

## OTHER USED OIL GENERATOR REQUIREMENTS

This guidance is for facilities that have [oils](#) that do not meet the conditions listed in the [Used Motor Oil Generator](#) guidance.

### 1. Use and Disposal Restrictions

Used oil in a liquid form **CANNOT** be disposed of by any of the following methods:

- Ø Dumped down drains or sewers or into surface or groundwater,
- Ø Disposed of in landfills,
- Ø Burned in municipal solid waste incinerators or other incinerators without energy recovery, or
- Ø Used as dust control or weed control.

Used oil generated at the site can be used as a rust preventative coating on farm or construction equipment.

Used oil and diesel fuel can be mixed on-site by the generator when used as a fuel in the generator's own vehicles. Until it is mixed, the oil must be managed under the used oil regulations.

Note: Generators that want to send their waste oil to any other facility to be burned at that site, including in a space heater, are required to meet marketer requirements. The receiving facility also has requirements. See the [Burning Used Oil](#) guidance. Discuss requirements with the Waste and Hazardous Materials and Air Quality Divisions in the [District Office](#).

**Due to higher fuel costs, this situation is becoming a common violation.**

### 2. Waste Oil Characterization

- ✓ **Determine if the waste oil is, or is not, hazardous waste** [R 299.9302 and 324.12103].
- ✓ **Keep characterization records at least 3 years after the waste was last sent for treatment, storage or disposal** [R 299.9307(1), and 324.12109].

**Failing to characterize waste and keep characterization records is a common violation.** Contact the Waste and Hazardous Materials Division [District Office](#) with questions about characterizing waste oil. Characterize used oil by either:

- **Using knowledge about the oil and the processes it was used in.** The material data safety sheet (MSDS) or other documentation may provide information about the flashpoint and additives in the virgin oil. The MSDS will not show whether or not waste oils have become contaminated with heavy metals from engines, from exposure to metals when used as cooling or cutting oils, or be cross contaminated by other facility operations like overspray from aerosols containing solvents. Obtain MSDS from the supplier, manufacturer, or Internet sources like [www.siri.org/msds/index.php](http://www.siri.org/msds/index.php). It is recommended to keep a copy of the MSDS in a waste characterization file in addition to the [MIOSHA requirements](#) for MSDS retention.
- **Testing the oil.** Discuss testing requirements with your used oil recycler. Get copies of test results from the transporter, recycler, or laboratory when tests are done. Having these results may protect you from potential financial liability if the transporter ends up with a contaminated used oil load because you can prove your waste oil was not a hazardous waste.

Usually the transporter will do a quick test before they pick up the used oil, or they may require you to provide them with test results. A recycler may require specific tests or laboratories to be used. A



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laboratory could test for common halogenated constituents of hazardous waste that the facility has in products they use which may contaminate the oil. Common examples include:

- perchloroethylene or tetrachloroethylene
- carbon tetrachloride
- 1,1,1-trichloroethane
- chloroform
- trichloroethylene

If each halogenated constituent present is below 100 parts per million (ppm), the oil would be managed as used oil and not hazardous waste. To find laboratories, see the [Environmental & Drinking Water Testing Labs Directory](#) or ask the recycler for a recommendation.

The administrative rules under Part 111, hazardous waste management, of Act 451 of 1994, as amended, identify when used oil is regulated as a hazardous waste [R 299.9809] and text in italics in this document highlights some differences from the used oil management rules and facilities would need to include that amount when determining their hazardous waste generator status.

#### **Used oil considered to be hazardous waste and not regulated under the used oil rules**

- Used oil that is listed hazardous waste or mixed with listed hazardous waste.
- Used oil is presumed to be hazardous waste if it contains more than 1,000 ppm total halogens. A facility has the option to demonstrate that the used oil does not contain significant concentrations of halogenated hazardous constituents which are listed in 40 CFR Part 261, appendix VIII usually by testing, and thus the oil would not be regulated as hazardous waste. This is called the “rebuttable presumption” [R 299.9809(2)(b)]. See the EPA "[RCRA Used Oil Rebuttable Presumption Guidance](#)" at [www.epa.gov/reg5rcra/wptdiv/usedoil/905-R-03-005.pdf](http://www.epa.gov/reg5rcra/wptdiv/usedoil/905-R-03-005.pdf). Read on for specific exemptions to this presumption.

