- Soil and Water Sampling
- Confined Space Entry
- State of Utah Used Oil Sampling and Analytical Requirements
- 49 CFR–Placard, Labeling, Manifesting, Transportation

STC employee or employees who perform the waste identification function are or will be trained in hazardous waste identification offered through various accredited institutions.

### USED OIL TRAINING

All employees will receive used oil training before participating in used oil handling operations.

Utah-specific used oil processing, storage, transportation, and handling training will be conducted on an annual basis for all employees involved in handling used oil in Utah. The training will be provided for new employees and then an annual refresher taken during scheduled company safety/training meetings, or as appropriate.

Training will focus on operations, storage, transportation, and handling of used oil and used oil products, including the following:

Identification of used oil;

Processing operations for proper management of used oil and used oil materials.

Representative sampling of used oil chemical screening, and the rebuttable presumption;

Documentation, Reporting and tracking. Proper receipts for collected and delivered used oil;

Emergency response, Spill Contingency plan, and spill reporting; and

Personal safety.

Records of training shall be maintained in the employee files at the Permittee's facility in Salt Lake City, Utah for 3 years with a document to confirm that each employee was trained or updated in training annually. A master file shall be maintained with records of all training and employees trained at the Permittee's facility.

**The training shall include:**

- Used Oil sampling procedures
- Used Oil loading and unloading
- Halogen verification Methods
- PCB sample preparation and analytical methods
- Record of training
- Spill Response
- Used Oil Sample Collection

