

Handling Used Oil and Liquid Industrial By- Products

PRESENTED BY: Ethan Israels, Senior Used Oil
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EGLE



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**MICHIGAN
ENVIRONMENTAL
COMPLIANCE
CONFERENCE**

Handling Used Oil and Liquid Industrial By- Products

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Today's Goals

- What is a liquid industrial by-product (LIB)?
- What is used oil (under the waste regulations)?
- Quick overview of liquid industrial by-products and used oil general requirements:
 - **Generators**
 - **Transporters**
 - **Designated facilities**

Waste Regulations

- Act 451, Michigan Natural Resources & Environmental Protection Act:
 - - Part 111, Hazardous Waste Management
 - - Part 121, Liquid Industrial By-Products
 - - Part 115, Solid Waste
 - - Part 169, Scrap Tires
 - - Part 117, Septage
- Act 368, Michigan Public Health Code:
 - - Part 138, Medical Waste Regulatory Act
- Federal Toxic Substance Control Act (TSCA)

Liquid Industrial By-Products

Definitions – 12101(n)

A material that is...

- ✓ Produced by or is incident to an enterprise or non-household activity
- ✓ Liquid as determined by the paint filter test
- ✓ Discarded
- ✓ Includes most materials being recycled



Liquid Industrial By-Products

- Liquid industrial by-products includes:
 - Most discarded liquids pumped and hauled over public roadway not subject to hazardous waste regulation – whether disposed or recycled
 - Liquids and sludges sent to a solid waste solidification facility prior to landfilling
- Must be specifically excluded by statute to not be subject to regulation as a liquid industrial by-product

Liquid Industrial By-Products

Liquid industrial by-products include wastes from locations other than “industrial” sites, like municipal, commercial, even non-profit facilities including:

- Health care (hospitals, pharmacies)
- Offices
- Nail salons
- Car washes

Liquid Industrial By-Product Examples

- Animal boarding and breeding wastewaters
- Some storm sewer cleanout
- Most antifreeze
- Slaughterhouse wastewaters
- Landfill leachate
- Catch basin clean-out waste
- Very Small Quantity Hazardous Waste Generator Liquids
- Most used oil being recycled
- Grease trap waste
- Off-specification fuels being recycled
- Food processing wastewaters
- Brine
- Oil Water Separator Cleanouts

Liquid Industrial By-Products

Exclusions - 12101(n)

- Liquid industrial by-product does not include any of the following:
 - Hazardous waste from SQGs or LQGs (Part 111)
 - Septage waste (Part 117)
 - Medical waste (Act 363, Part 138)
 - Discarded liquids from residents (Part 115)
 - Fats, oil, grease managed under Act 239
 - Part 31 permitted point source wastewater discharges (NPDES or groundwater permits)
 - Material managed to meet Section 12102a

Used Oil

- Under Part 111, used oil is “any oil which has been refined from crude oil, or any synthetic oil, which has been used and as a result of use, is contaminated with physical or chemical impurities.” It includes:
 - Used motor and hydraulic oil
 - Used hydraulic, transmission and brake fluids
 - Synthetic oil
 - Spent quench and gear oil
 - Oil-water mixtures
 - Non-PCB transformer oil



Used Oil

Under Part 111, used oil does *NOT* include petroleum-based products that were *NOT* designed to function as lubricating agents or other protective applications

Under Part 111, used oil does *NOT* include:

- Fuels (Gasoline, Diesel, Fuel Oils)
- PCB oils (subject to TSCA)
- Mineral spirits
- Certain test/calibration fluids
- Animal or vegetable-based oils



Used Oil

- Unlike other wastes, used oil that solely exhibits one or more of the hazardous waste characteristics of Rule 212 can still be managed as a used oil when recycled and is not a hazardous waste.
- For example, used oil CAN exceed the TCLP limits in Table 201a of Part 111 if recycled and is regulated as liquid industrial by-product.

