

BEP REPORTER

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from the Business Environmental Program (BEP)

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Used Oil Collection Center Registration Program

The regulations under Chapter 40 of the Code of Federal Regulations, part 279 (40 CFR § 279) specify two types of collection centers. The first type of used oil collection center (UOCC) is defined as any site or facility that accepts/aggregates and stores used oil collected from used oil generators (such as businesses, schools and government facilities) that are subject to the used oil generator regulations (40 CFR § 279, Subpart C). Although by law the maximum size of each individual load of used oil that may be accepted by this type of facility is 55 gallons, many such facilities impose a smaller per-load limit. A UOCC may also accept used oil from household do-it-yourselfers (DIYers).

The second type of UOCC is known as a household do-it-yourselfer (DIY) used oil collection center. A household DIY center is defined as a location that accepts/aggregates and stores used oil collected only from household do-it-yourselfers. DIY centers are required to comply with the used oil generator regulations (40 CFR § 279, Subpart C). DIY used oil collection centers are exempted from the registration requirement if they only accept/aggregate and store used oil from household do-it-yourselfers. It is highly recommended that DIY centers have procedures in place that prevent accepting/aggregating and storing used oil from generators regulated under 40CFR. While not required to register, there is an option to identify a collection center as a DIY center on the registration form, and DIY centers are encouraged to register.

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Aggregate Industries Cuts Costs

It's amazing what can be accomplished with a little teamwork and some research. Just six months ago, the Hacienda Materials Laboratory of Aggregate Industries Southwest Region was generating roughly 125 gallons of RCRA regulated solvent waste per month. Now, the Las Vegas construction materials and contracting services group will be generating just over that amount annually from their laboratory operations.

Over the summer, BEP was contacted by Mark Miller, Environmental Permits Manager for Aggregate, to discuss the possible addition of new technology at their facility. At their Hacienda lab, quality control testing is constantly done on aggregate and asphalt materials used for paving. In order to test the materials, it is necessary to use solvent to remove the asphalt oil binding agent. Once the materials are separated, the aggregate is tested and recycled while the used solvent is managed as hazardous waste. Every day, they used about five gallons of newly purchased solvent and created about five gallons of waste solvent. After a review of this process, Lab Supervisor, George Bone suggested that there might be a better way.



George teamed up with Quality Control Managers H. Venerable and Brandon McCormick to investigate the costs associated with their current process.

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College of Business
University of Nevada, Reno

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Training Requirements for Large Quantity Generators

Businesses that meet the criteria of a Large Quantity Generator (LQG) must comply with the same training requirements that EPA requires of treatment, storage and disposal (TSD) facilities. EPA rationalized that there is little difference between accumulation of large quantities of hazardous waste for shipment off-site and storage as far as potential damage to human health and the environment is concerned. Therefore the same standards apply.

The regulations require that all staff at the facility should be trained. The regulations state that training is required in two basic areas: (1) hazardous waste management procedures and (2) emergency response. The regulations do not specify the content of the training programs. The type and degree of training required will depend on each employee's responsibilities associated with his/her job function/description. For example, the sales staff does not need the same training as the person completing the manifest for shipment unless their job description contains the same language. Every position needs to be trained on communication and alarms as well as evacuation routes. Training should always cover both the 'how' and 'why' specific operations are performed in the prescribed manner. This information should reduce the short cuts that may lead to problems and it may lead to improved procedures developed by the staff that will prevent problems from occurring.

Training must be completed within six months of the initial date of employment or assignment to a new position at the facility. The training may be classroom or on-the-job training, conducted by an individual qualified, either by experience or education, on hazardous waste management procedures.

An annual review or refresher of training must be conducted and documented. The regulations are interpreted to allow a business to conduct the refresher training once annually for ALL employees in the facility. This may result in some employee's receiving the training more than a year after their initial training. Since the annual refresher training occurs separately from the initial

hire/transfer training and it is an annually scheduled event, the regulatory agencies consider the intent of the regulations as being met.

Training records must be maintained including the following information:

- Job title and name of each employee whose position involves the management of hazardous waste or can reasonably be expected to encounter hazardous waste in their work;
- Written job description;
- Written description of type and amount of introductory and continuing training;
- The documentation of the training needs to include the date, time, location of the training, the topic(s) and instructor.