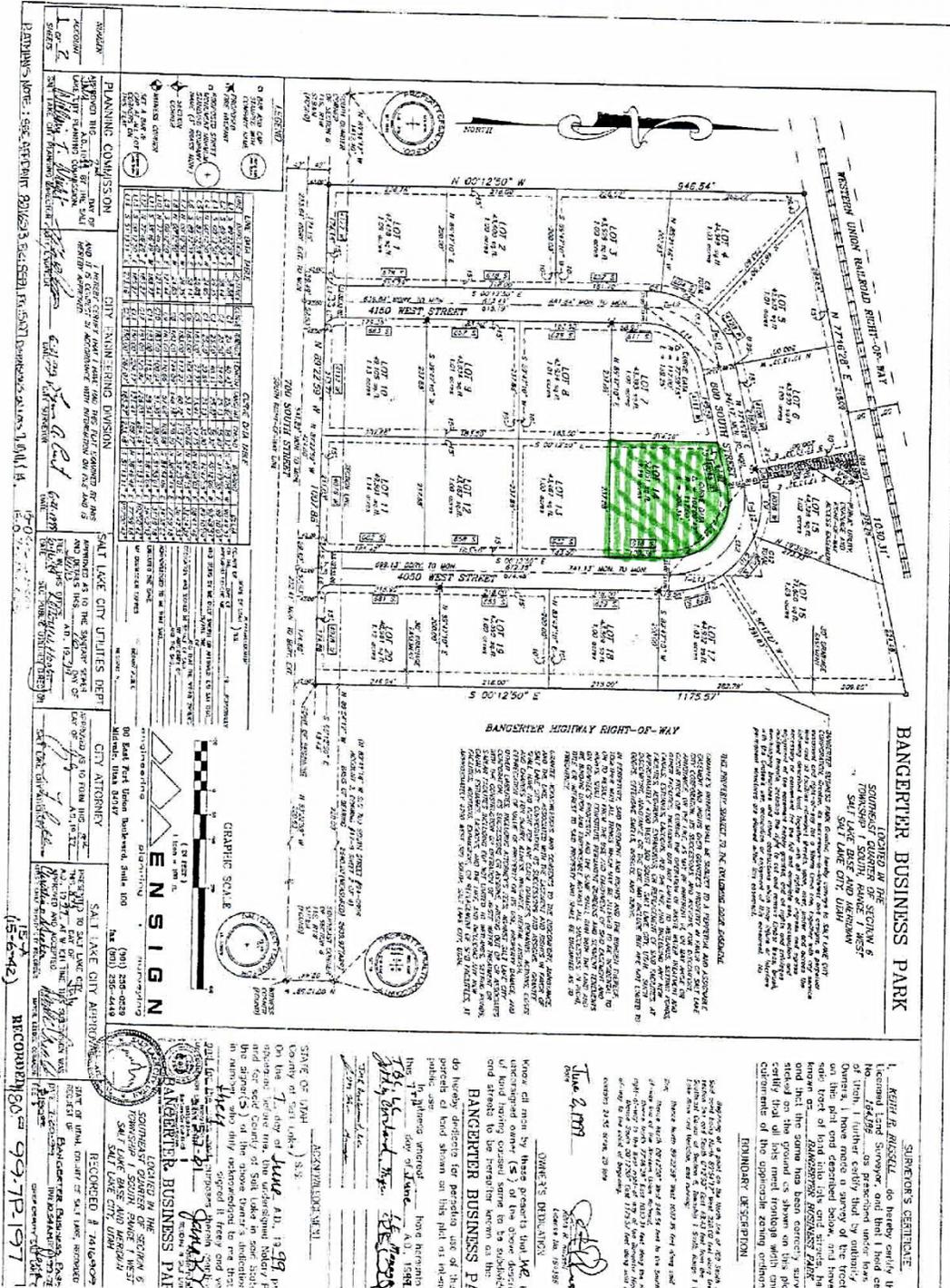
**STC Required Training**

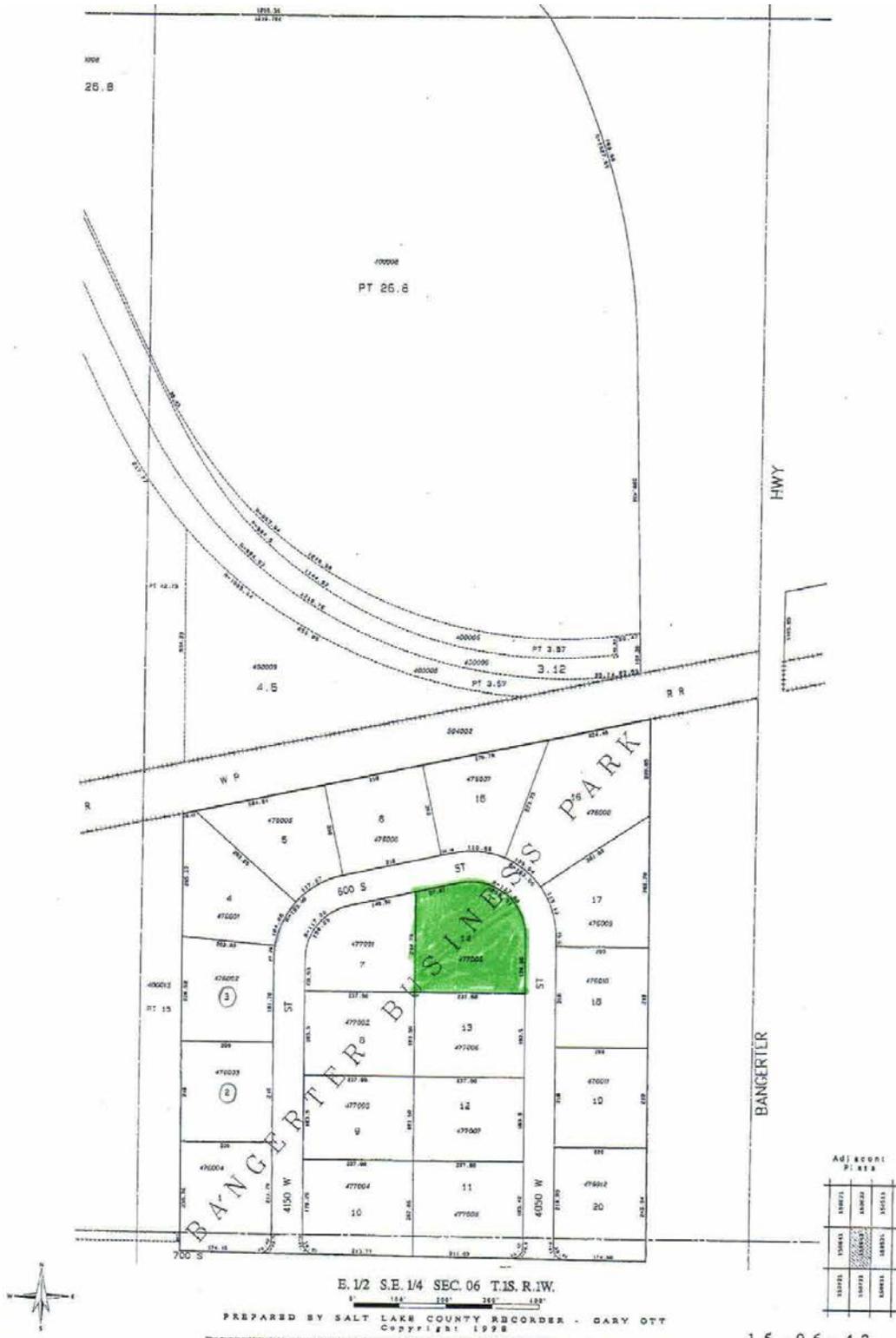
- 40 Hours Haz-Woper
- 8 Hour Refresher Haz-Woper
- Confined Space Entry
- MSHA as needed
- Forklift Training
- STC Site Specific Training
- Hazardous Materials Training/Hazmat Endorsement
- Commercial Driver License
- Used Oil Handling Training

