



BCUOMA

British Columbia Used Oil
Management Association

COMMENTS DOCUMENT

**Prepared and submitted by the BC Used Oil Management Association
(BCUOMA)**

On

January 10, 2011

Addendum to BCUOMA Stewardship Plan

1. REQUEST FOR CONSULTATION ON STEWARDSHIP PLAN

On October 21, 2010, the Ministry of Environment requested that BCUOMA hold a consultation meeting/webinar for stakeholders to receive their comments on the BCUOMA's proposed Stewardship Plan. To notify stakeholders of the consultation meeting/webinar, notices were sent to existing and potential BCUOMA collectors and processors, Recycling Council of BC distribution list, SWANA BC & Yukon Chapter distribution list, and the BCUOMA Board members.

2. CONSULTATION MEETING/WEBINAR ON STEWARDSHIP PLAN

A consultation meeting/webinar was held on November 30, 2010, at the Delta Town & Country Inn. Eleven attended in person and ten to thirteen participated via the webinar. Most of the participants were BCUOMA registered collectors and processors. A copy of the attendance/webinar list is included in Appendix A.

The meeting/webinar was set up in such a way that participants on the webinar could visually see the presenter plus the PowerPoint slides. At the meeting/webinar, each major section of the Stewardship Plan was reviewed with the use of PowerPoint slides. At the end of the discussion of each section of the Plan, comments and/or questions were invited from the meeting/webinar participants and were recorded. In addition, the meeting/webinar was recorded and sent to the Ministry of Environment for their information.

3. ANTIFREEZE COLLECTION AND REGISTRATION SYSTEM FOR COLLECTORS & PROCESSORS

Comments Received:

Percentage of antifreeze collected in drums, totes and tanker truck varies depending upon the region of the province. In rural areas of the province, most of the antifreeze is collected in drums.

BCUOMA Response:

BCUOMA agrees that collectors will utilize different means of picking up the used antifreeze from the generators across BC and will design the program for collectors accordingly.

4. ANTIFREEZE COLLECTION & PAYMENT SYSTEM TO COLLECTORS

Comments Received:

What is the % glycol standard in the used antifreeze that the processor would accept. You need to make sure that the processors align with the standard. 50% glycol in the used antifreeze is considered fair.

Addendum to BCUOMA Stewardship Plan

We do not agree with penalizing for water percentage. There has to be a different mindset. The purpose of the program is recovery of glycol, and there is a fine line between penalizing and recovering. So, there should be a reward for collecting any percent of glycol. Collector should not be a policeman for what the practices are out on the road. It's the responsibility of the stewardship program to provide education.

Who do you see would benefit from the dilution of antifreeze? And why would they do that?

When it comes to water percentage, you can't compare oil with antifreeze because water is a necessity in glycol. It is an accepted component of glycol. In the Lower mainland, which has moderate climate, a car driver may choose to top-up their radiator as much as they want. Every gas station has an air line and water line. So, the common practice is that if you are running low on glycol, you top it up with water.

If a customer brings in glycol with water, and is denied, they just dump it off right in our yard. So we have to accept it because we know where it's going to end up. If we had a refractometer, we could measure the water % and then try to mix and match to reach the optimum %.

Canadian Tire and Mr. Lube use exchange machines, but most generators don't, so the percentages are not very consistent. A customer won't spend \$3000 on an exchange machine. Even our big generators are not going to spend that kind of money.

With oil, we have to provide water % for truck load, and not individual pick-up; is it going to be same for antifreeze?

You should give some time to collectors and processors to figure out what their range for water % is, and then go from there. Because if we know our range, then if there is a change once the program kicks in, we'll know there's something going on.

What is the process to determine the RI and water percentage, and to settle the remaining issues.

How can you set the EHC first, without knowing the RI? It has to be done at the same time.

BCUOMA Response:

Of all the discussion items at the meeting/webinar, this topic resulted in the most discussion and comments. In Ontario, where the program has been in operation for over a year, the minimum percent glycol in the used antifreeze collected was specified at 35%.

Addendum to BCUOMA Stewardship Plan

Based on comments from a major antifreeze supplier across Canada, it appears that this low percentage of glycol has resulted in deliberate mixing of water with the antifreeze by generators and/or collectors to maximize their revenue.

