Manitoba Association for Resource Recovery Corporation

EcoCentre Operator

Training Manual

Contents

BACKGROUND AND SCOPE	3
	BACKGROUND AND SCOPE ROLES AND RESPONSIBILITIES. REGULATED LUBRICATING PRODUCTS. SITE AND FACILITY REQUIREMENTS. ADMINISTRATIVE REQUIREMENTS. OPERATING PROCEDURES. EMERGENCY RESPONSE PLAN AND PROCEDURES. SHIPMENTS FROM ECOCENTRES. COMMUNICATION PROCEDURES.

Module One

Background and Scope

1. BACKGROUND AND SCOPE

In 1997 it became illegal to supply lubricating products in Manitoba unless the steward supplying the product is registered with Manitoba Environment (now the Department of Conservation and Climate). Manufacturers and sellers must file a plan for how they will fulfil their product stewardship obligations set out in the Used Oil, Oil Filters and Containers Regulation (MR86/97) of the Waste Reduction and Prevention Act. This initiative puts the onus for establishing an effective management program for used oil, filters and containers on the manufacturers and sellers of these products in Manitoba. The overall goal of this program is to maximize the collection of used oil, filters and containers in an economically sustainable manner in order to protect the environment from contamination.

Prior to the introduction of this oil recovery program, every day Manitobans discarded, without proper treatment about 36,000 litres of used oil - the equivalent of a tanker truck load. Every year Manitobans threw away nearly 8 million empty oil containers and 1,500,000 used oil filters. These practices raised public concern because used oil is classified as a hazardous waste in Manitoba and has the potential to damage our environment:

 A single litre of waste oil has the potential to contaminate one million litres of water.



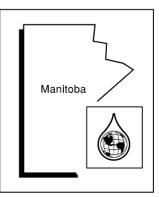
- The presence of as little as 50 parts per million of oil in water can cause serious problems in sewage treatment plants.
- The heavy metals found in oils used for lubricants in automobile engines pose a serious threat to human and environmental health.
- New lubricating oil can contain up to 25% additives (detergents, oxidants, rust inhibitors and flow modifiers).



- Used lubricating oil can be contaminated by heat and metal particles from engines, by exhaust gases and by other fluids like water and antifreeze, and have relatively high levels of poly-nuclear aromatics (benzo(a)pyrene) and metals (aluminium and lead).
- Nickel and polyaromatic hydrocarbons (P.A.H.'s) found as contaminants in crankcase oils have a harmful effect on the environment.

In 1995 Manitoba Environment found that 95% of the 53 random samples of used oil tested were contaminated by exhaust gas blow-by, glycols, parts wash solvent or gasoline and would be meet the criteria as hazardous waste. As a regulated waste, shipments of used oil must be reported to the government. In 1994, the tracking system reported that of the approximately 19.8 million litres of used oil generated in Manitoba, only one third (6.3 million litres) was properly managed.

- The Used Oil, Oil Filters and Containers Stewardship Regulation places requirements on stewards who sell lubricants and lubricant filters to provide or subscribe to a province-wide program to recover the waste products through a permanent, free, publicly accessible and convenient collection system.
- The costs associated with this initiative will be borne by the industry stewards who, as members of MARRC will remit an Environmental Handling Charge (EHC) at the time the product is sold. The EHC will be the sole source of funding for the Used Oil Stewardship Program.
- Retailers are required to provide point-of -sale information to consumers.
- The regulation will be reviewed after five years to determine its effectiveness.
- All collection sites must meet standards set by Manitoba Sustainable Development and operate in accordance with established procedures.



Module Two

Roles and Responsibilities

2. ROLES AND RESPONSIBILITIES

The Public and Businesses are at every step of the recycling process must clearly understand their role in helping the system to operate properly.

2.1 Manitoba Conservation and Climate

Under the Environment Act, the government of Manitoba has an obligation to protect our province's environment from damage and degradation.



In accordance with a national goal to reduce waste going to landfills by 50% (base year 1988) the Province of Manitoba has set a goal to maximize the collection of used lubricating products and containers in an economically sustainable manner. Through the Used Oil, Oil Filters and Containers

Stewardship Regulation, the government has provided a regulatory framework to divert and reclaim large volumes of waste oil which would otherwise be released into the environment. The provincial government's on-going role will be to enforce the regulations, both on the generators of oil and on the collection system, to ensure that manufacturers and distributors of lubricating products operate on a "level playing field" and to monitor, evaluate and verify the success of this Stewardship Program. Another objective will be to ensure a harmonized approach to environmental regulation with the other prairie provinces. Manitoba Conservation and Climate also maintains a registry of generators, approves and licenses those who collect and carry waste oil, and approves those processes which reclaim or re-use the recovered oil.

2.2 Stewards



A "steward" of lubricating products is the first person who supplies oil, oil filters, antifreeze or oil and antifreeze in containers to another person in Manitoba, or who uses oil, oil filters, antifreeze or oil and antifreeze in containers containers obtained outside Manitoba. They have established a non-profit corporation under the name Manitoba Association for Resource Recovery Corp. (MARRC) to administer the used oil recovery program and to set up the recovery capability in Manitoba.

The **Environmental Handling Charge (EHC)** paid by the stewards on each sale of lubricating oil products provides a means for the cost of the proper post-use management of the product to be paid in relation to the amount each steward sells and is remitted to MARRC to finance the recovery system. Suppliers and

retailers are required to provide point of sale information to consumers on Manitoba's Used Oil Initiative to educate and inform the public on the environmental risks associated with the improper disposal of used oil and on the system which has been developed to encourage its recovery.

2.3 Consumers and Generators

oint of sale promotional information, with the theme "Make very Drop Count" provides consumers with information their role in the proper management of lubricating oducts and of the importance of returning them to the coCentres for recovery.

dommercial users of lubricating pro

have a role as large volume generators of used oil. They are required to make arrangements with Approved Collectors for the on-site collection of used oil from the generator's location.



2.4 Manitoba Association for Resource Recovery Corp. (MARRC)

The Manitoba Association for Resource Recovery Corp. was incorporated as a non-profit organization in 1997, formed by manufacturers and marketers of oil and oil filters who operate in Manitoba. Its mandate is to develop, implement and administer a cost-effective, sustainable, industry-financed and province-wide stewardship program to maximize the collection of used oil, used oil containers and used oil filters on behalf of its members. In addition MARRC has responsibility for:

- developing a system which is harmonized with the other western provinces;
- liaison with the Manitoba Sustainable Development;
- liaison with current and potential members of MARRC, and
- developing informational and educational materials for distribution to stakeholders.