Attachment 6

Facility Maps and Diagrams

1. Plat Plans

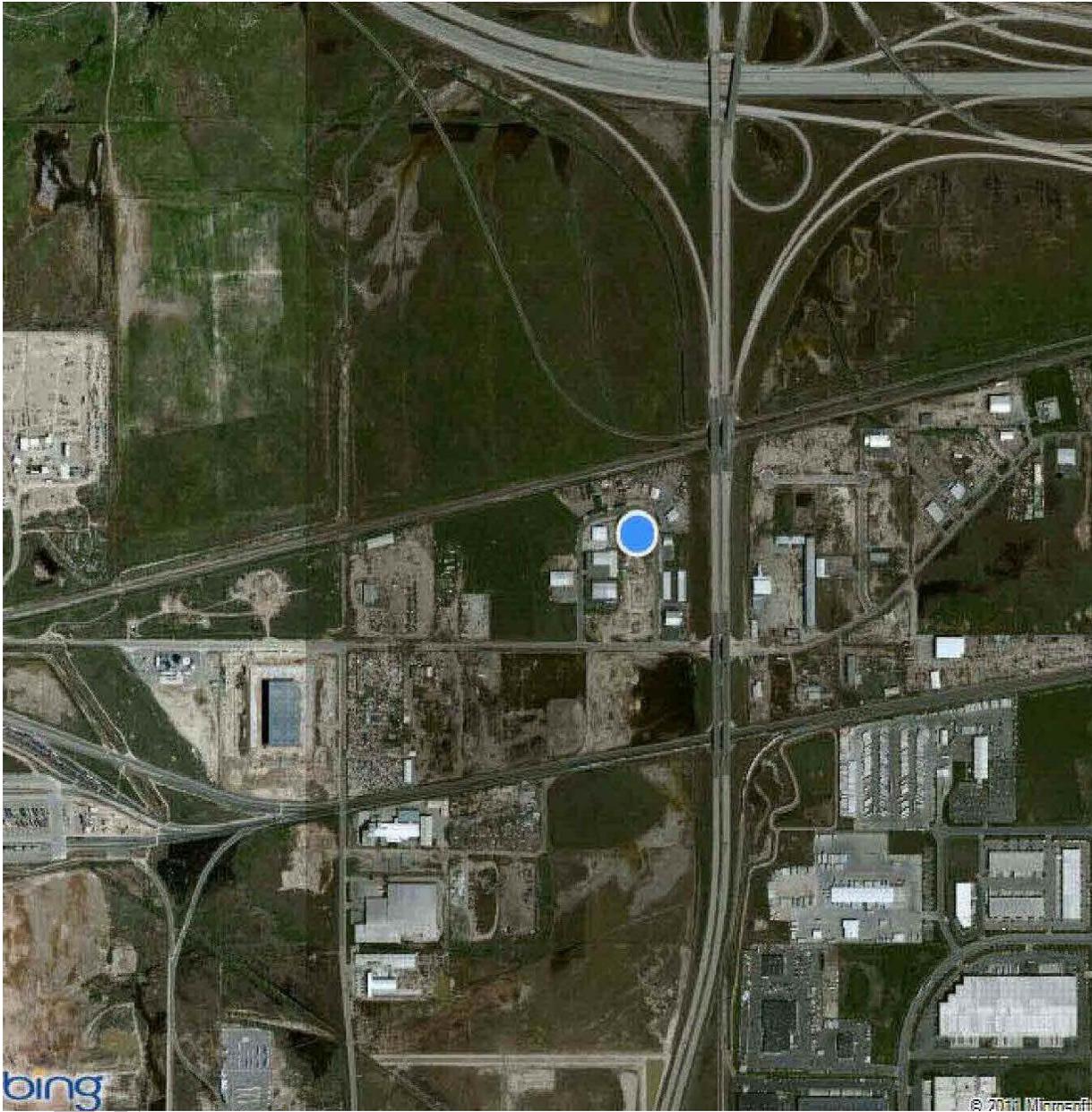




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 PREPARED BY SALT LAKE COUNTY RECORDER - GARY OTT  
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This map is not intended to represent actual physical property lines. In order to establish exact physical boundaries a survey of the property may be necessary.

## 2. Site Location







## Attachment 7

### Used Oil Waste Analysis and Management Plan

All absorbent materials and rags used to clean up minor leaks and spills and to wipe off equipment will be collected in containers at the Permittee's used oil facility for proper storage, applicable characterization testing, and disposal. Sludge and debris from screens on vacuum hoses and pump filters will be placed in the containers. Daily cleanup procedures include wash down and wipe down of all equipment and containers with standard industrial soap and water. Rinse water generated will be collected and processed in accordance with the Permittee's Salt Lake City Corporation's Wastewater Discharge Permit No. SLC-0021.

Spent filter media and solid wastes (estimate 5 tons quarterly) will be collected via hopper, and containerized. Once filled, the waste will be sampled and analyzed and disposed properly. The Permittee will characterize the waste to ensure it is not hazardous waste. Any hazardous waste will be handled by an appropriate permitted hazardous waste handler. The waste will be manifested to an appropriate TSDF.

Oily water will be treated prior to discharge in accordance with the Permittee's Salt Lake City Corporation's Wastewater Discharge Permit No. SLC-0021.

The Permittee shall document and maintain records showing proper handling and disposal for all used oil related waste products, including waste water.

The Permittee shall properly dispose of oily solids at a permitted facility. STC will follow Section I.I. (Waste Management) of this permit when disposing of used oil or solid waste generated from spills or operational activities.

STC will only accept materials which have been analyzed by a local certified lab under the required chemical parameters (see Exhibit A), and generator knowledge of material and process as required by R315-15. The material then will be profiled on the profile sheet as shown in Exhibit B. The waste material, once profiled and accepted as non-hazardous, will be manifested and transported to STC for processing. The generator will be responsible for sampling, as necessary, and analytical testing.

The waste will be tested for total volatiles, pH, ignitability, TPH and activity, if applicable. If in the opinion of the testing laboratory or STC that it is needed, a TCLP test will be performed.

These tests will be run if, in the course of the client's normal operation, materials are used which would contain F and D volatiles.

See Exhibit A, "Required Chemical Parameters"

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## EXHIBIT A

### REQUIRED CHEMICAL PARAMETERS

Generator:

Waste Type:

**IMPORTANT:** WASTES WILL NOT BE CONSIDERED FOR APPROVAL UNTIL ALL REQUIRED TESTING IS COMPLETE BY A UTAH ACCREDITED LABORATORY

#### SECTION I: (STANDARD PARAMETERS) - **REQUIRED**

ALL INDUSTRIAL WASTES MAY BE ANALYZED WITH RESPECT TO THE PARAMETERS IN THIS SECTION

Arsenic	Cadmium	Selenium	% Passing Filter (1311)
Lead	Chromium	Silver	Flashpoint
Barium	Mercury		

#### SECTION II:

THE ABOVE REFERENCED WASTE MUST ALSO BE ANALYZED WITH RESPECT TO THE PARAMETERS CHECKED BELOW

- Benzene \*
- TOX - Det. Limit <.05 mg/l \*
- F001-F005 Listed Solvents - Det. Limit ≤1 mg/kg
- "F" and "D" Volatiles (less pesticides/herbicides)
- "F" and "D" Semi-volatiles (less pesticides/herbicides)
- TPH
- MBTEX
- Cyanide Reactive
- Sulfur Reactive
- pH

\* Dependent upon waste type and source

All metals should be analyzed for total concentrations. TCLP analyses may be required based on results of initial testing.