#### **Used oil not considered to be hazardous waste**

If the used oil is not hazardous, it needs to be managed under the [Part 111 used oil rules and as a liquid industrial waste under Part 121](#) when it is accumulated, stored, or treated. Treated means it is made more amenable for recovery but is not fully reclaimed. Following are oils that are not hazardous waste.

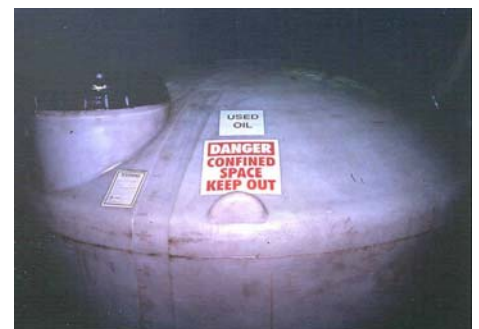
- **Used oil being recycled which contains less than 1,000 ppm total halogens** (a test for chlorine, bromine, fluorine, and iodine content) [R299.9203(1)(e)].
- **The following would be handled as used oil even if the total halogens are greater than 1,000 ppm:**
  - ↳ **Grinding and machine oils that contain chlorinated paraffins that are recycled and handled by a tolling arrangement.** Chlorinated paraffins are additives that have a wax base containing chlorines [R 299.9809(2)(b)(i)]. A tolling arrangement is a contractual agreement to reclaim the oil. The contract must indicate:
    - ✓ The oil is returned to the generator. They must use it as a lubricant, cutting oil, or coolant.
    - ✓ The type of used oil and the frequency of shipments.
    - ✓ The vehicle used to transport both the used and recycled oil is owned and operated by the used oil processor/re-refiner.
  - ↳ **Oils containing chlorofluorocarbons (CFCs) removed only from refrigeration units being reclaimed** [R 299/9809(2)(b)(ii)]. Information about CFCs can be found at [U.S. EPA: Ozone Depletion website](#) or contact the Stratospheric Ozone Information Hotline at 1-800-296-1996.
- **Used oil being recycled (including fuel use/blending) that exhibits a hazardous waste characteristic (i.e. ignitable, corrosive, toxic, reactive) and that was not mixed with hazardous waste when it is managed according to used oil regulations and environmental and human health standards in R 299.9602.** [R 299.9809(1)(g)] R 299.9602 requires a facility to be operated to avoid violations with the federal Clean Water Act and state Part 31 water resource protection regulations; federal Clean Air Act and state Part 55 air regulations; meet wastewater discharge requirements; and if a facility discharges to a

municipal sewer system, then it must be compliance with local pretreatment requirements [R 299.9206(4) and 40 CFR Part 279.10(b)(2)].

- **Oils containing PCBs under 50 ppm are regulated under both used oil regulations and regulated by US EPA under TSCA [40 CFR Part 761]. Oil with 50 ppm or more concentration of PCBs is regulated by US EPA under TSCA.** EPA assumes used oil to be burned for energy recovery contains quantifiable levels (2 ppm) of PCB unless testing or other information shows it does not [40 CFR Part 761.20(e)(2)] Contact EPA Region 5 at 312-886-1334 for more information about [federal PCB requirements](#).
- **Other exemptions for oils include:**
  - Mixtures of used oil and diesel fuel that is mixed on the generator's site and used in their own vehicles as fuel. Before mixing, the used oil must be handled under the used oil rules. [R 299.9809(2)(d)]
  - Material that had contained or was contaminated with used oil and has had the oil removed; for example, [Used Oil Filters](#) guidance. [R 299.9809(1)(c)]
  - De minimus amounts of oils in wastewater being discharged to a municipal sewer system with their approval, or according to a facility's discharge permit. De minimus means small spills, leaks, or other drippings from pumps, machinery, pipes, and other similar equipment during normal operations. [R 299.9809(2)(g)]
  - Used oil produced on vessels from normal shipboard operations while it is on the ship. Once ashore, it is handled under the used oil rules. [R 299.9809(2)(n)]
  - Some used oil associated with pipelines, petroleum refining or re-refining. See R 299.9809 for details.
  - Used oil that is considered a product after it has undergone reclamation to meet all of the acceptable fuel standards and is no longer regulated as a liquid industrial waste.