Used Oil Characterization

- Unlike the federal RCRA and 40 CFR 279, Michigan rules **DO NOT** allow VSQGs to mix halogenated solvents with used oil and have it be subject to regulation as used oil
- VSQGs **ARE NOT** allowed to add halogenated solvents to used oil
- VSQG used oil mixed with halogenated solvents is a hazardous waste under Michigan regulations per Rule 809(1)(a)

Used Oil Characterization

Generators can use knowledge or testing to characterize used oil

Knowledge

- MSDS
- Facility process information
- Regulatory exemption
- Hazardous waste listings

Testing

- Analyze for total halogens using SW-846, Method 9056A
- Screening equipment like “Chlor-D-Tect”

Used Oil Characterization

- Transporters screen used oil prior to pick-up to verify halogens are ≤ 1000 PPM and they can manage the oil as liquid industrial by-product
- Generators should keep copies of screening results from transporter and vice versa
- Screening data should be consistent with and support the generator/transporter characterization determination/record

Used Oil Characterization

Presumed Listed
Hazardous Waste

- Per Part 111, Rule 203(1)(e)...
- Used oil is presumed listed hazardous waste if it contains > 1000 PPM total halogens unless the generator/processor can present sufficient information to “rebut the presumption” that the halogens are present due to mixing listed halogenated hazardous waste (chlorinated solvents) with the used oil

Used Oil Characterization

Presumed Listed
Hazardous Waste

- Examples of chlorinated solvents include carbon tetrachloride, trichloroethylene, methylene chloride, and tetrachloroethylene, each which contain chlorine and are “F-listed” solvents
- Halogens are group of elements in the periodic table that are related and include fluorine, chlorine, bromine, iodine, astatine, and tennessine

Used Oil Characterization

Rebuttable Presumption

- “Rebutting the presumption” is complicated for transporters & processors accepting used oil from multiple sources
- Transporters & processors do not accept used oil with > 1000 ppm total halogens unless successfully rebutted
- Total halogens are usually tested using test method SW 846, Method 9056A and/or using on-site screening equipment like “Chlor-D-Tect”

Used Oil Characterization Rebuttable Presumption

If > 1000 PPM total halogens present, additional, costly analytical testing is required to “rebut” whether used oil was mixed with hazardous waste:

- Analyze for all halogenated Appendix VIII constituent
- If any constituent is > 100 PPM then the waste is subject to hazardous waste regulation, and the site failed to rebut the presumption

Used Oil Characterization

CONCLUSION: Do not mix used oil with other wastes to facilitate required recycling and avoid being required to manage the mixture as a hazardous waste

Keep it clean and recycle it for its fuel value as a liquid industrial by-product!

Used Oil Characterization Exemptions

- Recycled used oil with chlorinated paraffins:
 - Typically have a total organic halogen content of 4,000 ppm or more but can be recycled through a tolling agreement per Part 111, Rule 203(1)(e)(i)

Used Oil Characterization Exemptions

- Recycled heat transfer fluids:
 - Typically generated from mobile and/or commercial/industrial air conditioning units, these fluids which typically contain CFCs (chlorines and exhibit high halogen concentrations) are excluded from being a presumed hazardous waste when recycled and reused

Used Oil Characterization

Part 121, Section
12102a

- Used oil that is directly burned to recover energy and meets fuel specs is not a liquid industrial by-product if:
 - It meets the specifications in Part 111 Rule 809(1)(f)
 - It contains no greater than 1 ppm polychlorinated biphenyls (PCBs*)
 - It has a minimum energy content of 17,000 BTU/lb.
 - Is expressly authorized as a used oil fuel under Part 55

Specification Used Oil

Rule 203(1)(e) and
809(1)(f)

If $\leq 4,000$ ppm halogens and passed rebuttal, manage as product, specification used oil, if it meets the following specifications and can be marketed as fuel

Heating Value	17,000 BTU/Lb.
Arsenic	< 5.0 ppm
Cadmium	< 2.0 ppm
Chromium	< 10 ppm
Lead	< 100 ppm
Sulfur	< 1.5 % Typical
PCB	< 1 ppm*

Off-Specification Used Oil

Rule 203(1)(e) and
809(1)(f)

If > 4,000 ppm halogens and passed rebuttal, manage as off-specification used oil if it meets the following specifications and can be marketed as fuel