2.5 EcoCentres



A province-wide system of independent collection depots called EcoCentres were to be established over a three-year period, primarily in existing public sector waste management facilities and private sector businesses. They collect designated products from consumers and small volume generators who are not directly served by Approved Collectors. The system continues to grow and has extended to some first nation reserves in Manitoba and to used oil burning furnaces.

The EcoCentres were equipped and required to accept used oil, used oil containers and filters from consumers and other small volume generators at no cost. They will be limited to accepting a maximum of 500 litres per customer per delivery. EcoCentres will be eligible for investment and operating support from MARRC. In recent years, EcoCentres also accept delivery of glycol based antifreeze from internal combustion engine coolant systems.

2.6 Approved Carriers



An Approved Carrier is an individual or organization licensed by Manitoba Conservation and Climate to collect used lubricating products from generators, EcoCentres and return depots for transport to approved recycling processors, end users and end use receivers. Approved Carriers who are registered with MARRC are eligible to

receive Return Incentives (RIs) payable from MARRC based on volumes delivered to government approved processors and end users.

2.7 Approved Processors / End Use Receiver

An Approved Processor or End Use Receiver is an organization which is licensed by Manitoba Sustainable Development to receive used lubricating products for processing and subsequent transfer to another organization or for its own internal use. The most common used oil recycling methods include:

- · refining to use as base stock for lubricating oil
- slipstreaming to use as base stock for other petroleum products
- processing to burn for heat
- direct burning for heat.



Disposal of used oil is the option of last resort, as it wastes its neat and lubrication value. However, where the costs of recycling used oil are too high, usually where the oil is highly contaminated, it may not be economical.

Module Three

Regulated Lubricating Products

3. REGULATED LUBRICATING PRODUCTS

Oil, oil filters and containers are designated materials for purposes of the **USED OIL PRODUCTS AND STEWARDSHIP PROGRAM.**

To participate in the program, EcoCentre depots are required to accept all three products at no charge to the consumer or generator.

The following definitions of these products are contained in the **Used Oil, Oil Filters and Containers Stewardship** regulation, and apply to the MARRC program.

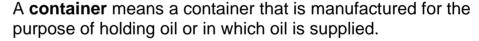
DEFINITIONS

3.1 Oil and used oil.

Oil means any petroleum or synthetic crankcase oil, engine oil, hydraulic fluid, transmission fluid, gear oil, heat transfer fluid, or other fluid capable of use for lubricating purposes in machinery or equipment.

Used oil means oil that through use, storage, handling, defect, damage, expiry of shelf life or other similar circumstances can no longer be used for its original purpose.

3.2 Containers.





A used container means a container that contains or has contained oil and that through use, storage, handling, defect, damage, expiry of shelf life or other similar circumstances can no longer be used for its original purpose.

3.3 Oil Filters.

An **oil filter** means any spin-on or element style oil filter that is used in hydraulic, transmission or in internal combustion engine applications and included a diesel fuel filter, but does not include a gasoline fuel filter.

A **used oil filter** means an oil filter that through use, storage, handling, defect, damage, expiry of shelf life or other similar circumstances can no longer be used for its original purpose.



3.4 OTHER USEFUL DEFINITIONS

3.4.1 Recycling

Recycling is a process which converts a waste material into a useable product. It **does not include** processes where the waste is destroyed in a combustion process or spread on land.



Module 4

Site and Facility Requirements

4. SITE AND FACILITY REQUIREMENTS

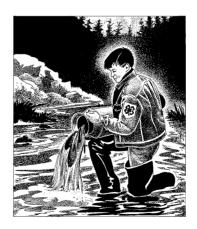
4.1 Site Selection

Preferred locations for the establishment of EcoCentres will include municipally operated waste disposal grounds and works yards, as well as enclosed commercial sites.

The following features should be considered in the identification of locations which are suitable for the establishment of EcoCentres:

• Vehicle access which permits the unloading of potantainers directly into the containment area, d access for tank vehicles to pump out collected oil and to remove containers and filters.

- Located away from sensitive occupancies such as hospitals and schools.
- Properly zoned by the local zoning or land use authority to permit the establishment of an EcoCentre.
- Water wells, drainage systems and environmentally sensitive areas identified and considered so that appropriate protective measures can be implemented.



4.2 Site Preparation

A receiving area must be provided immediately adjacent to the storage tank for the placement of full containers being delivered to the depot. This area must be adequately sized and graded to ensure that any spillage occurring during handling, or before or after transfer of the contents can be properly managed. The surface of the containment area must be concrete or metal or other impermeable material acceptable to Manitoba Sustainable Development's regulation respecting the storage and handling of petroleum products.

4.3 Facility Design

The depot design includes a pre-cast concrete building large enough to accommodate an oil storage tank and the receptacles for holding the used containers and filters. The 4500 litre single-walled tank used to store oil is specifically designed for this purpose, and displays a UCL label.

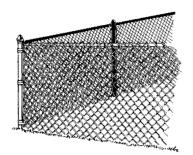


The used oil tank is positioned over a concrete containment base which will capture any overfill or the oil spill if the container ruptures. The tank installation is done in accordance with the manufacturer's instructions. The EcoCentre design complies with the applicable provisions of the Manitoba Fire Code.

EcoCentres must also provide suitable receptacles to receive oil containers and used oil filters designed to contain the oil which drains from filters or containers. The size of container provided will be determined by the expected throughput of the EcoCentre, and the receptacles located so the contents can be removed safely and effectively. 205 L drums are recommended for oil filter storage. Oil containers can be placed in heavy grade polyethylene bags designed to fit the rack.



4.4 Site Security and Access



EcoCentres must guard against the potential for unauthorized or unsuper-vised deliveries to the facility. The storage tank, container and filter receptacles and the receiving areas must be surrounded by fence with a minimum height of 1.8 metres to discourage unauthorized entry. The fenced area must be equipped with a lockable gate.

Where the EcoCentre is located within a fenced waste disposal ground, municipal yard or other site where access is not permitted unless the



operating staff is on site, an additional fence is not required around the depot site. Where the depot area is not fenced, the storage tank must be capable of being locked so as to prevent unauthorized depositing of used oil into the tank.

4.5 Signage, Equipment and Supplies

ECOCENTRE HOURS

8:00 am - 4:30 pm

OPERATOR MUST BE PRESENT TO ACCEPT THE DELIVERY OF OIL, CONTAINERS AND FILTERS.

