



Division of Waste Management and Radiation Control

**USED OIL TRANSPORTER PERMIT**



**Permittee Name:** Action Resources, LLC

**Permittee Corporate Address** 40 County Road 517  
Hanceville, Alabama 35077

**Permitting Facility Address (Utah)** 721 West Center Street  
North Salt Lake City, Utah 84054

**Permittee Phone Numbers:** (205) 777-0362 Corporate office  
(801) 936-6393 Utah Facility office

**Permittee Environmental Contact:** **Greg Calhoun**  
Director of Risk  
(205) 777-0362 office  
(256) 338-8359 cell  
Email: [greg.calhoun@actn.com](mailto:greg.calhoun@actn.com)

**Facility Operations Contact (Utah):** **Chad Shumway**  
Terminal Manager  
(801) 936-6393 office  
(385) 239-4243 cell  
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**Type of Permit:** Used Oil Transporter Permit

**Permit #:** UOP-0115

**Original Issue Date:** July 23, 2008

**EPA ID #:** ALR000007237

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

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

**I.A. Effect of Permit**

- I.A.1. Action Resources, LLC (hereafter referred to as “Permittee”) is hereby authorized to operate as a Used Oil Transporter in accordance with all applicable requirements of R315-15 of the Utah Administrative Code (UAC) 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.
- I.A.3. Attachments incorporated by reference are enforceable conditions of this Permit, as are documents incorporated by reference into the attachments. Language in this Permit supersedes any conflicting language in the attachments or documents incorporated into the attachments.

**I.B. Permit Revocation**

- I.B.1. Violation of any permit condition or failure to comply with any provision of the applicable statutes and rules may be grounds for enforcement actions, including revocation of this Permit. The Director of the Division of Waste Management and Radiation Control (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 any action on the modification request may be taken. Implementing a substantive modification prior to the Director’s written approval constitutes a violation of the Permit and may be grounds for enforcement action or permit revocation.
- I.C.2. The Permittee shall notify the Director in writing of any non-substantive changes, such as changes to the contact person, within 20 days of the change.
- I.C.3. The Director may modify this Permit as necessary to protect human health and the environment, because of statutory or regulatory changes or because of operational changes affecting this Permit.

**I.D. Spill Prevention, Emergency Controls and Maintenance**

- I.D.1. The Permittee shall maintain and operate all used oil transportation vehicles and associated equipment to minimize the possibility of fire, explosion or sudden or non-sudden release of used oil to the air, ground, soil, surface and groundwater and sewer systems.
- I.D.2. In the event of a release of used oil, the Permittee shall comply with the Emergency Controls and reporting requirements specified in R315-15-9 of the Utah Administrative Code and the Permittee’s Emergency Spill Plan in Attachment 1.

**I.E. Record Retention**

- I.E.1. The Permittee shall maintain all applicable used oil records required by R315-15 of the Utah Administrative Code and this Permit at the Permittee's facilities located at 721 West Center Street in North Salt Lake City, Utah.
- I.E.2. All records shall be readily accessible for review by representatives of the Director. Records may be in a hard copy or electronic format. Records shall be maintained for a minimum of three years.

**I.F. Tracking**

- I.F.1. The Permittee shall keep written transportation records for both the collection and delivery of used oil. Collection and delivery records may be a log, invoice, manifest, bill of lading or other shipping document.
- I.F.2. The collection records shall include the generator's, transporter's, transfer facility's, off-specification burner's or processor's name and signature (dated upon receipt), address, volume of used oil collected and EPA identification number if applicable.
- I.F.3. The halogen content from screening tests, analytical laboratory testing or generator knowledge shall be documented on the used oil record/bill of lading at each used oil collection location prior to loading for transportation. The halogen content determination method (i.e., test or generator knowledge) shall be documented on the shipping document with the halogen concentration in accordance with Attachment 2 (Procedures for Recording Halogen Content).
- I.F.4. The Permittee shall document the PCB concentration based on analytical results of used transformer oil prior to collection and transport the record/bill of lading at each used oil collection location.
- I.F.5. The delivery records shall include the Permittee's name, address, EPA identification number, vehicle designation number, driver name, date of delivery, the volume of used oil delivered and the type of delivery (i.e., bulk oil in tankers or containerized, specifying container types and numbers).
  - I.F.5.a. The used oil records shall include the receiving transfer facility's, off-specification burner's, processor's or other transporter's name and signature (dated upon receipt), address and EPA identification number.
  - I.F.5.b. The Permittee shall create a new delivery record for internal transfers between the Permittee's transportation vehicles.