#### SECTION III:

Sumps/Separators with excessive quantities of oil will be tested according to used oil regulations for the state of Utah.

**PARAMETERS, IN ADDITION TO THOSE LISTED ABOVE, MAY BE NEEDED TO ACCURATELY CHARACTERIZE WASTE**

**Sump & Trap Cleaning LLC**  
**618 South 4050 West**  
**Salt Lake City, Utah 84104**  
**(801)595-8151 Fax (801)521-2159**

**WASTE PROFILE**

Dear Client:

Please provide the information requested here concerning your non-hazardous waste. Be as thorough as possible. Please attach Material Safety Data Sheets and a current laboratory analysis if applicable. This information will be a matter of public record. **NOTE: Generators are legally responsible for proper representation and disposal of their waste. Please provide complete and accurate information to assure appropriate handling of your waste.**

**GENERATOR INFORMATION**

1. Company Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City, State, Zip: \_\_\_\_\_  
Site Address (if different): \_\_\_\_\_

2. **GENERATOR CONTACT** Name: \_\_\_\_\_  
Title: \_\_\_\_\_ Phone: \_\_\_\_\_

**TECHNICAL CONTACT** Name: \_\_\_\_\_ Title: \_\_\_\_\_  
Company: \_\_\_\_\_ Phone: \_\_\_\_\_

**BILLING COMPANY** Company: \_\_\_\_\_  
Accounts Payable Contact: \_\_\_\_\_ Phone: \_\_\_\_\_

**WASTE DESCRIPTION**

3. Common Name for this waste: \_\_\_\_\_

4. Process generating this waste: \_\_\_\_\_

5. Anticipated Volume: Gal Tons Yds. Drums Other \_\_\_\_\_  
Per Day Week Month Year One time Only

6. Please list ALL chemical products (i.e. cleansers, degreasers, solvents, fuels or other constituents) that may be present in the waste. If no products are present please state such. Attach Material Safety Data Sheets for EACH item listed. **(SPECIFIC PRODUCT NAME PLEASE)**

- 1. \_\_\_\_\_ 6. \_\_\_\_\_
- 2. \_\_\_\_\_ 7. \_\_\_\_\_
- 3. \_\_\_\_\_ 8. \_\_\_\_\_
- 4. \_\_\_\_\_ 9. \_\_\_\_\_
- 5. \_\_\_\_\_ 10. \_\_\_\_\_

**OVER**

7. Does this waste contain any petroleum products? Yes No
8. Odor: None Slight Extreme
9. Description of Odor: \_\_\_\_\_
10. Color and Physical Appearance (**describe completely**): \_\_\_\_\_
11. Check applicable properties: Liquid Sludge Soil Powder Oil Other: \_\_\_\_\_
12. To the best of your knowledge, is this waste derived from, contain or constitute hazardous waste as defined by 40 CFR or Utah Hazardous Waste Management Rules? Yes No
13. Additional Comments: \_\_\_\_\_

**To the best of my knowledge and ability, the information given in this document is a complete and accurate description of the waste.**

\_\_\_\_\_  
Authorized Generator's Signature Printed Name

\_\_\_\_\_  
Title Date

Is a laboratory analysis attached? Yes No

Which laboratory performed the analysis? \_\_\_\_\_

What is the laboratory sample **I.D. NUMBER**: \_\_\_\_\_

Did an employee of Sump & Trap Cleaning, INC. sample the waste at your \_\_\_\_\_ Yes No

If no, please sign below.  
I certify that the chemical results referenced above were derived from representative samples of the waste material.  
Procedures utilized for collecting the waste samples were in accordance with E.P.A. guidelines.