The key to complying with the requirement is matching the training to the position description (job duties) of your personnel and maintaining organized documentation of the training.

Please feel free to contact the Business Environmental Program on 800-882-3233 or visit our website, www.envnv.org for assistance or additional information on this and other environmental topics.

(UOCC—continued from page 1)

Used oil collection centers accepting used oil from regulated generators must register with the Nevada Division of Environmental Protection, Bureau of Waste Management (NDEP-BWM). There is no fee attached to the registration and it is a one time registration requirement. UOCCs are required to register with the NDEP-BWM by February 1, 2009. Registrants will be assigned a Nevada used oil collection center (NVUOCC) identification number. Typically, except for registration, UOCCs must only comply with the generator standards found in 40 CFR § 279, Subpart C, however, other used oil management requirements may apply depending on the used oil activities at the UOCC.

Additional information and the registration form is available on the NDEP-BWM website at: <http://ndep.nv.gov/bwm/uocc.htm>, and a link is provided on the BEP website.

The University of Nevada, Reno Business Environmental Program is available to provide free and confidential compliance assistance to UOCC's. Contact us at (800) 882-3233 (Northern Nevada) and (702) 866-5927 (Southern Nevada) or on line at www.envnv.org.

(Aggregate Industries—continued from page 1)

What they discovered shocked them. The cost of purchasing new solvent combined with the disposal costs of the waste solvent totaled nearly \$40,000 a year. What frustrated the team the most was that they were basically paying twice for the same solvent: once to purchase and once to dispose. George mentioned he had seen a solvent recovery unit at a previous lab and thought that it would be worth investigating. The team approached Mark to take the next step.

After some research and consulting with BEP, Mark and the team found a solvent recovery system suitable for needs of the laboratory. With support from Regional President Pat Ward and VP/GM Doug Barrowman, the team moved forward with the purchase.

The new solvent recovery unit was installed in August and works like a charm. In less than four hours it recycles the five gallons of solvent waste that the laboratory generates daily. Plus, since it shuts off automatically when the recovery is complete, it requires no man-hours. The only hazardous waste generated by the lab now is a small amount asphalt oil removed from the solvent, which is deposited into a bag by the unit with each cycle. The bags, which also keep the unit clean, are then disposed of as hazardous waste. The unit is low maintenance, requiring only an annual oil change. The recycled solvent works just as well as new solvent and, best of all, the unit has paid for itself in just over two months.

BEP has found that solvent recovery units are an effective way to reduce costs and prevent pollution. By installing this technology, Aggregate Industries reduced their annual hazardous waste generation by 9,500 pounds, saving them \$34,000 a year! Could this option be right for your business? Contact BEP for more information or assistance on how your business may be able to minimize or eliminate waste.

BEP Welcomes New Team Members

E. R. "Dusty" Moller has accepted a position in BEP's southern Nevada office as Wood Utilization Manager. He'll be working with the US Forest Service, Nevada Department of Forestry, the Nevada Fire Safe Council, wood recyclers and composters and other small businesses to develop alternative uses for currently land-filled wood wastes. A recent survey in Clark County, for example, pegged the volume of wood biomass being buried each year in the county at more than 130,000 tons.

The three main sources of that waste is construction and demolition waste from Nevada's building industry, household wood waste and landscaping waste. When combined with the woody biomass from nearby forests and rangelands, there are millions of dollars worth of fuel stock for power generation or wood pellet manufacture going to waste. Moller began his work in Las Vegas with four initial goals: get people in the know and involved; get local contractors committed; find good markets and better use; and use Best Management Practices and appropriate technology. "Land-filling wood waste is just like burying money", Moller said, and there's got to be a better purpose for that wood."

Cesar Garibaldo has joined BEP as the student programmer providing web page development and maintenance in the Reno office! Cesar is a junior at the University of Nevada, Reno majoring in Computer Information Systems.

BEP Seminar Calendar

Used Oil Collection Center Registration Program

January 8 10:00 am-12:00 pm—Reno
January 9 10:00 am-12:00 pm—Las Vegas

Hazardous Waste Management

February 24 9:00 am-12:00 pm—Las Vegas
February 25 9:00 am-12:00pm—Reno



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