BRITISH COLUMBIA USED OIL MANAGEMENT ASSOCIATION MANUAL FOR REGISTERED PROCESSORS AND COLLECTORS

December 2020



FOREWORD

The British Columbia Used Oil Management Association (BCUOMA), under approval from the Ministry of Environment, operates a Used Oil and Antifreeze Materials Stewardship Program in accordance with the requirements of the Recycling Regulation.

BCUOMA is a not-for-profit organization of oil, antifreeze and oil filter manufacturers and retailers. It is incorporated under the British Columbia Society Act, managed by a board of directors drawn from its members, retailers, government and other non-government organizations. The focus of the Program is to support only those end uses that provide landfill diversion and environmentally sound recycle/reuse/energy recovery options as described by the Ministry of Environment's Pollution Prevention Hierarchy (see Appendix A.)

Used oil and used oil filters are both classified as hazardous wastes in British Columbia and pose an environmental problem if improperly managed. The proper recovery, management, and reporting of these Used Oil and Antifreeze Materials is the focus of the BCUOMA Program.

This manual is designed to provide Processors and Collectors with a broad knowledge of the BCUOMA Product Stewardship Program and specific details regarding systems and procedures associated with registering for and claiming incentives.

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1.0 DEFINITIONS

- 1) **Antifreeze** automotive antifreeze which is eligible to receive a Return Incentive when processed by a Registered Processor.
- 2) Approval either physical signature, electronic signature/stamp or email approval.
- 3) **ASTM** American Society for Testing and Materials.
- 4) **BCUOMA** The British Columbia Used Oil Management Association.
- 5) BCUOMA Website http://bcusedoil.com
- 6) **Carrier** a transporter that crosses provincial borders and is registered with Transport Canada.
- 7) Collector a BCUOMA registered carrier that picks up Used Oil and Antifreeze Materials from Return Collection Facilities and/or Generators and delivers them to a Processor registered with BCUOMA.
- 8) **Commingling** introduction of non-BCUOMA materials into the separate waste streams. It includes all materials on which an EHC has not been remitted.
- 9) **Do-It-Yourself or DIY** consumers who purchase their own oil and antifreeze and service their own vehicles and equipment. These consumers include private motorists, farmers and small commercial generators such a fishers and loggers.
- 10) **End-Fate** how the recovered product was managed in accordance with Pollution Prevention Hierarchy.
- 11) *Environmental Handling Charge (EHC)* a levy paid to BCUOMA on sale or commercial use of new Oil and Antifreeze materials in the province of British Columbia.
- 12) *Feedstock* a raw material used in processing or manufacturing industries.
- 13) Filter all spin-on or element style fluid filters that are used in hydraulic, transmission or internal combustion engine applications including all oil, oil-air separator, diesel fuel, coolant, storage tank, and household furnace oil filters, sump tank automatic transmission filters, plastic/paper filters and diesel fuel filters used at retail and commercial pump islands, but does not include gasoline fuel filters, air filters, household furnace air filters and sock-type filters.

- 14) *Generator* the user of Lubricating Oil, Antifreeze, Filters and/or Oil or Antifreeze Containers who, through normal application of these products, generates Used Oil and Antifreeze materials.
- 15) *Ineligible Used Oil and Antifreeze Material* Used Oil and Antifreeze Materials that are not eligible for RI under the Program as prescribed by BCUOMA from time to time, and includes all material for which an EHC is not remitted by a supplier or received from Collectors not registered with BCUOMA.
- 16) Lubricating Oil all petroleum-derived or synthetic crankcase oils, engine oils, hydraulic fluids, transmission fluids, gear oils, heat transfer fluids or other oils or fluids used for lubricating purposes in machinery or equipment.
- 17) Oil and Antifreeze Containers all empty containers with a capacity of 50 litres or less that are manufactured and used for containing Lubricating Oil or Antifreeze or related fluid.
- 18) **Pelletized Plastic** small particles created by compressing oil containers, which are washed and turned into plastic resin that is useable for clean marketable feedstock.
- 19) Processor a BCUOMA-registered receiver of one or more Used Oil and Antifreeze Materials that processes these materials into saleable products.
- 20) **Program** the British Columbia Used Oil and Antifreeze Stewardship Program approved under the Hazardous Waste Regulation and administered by BCUOMA.
- 21) **Recycled** turning Used Oil Filters and Oil Containers into a different marketable product
- 22) **Recovered Energy** to recover and use the inherent energy of the product in a thermal process.
- 23) **Recycle Docket** a document that verifies the pick-up of an eligible Used Oil and Antifreeze Material by a Collector from a Generator.
- 24) **Return Collection Facility (RCF)** a BCUOMA-registered facility that agrees to receive Used Oil, Antifreeze, Filters and/or Oil and Antifreeze Containers from Do-It-Yourself consumers at no charge.
- 25) **Return Incentive (RI)** an incentive payment made by BCUOMA to registered Processors for the collection and processing of eligible Used Oil and Antifreeze Materials.