As a result, BCUOMA will be specifying a minimum % glycol, without penalty to the collector, to be in the range of 45% to 50%. Anything below that amount to about 30% will result in a pro-rated reduction in the payment of a Return Incentive (RI) to the collector. This pro-rated reduction will be set at a level which is sufficient to discourage deliberate mixing of water with the antifreeze. This method of a pro-rated reduction is similar in principle to what BCUOMA does with regards to the payment of RIs for used oil contaminated with water.

If the minimum glycol levels, and the pro-rated reductions, are later found to be incorrectly set, BCUOMA will make the necessary corrections to insure that the recycling of antifreeze, with a reasonable percentage of water, is not discouraged.

The process to determine the appropriate RI to be paid to the collectors is mainly based on what generators are currently being charged for pickup of the used antifreeze in the different areas (zones) of the province. The EHC is determined based on the RI to be paid, the amount per litre paid directly to the Return Collection Facilities (RCFs), and the expected administrative and program costs to be incurred. The RI and EHC will likely be determined by the Board and/or Members at the same time.

5. ANTIFREEZE PROCESSING SYSTEM

Comments Received:

To meet the ASTM standard, we use distillation. There are practices out there, which do not distill, which means they won't meet the ASTM standard. Program has to decide what they consider acceptable. There are also processors out there who buy without re-distilling.

After years of processing antifreeze, we have come to a point where the customer doesn't even question the quality of recycled antifreeze reliability. If those standards come down, it's going to have an adverse affect. Unless other companies are willing to make the financial commitment, it is a challenge.

Reprocessing glycol for industrial use means it has to be distilled back into concentrate (90 – 100%), which is very expensive. There is market for 50-50 product. It's a completely different process; additives for industrial glycol are completely different

Addendum to BCUOMA Stewardship Plan

BCUOMA Response:

BCUOMA has several objectives in clearly outlining the BCUOMA approved processing requirements for used antifreeze. Firstly, BCUOMA wants to make sure that there are enough acceptable end-uses for the processed used antifreeze collected each year in the province. Secondly, BCUOMA wants to ensure that each of the BCUOMA registered processors are in fact processing the collected antifreeze to the standards required. Thirdly, BCUOMA wants to put in place a system that supports the Recycling Hierarchy in the *Recycling Regulation*.

6. ANTIFREEZE CONTAINER COLLECTION SYSTEM

Comments Received:

Outside the lower mainland, there is more potential of collection. In the Lower Mainland, most of it is collected. They have always been a part of the collection system.

People use the antifreeze jug, and put oil in it. So we don't want to add it to the clean plastic. There has to be education for this.

One Regional District was highly skeptical that 50% of the antifreeze containers were already being recycled and that most of the current container recycling would have been done through tax-payer funded recycling collection programs. If the Stewardship Plan assumes that future collection will also be accomplished through a 'partnership' with local governments, then there needs to be provision in the Plan for compensation for local governments doing the Steward's work. It is untenable to think that BCUOMA will be collecting recycling fees, passing costs and responsibilities on to their 'partners', and then collecting the praise for a job well done.

BCUOMA Response:

BCUOMA agrees that, except for the do-it-yourselfers, most of the antifreeze containers in the Lower Mainland are already being recovered, together with the oil containers. In the interior, there is the potential to more significantly improve on the recovery rate of the antifreeze containers once the program is operational.

Since the antifreeze containers will continue to be collected in the same bags as the oil containers, it is not a concern if the antifreeze container is contaminated with oil, since the combined oil/antifreeze container mix will be processed together.

The estimated almost 50% recovery rate for antifreeze containers prior to program inception is based on an actual count of 1000 bags of oil containers in 2008 and extrapolating that information to the sales of antifreeze in 2009. These containers were not collected through tax-payer funded programs, but rather through the same BCUOMA

Addendum to BCUOMA Stewardship Plan

registered collectors that are picking up oil containers. Most of these antifreeze containers come from the Canadian Tire, quick lube shops and the thousands of other auto service shops throughout BC who put their antifreeze containers in the same recycling container as they put their oil containers.

