HAZARDOUS WASTE
COMPLIANCE EVALUATION INSPECTION
OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

Facility Name:	Oil Re-Refining, Co. dba Industrial Oils, Inc.
EPA Identification #:	ORD980980775
Mailing Address:	1291 Laverne Ave. Klamath Falls, Oregon 97603
Physical Address	Same
Facility Contact:	Tony Vang, Compliance Officer
Telephone #:	(503) 286-8352
Date of Inspection:	June 8, 2010
Inspection Participants:	Jesse Murrell and George Duckett, Industrial Oils, Inc., ORRCO; Bruce Long, EPA; and Fredrick Moore and Dan Lobato, DEQ
Inspector's Name/Title:	Dan Lobato, Compliance Specialist Department of Environmental Quality 165 East 7th Avenue, Suite 100 Eugene, Oregon 97401-3049
Report Prepared by:	Dan Lobato, June 24, 2010

FACILITY BACKGROUND AND COMPLIANCE HISTORY:

Oil Re-Refining Company (ORRCO) doing business as Industrial Oils, Inc. (IOI) operates a used oil processing and re-refining facility at 1291 Laverne Ave., Klamath Falls. This facility has been in the current location since 1993. The used oil processor consists of a building that houses equipment associated with the re-refining of used oil. Process equipment includes; a dehydrator, separator, cooling tower, scrubbers, heat exchanger, laboratory and storage under cover of the building. There are also two small tank farms separated by a truck loading pad. This facility is located on fenced property that has restricted access after normal business hours. The facility is currently shut down due to PCB contamination in the used oil.

A file review indicates that the facility has never been inspected for compliance with the used oil and hazardous waste management requirements.

dehydration and evaporation equipment are located as well as the used oil boiler. The southern tank farm consists of eight 23,000 gallon up right steel tanks inside of a containment walled area. The tanks are numbered; 5A & 5B, 6A & 6B, 7A & 7B and 16A and 16B.

The northern tank farm is next to the process building. This tank farm consists of five 18,000 gallon steel tanks. These tanks are numbered; 1, 2, 3, 4, and 15. The two tank farms are separated by a bermed truck loading pad. Dehydrators #D-1 & D-2 are also within this containment walled area.

Outside of the northern tank farm to the west is a 1000 gallon fuel tank, condenser #CT-1 and a heat exchanger.

Condenser #CT-2 and dehydrator # D-3 are located inside of the building.

There are three processes at IOI. The processing consists of dehydrating the used oil, evaporating water and burning used oil filters and solids, in an industrial boiler for energy recovery to provide operational steam for the plant.

Mr. Murrell explained that the procedures used by the route drivers were to go to the used oil pickup site, use the sniffer to see if the used oil contains chlorinated compounds and then pump the used oil into the route truck which usually has multiple compartments to store different materials as used oil, antifreeze, etc. Several pickups with like wastes may be put into a single compartment. For each facility/pick up, a "retain" sample will be taken by the driver and brought back to IOI. Once the load comes into IOI, a composite sample of "all" the pickups is taken and a chlor-d-tect test is performed. Then if the composite passes the chlor-d-tect, then the retain samples are dumped and the used oil is processed.

IOI accepts used oil filters and oily solids. These materials are burned in an industrial boiler. The boiler produces steam that is used in IOI processes. The metal left over from the burning is sent for recycling. The ash is sent to the landfill on a quarterly basis. The analytical is only done quarterly as well. This seems to be patterned after the air quality discharge permit. I don't believe the characterization of the ash is adequate. The ash is kept in a trailer with a dumpster. Mr. Murrell said that approximately ½ drum of ash is generated once a month. Currently there is no ash storage because the plant is shut down. The other solids burned besides filters were tank bottoms and oil rags from customers.

Antifreeze is just screened using the sniffer. I asked if the sniffer is calibrated and was told that it was not calibrated, even though I noted the calibration liquid was on the bench inside of the laboratory.

Once a week, a load of processed oil is taken to the Portland facility.

We then went to the tank farm outside of the building to set up the sampling. I noticed a 200+ gallon square tank that was full of what Mr. Murrell described as vac truck wastes. I asked what was in it and Mr. Murrell said used oil and water. I told him that the tarp used to cover it was insufficient to keep rain out of the used oil and that the container is not considered closed. Used oil storage containers are to be closed except when actively filling or removing used oil. The tank was labeled though. (See photo # 1&2)

2. **Other activities/permits:**

Drywells: none

Septic/sewer:

Landfill/solid waste service: Local hauler

Air Quality permits: ADCP # 02-0766

Underground storage tank permits:

3. **Groundwater permit:** none

Other (NPDES, etc.): None, but I believe they need a 1200Z stormwater permit under SIC 5093.

4. **Waste Process Descriptions:**
(List/describe generation processes. List/describe any wastes accepted from off-site)

Used oil tranporter, transfer facility, processor and generator.

5. **Hazardous Waste Type Descriptions:**
(List each waste type by name and number. Provide a physical and chemical description, MSDS, etc.)

Used oil

6. **Hazardous Waste Handling Unit Description:**
(List each type of unit or container, tank, underground tank, surface impoundment, septic tank, injection well, waste pile, spill area, etc., and indicate if used for storage, treatment, disposal, etc.)

Tank trucks, fixed storage tanks, 55 gallon containers and 250 gallon totes.

7. **Hazardous Waste Handling Summary**

Process Origin:				
Waste Name **Waste Codes:**				
Handling				