**I.G. Transportation Operations**

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

- I.G.2. Transportation of oily water shall be managed as used oil if the used oil is destined to be recovered in accordance with R315-15 of the Utah Administrative Code and this Permit.
- I.G.3. The Permittee shall only accept used oil or oily water subject to R315-15 of the Utah Administrative Code that has halogen concentrations less than 1,000 ppm unless rebutted in accordance with Attachment 3 (Analysis Plan) or unless the oil was generated by a Very Small Quantity Generator (VSQG) or Do-It-Yourselfer Collection Center (Type A or B).
- I.G.4. The Permittee shall comply with TSCA regulations when transporting used oil with PCB concentrations greater than or equal to 50 mg/kg.

**I.H. Sampling and Analysis Halogen Determination**

- I.H.1. The Permittee shall follow all sampling and analytical procedures in Attachment 3 (Analysis Plan) and Attachment 4 (Sampling 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.I. Prohibited Waste**

- I.I.1. Used oil that has been mixed with hazardous waste as defined by R315-261 of the Utah Administrative Code or PCBs as defined by R315-301-2(53) of the Utah Administrative Code shall no longer be managed as used oil and shall be subject to applicable hazardous waste and PCB-contaminated waste rules.
- I.I.2. Used oil shall not be stored in tanks, containers or storage units that previously stored hazardous waste unless these tanks, containers and storage units have been cleaned in accordance with R315-261-7 of the Utah Administrative Code.
- I.I.3. The Permittee shall not place, manage, discard or otherwise dispose of used oil in any manner other than specified in R315-15-1.3 of the Utah Administrative Code.

**I.J. Waste Disposal**

- I.J.1. The Permittee shall properly characterize used oil waste related material to determine if the wastes are hazardous or non-hazardous in accordance with R315-15-8 of the Utah Administrative Code and manage accordingly.
- I.J.2. The Permittee shall maintain records showing characterization, handling and disposal of waste generated.

**I.K. Used Oil Storage**

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

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

**I.L. Liability and Financial Requirements**

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

I.L.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 with the Annual Report Form UO 004.

I.L.3. The Permittee shall provide documentation of financial responsibility, environmental pollution legal liability and general liability coverage to the Director upon request.

I.L.4. The Permittee shall notify the Director immediately of any changes to the extent and type of liability coverage in accordance with R315-15-10 of the Utah Administrative Code.

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

I.M.1. In accordance with R315-15-4 of the Utah Administrative Code, the Permittee shall not operate as a used oil transporter without obtaining annually a Used Oil Handler Certificate from the Director. The Permittee shall pay a used oil handler fee, pursuant to Utah Code 63J-1-504, by December 31 of each calendar year to receive certification for the upcoming calendar year.

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

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

I.N.2. An authorized employee may collect soil, groundwater or surface water samples to evaluate the facility's compliance.

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

**I.O. Annual Report**

I.O.1. 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 the Division's Used Oil

Transporter Annual Report form (UO 004) as required by R315-15-13.4 of the Utah Administrative Code.