> FOR FURTHER INFORMATION CALL (204) 234-5678

Legible, weather-proof signs must be posted at the entrance to the EcoCentre identifying the area as a used oil collection facility. The sign must indicate the hours of operation, a contact number and a warning not to leave used oil products at the depot when the operator is not present to accept the delivery. Instructions on how and where to leave oil products may also be posted on the sign.

Any spillage that occurs during the handling of oil products must be contained and cleaned up promptly. Sufficient and appropriate clean-up materials must be available on the site at all times for

this purpose.

Module Five

Administrative Requirements

5. ADMINISTRATIVE REQUIREMENTS

5.1 Registration to Operate.

As used oils are classified as hazardous waste in Manitoba, facilities that collect, store or process waste oils are considered to be hazardous waste disposal facilities and are required to be approved by Manitoba Conservation and Climate under the authority of The Dangerous Goods Handling and Transportation Act and the Hazardous Waste Regulation MR 195/2015.

Registration for the establishment and operation of EcoCentres is to be submitted to the regional office of the Environmental Operations Division in the region in which the EcoCentre is to be located. A list of Manitoba Manitoba Conservation and Climate's Regional Offices is contained in the Directory of Resources in the Appendices. Forms can be found online at:

https://www.gov.mb.ca/sd/pubs/waste_management/hazardous/haz_waste_registration.pdf

The following information must be provided in the completed Generator Registration Form:

Generator identification information including:

- Generator (Legal Name): The full legal name of the Generating Company as it is registered in Manitoba.
- Corp. File #: The Companies Office File No. associated with the legal name of the Generating Company as it is registered in Manitoba.
- Mailing address: The address to which correspondence will be sent.
- Operation Name: The name under which the Generating Company does business (i.e. the "name over the door" for the site at which the waste is being generated).
- Site Location: The actual physical site location at which the hazardous waste is being generated. The site location should be a street name and number or, where there is no street name, the site location should be in terms of a legal description (section-township-range).
- Operation Mailing Address: The mailing address for the operation; enter "Same" if same as the mailing address indicated above for the "Generator (Legal Name)".

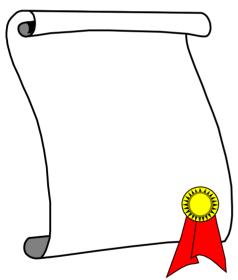
Waste Description including:

- Physical State
- TDG shipping name or Type of Hazardous Waste
- UN Number or Provincial Waste Code
- TDG Class (if applicable)
- Packing Group (if applicable)
- Provincial waste class code
- Quantity generated per month
- Frequency of generation

Waste Management Information

- General business type
- Source of hazardous waste
- Hazardous waste carrier(s) used
- Hazardous waste receiver(s) used

5.2 Licensing



Licenses are not required for used oil collection depots for total volumes of under 5000 litres. Licensing approvals can be applied for at:

https://www.gov.mb.ca/sd/permits_licenses_approvals/eal/licence/index.html

Hazardous waste generators are issued a registration number which consists of the prefix MB followed by seven digits. The EcoCentre operator must record this registration number on the Customer Log for all non-domestic deliveries to the depot.

Registration numbers are not required for small volumes of oil and filters delivered to the depot.

(20 litres of oil – 20 kilograms of filters

EcoCentres are not allowed to receive used oil from unregistered generators, other than domestic "do-it-yourself" sources delivering volumes of waste oil less of than 20 litres.

5.3 Liability Considerations and Insurance

Responsibility and liability for the products collected in accordance with the Used Oil, Filters and Containers Stewardship Regulation rests with whoever has care, custody and control of the oil or oil product. This means that consumers must be careful not to allow oil to become contaminated with other unacceptable substances prior to taking it to a collection depot.

EcoCentre operators must ensure that their facilities meet standards and conditions set out in their licenses and follow established procedures to minimize the risk of contamination. Carriers and receivers of the oil must also follow procedures to reduce their liability.

EcoCentre operators must ensure that they maintain adequate property, comprehensive general liability and environmental impact liability insurance coverage. Operators must provide evidence by way of insurance certificates to the Manitoba Association for Resource Recovery Corp. when the EcoCentre approval is first applied for, and on an annual basis thereafter.

EcoCentres must carry policies in the amount of not less than \$50,000 for property coverage, \$5,000,000 for Comprehensive General Liability, and \$1,000,000 for Environmental Impact Liability Insurance inclusive of any one loss.

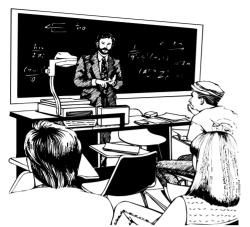
It is also important for the EcoCentre operator to verify that the Approved Carrier used to remove the used oil products from the EcoCentre also has current and adequate insurance coverage. Carriers are required, in addition to having a valid carrier license, to carry vehicle coverage to a value of \$2,000,000 in Public Liability, Property Damage and Environmental Impairment Insurance coverage.

DUE DILIGENCE

STEPS TO LIMIT ECOCENTRE LIABILITY

- 1. Ensure the EcoCentre has obtained a hazardous waste generator number.
- 2. Operate the EcoCentre within the conditions of the license.
- 3. Accept only approved products.
- 4. Be on the lookout for product contamination. Inspect each load before accepting it.
- 5. Ensure that public access is controlled, and that the depot is adequately staffed during hours of operation.
- 6. Train and supervise depot staff to ensure that they operate in accordance with established administrative, operating and emergency response procedures. Verify training outcomes, and document both training and supervision activities.
- 7. Maintain the facility in a clean and orderly condition.
- 8. Follow established procedures for operating equipment and transferring products.
- 9. Maintain accurate logs and inventory records to verify the source of the oil and the amount held on the site at all times.
- 10. Ensure a capability to deal promptly and correctly with leaks, spills and emergencies through proper procedures, equipment and supplies, and staff training.
- 11. Immediately inform Manitoba Sustainable Development of all reportable spills or dangerous occurrences.
- 12. Ensure continuing and adequate insurance coverage.
- 13. Contract only with an approved collector who is licensed and insured to remove products.

5.4 Staffing and Training



A trained person must be on site at all times when the depot is open to receive used oil, containers and filters. The EcoCentre personnel have the responsibility for ensuring that all in-coming shipments comply with the acceptance criteria and that the day to day operation of the depot is in accordance with the conditions of the Director's Order or license.

EcoCentre staff must themselves transfer or directly supervise the transfer of used oil to the collection tank.