- 26) Re-Use removing the impurities in Used Oil and Antifreeze so it can be used again.
- 27) **Shredded Flake** Small particles created by shredding oil containers, which are reusable for marketable feedstock.
- 28) **Stockpile** allowing unprocessed and processed material to accumulate in a Processors yard.
- 29) *Tare Weight* the weight of an empty truck/trailer. It does not include the weight of pallets or any other objects used to load, unload or transport used oil materials.
- 30) UOMA is Used Oil Management Associations, which include: Alberta Recycling Management Authority (AB Recycling); British Columbia Used Oil Management Association (BCUOMA); Saskatchewan Association for Resource Recovery Corporation (SARRC); Manitoba Association for Resource Recovery Corporation (MARRC); Société de gestion des huiles usagées (SOGHU); Stewardship Ontario; Société de gestion des huiles usages Used Oil Management Association New Brunswick (SOGHUOMA NB) and Société de gestion des huiles usages Used Oil Management Association Prince Edward Island (SOGHUOMA PE), Atlantic Used Oil Management Association (UOMA NL) & (UOMA NS).
- 31) **Used Antifreeze** automotive Antifreeze after it has been used for its initial purpose but does not include Ineligible Used Oil and Antifreeze Material.
- 32) **Used Oil** Lubricating Oil after it have been used for its initial purpose but does not include Ineligible Used Oil and Antifreeze Material.
- 33) **Used Oil and Antifreeze Material** Lubricating Oil, Antifreeze, Filters and Oil and Antifreeze Containers after they have been used for their initial purpose but does not include Ineligible Used Oil and Antifreeze Material.
- 34) Waste-to-Energy A facility that turns waste into energy.
- 35) **Waste Streams** The flow of used lubricating oil, used antifreeze, used oil filters, and oil containers from use to final disposition (ie. Disposal or processing into an approved end use).
- 36) **Zone** any one of eleven regions in British Columbia defined by BCUOMA for the purpose of calculating RI's and maximizing collection of Used Oil and Antifreeze Materials throughout British Columbia.

2.0 PROGRAM OVERVIEW

2.1 Program Objective

The Program's objective is to encourage cost effective, environmentally responsible handling of Used Oil and Antifreeze Materials in British Columbia to approved End-Fates in accordance with the Ministry of Environment's Pollution Prevention Hierarchy (see Appendix A.) This will be achieved by paying a Return Incentive (RI) to the Processors of such materials.

The Program is designed to achieve the optimum combination of:

- effectiveness, including optimal environmental processes and outcomes;
- efficiency, including the generation of accurate and clear records on collections, processing and end-use volumes; and
- accountability and clarity to industry, government and consumer stakeholders.

3.0 OPERATING GUIDELINES

3.1 General Guidelines

- The flow of material is from the Generators and/or RCFs to the Collectors, through to the Processors with a final End-Fate as described by the Ministry of Environment's Pollution Prevention Hierarchy (See Appendix A).
- The Program stimulates the recycling of Used Oil and Antifreeze Materials by providing a RI to Processors at an amount that should allow, under most market conditions, the collection, transportation and processing of the materials. The RI will change from time to time depending on market and other conditions.
- For a Used Oil and Antifreeze Material to be eligible for RI payments, it must be an EHC-applicable Lubricating Oil or Antifreeze material (see BCUOMA website definitions regarding EHC eligibility) and must meet the following criteria:
 - EHC was applied on the original sale or distribution of the product and paid to BCUOMA;
 - the product was sold or distributed; i.e., not the remains of unsold inventory, leftovers from an oil container "bottling" operation;
 - the product was collected from a Collector registered with BCUOMA; and
 - the product is not contaminated; i.e., mixed with solvents, PCBs, paint, etc.
- BCUOMA Used Oil and Antifreeze Materials are to be kept separate from other
 Used Oil and Antifreeze Materials for volume and weight measurements. Where
 this is operationally unattainable proration with be allowed provided it is approved
 to meet BCUOMA's reporting requirements. Claims for qualifying products sold
 in provinces other than British Columbia must be claimed with the respective
 provincial UOMA where applicable.
- Processors and Collectors are expected to comply with all applicable Federal,
 Provincial and Municipal laws and regulations.

3.2 Zones

Recognizing that transportation costs are a key component of Used Oil and Antifreeze Material management, BCUOMA has established eleven (11) Zones within British Columbia. The Zones are based on a number of factors including; primary and secondary road systems, the volume of Used Oil and Antifreeze Materials available for collection, and provincial demographics. Some specific communities have been assigned a separate Zone to compensate for collection issues.

A list of each municipality or community in British Columbia and its Zone can be found in Appendix C and on the BCUOMA Website.

The Zone Map is set out in Appendix B and on the BCUOMA Website.

