A04-0024

National Environmental Achievement Track

Application Form

Aaron Oil Company, Inc.
Name of facility

N/A
Name of parent company (if any)

713 Bill Myles Drive
Street address

Street address (continued)

Saraland, AL 36571
City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name Lynn Clemmons

Title Compliance Officer

Phone 334-675-4666 x226

Fax 334-679-8783

E-mail Lynnc@aaronoil.com

Section A

Tell us about your facility.

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility
- Identify your environmental requirements.

1 What do you do or make at your facility?

Aaron Oil Company is a used oil recycler and petroleum reclamation company. The Saraland facility treats waste oils, used oil, and other approved petroleum waste. The water removed in this process goes back through our waste water treatment process, and the oils are blended with virgin fuel to meet specifications in 40 CFR 279 and/or the industrial burner's specifications. All of our recycled oil, oily sludge, tank bottoms, and residues are burned in industrial permitted boilers and furnaces, or sent back to a petroleum refinery as an exempted waste.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
5093

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☒ Yes ☐ No

4 How many employees (full-time equivalents) currently work at your facility?

☒ Fewer than 50

☐ 50-99

☐ 100-499

☐ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)? ☒ Yes ☐ No

If yes, list in the right-hand column. ALD983180233

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Section E

Tell us about your EMS.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

- ☐ GEMI ☐ Other
- ☐ CEMP

☒ Third-party assessment

- ☒ ISO 14001 Certification
- ☐ Other

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Recycled/Re-used Materials Use	4274	Drums	8732 YTD	Drums

i. How is the current level an improvement over the previous level?

The current level is an 204% increase in the total volume of drummed material collected. The operation we are tracking was not in place prior to 1999, therefore previous level figures only reflect 1 year ago.

ii. How did you achieve this improvement?

The company increased its customer base by soliciting smaller Mom and Pop service stations who would otherwise be sending the used filters and absorbents to a landfill. Instead of landfilling, Aaron Oil is recovering and recycling the liquid fuel product removed during the processing of these filters and absorbents. The steel filters are sent to a steel smelter for recycling and the used absorbent material is burned by approved industrial furnances for energy recovery.

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Total Materials Used	107	gallons/yard	114	gallons/yard

i. How is the current level an improvement over the previous level?

The current level is a 7% reduction in the amount of fly ash used per gallon of sludge processed.

ii. How did you achieve this improvement?

A polymer (approximately 15 gallons/month) is utilized to coagulate the solids, dropping more water out which reduces the amount of fly ash needed for solidification. Thus reducing the amount of solidified material being sent to the landfill. The use of the polymerincreases the amount of oil and product recovered which goes back to a reclamation process.

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Recycled/Re-used Materials Use	0	Drums	43	Drums

i. How is the current level an improvement over the previous level?

A gasoline dispenser filter recycling program was initiated to collect, process, and recycle gasoline dispenser filters. Prior to program initiation we did not take in this product.

ii. How did you achieve this improvement?

A marketing strategy was developed and implemented to secure dispenser filter contracts. Previous to this program, standard operating practice for customers was to landfill these filters. Our marketing strategy includes educating potential customers on alternative disposal methods and raising there awareness of the environmental benefits of collecting and recycling these filters. We are working to expand this market and increase collection of these filters.

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect? Reduce BOD discharges to water

b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A: Absolute value (Quantity/Units)

☒ Option B: In terms of units of production or output 3755 lb/day (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value
(Quantity/Units)

☒ Option B:
In terms of units of production or output
1000 lb/day
(Quantity/Units)

e. How will you achieve this improvement?

We are adding an additional step to our current water treatment process. Prior to discharge to the POTW, our waste water will be treated with a new technology to further reduce the BOD levels.

Second aspect you've selected

a. What is the aspect?

Emission of VOCs

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value
(Quantity/Units)

☒ Option B:
In terms of units of production or output
.49 lbs/day
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value
(Quantity/Units)

☒ Option B:
In terms of units of production or output
0
(Quantity/Units)

e. How will you achieve this improvement?

Installation of the above mentioned new treatment technology will eliminate the need to air strip VOC's from our wastewater. This will result in a .49 lbs/day reduction in VOC emission.

Third aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS? ☐ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A: Absolute value (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A: Absolute value (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

Fourth aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS? ☐ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A: Absolute value (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A: Absolute value (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

The company EMS manual addresses communications with community members. Inquiries and other communications (received by mail, fax telephone, or in person) from external parties concerning the company's EMS or environmental performance may be received by a number of the organization's representatives. All such communications are reviewed by the President or Compliance Officer to determine appropriate response.