If other duties require the EcoCentre staff to leave the depot area, the facility must be locked to prevent unauthorized deliveries. The depot owner must ensure that all personnel who are assigned duties as operators of the depot receive adequate training.

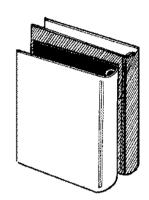
This training program has been developed by the Manitoba Association for Resource Recovery Corp. (MARRC) for all EcoCentres which operate through this industry-sponsored stewardship organization. As a minimum, MARRC requires that EcoCentre operators and their staff be trained in the following areas:

- the types of materials which can be received at the depot
- procedures for examining oil in relation to the acceptance criteria
- record keeping requirements log sheets, inventory control
- operating procedures for the collection tank and associated equipment including tank unloading
- emergency prevention and response procedures for spills and leaks, fire and first aid
- handling of accumulated run-off water
- occupational safety and health procedures to ensure safe operation
- training to meet regulatory requirements, including WHMIS and Transportation of Dangerous Goods (TDG).

5.5 Record Keeping

It is important to maintain a dedicated binder containing all documentation pertaining to the EcoCentre's licensing and approval to operate. This documentation should also include:

- the EcoCentre's Hazardous Waste Generator and Receiver Numbers;
- TDG training records, and copies of TDG certificates:
- the contract with the approved carrier;
- blank Hazardous Waste Generator registration forms to provide to commercial generators who require a number;
- emergency telephone numbers.



5.5.1 Customer Logs

EcoCentre operators and staff must keep a current and accurate record of all used oil deliveries in the Customer Log. Filters and plastic containers do not need to be recorded on the

Customer Log. Complete the log in accordance with the Guideline, including:

- the date of the delivery
- customer name and license number of the vehicle, or
- the MB hazardous waste generator number for nondomestic deliveries. Use MB 1000 for farm generators.
- the kind of **oil** product
- quantity of the oil in litres
- the **customer's signature** to confirm the information.

5.5.2 Inventory Control

EcoCentre staff are required to maintain an ongoing inventory record and summary for all receipts and collections as outlined on the Inventory Control Log. The tanks should visually inspected occasionally so that any leaks can be Identified without delay.

erp o	diter	асх	ws

ECOCENTRE CUSTOMER LOG

Opening Balance Quantity After Pump Out to be Entered on First Line of First Page – Use Dip Stick and Dip Chart							
Date	Customer	Vehicle License or MB Number	Used Oil Only Contains no fuels, solvents, PCBs or water greater than 5% Quantity in Litres	Signature			

PAGE _____ OF ____

EcoCentre staff must also visually inspect and record the estimated volumes in the tank using the dip stick before and after pick-up by the Approved Collector.

MARRC provides to the EcoCentre a list of registered carriers who are approved by Manitoba Conservation and Climate and who are eligible to pick up used oil, containers and filters. EcoCentre operators are responsible for contacting the Carrier for a pick-up when the tank is half to three-quarters full. Estimate the amount of oil in the tank by comparing the level on the **dipstick** to the **gauge chart** on the next page. This will ensure that the pick-up is made in a timely manner and reduce the likelihood that the EcoCentre operation will be disrupted should unexpected high volumes of oil be brought in.

5.5.3 Receiving Oil in Quantities over 20 litres

The Hazardous Waste Regulation allows for quantities of il in the amount of 20 litres and filters in the amount of 20 kilograms to be delivered without being registered with Manitoba Conservation and Climate. Amounts in excess of 20 litres or kilograms must only be transported by registered carriers and must be documented on a *movement document* or waste manifest.

The EcoCentre operator must retain all manifests accompanying non-domestic deliveries to the depot Should this occur. Note that EcoCentres are intended to receive oil from small volume customers.

5.6 Regulatory Requirements (The Transportation of Dangerous Goods)

The Transportation of Dangerous Goods (TDG) governs the movement of dangerous goods including many wastes similar to used oil in all modes of transport - by road, rail, marine and air. As used oil is classified as a hazardous waste according to Manitoba's Dangerous Goods Handling and Transportation Act (DGHTA) commercial generators, carriers, EcoCentre operators, Processors and End Use Receivers of used oil all have duties under the Act.

Below are the important elements of the DGHTA which must be considered by an EcoCentre operator:

 Duties are placed on those who handle, offer for transport and transport hazardous wastes.

- Anyone who performs these duties must be a trained person and possess a certificate issued by the employer describing the aspects for which the employee has been trained to perform. The certificate is valid for three years, after which time the training must be repeated and a new certificate issued.
- Whoever has care, custody and control of the dangerous good has the liability for the dangerous goods in their possession, including the responsibility for reporting dangerous occurrences such as spill or fires which involve the loss of the product, contamination or evacuation situations.
- The mandatory reporting requirements obligate the reporting of spills greater than 5 litres or 5 kilograms to Manitoba Conservation and Climate.
- As a hazardous waste, used oil is controlled during transport. The Regulation allows for shipments of 20 litres or less to be transported to the depot with documentation or generator registration.
- The generator of the oil in quantities greater than 20 litres must be registered with the Province of Manitoba and obtain a generator registration number. The Generator Number must be included on the Customer Log.
- EcoCentres may receive manifested shipments of used oil from small commercial generators, and must retain the depot copy of the Waste Manifest for two years. It must be available for inspection by an (Environment) Officer.
- When the used oil is transferred from the EcoCentre by an Approved Collector, the shipment will also require a Waste Manifest or movment document.
- Whoever signs the Shipping Document or Waste Manifest on behalf of the EcoCentre must be certified under TDG to offer the product for transport and the EcoCentre must retain the consignor's copy for two years.

Module Six

Operating Procedures

6. OPERATING PROCEDURES

EcoCentres are intended primarily for the convenient recovery of domestic quantities and small commercial consignments of used oil products. It is possible that they will be requested to accept large volume shipments from commercial generators. The EcoCentre operator must ensure that the acceptance of large volumes of oil does not overload the facility or restrict its accessibility to the general public.

Each EcoCentre operator is required to determine whether there is a need to establish criteria for maximum volumes of used oil which can be received from an individual generator. If volume limits are to be used, they should be clearly communicated to EcoCentre personnel and to the waste oil generators interested in bringing waste oil products to the facility.