4.0 RETURN INCENTIVE (RI) PROGRAM REQUIREMENTS

4.1 Registration Requirements

- All Processors and Collectors are subject to and must comply with all applicable federal, provincial and municipal laws and regulations, including, without limitation, business and transport licensing, insurance, storage/processing facility approvals.
- All Processors and Collectors must register with BCUOMA by completing and submitting the BCUOMA Processor and Collector Registration Application Form (available on the BCUOMA Website) along with the required documentation listed on the form. The Processor and/or Collector must indicate on the application form which Used Oil and Antifreeze Materials it will collect and process.
- All applications must include a Letter of Regulatory Compliance (see Section 6.1.)
- Upon receipt of the registration application forms, BCUOMA will review the application. If approved, BCUOMA will assign a unique registration number for each Processor and Collector.
- All Processors and Collectors must renew their registration by completing the Processor and Collector Registration Renewal Form and Letter of Regulatory Compliance (available on the BCUOMA Website.) The date of renewal will be 2 years after the last Letter of Regulatory Compliance was approved.
- BCUOMA maintains an active database of registered Processors and Collectors who provide the services required for BCUOMA to fulfill the mandate of the stewardship program. The list of registered Processors and Collectors is posted on the BCUOMA Website.

4.2 Equipment Requirements

Volume Measurements – Used Oil and Used Antifreeze

Volume measurements for Used Oil and Used Antifreeze using digital gauges in trucks and containers or volumes confirmed with metered sticks and corresponding volume charts are acceptable.

Digital gauges and water testing apparatuses (ie, retort machines) must be regularly checked for calibration as per manufacturer instructions. Proof of calibration must be provided upon request. Registered Processors must calibrate gauges and water testing apparatuses within 10 business days of any request made by BCUOMA.

Weigh Scales - Filters and Oil and Antifreeze Containers

BCUOMA will accept only weigh scale tickets that are printed from a scale that is registered with Measurement Canada. Scales which are used to provide supporting documentation for a RI claim must be regularly checked for calibration, no less than annually or at more frequent intervals as required by Measurement Canada.

Calibration of weigh scales may be requested periodically by BCUOMA and must be completed within 10 business days upon any request.

Hand-written weights, scale tickets from uncertified scales, or any weigh scale ticket whose validity is questionable will be disallowed.

4.3 Processor Requirements

Oil Processor

BCUOMA-registered facility or combination of facilities that processes oil to meet the following specifications:

- Government, American Society for Testing Materials (ASTM) or equivalent approved specifications for sale as a re-refined Lubricating Oil; or
- for sale in the manufacture of asphalt concrete (pavement), as outlined in the Hazardous Waste Regulation or applicable government standards in other states or provinces; or
- for sale to a cement kiln as a fuel as outlined in the Hazardous Waste Regulation or applicable government standards in other states or provinces; or
- for sale to a government-approved fuel use other than for cement kilns, as outlined in the Hazardous Waste Regulation or applicable government standards in other states or provinces; or
- for other uses that meet the intent of the Hazardous Waste Regulation or applicable government standards in other states or provinces such as for mining explosives or exploration drilling.

In all cases above, the used oil received for processing must be analyzed for water at point of delivery using one of the following methods as per the American Society for Testing Materials (ASTM):

D86 – Karl Fisher

D95 – Retort

D96 – Dean Stark Method or equivalent

Oil samples should be a minimum of 100 ml in size and must be a composite sample that reflects the whole load. Samples should either be taken by Coliwasa Tube from the top of the tank down to the bottom or should be taken from a tap during off loading, ensuring some comes from the beginning, middle and end of the offload.

Best Practice – all Processors should keep a testing log available for inspection.

Application of Used Oil to any land for the purpose of road construction, repair, or dust suppression is prohibited by the Hazardous Waste Regulation and is not a BCUOMA approved use. The application of Used Oil in oil-fired furnaces is not a BCUOMA approved use.

Antifreeze Processor

BCUOMA-registered facility or combination of facilities that processes the Used Antifreeze to meet the following specifications:

- American Society for Testing Materials (ASTM) ASTM D7713 11 standard for sale as a coolant in automotive engines; or
- American Society for Testing Materials (ASTM) ASTM E1119 97 standard for sale as an approved industrial grade coolant.

The Used Antifreeze must be analyzed in accordance with government-approved methods and shown to meet the required industry and/or government specifications.

Best Practice – all processors should keep a testing log available for inspection.

Filter Processor

BCUOMA-registered facility or combination of facilities that removes the oil and other impurities from the Filters so that the steel is accepted at a provincial or state government-approved steel smelter for processing into recycled steel.

Metal oil containers such as those used in the aircraft industry must be processed along with the metal Filters.

Paper Filters that are segregated from the metal Filters must be separately crushed to the point where there is less than 3 percent oil in the paper Filters and must be shipped to an approved waste to energy facility.

Best Practice – non-BCUOMA metal should be sent to the metal recycler in a separate bin.