**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 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 Permit Public Comment

**II.A. Transport Vehicle Requirements**

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

**Table II.A: Vehicle Description**

Type of Vehicle	Used Oil Capacity (gallons)
Tractor Trailers (semi-trailer)	4,400
Vacuum Tanker Truck	5,400
Box Van Trailers	4,400

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

II.A.3. All of the Permittee’s vehicles which transport used oil shall have a copy of the Permittee’s Emergency Spill Plan (Attachment 1) maintained in the vehicle at all times.

II.A.4. The Permittee shall maintain Emergency Spill Cleanup materials in all vehicles used to transport used oil as specified in Attachment 1 (Emergency Spill Plan) of this Permit.

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

II.B.1. The Permittee shall determine if the halogen content is less than 1,000 ppm prior to loading the used oil in accordance with Attachment 3 (Analysis Plan). The result shall be recorded on the transportation document (e.g., bill of lading).

II.B.2. The Permittee shall secure the vehicle by positioning wheel chocks and applying the emergency brakes before loading or unloading used oil.

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

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

II.B.5. The Permittee shall ensure the amount of used oil to be loaded into the transport vehicle will not exceed the carrying capacity. The Permittee shall utilize a calibrated gauging instrument to measure used oil volume in each collection vehicle/tanker.

II.B.6. The Permittee is allowed to transfer to rail cars in accordance with the rail car loading procedure in R315-15-4.10 of the Utah Administrative Code and Attachment 5, Rail Car Loading Procedure.

II.B.6.a. During loading and unloading operations, two trained operators shall remain at the transfer location and maintain control of the operations throughout the entire used oil

transfer. A single operator is allowed when a secure dome lid connector is used to attach the upper hose to the rail car.

## **II.C. Used Oil Sampling and Analysis**

- II.C.1. The Permittee shall determine the halogen concentration and PCB concentration, if applicable, prior to acceptance of the used oil as required in this Permit and Attachment 3 (Analysis Plan).

## **II.D. Rebuttable Presumption**

- II.D.1. Used oil with total halogen concentrations greater than 1,000 mg/kg (ppm) is presumed to have been mixed with a hazardous waste and shall be managed as a hazardous waste unless the Permittee successfully rebuts the presumption.
- II.D.2. Used oil with halogen concentrations between 1,000 ppm and 4,000 ppm may be accepted for transport, if the Permittee rebuts the hazardous waste presumption or has analytical data documentation from a prior used oil handler that the used oil is not a hazardous waste or if the used oil is solely from a Very Small Quantity Generators (VSQG) or is DIYer used oil from a collection center. The Permittee shall attach any analytical results used to rebut the hazardous waste presumption to the shipping documents.
- II.D.3. 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 halogens in the used oil originated from sources other than halogenated hazardous constituents listed in Appendix VIII of 40 CFR 261.
- II.D.4. If the additional testing shows that used oil has been mixed with a listed hazardous waste described in R315-261 of the Utah Administrative Code, the mixture is subject to regulation as a hazardous waste if the concentration of any individual compound listed in R315-261 Appendix VIII is greater than or equal to 100 mg/kg (ppm).
- II.D.5. The rebuttable presumption does not apply to metalworking oils/fluids containing chlorinated paraffins if they are processed through a tolling arrangement as described in R315-15-2.5(c) of the Utah Administrative Code to reclaim metalworking oils/fluids. The rebuttable presumption does apply to metalworking oils/fluids if such oils/fluids are recycled in any other manner or disposed.
- II.D.6. 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.E. Used Oil Training**

- II.E.1. The Permittee shall train handlers of used oil in accordance with R315-15-4 of the Utah Administrative Code and the requirements of this Permit. New employees may



not manage or process used oil without a trained employee present until used oil training is completed.