\_\_\_\_\_  
Authorized Signature Printed Name

\_\_\_\_\_  
Title Date

**FOR OFFICE USE ONLY**

Waste Type: \_\_\_\_\_ Waste Code: \_\_\_\_\_

Date Approved: \_\_\_\_\_ Expiration Date: \_\_\_\_\_

First Technical Approval: \_\_\_\_\_ Final Technical Approval: \_\_\_\_\_

Direct Billing: Yes No \_\_\_\_\_ Billing Approved: Yes No \_\_\_\_\_

Credit Application on file: Yes No \_\_\_\_\_ Credit Application Required: Yes No \_\_\_\_\_

Billing Approved By: \_\_\_\_\_ Date: \_\_\_\_\_

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Exhibit D-1

### Sump & Trap Cleaning Waste Separation Process Flow

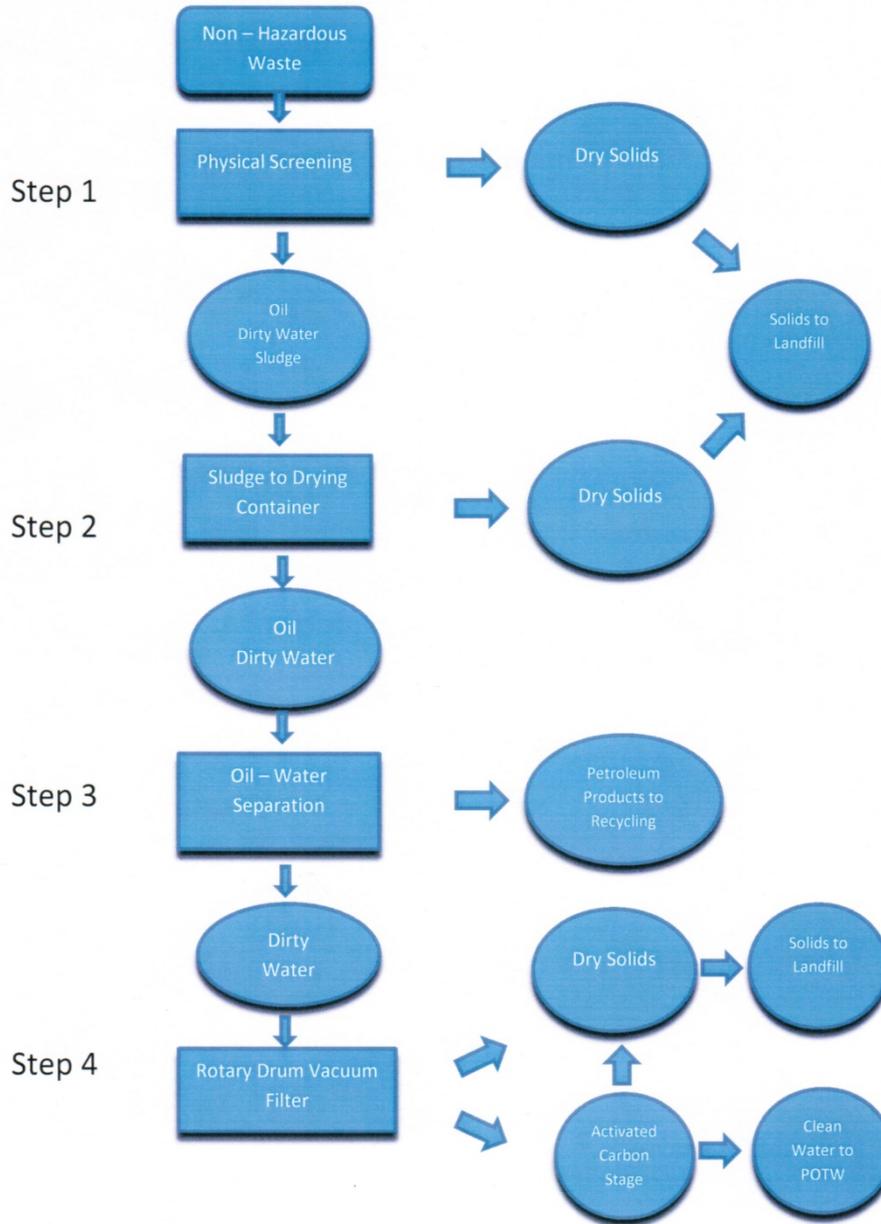
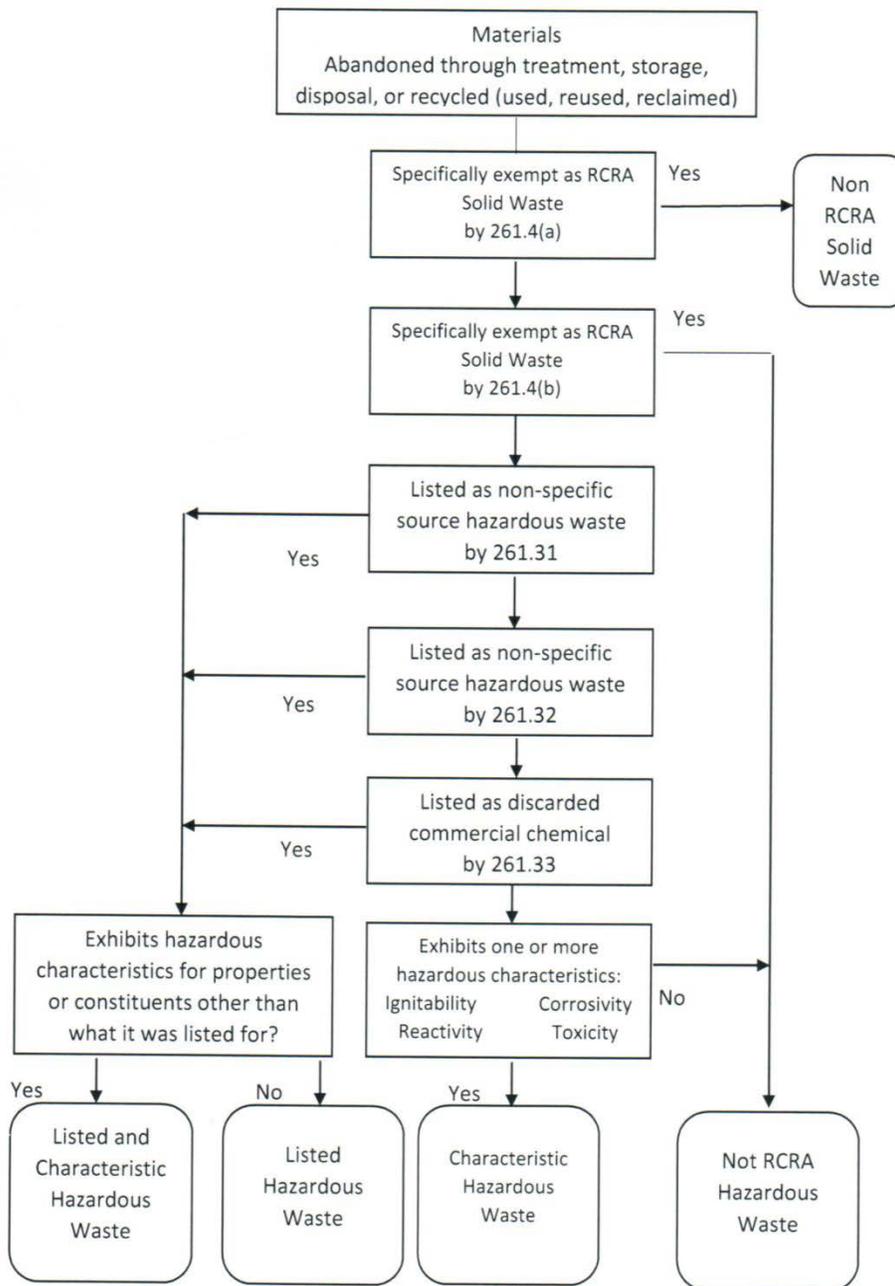