### 3. On-site Container Requirements

- Store only in tanks or containers that are in good condition and compatible with oil. Replace any leaking, severely rusted, or structurally damaged unit [40 CFR 279.22]. Contact your used oil hauler/recycler for their container preference. Some may take 55 gallon drums or will pump the oil from your containers into a tanker truck. In some instances they will provide the containers. It is recommended aboveground units are used instead of underground tanks; and a release valve or vent is used to provide tank ventilation to prevent buildup of potentially volatile fumes.
- Keep containers closed or covered except when filling or emptying, and keep the exterior clean of waste and residue [324.12113]. It is recommended to use funnels with self closing valves. The use of wide-mouth funnels may help minimize spillage during the transfer of oil. **Common violations include leaving open funnels in drums or tanks and leaving the bung off a drum.**
- Label each container or tank and fill pipes to underground storage tanks with the words "USED OIL" [40 CFR 279.22]. These words can be written on the container or pipe or use preprinted labels. Also meet [MIOSHA labeling requirements](#). **Improper labeling is a common violation.**
  - *If the used oil is a hazardous waste and being accumulated, then it must be labeled with the words "Hazardous Waste," the applicable hazardous waste code, and the accumulation start date [R 299.9306].*
  - *If the used oil is a hazardous waste and is being kept in a satellite accumulation area, then it must be labeled with the words "Hazardous Waste" **and** either "Used Oil" and/or the applicable hazardous waste code. The other [satellite accumulation](#) requirements must also be met [R 299.9306(2)].*
  - *Meet applicable hazardous waste tank and container requirements [R 299.9306]*
- Inspect tanks and accumulation areas for leaks or potential problems. It is recommended units are kept off the ground and high enough to allow visual inspection for leaks and corrosion.
- Protect the accumulation containers from weather, fire, physical damage, and vandals [324.12113]. Recommend restricting access to the containers by using a fence or lockable fill caps to protect from unauthorized dumping into them. **Leaving containers exposed to weather or vandals is a common violation.**



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- Do not mix other wastes with used oil, unless the practice meets the following conditions:
    - The recycler approves of mixing liquid industrial waste with the used oil.
    - Small and large quantity hazardous waste generators cannot mix listed or characteristic hazardous wastes with used oil. This pertains to any facility that generates 220 pounds or more of all non-acute, or 2.2 pounds of acute or severely toxic, hazardous waste in a calendar month.
    - Conditionally exempt small quantity generators (CESQG) of hazardous waste cannot mix halogenated hazardous waste with used oil as of December 16, 2004 [R 299.9809(1)(a)]. CESQG generate less than 220 pounds of all hazardous waste in a calendar month. Examples of halogenated solvents include perchloroethylene or tetrachloroethylene, TCE or trichloroethylene 1,1,1-trichloroethane, carbon tetrachloride, and chloroform. These chemicals are often found in degreasers, brake cleaners, dry cleaning, paint diluents, and other products.

It is recommended CESQGs do not mix any hazardous waste with used oil. If they want to, check if the recycler will accept the mixture before wastes are added to the oil. To avoid additional requirements, do not create mixtures with a flashpoint below 200 degrees Fahrenheit. If other hazardous wastes are mixed with oil by a CESQG, the oil mixture must be 1,000 ppm or less of total halogens to be managed under the used oil requirements. *If over 1,000 ppm and not rebuttable, it must be managed under the hazardous waste regulations and disposal is more costly [R 299.9809(1)]*
  - If the oil flashpoint is below 200 degrees Fahrenheit and in aboveground containers or tanks, meet the [Flammable and Combustible Liquid Rules](#) and the referenced National Fire Protection Association pamphlets. Most oils do not have these lower flashpoints. See Chapters 2 and 3 for requirements that apply to bulk storage of liquids in tanks and similar vessels. Chapter 4 applies to storage of liquids in containers and portable tanks in storage areas and warehouses. Chapter 5 applies to the handling and transfer of liquids and related operations and processing. Chapter 6 applies to electrical systems. Discuss specific requirements with the Waste and Hazardous Materials Division Storage Tank Unit at 517.335.7211.