- II.E.2. The Permittee shall document that employees are trained in the identification of used oil, recordkeeping requirements, emergency spill plan and facility used oil procedures for handling, transporting, sample collection, halogen screening and laboratory analytical methods, rebuttable presumption testing, and the appropriate use of “generator knowledge” when determining the halogen content of used oil.
- II.E.3. Employees collecting and performing field halogen testing shall be trained and demonstrate competence in collecting a representative used oil sample and testing for halogens using a CLOR-D-TECT<sup>®</sup> kit prior to fieldwork.
- II.E.4. The Permittee shall provide, at a minimum, an annual used oil training refresher course for employees handling used oil. Additional training is required if the Permittee changes used oil handling procedures or this Permit is modified.
- II.E.5. The Permittee shall keep training records for each employee for a minimum of three years. Employees and supervisors shall sign and date training attendance sheets to document class attendance.
- II.F. Spill Response, Remediation, and Reporting**
- II.F.1. In accordance with R315-15-9.1(a) of the Utah Administrative Code, the person responsible for the spill shall immediately take appropriate action to minimize the threat to human health and the environment and notify the DEQ Hotline at (801) 536-4123 if the spill is greater than 25 gallons or for smaller spills that pose threat to human health or the environment.
- II.F.2. Responders shall take action to prevent spill from spreading by utilizing absorbent, booms, pads, rags, etc. (Attachment 1- Emergency Spill Plan).
- II.F.3. Once the material is containerized, a waste determination shall be made to determine the material’s disposition.
- II.F.4. The Permittee is responsible for the material release and shall recover oil and remediate any residue from the impacted soils, water, or other property, or take any other actions as required by the Director until there is no longer a hazard to human health or the environment.
- II.F.5. All costs associated with the cleanup shall be at the expense of the Permittee.
- II.F.6. Vehicle spill kits shall contain, at a minimum, the equipment listed in Attachment 1 (Emergency Spill Plan) of this Permit and shall be checked daily prior to collection activities.
- II.F.7. The Permittee shall report all relevant information, including the amount of waste generated from cleanup efforts, the characterization of the waste (i.e. hazardous or non-hazardous), final waste determination, and disposal records. The report shall also include actions taken by the Permittee to prevent future spills.

- II.F.8. An air, rail, highway or water transporter who has discharged used oil shall give notice, if required by 49 CFR 171.15, to the National Response Center at <http://nrc.uscg.mil/nrchp.html>, (800) 424-8802. In addition to the notification above, a written report, as required in 49 CFR 171.16, shall be presented to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau located in Washington, D.C., 20590.
- II.F.9. In accordance with R315-15-9.4 of the Utah Administrative Code, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil.

Draft Permit Public Comment

**Attachment 1**  
**Emergency Spill Plan**

**A. General Procedures**

- A.1. In the event of a release of used oil, the Action Resources, LLC’s (Action) employee will immediately take the following appropriate actions to contain and minimize the spill and the threat to life, health, environment and property:
- A.1.a. The Action employee will attempt to control or stop the leak if it can be done safely.
  - A.1.b. Use absorbent material, booms, spill pads and dirt dams and dikes if necessary to control the material. If possible, keep spilled material out of storm drains and open waterways.
  - A.1.c. Contact 911 emergency responders if needed.
  - A.1.d. Contact the supervisor.
  - A.1.e. If necessary, the supervisor will contact an authorized waste remediation company for assistance with the clean- up.
- A.2. Used oil spills exceeding 25 gallons, or that pose a risk to human health and the environment, shall be reported to Action’s management, and to the Utah Department of Environmental Quality and any other applicable regulatory agency immediately after containment of the spill (Table 1).

**Table: 1: Regulatory Agency Notification Numbers**

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

- A.3. The following information shall be provided by telephone to the Utah State Department of Environmental Quality’s 24-hour answering service at (801) 536-4123:
- A.3.a. The names, telephone numbers and the addresses of the parties that is responsible for the release.
  - A.3.b. The name, title and telephone number of the individual that is reporting the spill.
  - A.3.c. Time and date of the release of used oil.
  - A.3.d. Location of the release, be as specific as possible including nearest town, city, highway or waterway.
  - A.3.e. Description of released material found on the manifest or shipping document, along with the amount of material released.
  - A.3.f. Cause of the release.