Oil and Antifreeze Container Processor

BCUOMA-registered facility or combination of facilities, based in Canada or the United States, that:

- shreds the containers and removes the oil and antifreeze from the plastic and pelletizes it into reusable plastic resin
 or
- shreds the containers and removes the oil and antifreeze from the plastic creating the product known as "shredded flake". The "shredded flake" must be sold for uses that meet the requirement of an approved End-Fate. Organizations that purchases the "shredded flake" must provide a management signed letter (known as End-Fate Confirmation Letter) that at minimum contains:
 - Confirmation of the End-Fate of the product
 - Agreement that they will submit to BCUOMA onsite Field Reviews and review for confirmation of usage for BCUOMA-incentivized products
 - Agreement to notify the processor and BCUOMA immediately of any changes to said letter

4.4 Program Confidentiality

Under the BCUOMA stewardship program, information with respect to specific Generators/RCFs, Collectors, Processors and other companies will be kept confidential. The volume of used oil and antifreeze and their related materials processed and the financial reimbursement to individual processors will not be disclosed except to any party designated by the BCUOMA, in its sole discretion, to assist the BCUOMA in the administration of its stewardship program (including in respect of a BCUOMA Audit pursuant to Section 7.1, below). This information may be released to certain parties in case of an investigation or a review.

5.0 RETURN INCENTIVE (RI) CLAIM PROCESS

5.1 RI Claim Requirements

General Requirements

Processors are the recipients of RI payments and will be held financially responsible for the accuracy and completeness of all information submitted to BCUOMA regarding collected and processed Used Oil and Antifreeze Material.

BCUOMA uses the following measurement units for reporting on the amount of Used Oil and Antifreeze Materials:

- Used Oil litres;
- Used Antifreeze litres;
- Filters and Oil and Antifreeze Containers (metal) weight of the crushed metal received by the metal broker in kilograms.
- Oil and Antifreeze Containers (plastic) weight of the shredded/centrifuged material derived from Oil and Antifreeze containers in kilograms;

Claim Verification Requirements

Background information to support a RI claim is to be retained by the Processor or Collector and is subject to Desk Review and Compliance Review. Background information must include the following

- 1) Collector name;
- 2) Pickup date;
- 3) Generator information including the following:
 - a) Generator name (first and last,) address, phone number including area code, and email address:
 - b) Zone from which pick up was made
 - c) Generator signature and printed name for manned sites:
 - d) Signed letter from Generator for pickups at unmanned sites;
- 4) Container counts (as applicable);
- 5) Information about the type and quantity of Used Oil and Antifreeze Material collected:
 - a) Used Oil (L);
 - b) Used Antifreeze (L);
 - c) Filters (kg);
 - d) Oil and Antifreeze Containers (kg);
- 6) Weigh scale tickets of both the unprocessed and processed weight of the materials (Filters and Oil and Antifreeze Containers);

- 7) Water/glycol tests; and
- 8) Transfer documentation for material moved between Collectors and Processors or between Processors. Can be in the form of Receiving Dockets, Manifests, Bills of Lading, Invoices etc.

Upon request, documents are to be submitted for the purpose of Desk Reviews conducted at the BCUOMA office. Results of the Desk Review will be communicated and the documentation will be returned to the Processor and Collector as applicable.

When Used Oil and Antifreeze Materials are transported between Collectors, the original Generator information/signatures must remain in the custody of the final Collector who delivers the Used Oil and Antifreeze Material to the Processor.

Claims Submission Requirements

BCUOMA requires either;

- Excel copies of BCUOMA RI Claim Forms and Zone Summary Forms to be sent to bcclaims@usedoilrecycling.ca.
- Web-based data transfer to the BCUOMA system

All claims information is due in the BCUOMA office within 60 days from the date the material is received at the Processor facility.

RI Claims sent to BCUOMA must provide the following information and documentation to substantiate the claim:

- Processor Return Incentive Claim Form,
- Collector Zone Summary Form,
- Processed Material documentation including scale tickets, metal tickets, glycol and water test results

Current RI Forms can be found on the website at:

https://bcusedoil.com/participants/processors/

Two Approvals are required on Return Incentive Claim Forms and Collector Zone Summary Forms: one Approval of the individual preparing the form(s) and another Approval of the individual verifying and approving the form(s).

Collectors will retain the Recycle Dockets with Generator signatures confirming volumes and Zones, or Collectors have the option to pass the Recycle Dockets to the Processor.

Processors will retain copies of the documentation sent to BCUOMA.

Annual Reporting Requirements

BCUOMA will require Processors to prepare Annual Sales and Inventory Forms (See BCUOMA Website,) to be completed and approved each year at December 31 for each type of Used Oil and Antifreeze Material processed. With prior approval of BCUOMA's Executive Director, Processors will have the option to use a fiscal year end other than a December 31 fiscal year end.

This information will be used to meet the reporting requirements to the Ministry of Environment which includes how the recovered product was managed in accordance with the Pollution Prevention Hierarchy (See Appendix A.)

Documentation Retention Requirements

All original supporting documents from Processors and Collectors must be kept for a minimum of seven years and provided to BCUOMA upon request. The documentation requirement applies notwithstanding the cancellation of the Processor's or Collector's membership.

5.2 Specific Material Claims Information

Used Oil Claims

BCUOMA will pay Processors a RI for eligible used Lubricating Oil processed according to the Pollution Prevention Hierarchy. The rate used for calculating the RI payment will be based on the Zone in which the Used Oil was collected.