6.1 Confirmation of Acceptability

It is very important to ensure that used oil received at a collection depot does not contain contaminants other than those resulting from the routine use of the oil. Oil contaminated with antifreeze, gasoline, paint and paint thinners or water in excess of 5 % cannot be accepted by an EcoCentre. Even a small concentration of

contamination can render an entire tank of used oil unfit for certain end uses. Whenever signs of contamination are detected, the used oil should either be returned to the customer with an explanation, stored separately or tested for contaminants before it is introduced into the storage tank or container holding other used oil.



6.2 Visual Inspections

EcoCentres are provided with samples of oil which have been contaminated with water, antifreeze, gasoline and paint / thinners for comparison to assist staff in identifying contaminated product. Each container of used oil delivered to a depot must be visually examined before the contents are transferred to the collection tank. The EcoCentre has been provided with samples of contaminated oil to aid in recognizing contamination. Any oil which does not have the characteristic colour and viscosity of used lubricating oil should not be accepted until it has been confirmed that the material falls within the definition of used oil as outlined in Part 3. If the oil is stratified, it is likely contaminated with water, antifreeze or other liquids. In addition to the appearance of the oil, odours can indicate contamination. If a distinctive odour of gasoline or solvent is noticed when the container is opened, the oil should not be accepted until the exact nature of the material is confirmed.

6.3 Rejection and Explanation

The most common reasons for rejection are likely to be:

- the product is not an acceptable product (See Section 3 for definitions) and cannot be accepted by the EcoCentre based on the conditions of its license; or
- the product contains a contaminant which makes it unacceptable for recovery and reuse. This is especially likely if the oil is brought to the EcoCentre in a container which originally held something which would contaminate the oil.





Some important points to remember:

- A clear explanation to the customer on the reasons for rejecting the product can assist in preventing similar contamination in the future.
- Provide the customer with information on where they can obtain information on legal disposal of the product, such as information on Household Hazardous Waste Programs or the telephone number for Manitoba Conservation and Claimate (See the Resource List set out in the Appendix).

If a product must be rejected the EcoCentre customer must be provided with an explanation of the reason why the product is unacceptable and with options which are available for proper disposal.



• Under no circumstances should suspicious or contaminated product be transferred to the tank. Return it to the customer or hold it in the locked storage area until it can be tested to determine if it acceptable, or a decision is made on how to dispose of it. (More information on dealing with unacceptable or contaminated products is found in Section 9.)

6.4 Maintaining the Customer Log

A record of quantities and sources of used oil received at the EcoCentre is necessary in order to determine the quantity of oil on-site at the EcoCentre at any given time. A Customer Log must be kept at the depot during the hours of operation. EcoCentre staff must record all deliveries of oil in the Customer Log as they are received. The Customer Log includes columns to record the date, the type and volume of oil, the name and telephone number of the person delivering the product, and the MB number or the license number of the vehicle in which it was brought in. The Customer Log and Batch Sheet must be maintained so as to be able to trace contamination to a specific tank. This information will be helpful to track the source of any problems with the quality of the oil shipped from the EcoCentre as well as to analyze use patterns at the depot.

For oil received from non-domestic generators, the waste generator registration number must be shown. If the shipment received by the EcoCentre is accompanied by a waste manifest, record the manifest number on the Customer Log. The completed log book must be retained for two years and be available for inspection by an Environment Officer.

6.5 Occupational Health and Safety Procedures

MARRC requires that EcoCentres are consistently operated to high standards which will protect the safety of employees and users of the facility, and will safeguard the environment. The Workplace Safety and Health Act requires employers to provide a working environment which is safe and free of risks to health and safety. Employees are required to act on the information provided by the employer by means of safe work practices and procedures which are to communicated through worker training programs.

- Employers are required, where necessary to provide and instruct employees on the use of Personal Protective Equipment (PPE) which must be worn where changes to work practices and the working environment cannot be relied upon to fully protect the employee from hazardous exposures.
- Employers are required to identify situations which could give rise to emergency situations (such as first aid or medical emergencies resulting from injury or chemical exposure, leaks and spills, fire and explosion, inclement weather) and to develop, resource and implement, as required, contingency plans to respond quickly and effectively to the emergency situation.
- Employers are required to develop, resource and implement as necessary a Working Alone Plan based on an assessment of the potential risks to an employee working alone, to provide a means of ensuring and verifying their continuing safety and to summon help if required.
- Human health can be adversely affected by used oil if it is handled improperly. It is possible that used oil may contain small amounts of harmful materials which can cause illness if they are inhaled or ingested.
- Used oil should be handled as little as possible to avoid splashing and spills which increase the potential for contact with the skin and eyes.
- Used oil does not evaporate easily in absence of elevated temperatures or mechanical action such as spraying. Therefore, the risks associated with inhalation are negligible to the EcoCentre staff who handle the oil products. These contaminants can pose a risk when inhaled if the oil is burned in an improperly vented burner, or if the oil does not burn hot enough or consistently enough to destroy organic chemicals.
- Used oil, or its contaminants can be ingested if they get onto the hands and are passed to food or smoking materials through poor hygiene.
 They can also be ingested if they get into drinking water and are not detected and removed.

EcoCentre operators are expected to provide at a minimum the following Personal Protective Equipment for the use of employees as a means of

ensuring that they can be protected from all direct exposure to oil products:

- chemical splash goggles to prevent the product from being splashed in the eyes
- rubber gloves to prevent skin contact
- a full length rubber apron to prevent oil saturation of clothing
- a particulate mask for use if required when using absorbent materials for spill clean-up.









Depending on the nature of the material handling in the EcoCentre, the employer may require the employee to wear long sleeved clothing and full length work pants, as well as CSA approved safety boots. Employees must wear the Personal Protective Equipment provided and required to be worn by the employer. Employees can contribute significantly to the maintaining of a safe working environment and to protection of their own health and safety by observing the following:

The basis for all workplace safety is good housekeeping.

The main emphasis should be on spill prevention.

To accomplish this, the EcoCentre staff,
and not the customer should handle the used oil.

- The used oil should be handled as little as possible, as the more it is handled, the greater is the potential for spills.
- If oil is spilled, it should be cleaned up immediately using a suitable commercial absorbent or materials such as sawdust or kitty litter. A large spill must be diked with absorbent pads, booms or sand as oil flows and moves. The oil must not be allowed to get into sewers, wells or surface water.
- As oiled surfaces are slippery, there is an increased risk of injury caused by slips, trips and falls.
- When cleaning up a spill outside, avoid inhaling the airborne dust or particulate of the clean up material.



