



BRIGHAM YOUNG UNIVERSITY – IDAHO

ENVIRONMENTAL, HEALTH & SAFETY

SAFETY DEPARTMENT

USED OIL MANAGEMENT PLAN

EH-008-R02

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1.0 Overview

- 1.2 This plan provides a written description of used oil management procedures, disposal methods, and transportation requirements. We encourage any suggestions that our employees have for improving our written plan for used oil management, as we are committed to developing and maintaining an effective protocol. We strive for clear understanding, environmentally sound practices, and involvement in the plan from every level of the company.

2.0 Policy

- 2.1 Properly managing used oil is important for four main reasons:
 - 2.1.1 To protect the environment.
 - 2.1.2 To protect human health.
 - 2.1.3 To protect against liability for environmental damages.
 - 2.1.4 To reuse, rather than waste, a valuable resource.
- 2.2 Used oil, even when not classified as a hazardous waste under RCRA, can have harmful effects if it is released into the environment. In addition, people's health can be affected if used oil is handled improperly.

3.0 Requirements

- 3.1 Used oil, even when not classified as a hazardous waste under RCRA, can have harmful effects if it is released into the environment. In addition, people's health can be affected if used oil is handled improperly.
- 3.2 Superfund regulations allow the federal government to hold any party that creates or contributes to the creation of a hazardous waste spill (including some used oil) financially responsible for cleanup costs.

3.3 Related Requirements

Related regulations that we must still comply with include:

Underground Storage Tank regulations (40 CFR 280)

Spill Prevention Control and Countermeasures requirements (40 CFR 112)

Hazardous Materials Transportation Act regulations (49 CFR 130)

Resource Conservation and Recovery Act requirements (40 CFR 260-268)

Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions (40 CFR 761). 40 CFR 761.20(e), contains restrictions, and testing and record keeping requirements for marketers and burners.

Please see related documents for information on how the university meets these additional requirements.

Reporting

BYU-Idaho performs the following reporting activity:

Reports are submitted to the Idaho Division of Environmental Quality as required and to the Idaho Division of Hazardous Materials pursuant to established reporting procedures.

4.0 Purpose

- 4.1 BYU-Idaho has developed this plan to properly handle used oil at various campus sites. This plan informs employees about the university's compliance with Environmental Protection Agency (EPA) requirements ([40 CFR 279](#)) for used oil generators.

5.0 Scope

- 5.1 The EPA defines used oil as "any oil that has been refined from crude oil or any synthetic oil that has been used and as a result of such use is contaminated by physical or chemical impurities." Used oil can be generated from automotive sources, or during Physical Plant maintenance operations. This includes oils that are used as hydraulic fluid as well as oils that are used to lubricate automobiles and other machinery, cool engines, or suspend materials in industrial processes. Oils used for these purposes can become contaminated with physical materials (such as metal particles from engine wear) or chemical contaminants (such as gasoline combustion products, like toluene).

6.0 Procedures

6.1 Used Oil Management

At this facility, used oil is generated from Facilities Management Service Station, HVAC Shop, Electrical Shop and Vehicle Maintenance Shop as well as from the Farm Mechanics facility, the Austin Building automotive labs and livestock center operations.

The university adheres to the following practices. University personnel are expected to:

- 6.1.1 Never dump or dispose of used oil in the trash, in sewers, storm drains, or on the ground.
- 6.1.2 Make sure our collection and storage set-up is leak proof, spill proof, and that tanks have lids or are covered to prevent water from entering. The storage set-up must also include a spill containment area/container.
- 6.1.3 Control access to prevent dumping of materials into a storage container when it is not supervised.

- 6.1.4 Maintain our collection containers regularly, comply with local fire and safety regulations, and avoid leaks and spills.
- 6.1.5 Label storage tanks "Used Oil."
- 6.1.6 Clean up any used oil spills or leaks. This includes providing soak-up material (e.g., kitty litter, or a commercial sorbent product) for minor spills. It keeps the area clean and helps prevent personal injury.
- 6.1.7 Keep records of used oil transported by contractors for recycling or disposal.

6.2 Storing Used Oil

The university stores used oil in specifically designed and labeled waste oil drums with secondary containment. Drum storage for waste oil is utilized because generators accumulate a relatively small amount of used oil each month, or used oil is accumulated from different sources which must be segregated until it can be tested for contaminants. This facility follows these storage practices. University personnel are expected to:

Never mix used oil with any other material. This facility keeps gasoline, solvents, degreasers, paints, and so on, from making the used oil a hazardous waste and increasing collection costs.

Carefully record the amount of used oil placed into and removed from storage devices. Record keeping plays an important role in leak detection for ASTs, USTs, and drums.

Have constructed secondary containment around our drums/tanks with a capacity for 100 percent of the contents of the drums we store; the base of the containment area is sloped so that any spilled oil may be recollected and removed.

Equip storage containers with wide-mouth, long-necked funnels to reduce spills during filling.

Equip storage containers with a pressure relief valve to reduce a build up of pressure, which could cause leaks.

Keep sorbent materials nearby to clean up any spills that occur.

Keep the area near the storage devices neat and clean.