Also contact the local fire marshal for zoning requirements and see the [MIOSHA Part 75 Flammable and Combustible Liquids Standard](#). Contact the Michigan Department of Labor and Economic Growth MIOSHA at 517-322-1809 regarding their standards.
  - If using an underground tank, meet [Part 211](#) and [federal UST regulations under RCRA](#) [40 CFR 279.22]. Also meet the [Flammable and Combustible Liquid Rules](#) requirements if the oil flashpoint is below 200 degrees Fahrenheit. Discuss specific requirements with Storage Tank Unit at 517.335.7211.
  - *If the oil is characterized as hazardous waste and has a flashpoint below 140 degrees Fahrenheit and generated by a large quantity generator, then there is a 50 foot isolation distance from the property line to the accumulation area [40 CFR 265.176]. If this is not possible, get a letter from the fire department that the facility is in compliance with the local fire code and keep letter on-site [R 299.9306(1)(a)(i)].*

### **3.1 Secondary containment**

Secondary containment means having some structure or device to keep a release from getting into drains, water ways, or onto the ground. Examples of containment include self made or commercially made containment units, cattle water tank that will hold 55 gallon drums, double walled tanks, diked walls, etc. Secondary containment is:

- ✓ Required for generators who have over 1,320 gallons in total aboveground storage capacity of all virgin and used oils and a release can reach navigable water per federal Spill Prevention Control and Countermeasure (SPCC) regulations. EPA has noted almost all of Michigan meets the navigable water condition. It is not necessary to include containers less than 55 gallons in size in this capacity calculation [\[40 CFR 279.22 and 40 CFR 112\]](#). EPA enforces these regulations so contact the [US Environmental Protection Agency SPCC Information](#) Hotline at 800-424-9346 or Region V, Oil Planning and Response Section at 312-353-8200 for more SPCC information. If subject to SPCC regulations, see the Water Bureau's [POG #2](#) regarding requirements under the state's Part 5 rules, Spillage of Oil and Polluting Materials.
  - ✓ Required if have regulated storage tanks.
  - ✓ May be requirement under other local ordinance or insurance company requirement, depending on the volume, type of oil, and how the oil is stored.
  - ✓ May be installed as a best management control practice if subject to [Water Bureau Storm Water Program](#).
  - ✓ Recommended as a safety precaution for all oil storage.
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## 4. Shipping Requirements

### 4.1 Using Correct Site Identification Number

- Obtain a site identification number in advance of a waste shipment if the facility doesn't have one [324.12103(2)] when hiring a transporter to ship wastes. This number is used on waste manifests. If you haul your own oil in amounts to a collection site, see Section 4.2. To check if a facility has a number or what the notification status is on file with DEQ, search the Waste Data System (WDS) at [www.deq.state.mi.us/wdspj/](http://www.deq.state.mi.us/wdspj/). If the facility needs to obtain a number or update facility notification information, it is recommended to file electronically through [MiTAPS](#) and use a credit card because a number can normally be obtained within a few business days. You may also submit the form [EQP 5150](#) and application fee payable to the State of Michigan to the address on the form.

If updating other information previously notified, either update via MiTAPS or mail the form EQP5150 to the WHMD address, or fax it to the number, on the form. Call 800-662-9278 or WHMD District Office with questions about what is on file or your generator status. **A common violation is using the wrong generator identification number on manifests.**

### 4.2 Hauling Own Used Oil Off-site and Shipping Records

- Generators may haul their own oil to a collection center or aggregation point in 55-gallon or less quantities without being a permitted and registered transporter [R 299.9812 and 29.473(9)]. If this is the only company waste, it is not necessary to obtain a site identification number because a waste manifest is not required to be used. However, some collections that accept used oil may require the generator to obtain a site identification number to track the used oil shipments. It is recommended you check if the destination site is in compliance with Part 121 management requirements and notified as a used oil collection site or aggregation point or liquid industrial waste destination facility. Some information is available through WDS or contact DEQ WHMD District Office.
- Keep records when transporting 55-gallons or less of your own generated used oil to a designated facility [324.12103]:
  - Prepare a record where the oil is from, how much, and where it was taken. Take the record along with the shipment.
  - Obtain a signature from the designated facility acknowledging receipt of the oil on the record and give them a copy.
  - Keep records for at least 3 years from shipment.
  - Check if your insurance company will cover accident expenses. The DEQ will not enforce the insurance requirement for a generator transporting its own LIW to a properly notified destination facility in quantities of 55 gallons or less, providing the generator is in compliance with the federal transportation requirements (see [op memo 121-2](#)).