- A.3.g. Possible hazards to human health or the environment and any emergency action taken to minimize these threats.
- A.3.h. The extent of injury, if any
- A.4. If a spill occurs on a highway or railway, employees should immediately stop the release if possible, secure the scene and contain the spill. Action shall give notice, if required by 49 CFR 171.15 to the National Response Center (Table 1). The Utah State Highway Patrol (Table 1) shall be contacted if the spill restricts a public road.
- A.5. A spill report of used oil spills exceeding 25 gallons, or that pose a risk to human health and the environment, shall be submitted to the Division of Waste Management and Radiation Control within 15 days of the spill in accordance with R315-15-9.1.
- A.6. The driver/employee shall immediately notify their supervisor of reportable spills. If after hours, initial notification is to be made to the 24-hour emergency contacts in Table 2 below. If there are, injuries to personnel/public or the spill will require additional emergency responders to contain then all 911 to request help. The discharge notification form is included in this spill plan shall be completed by the operator after containment of the used oil, notification to emergency responders (if applicable) and Action’s management.

**Table 2: Emergency Contacts List**

Contact Person	Title	Contact Information
Chad Shumway	Terminal Manager	Office: (801)-936-6393 Cell (24 hrs.): (385)-239-4243 Email: chad.shumway@actn.com
Marlowe Jett	Safety Supervisor	Office: 256-352-7083 Mobile: 256-338-8359 Email: marlowe.jett@actn.com
Fire Response	NA	911

- A.7. The transporter shall maintain absorbents and equipment to contain a leaking containers and spills. At a minimum each vehicle spill kit shall contain the items listed in Table 3.

**Table 3: Spill Equipment Inventory for Transporter Facility**

Equipment Description	Quantity
Shovel / Broom	1 each
Buckets	2
Spill Absorbent Pads	10
Granulated Absorbent	2 ft <sup>3</sup>
Absorbent Boom/oil sock	1
Emergency Controls Spill Plan (with contact numbers)	1
First Aid Kit and Fire Extinguisher	1 each

- A.8. Employees are exempted from reporting de minimis drips to management that are immediately cleaned up by the responsible employee.
- A.9. The Action supervisor shall be responsible to initiate and complete any reporting and notification to the required Federal, State and local agencies.

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## **Attachment 2**

### **Procedures for Recording Halogen Content**

#### **A. General Procedures**

- A.1. Action Resources LLC's drivers shall document the halogen content of the used oil, the determination method and date of entry, if applicable, on the shipping record (Bill of Lading as follows:

#### **B. Bill of Lading (Daily record for single transporter)**

- B.1. When the Permittee determines the halogen content using halogen field screening methods or laboratory analytical methods in accordance with Attachment 3 (Analysis Plan) the driver shall record the following halogen information:

Halogens  $\leq$  1000 ppm/test

Halogens  $>$ 1000 ppm/test

- B.2. When the Permittee determines the halogen content using Generator Knowledge provided by the generator, the driver shall write the following:

Halogens  $\leq$ 1000 ppm/GenKno

Halogens  $>$ 1000 ppm/GenKno

\*Note: The daily Bill of Lading must be dated.

#### **C. Manifest (record for single or multiple transporters)**

- C.1. When the Permittee determines the halogen content using halogen field screening methods or laboratory analytical methods in accordance with Attachment 3 (Analysis Plan) the driver shall record the following halogen information and date the entry in the special handling box of the manifest.