Processors will be responsible for verifying volumes and quality of used oil received from Collectors. Processors must sample and test all incoming loads of used oil for water and provide results with the signed Receiving Docket. Volume measurements using digital gauges in trucks and containers or volumes confirmed with metered sticks and corresponding volume charts are acceptable. Bottom sediment tests may be required by BCUOMA.

All Used Oil samples for testing must be representative of the entire load being received and use one of the two following methods in accordance with ASTM standards:

• tube sampling (all levels sample) method composite sample from the sampling from the top of the tank with a Coliwasa Tube, or

 sampling with a valve on the discharge line taken at the beginning, middle and end of the discharge, or approved equivalent.

If the Used Oil tank truck has more than one compartment, a separate sample must be taken for each compartment.

All Used Oil samples must be kept for a period of 6 months by the Processor.

BCUOMA will pay the RI on the net volume of Used Oil based on the following water content:

- a) Between 0% 35% water there is an RI reduction of 1% for every 1% increase in the water content, and
- b) Over 35% water Not RI eligible

Used Lubricating Oil that is contaminated with other products, such as paint, PCB liquid, solvents, etc., are not eligible for RI payments. In respect of PCB liquids, BCUOMA follows the federal regulation allowing up to 2 ppm.

Used Antifreeze Claims

BCUOMA will pay registered processors a RI for acceptable Used Antifreeze processed according to the Pollution Prevention Hierarchy. The RI rate used for calculating the RI payment will be based on the Zone in which the Used Antifreeze was collected.

Processors will be responsible for verification of the volumes and quality of Used Antifreeze received from Collectors. Processors must sample and test all incoming tank loads and/or drums of Used Antifreeze for percentage glycol and provide results with the signed Receiving Docket.

All Used Antifreeze samples for testing must be representative of the entire load being received and use the Tube sampling (all levels sample) method in accordance with ASTM D4057, or a composite sample from the sampling valve on the discharge line taken at the beginning, middle and end of the discharge, or approved equivalent. If the Used Antifreeze tank truck has more than one compartment, a separate sample must be taken for each compartment.

All Used Antifreeze samples should be kept by the processor for a minimum of 6 months.

Glycol content in Used Antifreeze must be determined by the Processor by the ASTM D3321, or approved equivalent. BCUOMA limits contaminants in used Antifreeze eligible for an RI on the following glycol content:

- a) 42% glycol or greater- RI eligible with no volume discount
- b) Between 42% 25% glycol for RI eligible glycol between 42% and 25%, there is a reduction of 4% for every 1% decrease in the glycol content.
- c) Less than 25% glycol Not RI eligible

Used Antifreeze contaminated with other products (i.e. oil, paint, solvents, PCBs, etc.) is not eligible for the RI.

Filter Claims

BCUOMA will pay Registered Processors a RI on the weight in kilograms of the crushed weight of the Filters as determined by the signed metal broker/steel mill weight scale ticket. The RI rate used for calculating the RI payment will be based on the processed weight from each Zone. The processed weight for each Zone will be based upon a proration of the collected weights from each Zone that make up the processed material.

The conversion factor of 2.2046 is used to convert pounds (lb.) to kilograms (kg).

Metal oil containers such as those used in the aircraft industry must be crushed along with the metal Filters and can be included in a claim made to BCUOMA.

Paper Filters can be separated out and once they have been drained and crushed to meet the requirement of less than 3% oil they can be sent to a Waste-To-Energy Facility. Once a scale ticket is obtained, they can be added to the Filter RI claim. Prior to sending Paper Filters to a Waste-to-Energy Facility, there should be a sign-off from the BCUOMA approved waste-to-energy facility that they accept the crushed paper Filters as a fuel source from the Processor.

Oil and Antifreeze Container Claims

BCUOMA will pay Registered Processors a RI for acceptable Used Oil and Antifreeze Containers based on the shredded and centrifuged weight of Used Oil and Antifreeze containers. The product created is known as "shredded flake". The RI rate used for calculating the RI payment will be based on the processed weight from each Zone. The processed weight for each Zone will be based upon a proration of the collected weights from each Zone that make up the processed material.

BCUOMA will be paying separate rates for bags versus pails. Bags and pails must be processed separately, and the processed material be weighed separately before commingling.

In the event that a processor segregates and processes separately used oil PET bottles, an RI claim for handling of these plastics may be made to BCUOMA.

In the event that a processor segregates and processes separately used oil bladder bags, an RI claim for handling of these plastics may be made to BCUOMA. Prior to sending Used oil bladder bags to a Waste-to-Energy Facility the processor must get a sign-off from the BCUOMA approved waste-to-energy facility that accepts bladder bags as a fuel source.

5.3 Claim Submission and Payments Schedule

Best efforts will be made to issue two payment runs per month with the below due dates and payment dates for properly completed claims:

- Claims received in the BCUOMA office by end of day of the 10th of the month for payment last working day of the month
- Claims received in the BCUOMA office by end of day of the 25th of the month for payment on the 15th of the following month

All payments will be made by electronic funds transfer.