- Stay upwind of the spill being cleaned up. Wear a particulate mask
 both indoors and outdoors if necessary to prevent airborne exposure to the absorbent.
- Visually inspect the oil for contamination. Do not sniff the oil. If an unusual odour is detected when the oil is being poured, stop the transfer immediately. Unusual odour can be a sign of contamination.
- Used oil should be accepted only if the customer has brought it in a clean, leak-proof container.
- The container should be inspected.
 Oil brought in bleach bottles,
 anti-freeze jugs, paint thinner cans or
 other chemical containers may be
 contaminated. Even small amounts of
 these substances can contaminate the
 tank.
- Use the two sides of the bag stand to separate oil containers from other plastic containers. The plastic processor will accept other plastic containers, but does not receive the Return Incentive for other than oil containers on which the Environmental Handling Charge has been paid.



- Take the opportunity to **educate the customer** on the importance of not mixing anything with used oil, and of returning it to the EcoCentre in clean, leak-free containers.
- A covered metal trash can should be used to collect spill clean up rags, bags, boxes or containers which are not suitable for return to the plastic processor.



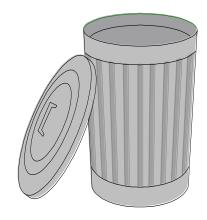
- Oil will burn. Keep all open flames and ignition sources at a distance greater than 3 meters of the storage area, and the EcoCentre must be designated as a **No Smoking Area**.
- Smoking is not allowed in the EcoCentre or when transferring lubricating products from the customer's vehicle.
- The area surrounding the EcoCentre must be kept clean to encourage

customer participation in the program and to set a good example on the proper way to handle used oil.

6.6 Product Transfer

This area upon which the EcoCentre is constructed must be adequately sized and graded to ensure that any spillage that may occur can be properly managed. The EcoCentre design includes a metal grate over concrete foundation. Some of the grates can be removed to facilitate spill clean up

- Heavy gauge plastic bags must used on the bag stand to hold empty 1 and 4 litre containers. Do not overfill the plastic bags to prevent rupture and leakage of oil from the containers.
- Metal barrels must be leak-proof to contain any used oil which may drain from the filters. Arrangements must be made with the carrier for enough barrels to accommodate the expected throughput filters. The barrels should be positioned to ensure that they can be removed safely and effectively.
- 205 L drums with lids capable of being tightly secured are recommended for the containment and transfer of oil filters. No liner is required in the drum.
- The concrete receiving area adjacent to the doorway is intended for positioning barrels or drums as they are pumped out. Alternatively, drums can be pumped directly into the tank without removing them from the customer's vehicle.



 The storage are behind the is hatch door is intended for holding potentially contaminated oil in secure storage until it can be tested or disposed.

6.6.1 Transferring product from plastic containers

- Open each container and inspect the contents before transferring them from the container.
- Verify with the customer that the container holds used oil only. If the oil is suspect, pouring it into the oil inspection

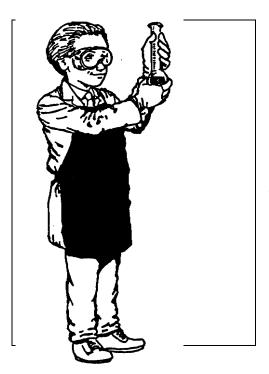


pan and examine it before releasing it into the storage tank.

- If the oil is suspected to be contaminated, return it to the original container through the spout on the inspection pan and hold it in the secure containment area for testing or disposal.
- If the customer does not wish to have the oil container returned, place it appropriate bag on the bag stand.
- If the container is unsuitable for return, place it in the refuse container for disposal.

6.6.2 Drum transfer

- Open the bung and inspect the contents of the drum before connecting the hand pump.
- Verify with the customer that the container holds used oil only, and that there is no possibility of contamination. Ask the customer for an estimate of the drum's contents by asking, for example "Is the drum full of oil?"
- If the oil is suspect, draw a sample using the barrel pump. Pump the oil from the bottom of the drum into a clear glass jar or oil pan for inspection before transferring the oil into the storage tank.



- Once the contents have been verified as acceptable, place the stem of the pump in the drum and commence the transfer.
- Do not release any suspect oil into the main storage tank.
- Return the drum to the customer, as the EcoCentre cannot accept oil containers with volumes greater than 20 litres.

6.6.3 Operating procedures for collection tank and associated equipment

- The EcoCentre tank used to store used oil is designed specifically for this purpose.
- The EcoCentre design has eliminated the need for a secondary containment system as the concrete area below the tank is adequate in size to hold its full volume.
- The tank is constructed to meet ULC S652, the "Standard for Tank Assemblies for Collection of Used Oil", and displays an appropriate ULC label.
- The tank is installed in accordance with the manufacturer's instructions. The manufacturer's directions for use instructions must be followed.

6.6.4Leak and Spill Procedures

The major environmental concerns associated with used oil collection facilities are soil or groundwater contamination caused by spillage of used oil, and the contamination of the used oil by the introduction of other waste streams such as antifreeze, paints, solvents, fuels, and water.



The design of the EcoCentre includes the features described above to contain any spillage which occurs during handling or storage of the oil. Manitoba Conservation and Climate also requires EcoCentres to follow specific safe handling procedures to minimize the occurrence of these situations.

6.6.5 Closing Tank Valves and Openings

All tank valves and openings must be kept securely closed, except when transferring oil into or out of the storage tank.

All tank openings, valves and gates to the used oil storage compound must

be locked after normal business hours.

6.7 Handling of Water Run-off

Run-off or melt water which has accumulated in spill containment areas must be examined before it can be discharged.

Generally discharge can occur if there is no visible layer of oil on the water. In some sensitive areas more specific discharge criteria may be applied.

6.8 Disposal Procedures for Contaminated Oil

Although used oil normally contains some water, if it is contaminated with water in excess of 5%, it will require additional processing to de-water it. Used oil containing water greater than 5% may be subject to dockage by the Carrier.

- Excessive solids, heavy metals, PCBs or organic chloride concentrations could be subject to a surcharge by the Carrier.
- The EcoCentre will be responsible to pay the surcharge directly to the Carrier and the Carrier, in turn, could be surcharged by the Processor / End Use Receiver for the additional operating costs associated with processing the contaminated oil.
- The MARRC program and Manitoba Conservation and Climate can be called on to assist an EcoCentre with any problems associated with the receipt and disposal of contaminated oil.
- Contaminated waste oil must be classified as hazardous waste and transported to an approved waste treatment or disposal facility by a licensed hazardous waste carrier.
- The shipment must be accompanied by a waste manifest showing the EcoCentre operator as the consignor.

