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Environmental Health and Safety (EHS) Policy

Used Oil

Regulatory Reference: 40 CFR 279, Standards for the Management of Used Oil, State specific used oil rules.

Purpose: The purpose of this Used Oil Program is to establish a framework for each Fixed Base Operation (FBO) to become and remain compliant with the Federal Environmental Protection Agency (EPA) rules as well as state specific rules for Used Oil.

The EPA Used Oil regulations came about in the early 1990s to allow generators, transporters, and recyclers of used oil to properly recycle these items and streamline the requirements for this material.

General Requirements:

The Federal EPA has set forth rules for proper handling and recycling of used oil under the Standards for the Management of Used Oil regulations and the requirements for handling these items are simpler than the rules governing hazardous waste. A significant part of these rules includes the proper recycling of the used oil. Used oil may contain hazardous impurities such as heavy metals and must be protected from entering the environment. Recycling oil keeps it out of the landfills and thus protects the environment from potentially hazardous waste.

Proper handling of used oil includes proper labeling. Each used oil storage location must be labeled as "Used Oil" and the fill port for any used oil stored in underground storage tanks (USTs) must also be labeled as "Used Oil." Keep containers in good condition and free of leaks. If a leak occurs, it must be repaired immediately and any contaminated soil must be removed. Containers must follow the requirements of 40 CFR 112, Spill Prevention Control and Countermeasures, if the facility aggregate tank capacity exceeds 1,320 gallons.

Employees must not transport used oil. An approved transporter must be used (typically the company that recycles the oil).

Do not mix used oil with any other products such as waste jet fuel or waste AVGAS.

Any spills of used oil must be handled per the site specific SPCC Plan. The Manger/Supervisor should make any notifications to Federal, State, and Local environmental regulatory agencies and keep the EHS/Safety department informed along the way.

Many FBOs already have a used oil recycling company in place, however, if a used oil recycler is needed, companies can be located with the assistance of the Coordinating Committee for Automotive Repair (CCAR) on their web site at www.ccar-greenlink.org.

Responsibilities:

1. Employees:

Employees must be aware of the requirements for the handling of used oil, properly recycling used oil, and the proper response to spills of used oil.

Employees must properly store and label all containers with a “Used Oil” label.

Employees must know the proper method to respond to a spill of used oil and how to dispose of clean-up materials.

Employees must participate in a training session to discuss proper handling and proper response to spills of used oil. This training is incorporated into the Spill Prevention Control and Countermeasures (SPCC) training and needs to be completed annually.

2. Managers/Supervisors:

Managers/Supervisors should ensure that employees are performing their work activities in a proper manner including handling, recycling, and responding to spills of used oil.

Managers/Supervisors should ensure that employees respond appropriately to used oil spills. Managers/Supervisors should make notifications to Federal, State, and Local environmental regulatory agencies if required as identified in the facility SPCC Plan.

Managers/Supervisors should ensure that used oil containers are properly labeled.

Managers/Supervisors should ensure employees participate in the required training.

3. EHS/Safety:

The Environmental Health and Safety (EHS)/Safety Department will monitor compliance with all environmental regulations including used oil regulations.

The EHS/Safety Department will assist FBOs in setting up initial “train the trainer” sessions and can assist in any environmental questions that may arise.

The EHS/Safety Department must be notified of any reportable spill event and will properly document in the company tracking system.

Training:

Employees must participate in a training session to discuss proper handling and proper response to spills of used oil. This training is incorporated into the SPCC training and must be completed annually. EHS/Safety is planning to develop used oil specific training materials and make them available to each FBO.

Recordkeeping:

No shipping records or manifests are required.

Documentation of the training activities must be maintained as defined in the SPCC Program.