2 How do you inform community members of important matters that affect them?

The company EMS procedures also address outreach to interested parties. On an as-needed basis, or as opportunities arise, the organization solicits the views of interested parties on its environmental management system, its environmental performance, and other related matters. In particular, such outreach may be conducted when significant changes at the facility are being considered, such as facility expansion or other actions that might affect actual or potential environmental impacts of the plant's products, activities, or services. As part of the management review process, the team designated to conduct the review evaluates proactive efforts to communicate with external parties. Based on this evaluation and other factors, the organization's management determines the need for outreach with external parties in the coming year and how such communications can most effectively be carried out.

Additionally, the company website (www.aaronoil.com) explains protective measures the company has taken to prevent soil contamination, storm water pollution, spills and leaks at the facility.

3 How will you make the Achievement Track Annual Performance Report available to the public?

- [x] Website www.aaronoil.com
- [ ] Newspaper
- [ ] Open Houses
- [ ] Other

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	*Name*	*Phone number*
Representative of a Community/ Citizen Group	Saraland City Councilman, Owner Mitchell Container	Ron Mitchell	334-675-3786
State/Local Regulator	Alabama Department of Environmental Management	Glenda Dean	334-271-7700
Other community/local reference	President, Saraland Historical Society	Gene Leachmman	334-675-9225

Section E

Application and Certification Statement

On behalf of Aaron Oil Company, Inc.
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date 9-26-2000

Printed Name/Title Dan Cowart, President

Facility Name Aaron Oil Company, Inc.

Facility Street Address 713 Bill Myles Drive, Saraland, AL 36571

Facility ID Numbers EPA ID # ALD983180233

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name	Aaron Oil Company, Inc.
Facility Location:	Saraland, Alabama
Facility ID Number(s): ***(attach additional sheets if necessary)***	EPA ID # ALD 983180233

Air Pollution Regulations	Check All That Apply
1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	☒
2. Permits and Registration of Air Pollution Sources	☐
3. General Emission Standards, Prohibitions and Restrictions	☐
4. Control of Incinerators	☐
5. Process Industry Emission Standards	☐
6. Control of Fuel Burning Equipment	☐
7. Control of VOCs	☒
8. Sampling, Testing and Reporting	☒
9. Visible Emissions Standards	☐
10. Control of Fugitive Dust	☐
11. Toxic Air Pollutants Control	☐
12. Vehicle Emissions Inspections and Testing	☐
Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)	
13.	☐
14.	☐

Hazardous Waste Management Regulations	
1. Identification and Listing of Hazardous Waste (40 CFR 261)	
- Characteristic Waste	☒
- Listed Waste	☒
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)	
- Manifesting	☒

- Pre-transport requirements ☐
- Record keeping/reporting ☒

3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
   - Transfer facility requirements ☐
   - Manifest system and record-keeping ☐
   - Hazardous waste discharges ☐
4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
   - General facility standards ☐
   - Preparedness and prevention ☐
   - Contingency plan and emergency procedures ☐
   - Manifest system, Record keeping and reporting ☐
   - Groundwater protection ☐
   - Financial requirements ☐
   - Use and management of containers ☐
   - Tanks ☐
   - Waste piles ☐
   - Land treatment ☐
   - Incinerators ☐
5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

8. ☐
9. ☐

Hazardous Materials Management

1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☒
2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

6. Used Oil Management Regulations ☒
7. ☐

Solid Waste Management

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
2. Permit Requirements for Solid Waste Disposal Facilities ☐
3. Installation of Systems of Refuse Disposal ☐

4. Solid Waste Storage and Removal Requirements ☒
5. Disposal Requirements for Special Wastes ☒

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. ☐
7. ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☒
2. Designation of Hazardous Substances (40 CFR 116) ☐
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☐
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☐
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☒
11. Effluent Limitations for Direct Dischargers ☒
12. Permit Monitoring/Reporting Requirements ☒
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☒
14. Collection, Handling, Processing of Sewage Sludge ☐
15. Oil Discharge Containment, Control and Cleanup ☒
16. Standards Applicable to Indirect Discharges (Pretreatment) ☒

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. ☐
18. ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☐
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☐
5. Underground Injection Control Requirements ☐

6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. ☐
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☒
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. ☐
10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☒

2. RCRA Corrective Action (identify) ☒

☐

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)

3. ☐
4. ☐