

**DEPARTMENT OF THE NAVY
NAVAL AIR STATION
NORTH ISLAND
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SAN DIEGO, CALIFORNIA 92135-7033**

From: Commanding Officer, Naval Air Station, North Island

Subj: PROCEDURES FOR RECYCLING USED OILS AND RECLAIMING JP-5

Ref: (a) Executive Order 12856 of 03 Aug 93
(b) OPNAVINST 5090.1B, Environmental and Natural Resources Program Manual

Encl: (1) Procedure for Recycling Used Oils
(2) Procedure for Reclaiming JP-5

1. Reference (a) mandates federal facility compliance with the Pollution Prevention Act of 1990, which requires reducing pollution by reusing and recycling hazardous materials to the maximum extent possible. Reference (b) directs Navy shore activities to establish and maintain programs for the segregation, reuse and recycling of used oils. Accordingly, NAS North Island has in place procedures for recycling used oils and reclaiming JP-5.
2. In addition to complying with regulatory goals, the recycling of oils and reclaiming of JP-5 saves NAS North Island significant costs in hazardous waste disposal fees and avoided costs in procurement of JP-5.
3. Waste lubricating oil, hydraulic fluid and PD-680 that has not been contaminated with fuel, solvent or any other hazardous waste is to be recycled per enclosure (1).
4. JP-5 collected from sampling and maintenance operations, and not contaminated apart from debris or water, is to be reclaimed per enclosure (2).
5. Point of contact for NAS North Island, Environmental Division (Code 18E), is Mr. Bob Hylton at 545-1127.

A.V. BERNARDO
By direction

Distribution:
NASNIINST 5215.2V
Lists A, C, D (Case I)

PROCEDURE FOR RECYCLING USED OILS
NAS NORTH ISLAND
May 1997

Background

Recycling used oil is a key part of NASNI's hazardous waste minimization effort and saves the Navy hundreds of thousands of dollars per year in avoided disposal costs. The oil is diverted from the waste stream, and refined into other products such as marine diesel, heating oil and asphalt products by a petroleum recycling company.

What is Recyclable Oil?

Lubricating oil, hydraulic fluid, and small amounts of PD-680 from patch testing are recyclable and may be mixed together and accumulated in the same drum. The oils must not be contaminated with fuel (JP-5, diesel, gasoline, etc.), solvents or any other hazardous waste. If fuel has been mixed in with the oil, it is no longer recyclable and must be disposed of as a hazardous waste. Likewise, if the oil contains more than 1,000 ppm of halogens (which could result from a very small amount of solvent entering the drum), it is no longer recyclable and becomes a hazardous waste.

Accumulation

Note: Recyclable oils must be managed as "satellite accumulation" only.

Container

Dedicate a clean, bung-top, 55-gallon drum for recycled oils. To avoid contamination, a drum lock is suggested. An approved funnel (tight closing lid, t-plug fitting in throat) may be used. Only one drum may be used.

Labels

In California recyclable oil is a hazardous waste until it's at the refinery. Affix a completely filled out HW label to the drum; next to "Contents" enter the words "recyclable oils." Mark the "Toxic" box. Write in the word "Satellite" above the Accumulation Start Date. See attachment (a) for example.

Also, regulations require that the words "USED OIL" be on the drum in large letters. This may be either a separate label or stenciled onto the drum. Use letters at least 3" high.

Location of Drum

"Satellite accumulation" regulations require that the drum be located "at or near" the point of generation of the oil, and "under the control of the operator." Locate the drum per these

requirements; do not put it in your less-than-90-day site unless it's centrally located to the generation points.

For example, if the oil is generated in a shop, locate the drum (with secondary containment) in that area and near a door that is accessible to the truck that picks up the oil. However, if the oils are generated at various points around the flight line, the 90-day site might be appropriate. Check with the point-of-contact.

Accumulation Time

Under the rules for satellite accumulation, the oil can only be on NASNI for one year or less. Once the truck picks up your oil and transports it to the tank at the fuel farm, it may remain there for up to 90 days. Therefore, have the oil picked up before 9 months from your accumulation date to ensure it's on the base less than one year.

Turn-in Procedure

Call Trajen Corp. at ext. 57208 to schedule a pick-up. Your drum should be at least half full. When the driver picks up the oil, be sure you get a chit – it will show the quantity, type oils, whether it passed a halogen test, the date on your drum, and the date of pick-up. Keep this chit in your files. Attachment (b) is an example. Remove and destroy the old HW label and put a new one on the drum with that day's date on it, since there will be a residue in the drum already.

Record-Keeping

Keep your chits from Trajen on file. They're required for inspections, and once a year SCE Environmental will want to know how much oil you recycled.

Also, since this is a satellite accumulation, you need to maintain a weekly inspection log of the drum (e.g., closures tight, no puddles on drum top, secondary containment, label proper, etc.). If it's in your 90-day site this could be added to that inspection.

Point of Contact

For additional information contact Bob Hylton, SCE Environmental Division, at 545-1127.

Enclosure (1)

PROCEDURE FOR RECLAIMING JP-5
NAS NORTH ISLAND
May 1997

Background

Previously, JP-5 accumulated from aircraft sampling, pencil drainings and other maintenance operations was disposed of as hazardous waste or mixed with other waste oils for off-site recycling. Fuel farm personnel estimated about 600 gallons per week of this waste oil was composed of potentially reclaimable JP-5.