Heating Value	17,000 BTU/Lb.
Arsenic	< 5.0 ppm
Cadmium	< 2.0 ppm
Chromium	< 10 ppm
Lead	< 100 ppm
Sulfur	< 1.5 % Typical
PCB	< 1 ppm*

Note - off-specification used oil remains subject to the liquid industrial byproduct requirements

PCB's*

- As a practical matter, polychlorinated biphenyls must be < 1 ppm to be marketed as fuel in Michigan
- Air permits limit PCBs to 1 ppm or the detection limit for PCBs in oil using SW-846 Method 8082

Liquid Industrial By-Products

Definitions –
120101(k)(m), & 12102(m)

- Generator - Person whose act or process produces liquid industrial by-product.
- Transporter - Person engaged in the off-site transportation of liquid industrial by-product by air, rail, public roadway, or water.
- Designated Facility - Treatment, storage, disposal, or reclamation facility that receives liquid industrial by-product from off-site.

Liquid Industrial By-Products

Definitions – 12102(a)

- On-site means on the same geographically contiguous property, which may be divided by a public or private right-of-way if access is by crossing rather than going along the right-of-way.
- On-site also includes noncontiguous pieces of property owned by the same person but connected by a right-of-way that the owner controls and to which the public does not have access.

Liquid Industrial By-Products

Designated Facility
Examples

- Wastewater treatment plants
- Central waste treatment facilities
- Used oil processors and transfer facilities
- Hazardous secondary material handlers
- Facilities receiving fuel for re-refining
- VSQG liquid hazardous waste collection sites

Liquid Industrial By-Products

Designated Facility
Examples

- Food waste processors
- Renderers
- Anaerobic digesters
- Biofuel producers
- Non-hazardous liquid by-product transporters with storage and consolidation facilities

Required Waste Records

Required records to retain onsite include:

- ✓ Liquid Industrial By-product (LIB) and Used Oil Characterization

AND

- ✓ Shipping Documents

Both must be retained for at least 3 years from the date of last shipment

Completed By:	WASTE CHARACTERIZATION RECORD
Completion Date:	
Waste Details	
	Sample Details

EGLE	MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
WASTE CHARACTERIZATION RECORD	
EXAMPLE AND GUIDANCE	

Shipping Documents

- Uniform Hazardous Waste Manifests are no longer required for shipments of liquid industrial by-products or used oil, as of 2016
- Shipping documents can be in written or electronic form

The image shows the EPA Form 8700-22 (Rev. 3-05) Uniform Hazardous Waste Manifest. The form is titled 'UNIFORM HAZARDOUS WASTE MANIFEST' and includes fields for Generator ID Number, Emergency Response Phone, Manifest Tracking Number (000137379 GBF), Generator's Name and Mailing Address, Generator's Site Address, Generator's Phone, Transporter 1 Company Name, Transporter 2 Company Name, Designated Facility Name and Site Address, and Facility's Phone. It also includes a table for waste description, quantity, and codes, and sections for Special Handling Instructions, Generator's Certification, and Signatures. The form is marked with a large red 'X'.

Shipping Documents

- May be a log, invoice, bill of lading, or uniform hazardous waste manifest
- Must be readable, readily available for review, and have ALL required information

Individual Shipping Document

- Required information:

- Name and address of the generator
- Name of the transporter
- Type and volume of by-product in the shipment
- Date the by-product was shipped off-site
- Name, address and Site ID number of the designated facility

Individual Shipping Document Certification

The generator or generator representative signs/certifies the shipping document stating:

- the shipping document fully and accurately describes the shipment
- the shipment is in proper condition for transport
- the shipping document information is factual

Individual Shipping Document Certification

The transporter signs/certifies the shipping document stating by-product listed on the shipping document:

- was received

AND

- will be delivered to the designated facility identified on the shipping document

Individual Shipping Document Certification

- Generator retains copy of shipping documents with generator and transporter signature
- Transporter obtains copy of shipping document with both signatures which accompanies the shipment during transport

Individual Shipping Document

Certification and
Distribution

Receiving designated facility must:

- provide confirmation of receipt to the generator or generator representative
- only accept delivery when accompanied by shipping document listing the designated facility