Module Seven

Emergency Response Plan and Procedures

7. EMERGENCY RESPONSE PLAN AND PROCEDURES

An Emergency Response Plan must be developed specific to each EcoCentre and in consideration of the situations and circumstances which could give rise to emergencies in each location.

The Emergency Response Plan must contain step-by-step procedures for personnel to follow in case of an injury, fire, explosion, flood or release of used oil to the environment.

 First aid procedures should be set out to deal with a medical emergency or with injuries to staff or customers associated with an emergency situation.



- The Emergency Response Plan should include the telephone numbers of the local police, fire department, ambulance service and hospital.
- The Plan should be reviewed on a regular basis with employees and with others who may be involved in its implementation.
- It is important to inform the local emergency services which will be called upon to respond to an emergency at the EcoCentre of their role and responsibilities in the event that they will be called upon to respond.
- The Plan should be kept in a central location so it can be easily referred to in the event of an emergency.

7.1 Leaks and Spills

- Any spillage that occurs during handling of materials at the site must be contained and cleaned up promptly.
- Sufficient and appropriate clean-up materials must be immediately



available to the EcoCentre personnel.

- Commercial absorbents, kitty litter and sawdust can be used to soak up spilled oil. Rags can be used to wipe up small spills.
- Where there is a danger of spilled oil flowing and broadening the area of contamination, absorbent pads, berms or sand should be placed around the spill to prevent it from migrating.

All spill clean-up should be done quickly and completely. It is important to use personal protective equipment in the spill clean-up situation as it is during routine handling of oil and oil products. Keep the following information in mind as you clean up a spill:

- Oil flows and can move resulting in contamination of sewers, wells or surface water.
- Oil is slippery and can cause injuries from slips and falls.



• Oil will burn. Extinguish all ignition sources with 3 m of the spill.







- Soak up with absorbent (eithera commercial product, kitty litter or sawdust) or on rags as appropriate.
- Oil recovered following a spill must be placed in a waste container and held for proper disposal.
- Under no circumstances should this waste be placed in, or returned to the oil collection tank.
- Shovel oil-filled absorbent into appropriate metal garbage container or drum designated to store recovered product and place oily rags in a

covered metal container.

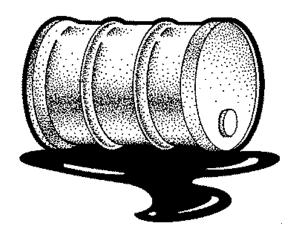
- Sweep up excess absorbent
- Report the incident and the amount spilled on an Incident Report Form and report it to EcoCentre manager (employer).



ECOCENTRE INCIDENT REPORT	
DESCRIPTION OF THE INCIDENT	ACTION TAKEN

For major spills (over 5 kg or 5 litres):

- Contact your employer immediately.
- Call for fire, police or other emergency help as required.
- Attempt to berm the oil spill to contain it and stop its flow.
- Spread the spill area with commercial absorbent.
- Call for a vacuum truck or commercial clean-up contractor.



- Report any spill over 5 litres, to the local Sustainable Development (Environment) Officer. Spills over 100 litres must be reported to the Manitoba Environment Spill Line at (204) 944-4888.
- Arrange for disposal of the recovered product.

7.2 Fire and Explosion

While oil is classified as neither flammable nor combustible according to WHMIS and TDG regulations, the EcoCentre must still be prepared and equipped to deal with a potential fire and explosion. Oil will burn, and there is a potential for risk of spontaneous combustion when oily rags and cardboard are improperly stored.



- Customers must turn of vehicle engines when delivering used oil product to the EcoCentre.
- Paper products and oily rags used in spill clean-up must be placed in covered containers which are removed on a regular basis for disposal in accordance with local landfill authority.

EMERGENCY NUMBERS

- The EcoCentre must be equipped with an ABC type fire extinguisher, and staff trained to use it in the event of a fire emergency.
- Numbers for the local Fire Department must be prominently posted, and the EcoCentre equipped with a means of communication in the event of a fire emergency.

FIRE 911 HOSPITAL 234-5678 AMBULANCE 911

> DEPARTMENT OF SUSTAINABLE DEVELOPMENT SPILL LINE

(204) 944-4888





7.3 Emergency Evacuation

 The egress route from the building must be clearly marked and kept free of debris and obstructions which could hamper quick and safe evacuation.



 Employees must be trained to follow specific evacuation procedures and to remain at a designated marshaling location at a safe distance from the EcoCentre until they are accounted for and given further instructions.

7.4 First Aid

Used oil may contain small amounts of harmful materials which can cause illness if they are inhaled or ingested. However, oil vapours are unlikely to become airborne in absence of elevated temperatures or mechanical action such as spraying.



Safe work practices and good personal hygiene

will eliminate any potential for ingestion of oil products.

As with any workplace in Manitoba, the EcoCentre must be equipped with first aid equipment and supplies which meet the requirements of the First Aid Regulation of the Workplace Safety and Health Act. EcoCentres must evaluate the potential for accidental injury and exposure to hazardous materials and provide appropriate information, training and resources to ensure that a quick and correct response capability is available. The following First Aid Measures are recommended for exposure to used oil.

- **Eye Contact:** Flush eyes with large volumes of water until irritation subsides. If irritation persists, seek medical attention.
- **Skin Contact:** Flush the affected area with large volumes of water. Use soap if possible. Remove severely contaminated clothing (including boots or shoes) and launder before re-use.
- **Ingestion: DO NOT INDUCE VOMITING** as it is important that no amount of the material enter the lungs through aspiration. Keep at rest. Get immediate medical attention.
- **Inhalation:** In case of adverse exposure to exposure to vapours, mists or fumes, move to fresh air. Administer artificial respiration if breathing has stopped. Keep at rest. Call for prompt medical attention.

7.5 Inclement Weather

- In the event of, or in anticipation of inclement weather, the EcoCentre should stop accepting oil products and cease all operations until the weather clears.
- In the event of thunderstorms, hail, freezing rain, snow storms or flooding, the EcoCentre must not be operated for used oil collection, or for transfer out of products.



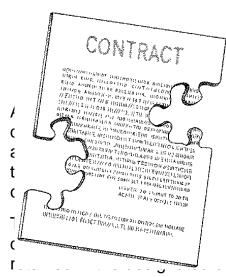
• This will reduce the likelihood of product spills, staff injuries and water contamination of the containers and used oil tank.