As a goal of our Pollution Prevention Plan, NASNI has begun operation of a prototype Aviation Fuel Reclamation system. By maintaining strict segregation of retrograde JP-5 at the activity level, this fuel can be collected and reclaimed. After processing and laboratory certification it can then be used for its originally intended purpose. The benefits are the reduction of high-grade fuel waste and disposal costs, promoting waste minimization through reuse of fuel product, and decreasing the quantity of JP-5 to be procured.

What is Reclaimable JP-5?

JP-5 that is clear and bright, contains no dyes, and when swirled contains no evidence of contamination other than particulates and water is reclaimable and shall be designated "Retrograde JP-5." No other fuel products or oils shall be mixed with the JP-5. Isopropyl alcohol, previously used for cleaning sample bottles, shall not be placed in this drum. Use only clean JP-5 for cleaning sample bottles; discontinue use of isopropyl alcohol.

JP-5 that contains dyes or is suspected of contamination other than particulates or water is hazardous waste and must be managed accordingly. It may not be mixed with recyclable used oil.

Accumulation

Container

Dedicate a clean, bung-top 55-gallon drum for retrograde JP-5. To avoid contamination, a drum lock is suggested. An approved funnel (tight fitting, t-plug fitting in throat) may be used. Ground the drum.

Label

Affix a label to the drum with the words "RETROGRADE JP-5" for contents. The label must also contain the name of your activity and the accumulation start date. Do not use the words "waste," "recyclable" or "excluded recyclable" to describe the JP-5. SCE Environmental will have "Retrograde JP-5" labels made up in the near future. At this time you may use the green

and white “Excluded Recyclable Material” labels after cutting off the words “Excluded Recyclable” from the top of the label. See attachment (c).

Location of Drum

Locate the drum in the less-than-90-day HW accumulation site. It may be located elsewhere if necessary; however, ensure that proper grounding and secondary containment are provided.

Accumulation Time

Retrograde JP-5 must be reclaimed within one year of initial accumulation. Therefore, ensure that the fuel is picked up by Trajen before one year elapses.

Turn-in Procedure

Call Trajen Corp. at ext. 57208 to schedule a pick-up. Your drum should be at least half full. When the driver picks up the fuel, be sure you get a chit – it will show the quantity, type of fuel, whether it passed a halogen test, the date on your drum, and the date of pick-up. Keep this chit in your files. Attachment (b) is an example. Remove and destroy the old label and put a new one on the drum with that day’s date on it, since there will be a residue in the drum already.

Alternatively, you may keep the same label and next to “Accumulation Start Date” write in “see attached card/schedule.” Then affix another label, or a card in a plastic bag attached to the drum, that has a table with two columns: “start date” and “empty date.”

Record-Keeping

Keep your chits from Trajen on file. They’re required for inspections, and once a year SCE Environmental will want to know how much fuel you have reclaimed. Since this is retrograde material and not a hazardous waste, it is not required to keep an inspection log as with satellite accumulation of used oils.

Point of Contact

For additional information contact Bob Hylton, SCE Environmental Division, at 545-1127.

HAZARDOUS WASTE

STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. IF FOUND, CONTACT THE BASE COMMAND DUTY OFFICER.

GENERATOR INFORMATION:

NAME: YOUR ACTIVITY

ADDRESS: NAS NORTH ISLAND

CITY: SAN DIEGO STATE: CA ZIP: 92135

CONTENTS/COMPOSITION: RECYCLABLE OILS: LUBE OIL, HYDRAULIC FLUID, PD-680

PHYSICAL STATE: SOLID SEMI-SOLID LIQUID GAS

HAZARDOUS IGNITABLE CORROSIVE TOXIC

PROPERTIES REACTIVE

SATELLITE

ACCUMULATION START DATE: 01 MAY 97

LABELED BY: RATE, NAME

ATTACHMENT (a)

TRAJEN

FLIGHT SUPPORT

NAVAL AIR STATION NORTH ISLAND
RECYCLED HAZARDOUS WASTE TURN-IN RECEIPT
TRAJEN TEL. NO. (619)-545-7208
ASHBURY ENVIRONMENTAL TEL. NO. (213)-321-1392

NAS DEPT./SQUADRON **YOUR ACTIVITY** BLDG. **YOUR BUILDING NO.**

***RECLAIMABLE
JP-5, OILS, ETC.***



***DATE ON YOUR
DRUM LABEL***



Approx. quantity (gals.)	Type of waste	Pass test (PPM)	Fail test (PPM)	Accumulation date

ACTIVITY REPRESENTATIVE **YOUR NAME** DATE ___/___/___

TRAJEN DRIVER **DRIVER NAME** DATE ___/___/___

↑
DATE PICKED UP

ATTACHMENT (b)

MATERIAL

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND CONTACT THE BASE COMMAND DUTY OFFICER

GENERATOR INFORMATION

NAME YOUR ACTIVITY
ADDRESS NAS NORTH ISLAND
CITY SAN DIEGO STATE CA ZIP 92135

CONTENTS/COMPOSITION: RETROGRADE JP-5

PHYSICAL STATE: SOLID LIQUID GAS

HAZARD CLASS: IGNITABLE CORROSIVE TOXIC REACTIVE

ACCUMULATION START DATE 01 MAY 97

ATTACHMENT (c)