6.0 REVIEW REQUIREMENTS

6.1 Requirement for a Letter of Regulatory Compliance

All BCUOMA registered Processors and Collectors are required to provide BCUOMA with a Letter of Regulatory Compliance at registration time and every two years thereafter during their renewal time. The site visit must be dated within 60 days of the registration application date or expiry of current Regulatory Compliance and submitted with the completed Processor and Collector Registration Form or Renewal application.

The submitted audit report should include, but not be limited to: list of Regulations & Legislation checked against, list of deficiencies and the urgency for correction, a Statement that deficiencies have been corrected, and a statement from the auditor that both the Collection and Processing sides of the operations were checked.

Forms are available on the BCUOMA Website.

The Letter of Regulatory Compliance is to certify that the Processor and/or Collector have had a third-party audit of its entire operation, including transportation/collection activities, and that the operation is in compliance with all applicable legislation and regulations. The Letter of Regulatory Compliance shall be signed and/or sealed by a member of a duly recognized professional association or society that sets member qualifications and has appropriate audit standards and protocols, such as:

- Canadian Environmental Certification Approvals Board http://www.cecab.org
- Association of Professional Engineers & Geoscientists http://www.apeg.bc.ca/, and
- Applied Science Technologists & Technicians of BC http://www.asttbc.org/.

The frequency of the Letter of Regulatory Compliance may be changed for any or all Processors and Collectors, as the Board deems appropriate.

BCUOMA will provide a 30-day grace period for receipt of the Letter of Regulatory Compliance for registration renewal, and during this time all RI Claims will be held in abeyance. At the end of the grace period, if the Letter of Regulatory Compliance remains incomplete, the Processor will forfeit these claims and will be de-registered automatically.

6.2 Return Incentive Claims Review Program

BCUOMA will administer a Return Incentive Claim Review Program of Processors and Collectors to ensure compliance with Program requirements and to demonstrate BCUOMA's accountability to its members and stakeholders, including the Ministry of Environment, regarding Program stewardship.

BCUOMA's Return Incentive Claim Review Program will consist of the following:

- Desk Reviews for ongoing monitoring of the completeness and accuracy of Return Incentive claims filed by Processors
- **Field Reviews** to confirm operational assumptions and ascertain if there are any operational issues to be addressed
- Compliance Reviews to ascertain the compliance of Processors and Collectors to Program requirements including documentation, accounting, reporting, and records retention

Return Incentive Claim Reviews may result in any or all of the following:

- claim overpayments/underpayments will be reconciled between the Processor and BCUOMA
- refusal by BCUOMA to continue to accept claims from a Processor
- cancellation or suspension of the registration of a Processor/Collector and declaration of the Processor/Collector as ineligible for further funding
- the Processor/Collector to take remedial action as may be appropriate in the circumstances to rectify any issues in a timely fashion
- any other steps deemed reasonable by BCUOMA.

6.3 Return Incentive Claim Review Program Requirements

Information and Data

Processors are fully responsible and accountable for all of the information, data and documentation required to support their Return Incentive claims. Collectors must cooperate in providing Processors with all required documentation in support of the Return Incentive claim. BCUOMA acknowledges that Processors will have unique systems to secure, store, and report the information relating to their Return Incentive claims. However, BCUOMA requires that all information and data provided by registered Processors must:

- be objective and verifiable (i.e. a 3rd party could re-perform RI claims and obtain the same result);
- ensure that transaction information is complete and accurate;

- ensure any information, data and records are kept and can be made available to 3rd parties for inspection; and
- ensure site operations contain sufficient physical and procedural controls to ensure that weights and measures are quantified objectively and accurately

BCUOMA will require Processors and Collectors to assist and co-operate in providing information, access to records related to the Program, as well as all related non-BCUOMA materials, and otherwise allowing reviewers to determine the Processors' and Collectors' compliance with the Return Incentive Claim Review Program.

6.4 Review Types

Desk Review

Processors and Collectors will be contacted periodically and advised that their Return Incentive Claim, or part of, have been selected for a Desk Review. Supporting documentation pertaining to the claim details shall be requested to be submitted to BCUOMA for review.

Claims will be randomly selected for Desk Reviews. The more errors and anomalies found on Desk Review will result in a greater number of further claims of the Processor/Collector being selected for review.

Review procedures include but are not limited to:

- verification of supporting documents by verifying/examining:
 - Generator location/zoning;
 - signatures, signatory names;
 - material program qualification (i.e. if a generator is producing Used Oil/Antifreeze material from products that would fall outside of BCUOMA's Environmental Handling Charge program);
 - o weights/volumes; and
 - water/glycol test results
- validation of the occurrence of the pickup of Used Oil Material from the Generator; and re-performance of calculations and evaluation of any proration methodology.

Upon completion of the Desk Review, the result of the Desk Review will be communicated to the Processor/Collector. All supporting documentation will be returned to the Processor/Collector as applicable.