6.3 Responding to Releases of Used Oil

Even though all steps have been taken to prevent leaks or spills from occurring, the university is also prepared to respond to spills of used oil. We instruct workers to use the following protocol to manage spills of used oil and provide any necessary equipment:

- 6.3.1 Stop the release.** This action will vary depending on why the release is occurring. For example, if the spill occurs because a 55-gallon drum has been

knocked over, the drum should be righted to stop more used oil from being released.

If the spill occurs because a valve on a storage device has been left open, the valve should be closed. If a leak is a result of a puncture in the tank or drum, rags or similar materials should be used to plug the leak.

6.3.2 Contain the release. We strive to prevent the used oil that has been released from spreading. For example, a sorbent should be spread over the spilled used oil.

6.3.3 Clean up the release. Depending on the extent of the release, cleaning up the used oil can be a simple or a complicated task. For small spills on the ground, the soil can be dug up and disposed of. (The soil must be tested to determine if it exhibits hazardous characteristics.) For larger spills where puddles of used oil have formed, vacuum-type machinery can be used to collect the used oil before the soil is dug up for disposal. Because releases that contaminate a great deal of soil or ground or surface water are very difficult to clean up, the university contacts professionals to conduct the cleanup operation.

Properly manage the used oil that has been cleaned up. Any leaked or spilled used oil is managed just like any other used oil under 40 CFR 279.

Properly manage the solid materials generated during the cleanup. We place solid materials used to clean up a spill of used oil in a sieve-like container to allow the used oil to drip from the solid materials into a storage device. In addition, we compact the materials to remove the used oil. (Removal is complete when there are no more signs of free-flowing oil.) Materials contaminated with used oil that are burned can be managed in the same manner as used oil.

Contaminated materials that will not be burned for energy are tested to determine if they exhibit hazardous waste characteristics. If they do not test hazardous, they are disposed of in a RCRA subtitle D facility. If they are hazardous, they are disposed of in a RCRA subtitle C facility.

Remove the storage device from service and repair or replace it.

6.4 Managing and Disposing of Used Oil Filters

Whenever university personnel change the oil in a fleet vehicle, the oil filter is also changed to keep the solid contaminants of the old oil from immediately contaminating the new oil. Used oil filters can contain 10 to 16 ounces of used oil, therefore proper management of this source of used oil is a concern of the university. Used oil filters are not considered a hazardous waste under RCRA if they are non-tern plated and have been properly drained of oil.

When used oil filters are removed from a warm engine, the university uses the Gravity draining - when the filter is removed from the engine, it should be placed with its gasket side down in a drain pan. If the filter has an anti-drain valve, the

"dome end" of the filter should be punctured with a screwdriver (or similar device) so that the oil can flow freely. The filter should then be allowed to drain for 12 to 24 hours. .

We store our drained used oil filters in a covered, rainproof container to prevent used oil from being washed from the filters to the surrounding environment. Our used oil filters are then recycled or properly disposed of.

6.5 Shipping/Transporting Used Oil

All used oil transported from the BYU-I campus is managed through the University Safety Office - Hazardous Materials Specialist.

The used oil management standards define a used oil transporter as any person who transports used oil, any person who collects used oil from more than one generator and transports the collected oil, and owners and operators of used oil transfer facilities." BYU-Idaho has chosen Safety Kleen to transport our used oil. Our transporter has an EPA ID number and complies with all relevant used oil regulations, including maintaining tracking records of where the used oil is collected and where it will be transported to.

When working with our transporter, we:

Ensure that the hauler has a current EPA ID number.

Measure the level of oil in a tank before and after the hauler collects it to be certain the oil collected matches the amount the hauler reports collecting.

Make sure a company representative signs and dates the hauler's tracking sheet.

Receive a receipt from the transporter that states how much used oil was collected from our facility and where the used oil will be taken.

Make sure that the hauler maintains storage tanks/containers; labels containers "Used Oil"; stores used oil over oil-impervious surfaces; has secondary containment structures in place; stores used oil for no more than 35 days; tests waste in out-of-service tanks; closes out-of-service tanks containing hazardous waste according to EPA standards.

7.0 Administrative Duties:

The BYU-Idaho Safety Office is responsible for developing the written used oil management plan; for ensuring that our written plan is complete, kept up to date, and **made** available to applicable or required authorities; and for maintaining used oil management records. A copy of our used oil management plan may be reviewed by employees. It is located on the Safety Office Web Page which can be accessed from the main university web site.

8.0 Employee Training

Although training is not required under the regulations, we have designated the Safety Office to train personnel who will handle used oil. Direct any questions concerning used oil training to this office.

Under this plan, employees are informed of used oil management procedures relevant to the positions in which they work. This training occurs both in the classroom and on the job.

We keep records of job titles and written job descriptions for all positions related to used oil management and the names of employees filling each job. We also keep records describing the type and amount of training provided.

9.0 Monitoring the Plan

9.1 Record keeping

The University Safety Office is responsible for keeping the following records:

The Idaho Hazardous Waste Generator Annual Report, the Emergency and Hazardous Chemical Inventory Report and waste disposal records.

9.2 Maintaining the Plan

The BYU-Idaho Safety Office is responsible for:

Conducting periodic site audits.

Keeping records of all inspections and reports.

Reviewing and updating the plan as needed by incorporating any necessary updates resulting from major changes in our facility's operation or maintenance or by changes in government regulations.

10.0 APPENDICIES

10.1 (Reserved)