Module Eight

Shipments from EcoCentres

8. SHIPMENTS FROM ECOCENTRES

8.1 Selecting and Contracting with Approved Collectors and Carriers



e EcoCentre operator must enter into an reement with an Approved Collector to receive used oil available to be shipped from the oot.

Collector must remain in force at all times e facility. The agreement should state how ely be used, and contain a commitment from cate of disposition for each shipment

to determine where the exemptions for waste bly. A copy of this agreement must be nder (See Section 5.5) and be available for

inspection by an Environment Officer representing the Sustainable Development Department.

- the oil must be transported by a licensed hazardous waste carrier
- the shipment must be accompanied by a waste manifest or movement document showing the EcoCentre operator as the consignor.

In all cases, shipments of oil from EcoCentre must comply with applicable parts of the Transportation of Dangerous Goods Regulations.

These requirements are set out in Part 5 of this training program.

Module Nine

Communication Procedures

9. COMMUNICATION PROCEDURES

9.1 Customer Relations

Mission

To encourage and promote the proper disposal of used oil, oil filters and other automotive and used industrial petroleum distillates by providing customers with an efficient and reliable removal service.

The success of the EcoCentre, and the success of the Used Oil Stewardship Program as a whole, depends to a great extent on the support and co-operation of the company's customers. The staff of an EcoCentre have both the opportunity and the responsibility to ensure that the customer's experience in returning used oil, containers and oil filters is a positive one, and reinforces

the environmentally responsible initiative taken by the customer. EcoCentre staff are expected to act in a friendly and courteous manner at all times.

The typical interaction with a customer will occur in the following way:

- 1. **GREET** the customer.
- 2. **CONFIRM** that the product(s) being offered can be received.
- 3. **INSPECT** and **ACCEPT** the product, or
- 4. **INSPECT** and **REJECT** the product, giving a reason why the product is unacceptable (it is contaminated, or not within the scope of acceptable products) and what alternatives the customer has to dispose of the product.
- 5. **THANK** the customer for returning the product in, and for supporting the Used Oil Stewardship Program.

9.2 **DEALING WITH DIFFICULT CUSTOMERS**

- EcoCentre staff are instructed that, under no circumstances is a customer to be allowed to leave products that the company is not licensed to accept (such as contaminated fuel or household hazardous waste).
- If a customer refuses to take a rejected product, staff are not expected to provoke a confrontation, but to write the incident up on an **Incident Report Form**, to provide any information of which the staff is certain on the identification of the customer (name and address, telephone number, vehicle license number) and to bring the situation to the attention of the main office as soon as possible.
- The contaminated oil must be identified, segregated and held until a decision is made on how to deal with the situation. Both MARRC and Manitoba Conservation and Climate can be contacted for advice and support in this situation.
- It is unlikely that EcoCentre staff will receive complaints from consumers about the Environmental Handling Charge placed on the oil, container and filter at the point of purchase. If customers do complain, they should be encouraged to bring their comments and concerns to the attention of MARRC at the number provided in Appendix 1.

9.3 Media and Public Relations

- It is important to determine who is the person responsible for speaking on behalf of the company in the event of an incident. This person will require complete and accurate information from EcoCentre staff directly involved in case of an environmental incident. This will ensure the release of appropriate and consistent facts to the media.
- The confidence of the public and the EcoCentre customers is important to the success of the Used Oil Stewardship Program. This confidence must be preserved in the event of an incident, or it may be formed in the context of this media attention. Therefore it is important to respond to preserve a positive image.

The following is provided as a guideline to assist EcoCentre staff in providing clear and concise detail about the incident in what is likely to be an unfamiliar situation. Understanding what kind of information will be requested will assist those with direct knowledge of the situation to communicate the facts,

Reporters will want to obtain some basic information:

- The name of the person who is speaking on behalf of the company, and the names and positions of others involved in the incident.
- When did the incident occur, and how and when did you find out about it.
- What happened, and what caused it to happen.
- How did it occur?
- Who is involved?
- Where did it occur?
- Why did it occur?
- What have you done about it?
- What is the impact of this incident?



With this information in his possession the company spokesperson will be able to give one of the three appropriate responses to questions concerning the incident:

- 1. Yes, I know the answer, and here it is.
- 2. No, I don't know the answer, but I will try and find out.
- 3. Yes, I know the answer, but I can't tell you.



There are some basic principles in dealing with the media:

- Nothing is "off the record". If you don't want something attributed to you, don't say it.
- Your comments will be printed, and may be recorded in audio or video format for radio or television broadcast.
- Because your comments will be edited to suit the medium, be concise, accurate, calm and direct.
- Get the interviews over with as soon as possible.
- Anticipate questions, and if possible have written information ready for release.
- Remember that you might have to do might have to be interviewed again in a follow up situation, so retain copies of what was released and written to ensure consistency.
- Refer any questions about the Used Oil Stewardship Program to the MARRC Office.
- Always get the names, addresses, telephone and fax numbers for the reporters for information you may wish to provide after the interview.



Directory of Resources

Directory of Resources

Wall limb	Emergency Services	P.
Numer Name N	Fire Department	
	Ambulance Service	
Name of the Party	Hospital	
W. Complement	Doctor	
, annual and	Manitoba Environment Environmental Accident Reporting Line (204) 944-4888	· · · · · · · · · · · · · · · · · · ·

MANITOBA ASSOCIATION FOR RESOURCE RECOVERY CORP.

Aaron Strub
Manitoba Association for Resource Recovery Corp.
35 - 1313 Border Street
Winnipeg, Manitoba
R3H 0X4
TELEPHONE (204) 632-5255
FAX (204) 633-9380
e-mail: marrc@mymts.net

TRAINING FACILITATOR

Adam Hannah



29-1313 Border Street Winnipeg, Manitoba R3H 0X4

Telephone: (204) 953-1700 adam@corporatehealthworks.ca

MANITOBA CONSERVATION AND CLIMATE - USED OIL STEWARDSHIP PROGRAM – Local Provincial contacts can be found at the following link

https://www.gov.mb.ca/sd/environment_and_biodiversity/petroleum_storage/contact.html

ACCREDITED LABORATORIES

Enviro.Test Laboratories 745 Logan Avenue Winnipeg, Man. R3E 3L5

Telephone: (204) 945-3705 Fax: (204) 945-0763 Toll Free: 1-800-607-7555

National Testing Laboratories 180 Henlow Bay Winnipeg, Man. R3Y 1G4

Telephone: (204) 488-6999 Fax: (204) 488-6947