



State of Oregon
Department of
Environmental
Quality

Permit Evaluation and Overview

Oregon Department of Environmental Quality
Northwest Region Office
700 NE Multnomah Street, Suite 600
Portland OR 97232

Date: Updated September 19, 2017
Subject: Solid Waste Permit Evaluation Report
Site: EcoLube Recovery LLC dba American Petroleum Environmental Services, Inc. proposed - SWDP 1591
Proposed Permit: Transfer and Material Recovery Facility
Facility Contact: Kristi Hunt, Facilities Manager
Permit Writer: Heather Kuoppamaki

Facility Location

American Petroleum Environmental Services (APES) / EcoLube Recovery
11535 N Force Ave
Portland, Oregon

Proposed Permit

The facility has submitted an application for a solid waste transfer and material recovery facility.

Facility Description

Solid Waste Disposal Permit (SWDP) #1591 authorizes the facility to accept oily debris (including fabric and granular absorbent materials) for transfer to a final disposal location, used antifreeze for transfer to a recycling facility, and used oil filters for onsite material recovery of used oil and metal. American Petroleum haulers deliver waste to the facility during normal operating hours.

The site is approximately 4 acres. The majority of the site is covered with asphalt, concrete, tanks or buildings. Structures include an office building, a front warehouse building, oil storage area with secondary containment, antifreeze storage area with secondary containment, and three smaller buildings associated with the re-refining process.

Access is controlled by fencing on all sides. Zoning is compatible with the facility land use per the Land Use Compatibility Statement signed by city of Portland staff on December 13, 1993.

Adjacent land uses include various industrial activities, the Heron Lakes golf course, and the Portland Expo Center.

Stormwater from the site is collected in a series of catch basins that flow to an oil/water separator and is ultimately discharged to Force Lake.

On September 18, 2017, DEQ was informed that EcoLube Recovery had purchased the assets of APES. The permit has been updated accordingly.



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Operations Overview

American Petroleum Environmental Services is an oil re-refining company. The facility primarily re-refines used oil into saleable oil. Regulations regarding re-refining of used oil are provided in 40 CFR 279 and OAR 340-111.

Wastewater generated during used oil re-refining is stored in a tank onsite and then transferred to Oil Re-Refining Company, Inc. (ORRCO) for treatment and discharge into the city's sewer system.

Activities covered under this permit include crushing and cubing used oil filters for recovery of the metal and used oil (material recovery), the accumulation of oily debris prior to final disposal (transfer), and the accumulation of used antifreeze prior to transfer to a recycling center (transfer).

Used oil filter and crusher

APES collects drums of used oil filters at the point of generation from clients. APES personnel visually inspect the drums at the point of generation for any non-acceptable materials prior to loading drums onto delivery trucks. The drums of filters are then transported to APES for processing. The drums are then inspected a second time for any non-acceptable wastes. Any unacceptable drums are returned to the point of generation. The drums are manually emptied into a hopper where APES personnel visually screen the material in the drums for unacceptable materials. The screened filters are then transferred using a conveyor to the filter cuber/crusher. Used oil is squeezed out of the filters in the crusher. The remaining metal and paper is cubed and then transferred to a cube hopper that is stored under cover in the front warehouse. The cubes are then transported to a metal recycler. The used oil collected from the filters is tested to verify acceptability for used oil processing and then added to the used oil processing system onsite.

Oily debris

Oily debris includes used absorbent fabrics such as oily rags, and granular absorbents such as sawdust or wood chips. The solids are collected in drums at the point of generation and transferred to the facility via truck. The oily debris is stored in a covered bin until it is transferred to the final disposal location.

Used antifreeze

Used antifreeze is collected in a tank onsite prior to being sent offsite for processing.

Used Oil

Used oil is collected and re-refined onsite.



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Regulatory Context

Oil contaminated media and debris is not considered used oil in Oregon and therefore not subject to 40 CFR 279 and OAR 340-111 (used oil regulations). Oily debris and used oil filters are considered solid wastes in Oregon in accordance with OAR 340-093-0030(91). APES does not accept terne-plated used oil filters.

Used antifreeze regulations are located in 40 CFR 261, OAR 340-093, and OAR 340-096. Used antifreeze that is managed in accordance with the "Best Management Practices" described at the following website is not considered a hazardous waste:

<http://www.deq.state.or.us/lq/pubs/factsheets/hw/UsedAntifreeze.pdf>

Used oil regulations are located in OAR 340-111 and 40 CFR 279.

Permit History

This will be the first DEQ Solid Waste Permit for this facility.

The facility has had a standard air contaminant discharge permit (ACDP) 26-3021-ST-01 and a 1200-COLS permit for discharging stormwater to the Columbia Slough. DEQ is concurrently modifying and renewing APES ACDP with the draft solid waste disposal permit.

Compliance History

The facility does not have any historic violations with DEQ solid waste.

The facility does not have any outstanding violations with DEQ. The following is a list of violations at the facility within the last 5 years:

The facility received a warning letter in 2015 for not labeling used oil tanks. The warning letter was issued in August 2015 and the facility achieved compliance in October 2015.

The facility was under enforcement in 2014 for failing to collect stormwater discharge monitoring data and submitting a timely report. The case was closed in 2014.

Public Comment

DEQ held a public information meeting on March 7, 2017 to answer questions from the public about the solid waste and air quality permitting requirements. DEQ then drafted a solid waste material recovery/transfer station permit and issued a public notice on May 19, 2017 to accept comments on the draft solid waste permit. DEQ also held a public hearing on the draft air and solid waste permits on June 21, 2017. The public comment period closed at 5 p.m. on July 3, 2017.



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DEQ received comments on the draft solid waste permit that were forwarded from Metro who received the comments during their public notice period. DEQ received comments on the draft solid waste permit from five additional people. Based on these comments, DEQ modified the draft permit to include additional rule citations and clarify permit language. DEQ prepared a Response to Comments document that summarizes the comments made.

Permit modifications include:

- Clarification of the type of disposal site (transfer and material recovery facility),
- Clarification that used oil must be managed in accordance with OAR 340-111 and 40 CFR 279.
- Adding rule citations throughout the permit.
- Prohibiting acceptance and burning of off-specification used oil.
- Clarification on records retention requirements for the facility.

Recommendations

DEQ has determined that APES is able to comply with solid waste permitting requirements. DEQ recommends issuing the draft solid waste permit.