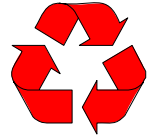
If the generator is hauling more than 55 gallons, then it is necessary to:

- Meet the following insurance requirements:
  - ↳ If vehicles are under 10,000 pounds gross vehicle weight, have at least \$300,000 fleet coverage.
  - ↳ If vehicles have 10,000 or greater pounds gross vehicle weight, have at least \$750,000 fleet coverage.
  - ↳ Obtain the form MCS-90 (endorsement for motor carrier policies of insurance for public liability under section 29 or 30 of the motor carrier act of 1980) from your insurance company and submit it to the DEQ WHMD, Attn: Transportation Program Technician, Southeast Michigan District Office, 27700 Donald Court, Warren, MI 48092-2793.
- Obtain a site identification number
- Use a waste manifest

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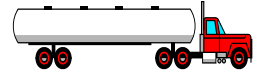
### 4.3 Finding Used Oil Recyclers and Manifesting Waste Shipments

- See the Oils and Solvents category in the [Recycled Materials Market Directory](#) at [www.michigan.gov/deqrmmd](http://www.michigan.gov/deqrmmd) or call 800-662-9278 for companies that have notified DEQ they recycle oil. If hiring haulers, make sure that they are [registered and permitted waste transporters](#).



- Use only [permitted and registered transporters](#) who have obtained site identification numbers [R 299.9810 and 40CFR279.24]. Use liquid industrial waste transporters for used oil shipments being recycled. If hazardous waste, then hire a company registered as an Uniform Program Transporter.

Meet one of the following requirements for appropriate shipping records when hiring a transporter.



- ☞ Use the Uniform Hazardous Waste Manifest when shipping used oil. Keep records 3 years from shipment. A [manifest tracking form](#) is available to help organize recordkeeping. Most haulers or recycling companies will provide manifests. [Manifest instructions](#) and [ordering manifest information](#) is at [www.michigan.gov/deqwaste](http://www.michigan.gov/deqwaste). A new national manifest system became effective September 5, 2006.
  - Submit copies per manifest instructions. Keep the generator's initial copy until you receive the signed "Designated Facility to Generator copy" back from the disposal or recycling facility. You should have that within 35 days after shipping. Keep that copy for at least 3 years from shipment date.
  - If you do not receive a signed copy within 45 days after shipment, send a copy of the manifest and a letter explaining what contacts you have had, and any other information regarding the shipment to the DEQ Waste & Hazardous Materials Division, Manifest Unit, PO Box 30038 Lansing, MI 48909-7538.
- ☞ If the transporter uses a [consolidated manifest](#), obtain a receipt with the following information and keep records 3 years from shipment:
  - ✓ Transporter's company name,
  - ✓ Driver's signature,
  - ✓ Date of pickup,
  - ✓ Type and quantity of waste removed,
  - ✓ Designated facility, and
  - ✓ Consolidated manifest number.

**Failing to have manifests or shipping records is a common violation.**

#### **If the transporter is using a waste manifest when picking up the waste oil as hazardous waste:**

- *Submit and keep copies or exception reports as required. A [manifest tracking form](#) is available to help organize recordkeeping.*
- ☞ *Small quantity generators must receive copy within 60 days [R 299.9308(5)]. If a signed copy is not received, you must send a copy of the manifest and an indication that the disposal or recycling facility did not return your copy to both the DEQ and EPA. Mail these to both the DEQ Waste and Hazardous Materials Division, Manifest Unit, PO Box 30038 Lansing, MI 48909 and EPA Region V, Sharon Kiddon (DR-7J), 77 West Jackson Blvd, Chicago, IL 60604.*
- ☞ *Large quantity generators must receive copy within 35 days [R 299.9308(3)]. If a signed copy is not received, contact the transporter and disposal or recycling facility to determine what happened with the shipment. If the signed manifest copy is not received within 45 days after shipment, submit a copy of the manifest and a cover letter signed by the generator or authorized representative stating what efforts were taken to locate the shipment to both the DEQ Waste and Hazardous Materials Division and EPA Region V.*