7. RETURN COLLECTION FACILITIES (RCFs) FOR DO-IT-YOURSELFERS

Comments Received:

A not-for-profit eco centre currently receives about 2 - 3 drums of antifreeze per week, without a stewardship program in place.

We found that the do-it-yourselfers always come back once every year at a Household Hazardous Waste (HHW) collection event. It is because of the advertising. When there is a one day event, people just decide to clean up.

There still seems to be public confusion about where depots are. Depot owners do not seem to be eager to promote their service. Do you hear about resistance from depots to post signage? How about the signage size and placement in collection depots? What approach do you take to encourage publicity of the service?

Is there training and follow up provided to depots to ensure the site is maintained well?

Landfill bans do not ensure the material is collected elsewhere. More depots and round ups are required to ensure material does not go to landfill. Black bags hide many things!

One Regional District expressed concern about:

- the turnover of used oil collection sites and how it makes it difficult for the residents to know how to participate in the program.
- the fact that BCUOMA informs the residents about the oil drop-off locations via the website and not all residents, especially the do-it-yourselfers, are internet savvy. A better system would be for each site that sold the product to also provide the information on where to recycle the used materials and containers. It should be a requirement that all retailers who sell oil/antifreeze should provide a recycling program for that material and/or container.
- The selection of a drop-off site by BCUOMA should be a much more strategic and deliberate act than the present system.
- The information in the Stewardship Plan is misleading as the financial incentives paid to the drop-off sites are not sufficient to cover the cost of handling the material.
- The BCUOMA collection site model incorrectly assumes that there is a competitive advantage for a service station to be the drop-off location. The "competitive

Addendum to BCUOMA Stewardship Plan

advantage model" breaks down in rural BC due to there being only one or two service stations in a rural area, which are then faced with accepting oil and containers purchased in larger centers from big box stores.

- A collection system that relies on the drop-off location operators' "good nature" for wanting to see the environment protected as the reason for accepting the used materials will not succeed without a sufficient financial reward.

BCUOMA Response:

BCUOMA acknowledges that there is significant turnover of RCFs each year. However, with almost 490 RCFs, and the dynamic nature of businesses selling, relocating and shutting down, it is inevitable that there will continue to be significant turnover of RCFs.

BCUOMA informs residents through of the location of the RCFs by a number of different means. The 1-800-667-4321 toll free hotline run by the RCBC is the most accessible option for all British Columbians to determine the RCFs closest to their place of residence. The website www.usedoilrecycling.com/bc is another option that internet savvy British Columbians can use to determine the location of a RCF. In addition, BCUOMA uses radio and newspaper ads and brochures to get the message out to British Columbians about how and where to recycle their used oil materials, and will continue to follow the same methods to advertise the antifreeze material recycling options.

In addition, BCUOMA engages an Ambassador Team of two university students to drive around the province and meet with or talk to almost all of the 490 RCF operators in the province, explain the program, answer their questions and provide signage to the RCFs. Frequently, the Ambassadors are interviewed by the local media, which provides a further opportunity to talk about the RCFs in their community. As a result of the Ambassador visits to the RCFs, the RCF list is regularly updated.

When the program first began in 2003, the money passed on to the RCFs by the BCUOMA registered collectors was for the most part a good incentive for someone to consider being a RCF for the do-it-yourselfer, including a number of local governments. In the last several years, the markets for used oil have diminished and the financial incentives provided to RCFs were reduced. BCUOMA has considered the changing market conditions, and recently the BCUOMA Board determined that, effective July 1, 2011, BCUOMA will be paying the RCFs directly for the collection of used oil and antifreeze materials. Further specifics regarding this program will be provided to operators of RCFs in the next several months.

Most of the RCFs are auto repair and/or quick lube facilities where most of the used oil materials they collect are from the vehicles they service, not from the do-it-yourselfers. All generators of used oil and antifreeze materials are required to meet the requirements of

Addendum to BCUOMA Stewardship Plan

the *Hazardous Waste Regulation*. BCUOMA does not impose any additional requirements to that Regulation.

8. CONSUMER AWARENESS

Comments Received:

It's difficult to get the message out there. How effective do you think your education is in reaching the residents?

As for education, you should work with the retailers. People on the front-end do not know, e.g. Canadian Tire. They are listed as RCF, but when you call, people on the front line don't know and provide wrong information.