Field Review

Field Reviews will be performed on-site by BCUOMA to examine if the processed material is Used Oil Material eligible for Return Incentive claims as well as if the systems, procedures and equipment in place are reliable and accurate.

Field Reviews will happen approximately twice a year per processor/collector site. The frequency will vary based on findings from prior Field Reviews, Desk Reviews and Compliance Reviews.

Review procedures include but are not limited to the following areas:

- review of procedures for collecting information to ensure they are reasonable, accurate, and are being followed;
- ensuring testing/weighing equipment is accurate and meets government requirements;
- ineligible material contamination is within tolerances;
- inspection of storage areas to ensure are properly maintained; and
- inspection to verify there is no stockpiling/inventory build-up.

Upon completion of the Field Review, the result of the Field Review will be communicated to the Processor/Collector.

Compliance Review

Compliance Reviews on Processors will be by a combination of on-site visits and email correspondence to examine the accuracy and completeness of the submitted Return Incentive Claims verses the accounting and tracking systems of the Processor.

Compliance Reviews will be performed on an as needed basis resulting from issues identified during the Claim Check In, Desk Review and Field Review processes.

Review procedures include but are not limited to:

- reconciliation of received volumes/weights received by the Processor, for both BCUOMA and non-BCUOMA material, against submitted claims;
- reconciliation of sale volumes/weights shipped from the Processor, for both BCUOMA and non-BCUOMA material, against submitted claims;
- reconciliation of Collector information against Processor information;
- checking for duplicate claims, dockets, invoices;
- assessment of Opening & Closing Inventories methodologies and back-up; and confirmation of Approved End-Fate documentation and calculations.

Upon completion of the Compliance Review, the result of the Compliance Review will be communicated to the Processor. All supporting documentation will be returned to the Processor as applicable.

7.0 APPENDICES

APPENDIX A Pollution Prevention Hierarchy

APPENDIX B Zone Map

APPENDIX C List of BC Municipalities or Communities and their Zones

APPENDIX A - POLLUTION PREVENTION HIERARCHY

BCUOMA Pollution Prevention Hierarchy (PPH) Reporting Procedures

BCUOMA is required to produce an annual report on the performance of its program, including how the recovered product was managed in accordance with Pollution Prevention Hierarchy. Key definitions and procedures to support this reporting are provided below.

1.0 Operating Definitions of Pollution Prevention Hierarchy terms

Reuse the Product: to use again as the original product after reclaiming and/or refining.

Recycle the Product: to reprocess into a new, different product.

<u>Recover Energy from the Product:</u> to recover and use the inherent energy of the product in a thermal process. Thermal treatment without energy recovery is considered disposal not Recovered Energy.

2.0 Procedures for PPH Reporting

<u>Used Oil –</u> The amount of uncontaminated used oil recovered, less the water content, that is received at a used oil refinery is reported as **Reuse**. The amount of uncontaminated used oil, less the water content, that is received at a facility that is not a refinery and treated and sold for use as a new product (e.g. asphalt, energy) that meets applicable use standards is reported as **Recycled**.

<u>Used Antifreeze</u> - The amount of used antifreeze that is received at a used antifreeze processing facility, that has a glycol content of 42% or greater and is uncontaminated, and is refined and sold as an antifreeze product that meets applicable use standards is reported as **Reuse**.

<u>Filters</u> – The amount of metal filters processed and received at a steel recycler will be reported as **Recycled**. The amount of paper filters sent for thermal treatment where a portion of the inherent energy is recovered will be reported as **Recovered Energy**.

<u>Antifreeze and Lubrication Oil Containers</u> – The amount of containers received at a facility that manufactures plastic resin (pellets) or a steel recycler will be reported as **Recycled**. The amount of containers received at a facility that recovers a portion of the inherent energy from the containers will be reported as **Recovered Energy**.