Halogens  $\leq$  1000 ppm/test date

Halogens  $>$ 1000 ppm/test date

- C.2. When the Permittee documents the halogen content using Generator Knowledge the driver shall write the following:

Halogens  $\leq$  1000 ppm/GenKno (Date)

Halogens  $>$ 1000 ppm/GenKno (Date)

### **Attachment 3**

#### **Analysis Plan**

##### **A. General Requirements**

- A.1. The Permittee shall verify that the halogen content of the used oil collected prior to transport in accordance with at least one of the following halogen verification methods in accordance with B through D:

##### **B. Halogen Field Screening Methods**

- B.1. If the Permittee screens the generator's used oil to verify halogen concentration, the Permittee shall use a halogen field screening method in accordance with the following requirements:
- B.2. Used oil that contains less than 20% water shall be screened for halogens with a CLOR-D-TECT<sup>®</sup> halogen test kit (EPA Method 9077).
- B.3. Used oil that contains between 20% and 70% water shall be screened for halogens with a HYDROCLOR-Q<sup>®</sup> test kit. The resulting halogen concentration must be corrected using the following conversion formula to calculate true halogen concentration.

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

**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:

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

- B.4. Used oil that contains greater than 70% water shall be screened for halogens with a HYDROCLOR-Q<sup>®</sup> test kit. Correction of the halogen screening results is not required.
- B.5. The Permittee shall document on acceptance records or bill of lading the screening results.
- B.6. 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 (EPA Method 9077) and is not required for each load collected at individual generators.

##### **C. Halogen Laboratory Analytical Methods**

- C.1. If the Permittee submits a representative used oil sample to a Utah-certified laboratory to analyze for total halogen concentration, the Permittee shall use Method 9076 or other equivalent method approved by the Director.
- C.2. The Permittee shall document the analytical results on the transportation document such as a bill of lading or manifest.

**D. Halogen Generator Knowledge Method**

- D.1. The Permittee shall have information on file, (e.g., analytical testing, industry process knowledge) from the generator which is sufficient, as determined by the Director, to support any use of generator knowledge.
- D.2. The Permittee may not rely solely on a safety data sheet (SDS) in making a halogen concentration determination.
- D.3. If relying on generator knowledge, the Permittee shall document on the shipping record the use of generator knowledge in accordance with Attachment 2 (Procedures for Recording Halogen Content).
- D.4. Used oil determined to be on-specification by a Utah-registered marketer can be collected and transported without further testing. Bills of lading, manifests or other used oil transportation records shall include copies of the analytical results for reference.

**E. PCB Contaminated Used Oil**

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

**Table 1: PCB Sample Preparation and Analytical Methods**

Sample Preparation Methods	Analytical Method	Analytes *	
		PCB CAS RN	PCB Aroclor®
3500C (General) 3580A (Preparation) 3665A (Cleanup)	<ul style="list-style-type: none"> <li>• 8082A</li> <li>• Analyses of the Aroclors 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
		<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		



- E.3. The Permittee shall obtain analytical results of dielectric oil used in transformers and other high voltage devices, verifying the PCB concentrations are less than 50 mg/kg prior to loading the used oil into the transportation vehicle.
- E.4. PCB used oil may not be diluted to avoid any provision of 40 CFR 761.
- E.5. If PCB concentrations greater than or equal to 2 mg/kg have been transported, the Permittee shall assume that all subsequent loads of used oil are contaminated with PCBs and has a quantifiable PCB concentrations of 2 mg/kg or greater unless the equipment has been decontaminated as described in 40 CFR 761 Subpart S