Individual Shipping Document Certification

- Designated facility – No certification or shipping document distribution is required
- Designated facility confirmation may be written or electronic (documented phone call, email, receipt, shipping document or manifest copy)

For consolidated shipping document, transporter completes shipping document requirements and must leave generator receipt at pickup that includes:

- | EGLE
MICHIGAN DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY | | Liquid Industrial 8-Products Example Shipping Document | | | | |
|---|-----|--|---|----------------------|----------------------|-----------|
| STRAIGHT BILL OF LADING | | | | | | |
| ORIGINAL - NOT NEGOTIABLE | | | | | | |
| Bill of Lading Number: | | | | | | |
| FROM: | | | | | | |
| 1. Shipper / Generator Location | | | 2. Shipper / Generator Mailing Address (if different) | | | |
| A. Top Generator
567 Oak Drive
Carterville, MI 48222 Phone No.: | | | | | | |
| Emergency Response Phone: | | | Generator ID (if applicable): | | | |
| TO: | | | | | | |
| 3. Consignee / Facility Name and Address | | | 4. Consignee / Facility ID# | | | |
| Best Disposal
123 Main Street
Smithtown, MI 48333 Phone No.: | | | MIK23321456 | | | |
| 9. Notes: | | | | | | |
| DELIVERED BY: | | | | | | |
| 5. Carrier/Transporter Name and Address | | | 6. Carrier Transporter ID# | | | |
| A Great Transporter
123 Elm
Jonesville, MI 48222 Phone No.: | | | MIK987789987 | | | |
| 7a. | 7b. | BASIC DESCRIPTION
UN or NA number, Proper Shipping Name, Hazard Class, Packing Group (if any) | 8. Containers
No. | 9. Total
Quantity | 10. Unit
Wt./Vol. | 11. other |
| 1. | 2. | 3. | 4. | 5. | 6. | 7. |
| 1. | 2. | 3. | 4. | 5. | 6. | 7. |
| 1. | 2. | 3. | 4. | 5. | 6. | 7. |
| 1. | 2. | 3. | 4. | 5. | 6. | 7. |
| 18. Special Handling Instructions and Additional Information: | | | | | | |
| By signing below, Shipper hereby declares that the contents of this consignment are fully and accurately described above by the proper shipping name and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable governmental regulations. As shipper, I hereby certify that the liquid industrial by-product(s) are fully and accurately described on this shipping document, in proper condition for transport, and that the information contained on the shipping document is factual. | | | | | | |
| SHIPPER (Print Employee Name) | | | Signature | | Month | Day Year |
| Carrier / Transporter (Print Driver Name) | | | Signature | | Month | Day Year |
| Consignee / Facility Acknowledgement of Receipt (Print Name) | | | Signature | | Month | Day Year |

White Copy: Consignee/Facility Original • Yellow Copy: Consignee to Shipper • Pink Copy: Carrier/Transporter • Green Copy: Shipper Initial Copy

Consolidated Shipping Document

- Designated facility must provide confirmation of receipt to the transporter listed as the generator
- Generators should obtain confirmation of receipt at the designated facility from the transporter in written or electronic (documented phone call, email, receipt, shipping document or manifest copy)

Management Requirements

Liquid industrial by-products managed by the generator, transporter and designated facility must. . .

- Be managed in tanks or containers that are in good condition with no visible signs of leaks
- Be labeled “Used Oil” or words describing the liquid industrial by-product
- If a used oil tank, have fill pipes used to transfer used oil also labeled “Used Oil”



Management Requirements

Liquid industrial by-products must be managed by the generator, transporter and designated facility such that:

- Exterior of all vehicles, containers and tanks used to hold the liquid industrial by-product are free of residues
- Cannot be discharged to soil, surface water, ground water, a drain, sewer, or the air



Management Requirements



Product managed by
ted facility or

, physical damage

only opened to add

Closed Container Used Oil

Containers in storage:

- Cover secured with snap rings bolted
- Bung caps capped



Containers in use:

- Lids properly affixed to prevent spills
- Funnels with manual or spring-loaded lids or tightly screwed into bung cap with a one-way valve

Closed Container Used Oil

Non-pressurized
mobile oil drain pans,
at a minimum, must
be emptied when not
in use to be
considered closed!



