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# Used Oil Enforcement: Alabama Department of Environmental Management Proposed Administrative Order to Limestone County Used Oil Processing/Re-Refining Facility

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The Alabama Department of Environmental Management (“ADEM”) issued an August 20th Proposed Administrative Order (“AO”) to Pine Ridge Transportation, LLC (“Pine Ridge”). See Order No. 20-XXX-HW.

The AO states that Pine Ridge owns/operates a used oil transport, processing and re-refining facility (“Facility”) in Limestone County, Alabama.

The Facility holds a RCRA United States Environmental Protection Agency identification number.

A representative of ADEM’s Industrial Hazardous Waste Branch is stated to have conducted a compliance evaluation inspection (“CEI”) of the Facility on February 21, 2020. The CEI and a review of Pine Ridge’s compliance are stated to have indicated the following alleged violations:

- Improper disposal of used oil onto the ground
- Failure to minimize the possibility of any unplanned sudden or non-sudden release of used oil to air, soil, or surface water
- Failure to keep closed drums of used oil
- Failure to have a Spill Prevention, Control and Countermeasures (“SPCC”) plan
- Failure to provide secondary containment in truck loading areas
- Failure to remove precipitation mixed with used oil from the tank secondary containment areas
- Failure to remove precipitation mixed with used oil in the secondary containment in a timely manner
- Failure to mark with the words “Used Oil” containers holding used oil
- Failure to keep records of used oil accepted for used oil processing or shipped off-site
- Failure to maintain or provide all required records
- Failure to submit a biennial report to the ADEM
- Failure to provide financial assurance documentation for the duration of the transporter permit
- Failure to produce documentation of tests to determine if used oil was a hazardous waste
- Failure to ensure all spent oil filters are drained of free flowing used oil
- Failure to ensure all containers holding used oil are closed
- Failure to ensure all containers holding used oil are in good condition
- Failure to respond to a release of used oil to the environment

A civil penalty of \$39,700 is proposed to be assessed.

A copy of the proposed AO can be downloaded [here](#).