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## **Attachment 4**

### **Sample Collection Procedures General**

- A.1. Action Resources LLC employees shall use the sampling procedures below to collect representative sample from customers' tanks and containers when screening used oil for halogen content prior to collection.
- A.2. Drums or containers of used oil from different sources or processes shall be sampled individually at each generator's facility.
- A.3. Composite sampling is only allowed for a maximum of 500 gallons from containers of used oil that are generated from the same source or process at each generator's facility.
- B. Procedure 1- Containers < 375 gallons**
- B.1. Sampling Equipment  
Composite Liquid Waste Sampler (COLIWASA) nominally 175 ml, 39 inch, sample jar.
- B.2. Step 1  
Take COLIWASA and dip into drum or tote make sure the tube fills up a good cross section before closing.
- B.3. Step 2  
Open sample jar and dispense the entire contents from COLIWASA into sample jar.
- B.4. Step 3  
Screen sample using CLOR-D-TECT halogen test kit in accordance with Attachment 3 (Analysis Plan).
- B.5. Step 4  
Empty the sample in the bucket back into the used oil container/tank.
- C. Procedure 2 – Containers ≥ 375 gallons**
- C.1. Sampling Equipment  
Composite Liquid Waste Sampler (COLIWASA)
- C.2. Step 1  
Lower a COLIWASA tube slowly into the liquid waste at a rate that allows the liquid level inside and outside the tube to equalize.
- C.3. Step 2  
Slowly withdraw COLIWASA tube from the liquid. Either wipe the exterior of the sampler tube with a disposable cloth or allow excess liquid to drain back into the used oil container/tank.
- C.4. Step 3  
Discharge the sample by placing the lower end of the tube into a sample container.

C.5. Step 4

Screen sample(s) using the appropriated halogen screening test kit(s).

C.6. Step 5

As appropriate, note that the halogen screening result of the used oil tested was < 1000 ppm halogens and document results on the BOL.

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## Attachment 5

### **Rail Car Loading Procedures General**

- A.1. The following procedure is designed to ensure that all railcars containing used oil and non-regulated waste are loaded safely and in compliance with all applicable regulations in order to minimize the potential for spills.
- A.2. Two people with knowledge of loading and offloading procedures must be present during loading or off-loading of any rail car. One person must remain on top of the railcar and one person must remain at the tank truck connection at all times during transfer. If at any time, one of the people must leave the operation, the operation must be stopped until a second qualified person is available. A single operator may be used if a secure dome lid connector is used to attach the upper hose to the rail car. The operator remains in sight of all connections, and the pump controls are readily accessible.
- A. Rail Car Loading and Unloading Procedure**
- B.1. Lock-out track with derailleurs at both ends of the rail spur so train operators know not to move any railcars on the spur during offloading.
- B.2. Place railcar chocks on both sides of the wheels of the railcar while offloading.
- B.3. Securely park used oil transportation trucks on an asphalt or concrete loading pad. Black containment mat or other containment structure during the loading and unloading of used oil between the trucks and rail tanker car.
- B.4. Set truck parking brake and chock both sides of one wheel of the truck to prevent accidental movement. Ensure adequate spill response equipment is readily accessible per procedures in Attachment 4.
- B.5. Prior to railcar loading, fill out the Railcar Used Oil Transfer Log.
- B.6. Take a beginning reading on truck to determine volume to be transferred.
- B.7. Unsecure railcar manway/top hatch by removing I-bolts using a pipe wrench.
- B.8. Open manway/top hatch and take a beginning reading on the rail car by using a tape measure and verifying the current railcar measurements with the railcar strapping chart to ensure there is enough space available for transfer.
- B.9. Hoist opposite end of hose up to railcar hatch, uncap hose end, and insert into railcar. The top man must hold the hose in place while transferring or a fill lid must be used.
- B.10. Secure the hose to the side of the railcar, candy cane or other transfer equipment.
- B.11. Check the cam lock gaskets for integrity and secure the cam lock ears down.

- B.12. Proceed with transfer operation.
- B.13. If dome lid is not in use the top man shall notify second operator immediately if the railcar appears to be filling to a level higher than expected so the operation can be stopped.
- B.14. After transfer is complete, clear the hose of any material.
- B.15. Cap and plug all hoses to prevent drips.
- B.16. Close and secure the railcar hatch unless dome lid is in use.
- B.17. Complete all necessary shipping documentation and checklists.
- B.18. Ensure all tank files are updated after each transfer is completed.
- B.19. Clear area of all safety equipment and clean area of any spills or drips prior to departing transfer area.
- B.20. Remove derailleurs and railcar chocks when car is full and ready to be moved.

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