Storage Options



Transport

Person engaged in the off-site transportation of liquid industrial by-product (used oil) by air, rail, public roadway, or water

- Requires a permit & registration under Michigan Act 138 of 1998
- Requires spill insurance on MCS-90 form
- Must carry credential verifying permit/registration



Alliance for Uniform Hazmat Transportation Procedures
Uniform Program Credentials

IMPACT ENVIRONMENTAL SERVICES INC.
6000 E. 12TH AVE.
TAYLOR, MI 48180

LEADOT' Credential #
VCE#
EPA Transporter ID# 11111111111111111111
Institute Motor Carrier #

Telephone number to call in case of accident or emergency: (877) 123-4567

Leading Program #
Certified By: Lawrence J. Anderson
Registration Issued: 02/05/2008 Expiration: 02/05/2010
Issuing Agency: Michigan Dept. of Environmental Quality
Agency Telephone Number: (800) 762-2800

ALLIANCE FOR UNIFORM HAZMAT TRANSPORTATION PROCEDURES

STATE OF MICHIGAN

Transport

- Generators can self transport if insured, having required MCS-90, for spills
- Generators can only offer liquid industrial by-products for transport to Act 138 permitted and registered transporters
- Chapter 4 of the guidebook covers Act 138 and U.S DOT requirements



Designated Facility

- Liquid Industrial by-product designated facility is a facility that receives liquid industrial by-product generated by another site
- Designated facility may store, treat, process, and/or reclaim
- Used oil designated facility is required to recycle used oil and manage newly generated residues appropriately



Designated Facility Examples

- Wastewater treatment plants
- Central waste treatment facilities
- Used oil processors and transfer facilities
- Hazardous secondary material handlers
- Facilities receiving fuel for re-refining
- VSQG liquid hazardous waste collection sites

Designated Facility Examples

- Food waste processors
- Renderers
- Anaerobic digesters
- Biofuel producers
- Non-hazardous liquid by-product transporters with storage and consolidation facilities

Site Identification (ID)

- Site ID is required for liquid industrial by-product transportation and designated facility activities
- Site IDs are also required of self-transporters
- Generators no longer need site IDs due to a March 2016 law change

- Use EQP 5150 Form – Notification of Regulated Waste Activity to obtain Site ID



Liquid Industrial
By-product
Shipments
Designated Facility

- Designated facilities:
 - Can only accept delivery of by-product if the facility is the destination indicated on the shipping document
 - Must provide the generator or authorized representative confirmation of receipt of by-product
 - Must maintain records of characterization

By-product Treatment, Storage, and Disposal

Designated Facility

- By-product cannot be stored for longer than 1 year UNLESS:
 - It is stored for reclamation AND
 - Not less than 75% of the cumulative amount, by weight or volume of each type of by-product stored is reclaimed or transferred to a different site for reclamation during that calendar year

Documentation is required to ensure storage beyond is authorized

Designated Facility

- Liquid industrial by-product reporting due annually by 4/30, reports previous calendar year activities
- Used oil reporting due biennially in odd years by 3/1, reports calendar year activities for even years
- Must maintain plan for responding to releases and minimizing the release hazards
- Must train staff to properly handle liquid industrial by-products and to respond to releases and document that training occurred