*If the oil is hazardous waste, then other agencies also have requirements regarding hazardous material transportation. See the hazardous material table in 49 CFR 172.101 or hazardous substance in Appendix A to 172.10. The oil would need to be shipped with proper packaging, marking, labeling, placarding, and manifest or hazardous material shipping paper. Training for the employees directly involved in transporting it and preparing it for transportation is also required. For more information, contact:*

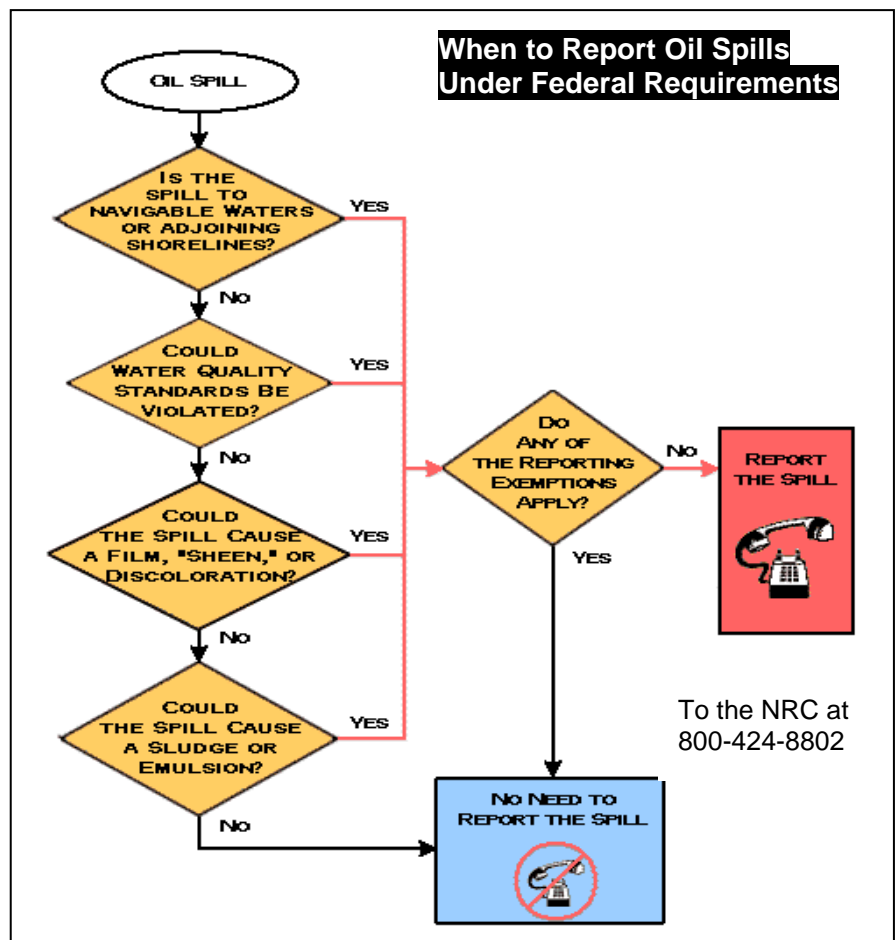
- Michigan State Police Division of Motor Carriers 517-336-6195 [www.michigan.gov/msp](http://www.michigan.gov/msp) or
- US Department of Transportation 517-377-1866 <http://hazmat.dot.gov>

## 5. Release Reporting, Emergency Plans, and Training

### 5.1 Release Reporting

Numerous state and federal regulations have release reporting requirements. All spills must be cleaned up. **If in doubt, report the spill by calling PEAS at 800-292-4706 (or from out of state call 517-373-7660) and 911. If the release got into navigable waters or adjoining shorelines, or occurred during transport, also call the National Response Center at 800-424-8802.** The facility can then contact the DEQ for help in determining the applicable regulations and follow-up reporting requirements.