Exhibit E

**Hazardous waste definition**



## Attachment 8

### **Inspection and Maintenance Schedule**

STC shall perform facility self-inspections a minimum of twice a week (scheduled Mondays and Fridays), and as needed. The inspection results shall be recorded on an inspection log, an example of which is presented below.

*Draft Mod for Public Comment*



## Attachment 9

### Cleanup and Closure Plan

In accordance with R315-5.5(f) and R315-15-11, STC shall, upon closure, submit to the Division for approval by the Director, a comprehensive plan detailing how STC will perform the following steps:

1. STC shall initiate closure in accordance with the approved cleanup and closure plan and notify the Director within 90 days after the Permittee receives the final volume of used oil or the Director revokes the Permittee's used oil permit.
2. All used oil and associated materials on the premises will be processed or removed.
3. All used oil tanks, containers, equipment, processing areas, and secondary containment surfaces where the used oil was stored will be decontaminated, washed down, and cleaned with detergent and water prior to removal.
4. Decontamination fluids generated during the cleaning operation will be appropriately managed in accordance with applicable regulations and all discharged fluids in accordance with the Permittee's POTW permit or disposal at a hazardous waste facility.
5. The decontaminated equipment will be disassembled and prepared to store or sell as the Permittee sees fit.
6. Decontamination verification of equipment shall be performed using ASTM D6661 or equivalent method approved by the Director.
7. Quality Control sampling and analysis will be performed with each set of wipe samples.
8. Soil and groundwater sampling will be performed if deemed necessary by the Division at time of closure. STC shall notify the Division sufficiently ahead of any sampling event so as to provide Division personnel an opportunity to be present during the sampling.
9. As part of closure of the facility, the procedures and activities undertaken will be documented and compiled into a cleanup and closure report.

Within 60 days of completion of cleanup and closure, the Permittee shall submit to the Director, by registered mail, a closure report certifying that the facility has been cleaned and closed. The

closure certification should be signed by the Permittee and by an independent, Utah registered professional engineer. The report will include documentation of the closure process, the removal of the used oil inventory, and the decontamination of equipment and containment surfaces. If closure has defaulted to the Director of the Division of Solid and Hazardous Waste, the report will include closure costs. At the time of this approval, the closure costs are estimated to be \$14,650 as detailed in Attachment 8, "Closure Cost Estimate/Financial Assurance/Liability Insurance and Endorsement". The closure costs will be updated annually with the Annual Processor Report submittal. Notes and photos may be included as part of the closure documentation. Contact the Department of Environmental Quality to schedule a verification inspection.

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## **PROCESSING FACILITY CLOSURE REQUIREMENTS**

1. Sump and Trap Cleaning LLC will notify Director of the Department Environmental Quality and the Salt Lake Valley Health Department 90 days prior to closure.
2. Upon cessation of business, the facility would remove any remaining product and/or equipment from the premises, in compliance with Salt Lake Valley Health Department requirements. This would alleviate the need for any further maintenance and would meet post-closure requirements.
3. 90 days prior to closure, STC would notify the generators/users by posting a closure letter on the premises, as required.
4. Upon closure, STC would notify the Salt Lake Valley Health Department, Utah Department of Environmental Quality for site inspection and final approval.

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Attachment 10

**Cleanup and Closure Plan Costs**  
 Updated 8/1/2018

Itemized Task Closure Costs for Financial Assurance

Closing cost estimate table

Task	Task Description	Company	Units	Rate	Cost
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1	Site Sampling and Analytical				
	Used oil tank oil analysis	American West Analytical	12	\$75.00	\$900.00
	Oil water separator analysis	American West Analytical	1	\$450.00	\$450.00
	Used oil tank wipe analysis	American West Analytical	12	\$75.00	\$900.00
	Oil water separator wipe analysis	American West Analytical	5	\$75.00	\$375.00
Site Sampling and Analytical Total					\$2625.00

2	Plant Decommission Costs				
	Profile fees	Thermo Fluids or Rock Cyn	1	\$500.00	\$500.00
	Remove Used Oil	Thermo Fluids or Rock Cyn	7500	\$0.25	\$1875.00
	Remove oil / water separator water / oil	Thermo Fluids	15,000	\$0.60	\$9,000.00
	Tank rinsate recycling from cleaning of used oil tank and oil water separator	Thermo Fluids	1000	\$1.00	\$1000.00
	Containment rinsate water from cleaning of 6 containments	Thermo Fluids	2000	\$0.60	\$1200.00
	Equipment cleaning costs / labor	Stericycle, Redi Services, Clean Harbors	40	\$195.00	\$7,800.00
	Fees & Surcharges				\$1,000.00
	Solids Disposal	ET Technologies SRS	20	\$35.00	\$700.00
	STC Personnel / Labor costs		60	\$90.00	\$5,400.00
	Waste Transportation				\$4,000.00
	10% Cushion for unknown costs		37600	\$0.10	\$3,760.00
<b>Total Decommission costs</b>					<b>\$36,235.00</b>

3	Final Closure Verification				
	Independent PE Verification	Wasatch Environmental			\$2,500.00
	Final Closure Verification Total				
<b>Total Closure Costs</b>					<b>\$41,360.00</b>