Designated Facility Reporting

Receiving Facility Reporting Regulations Guide

RECEIVING FACILITY REPORTING REGULATIONS:					
Biosolids, Medical Waste, Liquid Industrial By-products, Septage, Sanitary Sewer & Combined Sanitary Sewer Wastewaters, and Stormwater					
WASTE DESCRIPTION	ACT 451, NREPA* REGULATORY CITATION	RESPONSIBLE DIVISION	REPORTING DUE DATE	ADDITIONAL ONLINE RESOURCES	REPORTED INFORMATION
Separate or combined sanitary sewer system maintenance waste from system subject to Part 31 NPDES or groundwater discharge permit	Part 31, Section 3112a and discharge permit	WRD	Initial report due immediately, no more than 24 hours after the release begins	DEQ SSO-CSO website	Amount and quality of the discharge, cause of the discharge, impacted water and/or land area, beginning and end time of the discharge, and permittee's compliance status.
Biosolids land applied via a Part 31 approved Residual Management Program	Part 24 Rules , Rule 2403(3)	WRD	October 30 of each year	DEQ Biosolids program website	Dry tons of land applied biosolids, analytical data, pathogen and vector attraction reduction documentation, land application site summary, and permittee compliance certifications.
Sewage sludge or other non-hazardous residuals from WWTP failing the paint filter test and being disposed	Part 121, Section 12101(n) and Section 12112(5)	WMRPD	April 30 of each year	Form EQP 1602, Instructions Part 121 Liquid Industrial By-products Reporting Web page	Amount of liquid industrial by-products accepted in prior calendar year (January 1 - December 31)
Combined sanitary sewer system maintenance wastes from a satellite system not subject to Part 31 NPDES or groundwater discharge permit	Part 121, Section 12101(n) and Section 12112(5)	WMRPD	April 30 of each year	Form EQP 1602, Instructions Part 121 Liquid Industrial By-products Reporting Web page	Amount of liquid industrial by-products accepted in prior calendar year (January 1 - December 31)
Separate stormwater sewer system maintenance waste (permitted or not permitted)	Part 124, Section 12101(n) and Section 12112(5)	WMRPD	April 30 of each year	Form EQP 1602, Instructions Part 121 Liquid Industrial By-products Reporting Web page	Amount of liquid industrial by-products accepted in prior calendar year (January 1 - December 31)
Industrial and commercial wastewaters and sludges not subject to hazardous waste, medical waste, or septage regulation. ¹	Part 121, Section 12101(n) and Section 12112(5)	WMRPD	April 30 of each year	Form EQP 1602, Instructions Part 121 Liquid Industrial By-products Reporting Web page	Amount of liquid industrial by-products accepted in prior calendar year (January 1 - December 31)
Separate sanitary sewer system maintenance waste from a satellite system not subject to a Part 31 NPDES or groundwater discharge permit	Part 121, Section 12101(n) and Section 12112(5)	WMRPD	April 30 of each year	Form EQP 1602, Instructions Part 121 Liquid Industrial By-products Reporting Web page	Amount of liquid industrial by-products accepted in prior calendar year (January 1 - December 31)
Septage waste from on-site wastewater systems ²	Part 117, Section 11703(5)	DWMAD	March 15 each year with annual invoice	Reporting form EQP 5921 www.michigan.gov/deqseptage	Amount of septage transported or disposed, location where septage was disposed each month in prior calendar year (January 1 - December 31) and any complaints received concerning septage disposal.
Non-hazardous medical wastewaters ³	Act 368, Part 138 and Part 138 rules	WMRPD	NA	Medical Waste Program Website www.michigan.gov/deqmedwaste	Part 138 does not require reporting. However, IIS DOT shipping documents must be maintained for any medical waste transported.

*NREPA: Natural Resource and Environmental Protection Act

¹ Liquid industrial by-products include commercial and industrial wastewaters and sludges that must be hauled over public roadway from operations like food processing or commercial animal boarding, breeding, and sale; car wash, laundromat, and power washing wastewaters and sludges; antifreeze, leachate, and other wastewaters and sludges from service operations generated by non-households. Also includes fats, oils, and grease or other domestic wastewaters not subject to septage regulation. Part 31 wastewater discharge permitting via permit, rule or order, nor other regulation like hazardous waste, medical waste, etc.

² Septage includes only food establishment septage, domestic septage, domestic treatment plant septage, or separate sanitary sewer cleanout septage, or any combination of these. On-site septic systems are permitted and inspected by the local health departments and only designed to handle sanitary wastewaters from bathrooms, kitchens and laundry devices.

³ Non-hazardous medical wastewaters include wastewaters from funeral homes, animal processing, and healthcare (dental, veterinarian, family medicine, etc.)