- Under Part 121 liquid industrial waste regulations, generators are required to report releases of used oil that threatens human health, safety, or welfare to both the public and employees, or environment. Call PEAS and prepare a written report summarizing the incident and response actions within 30 days of the release and keep a copy at the facility. Submit a copy to DEQ if requested. [Sec 324.12111]
- SPCC facilities are required to [submit certain information](#) after having two or more discharges (over 42 gallons) in any 12-month period or a single discharge of more than 1,000 gallons.
- [Part 5 rule facilities](#) must report oil releases as defined by R 324.2002(b) of 50 pounds onto the ground, or any amount to waters that causes sheen, oil films, foams, turbidity, color, solids, or deposits in the receiving water body. To calculate this amount in gallons, take the oil's specific gravity from the MSDS x 8.34 lb/gal (weight of water) = weight of the product in lb/gal.
- Under the used oil rules in Part 111, generators must:
  - ✓ Stop the release [40 CFR 279.22(d)(1)]
  - ✓ Contain the release used oil [40 CFR 279.22(d)(2)]
  - ✓ Clean-up and manage the released used oil and other material [40 CFR 279.22(d)(3)]
- A facility may also have reporting and cleanup [requirements per Part 201](#). The cleanup may be overseen by the Remediation and Redevelopment Division or Waste and Hazardous Materials Division. Contact the [district office](#) to discuss your release situation.
- For a summary of other release reporting requirements, see the [Spill/Release Reporting](#) website. It includes the Release Notification Requirements in Michigan Table and forms used to report releases.



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## 5.2 Emergency Plans and Training

All facilities should have emergency procedures in place and employees trained to what they will do if there is a release. Specific requirements for written emergency plans and training will depend on what type of oils are on site, how much, and to what level the employees will respond. See the [emergency planning](#) website for more information including developing an integrated contingency plan.

In order to take appropriate actions when there is a release as required by [Part 111 and Part 121](#), a facility needs to have appropriate equipment available and have staff trained about their responsibilities during a release. In addition, a facility should determine if the following regulations apply to their operations especially if the facility:

- Has a single 660 gallon or larger aboveground storage tank or has 1320 gallons or more aboveground storage capacity of all oils site: [Part 5 Rules](#) (see [POG #2](#))
- Has 1320 gallons or more aboveground storage capacity of all oils site: [federal SPCC regulations](#) including developing and implementing a Spill Prevention Control and Countermeasure Plan
- Has [underground storage tanks, or aboveground storage tanks](#) with oil flashpoint below 200 degrees Fahrenheit (see linked table for specific rules), and
- Is subject to [MIOSHA worker and safety standards](#) including the [Hazard Communication/Employee Right-to-Know](#) and [HAZWOPER](#) (Hazardous waste operations and emergency response) standards overseen by the Department of Labor and Economic Growth.

The DEQ does not keep a list of emergency trainers or companies that prepare emergency plans nor provides emergency training. If the facility belongs to an association, check if they keep a list or search the Internet for consultants that offer these services. The [Michigan State Police, Emergency Management and Homeland Security Division](#) provides related emergency response training. Contact the State Police Hazardous Materials Training Center at 517-322-1190 or Emergency Management and Homeland Security Division at 517-333-5034 for more information.

## 6. Additional Compliance and Information Resources

- See the [used oil inspection form](#) and [liquid industrial waste inspection form](#) for doing a compliance self assessment. If the oil is a hazardous waste, use the appropriate hazardous waste inspection forms. If doing a voluntary, internal evaluation consider meeting the [environmental self audit](#) criteria. See the referenced regulations or discuss your requirements with the regulating agency staff.
- The Agency for Toxic Substances and Diseases has health fact sheets about [fuel oils](#) and [used crankcase oil](#).
- Call your [DEQ district office](#) or the DEQ Environmental Assistance Center at 800-662-9278, or email [deq-ead-env-assist@michigan.gov](mailto:deq-ead-env-assist@michigan.gov) if you have additional questions.

This guidance was revised May 2007 by the Environmental Science and Services Division in conjunction with the Waste and Hazardous Materials Division. Regulations are subject to change. Reliance on information from this document is not usable as a defense in any enforcement action or litigation. Refer to the regulations and discuss your requirements with the regulating agency, or contact the Environmental Assistance Center at 800-662-9278 for referral.

The Michigan Department of Environmental Quality (MDEQ) will not discriminate against any individual or group on the basis of race, sex, religion, age, national origin, color, marital status, disability, or political beliefs. Questions or concerns should be directed to the MDEQ Office of Human Resources, PO Box 30473, Lansing, MI 48909.