The consumer just thinks EHC is a government tax, and don't question it. The receipt doesn't tell them it is a recycling fee, and they should recycle the product. Canadian consumers need to be educated that this is not a government tax. You could provide funding to local governments

BCUOMA Response:

Based on the excellent recovery rates for used oil materials and the results of several waste composition studies, BCUOMA feels that the program is recovering over 90% of what is available for collection.

There are thousands of sellers of oil and antifreeze in British Columbia. As well, for companies like Canadian Tire and Wal-Mart there are many different stewardship programs. To have all the front line staff in the stores selling stewarded products to be fully aware of all the stewardship programs, would be a very significant additional workload and cost requirement on these stores. Similarly, to prominently display signage about all the stewarded products in the stores where the products are sold would also place an unrealistic burden on these businesses. Rather, the BC Stewards are collectively looking at how we can work with businesses and each other to better advertize the programs to the public, and to make the demands on British Columbians for returning the used products less onerous.

9. PROGRAM PERFORMANCE

Comments Received:

No specific comments received for this topic.

Addendum to BCUOMA Stewardship Plan

10. OPTIMAL RECOVERY RATES

Comments Received:

We are not aware of any generators who are putting the antifreeze down the sewer. It has been a good practice since the 90's. We are likely getting 95% of it.

The consumed-in-use numbers that you have provided seem too high. Quick lubes, etc., do a lot of top-ups, and that could be why the numbers are high.

BCUOMA Response:

BCUOMA is aware of the widely varying rates of recovery for antifreeze across the province. In the Lower Mainland and southern Vancouver Island, the existing rates of recovery are much higher than in the rural areas. Once the payment system to collectors of antifreeze has been implemented, the recovery rates will also significantly improve in the rural areas of the province.

BCUOMA is working with the other Used Oil Management Associations (UOMAs) in determining the consumed-in-use number for antifreeze. So far, the accepted best number is 55% of what is sold is consumed-in-use. Additional work will be done by BCUOMA and the other UOMAs to update the consumed-in-use number for antifreeze.

11. INFORMED AND PARTICIPATING END-USERS

Comments Received:

No specific comments received for this topic.

12. ENVIRONMENTALLY RESPONSIBLE MANAGEMENT OF USED ANTIFREEZE MATERIALS AND REPORTING

Comments Received:

No specific comments received for this topic.

13. DISPUTE RESOLUTION

Comments Received:

No specific comments received for this topic.

14. PRODUCT LIFE CYCLE MANAGEMENT AND POLLUTION PREVENTION HIERARCHY

Comments Received:

No specific comments received for this topic.

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Submitted by
British Columbia Used Oil Management Association
www.usedoilrecyclig.com

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Addendum to BCUOMA Stewardship Plan

Appendix A

Meeting/Webinar attendees

<i>S.No.</i>	<i>REGISTRANT</i>	<i>COMPANY</i>
IN PERSON ATTENDEES		
1	Andrew Doi	Metro Vancouver Planning Division
2	Bob Edmiston	Hetherington Industries Ltd.
3	George Mate	M & R Environmental
4	Jeremy Smith	M & R Environmental
5	Jim Cairns	
6	Kevin Andrews	Merlin Plastics
7	Kim	Ridge Meadows Recycling
8	Marvin Hunt	City of Surrey
9	Michael Schellinck	Nanaimo Recycling Exchange
10	Peter Hetherington	Hetherington Industries Ltd.
11	Wayne Sorci	Nu-Plastics
WEBINAR ATTENDEES		
1	Clint Kilback	Newalta Corporation
2	Frank Wagner	Safety-Kleen
3	Glenn Lundrigann	Safety-Kleen
4	Greg Norum	Newalta Corp.
5	Jag Grewal	Newalta Corporation

Addendum to BCUOMA Stewardship Plan

<i>S.No.</i>	<i>REGISTRANT</i>	<i>COMPANY</i>
6	Karmen Morgan	RD of N. Okanagan
7	Kathleen Milward	Cowichan Valley RD
8	Paul Dunbivan	Newalta Corporation
9	Tim Dueck	RD of Kootenay Boundary
10	Wendy Dunn	Capital Regional District