800-662-9276 [www.michigan.gov/deq](#)

March 2018

Emergency Response

Designated Facility

- Designated facilities must have a plan to respond to and minimize hazards to human health and the environment from unplanned sudden and non-sudden releases

Recordkeeping Designated Facility

Owner/operator of a designated facility shall:

- Retain all required records for 3 years
- Make records readily available for review and inspection
- Electronic recordkeeping is acceptable but must be readable, have all the required information, and be accessible

Training

Designated Facility

- Designated facilities must document that employees who manage by-product are trained in proper handling and emergency response as appropriate for their job duties

Releases

If a release occurs that could threaten the public health, safety, welfare, or environment or a release reaches surface water or groundwater, take immediate action to:

- Protect the public health, safety, and welfare
- Notify local authorities
- Notify the Pollution Emergency Alerting System (PEAS) at 800-292-4706



Releases

Within 30 days of the release:

- Prepare and maintain a report that includes the data elements in the statute and describes the release, response actions, includes analytical, and
- Submit the report to EGLE

**See release notification table at
Michigan.gov/ChemRelease**

Other Compliance Tools

Michigan Guide to Environmental Regulations, Chapter 4 covers:

- Part 31, Part 5 Rules
- Spill Prevention, Control, and Countermeasures
- LARA, Bureau of Fire Services, Combustible Liquid Storage
- Michigan State Police U.S. DOT Regulations

“Best of the Rest”

• Violations we see!



EGLE
MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
Material Management Division
LIQUID INDUSTRIAL BY-PRODUCT INSPECTION
Under the Authority of Part 121, Liquid Industrial By-Products, and Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA)

This document is used by EGLE inspectors and waste generators to determine compliance with Part 111 and Part 121

Facility Name: _____

Inspection Date: _____ Site ID# _____ WDS#: _____

The following checked sections are included for this inspection, if not checked, left intentionally blank:

- ☐ Section 1 - Materials That are not Liquid Industrial By-Product
- ☐ Section 2 - Duties of Generators, Transporters and Designated Facilities
Treatment, Storage, Disposal Requirements of Generators, Transporters and Designated Facilities
- ☐ Section 3 – Generator Duties
- ☐ Section 4 – Duties of Designated Facilities

Note: Used oil may be regulated under: Part 121, Liquid Industrial By-Products (LIB); Part 111, Hazardous Waste; Rules 299.9809-816 regarding used oil, of the administrative rules promulgated pursuant to Part 111 (Part 111 Rules); and 40 CFR 279, Standards for the Management of Used Oil.

If you need this information in an alternate format, contact EGLE-Accessibility@Michigan.gov or call 800-662-9278.

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EGLE
MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
Materials Management Division
USED OIL INSPECTION
Under the Authority of Part 121, Liquid Industrial By-Products, and Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), and Title 40 of the Code of Federal Regulations (CFR), Part 279, Standards for the Management of Used Oil

This document is used by EGLE inspectors and waste generators to determine compliance with Part 111 and Part 121.

Facility Name: _____

Inspection Date: _____ Site ID# _____ WDS#: _____

The following checked sections are included for this inspection. If a section is not checked below, it is intentionally left blank.

- ☐ Section 1 - Materials Not Regulated as Used Oil
- ☐ Section 2 - Used Oil Disposal Requirements
- ☐ Section 3 - Used Oil Generator Requirements
- ☐ Section 4 - Used Oil Collection Centers and Aggregation Points
- ☐ Section 5 - Used Oil Processors and Re-Refiners
- ☐ Section 6 - Burner of Off-Spec Used Oil for Energy Recovery
- ☐ Section 7 - Used Oil Fuel Marketer

Note: Used oil may be regulated under: Part 121, Liquid Industrial By-Products (LIB); Part 111, Hazardous Waste; Rules 299.9809-816 regarding used oil, of the administrative rules promulgated pursuant to Part 111 (Part 111 Rules); and 40 CFR 279, Standards for the Management of Used Oil.

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**MICHIGAN ENVIRONMENTAL
COMPLIANCE CONFERENCE**

Exhibit 1.



Exhibit 2.



Exhibit 3.



Exhibit 4.



Exhibit 5.



Exhibit 6.



Exhibit 7.



Exhibit 8.





Exhibit 9.



Exhibit 10.



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IsraelsE@Michigan.gov or 517-285-0093