APPENDIX B - ZONE MAP



APPENDIX C – LIST OF BC MUNICIPALITIES OR COMMUNITIES AND THEIR ZONES

City/Town	Zone	Bear Lake	2	Burton	6
100 Mile House	4	Beaton	6	Cache Creek	4
108 Mile Ranch	4	Beatton River	5	Campbell River	8
150 Mile House	4	Beaver Cove	8	Canal Flats	6
40 Mile Flats	5	Beaverdell	6	Canim Lake	4
70 Mile House	4	Bedwell Harbour	8	Canoe	4
Abbotsford	1	Belcarra	1	Canyon	6
Adams Lake	4	Bell II	5	Canyon Hot Springs	6
Agassiz	1	Bella Bella	10	Carson	6
Ahousat	8	Bella Coola	10	Cascade	6
Ainsworth Hot Spring	js 6	Big Bar Creek	4	Cassiar	5
Albion	1	Big Bay	10	Cassidy	7
Aldergrove	1	Big Creek	4	Castlegar	6
Alert Bay	8	Big Lake Ranch	2	Cawston	4
Alexis Creek	4	Birch Island	4	Cecil Lake	3
Alice Arm	5	Birken	4	Cedar	7
Alkali Lake	4	Black Creek	8	Cedarvale	9
Altona	3	Blackpool	4	Celista	4
Anahim Lake	10	Blind Bay	4	Central Saanich	7
Anglemont	4	Blind Channel	10	Charlie Lake	3
Anmore	1	Blubber Bay	8	Chase	4
Annacis Island	1	Blue River	2	Chasm	4
Applegrove	6	Boat Basin	8	Cheekye	4
Argenta	6	Bob Quinn Lake	5	Chemainus	7
Armstrong	4	Boston Bar	4	Cherryville	4
Arras	3	Boswell	6	Chetwynd	3
Arrow Park	6	Bouchie Lake	2	Chilanko Forks	10
Ashcroft	4	Boundary Bay	1	Chilliwack	1
Aspen Grove	4	Bowen Island	8	Chopaka	4
Athalmer	6	Bowser	8	Christina Lake	6
Atlin	5	Brackendale	4	Clayhurst	3
Avola	4	Bralome	4	Clearbrook	1
Baldonnel	3	Brentwood Bay	7	Clearwater	5
Baldy Hughes	2	Bridesville	6	Clinton	4
Balfour	6	Bridge Lake	4	Clo-oose	7
Bamberton	7	Brisco	6	Cloverdale	1
Bamfield	8	Britannia Beach	4	Coal Harbour	8
Barkerville	2	Buckinghorse River	5	Coal River	5
Barnfield	4	Buckley Bay	8	Coalmont	4
Barnston Island	1	Buffalo Creek	4	Cobble Hill	7
Barriere	5	Buick	3	Coldstream	4
Baynes Lake	6	Burnaby	1	Colwood	7
Bear Cove	8	Burns Lake	9	Comox	8

Coombs	8	Engen	9	Good Hope	10
Copper Creek	4	Erickson	6	Good Hope Lake	5
Coquitlam	1	Errington	8	Goodlow	3
Corbin	6	Esquimalt	7	Grand Forks	6
Cordova Bay	7	Fairfield Island	1	Granisle	9
Courtenay	8	Fairmont Hot Springs	6	Granite Bay	10
Cowichan Bay	7	Falkland	4	Grasmere	6
Craigellachie	4	False Bay	8	Grassy Plains	9
Cranberry Junction	5	Fanny Bay	8	Gravelle	2
Cranbrook	6	Farmington	3	Gray Creek	6
Crawford Bay	6	Fauquier	6	Green Cove	8
Crescent Spur	2	Fernie	6	Greenville	5
Crescent Valley	6	Field	6	Greenwood	6
Creston	6	Fireside	5	Grindrod	4
Crofton	7	Firvale	10	Groundbirch	3
Croydon Station	2	Flathead	6	Gulf Islands North	8
Cultus Lake	1	Forest Grove	4	Gulf Islands South	8
Cumberland	8	Fort Babine	5	Hagensborg	10
D'Arcy	4	Fort Fraser	9	Halfmoon Bay	4
Darfield	4	Fort Langley	1	Hanceville	4
Darrell Bay	4	Fort Nelson	5	Harrison Hot Springs	1
Dawson Creek	3	Fort St. James	9	Harrison Mills	1
Dawsons Landing	10	Fort St. John	3	Harrogate	6
Dease Lake	5	Fort Steele	6	Harrop	6
Delta	1	Fort Ware	5	Hartley Bay	10
Denman Island	8	Francois Lake	9	Hazelton	9
Departure Bay	7	Fraser	5	Hedley	4
Deroche	1	Fraser Lake	9	Heffley Creek	4
Dewdney	1	French Creek	8	Hendrix Lake	4
Dog Creek	4	Fruitvale	6	Heriot Bay	10
Dome Creek	2	Fulford Harbour	8	Highland Valley	4
Donald	6	Gabriola	8	Highlands	7
Douglas	1	Galena Bay	6	Hixon	2
Douglas Lake	4	Galloway	6	Holberg	8
Dove Creek	8	Gambier Island	4	Honeymoon Bay	7
Duke Point	7	Gang Ranch	4	Hope	1
Duncan	7	Ganges	8	Hornby Island	8
Dunster	2	Garden Bay	4	Horsefly	2
Eagle Bay	4	Garibaldi Highlands	4	Horseshoe Bay	1
Eagle Creek	4	Genelle	6	Hosmer	6
Earls Cove	4	Germansen Landing	5	Houston	9
Eastbourne	4	Gibsons	4	Howser	6
Edgewater	6	Gilles Bay	8	Huckleberry Mines	10
Edgewood	6	Gitwinksihikw	5	Hudson's Hope	3
Egmont	4	Glade	6	Huntingdon	1
Elkford	6	Glenora	5	Invermere	6
Elko	6	Gold Bridge	5	Irvines Landing	4
Endako	9	Gold River	8	Iskut	5
Enderby	4	Golden	6	Isle Pierre	2

Jaffray	6	Lakelse Lake	9	Merritt	4
James Island	7	Langdale	4	Merville	8
Jesmond	4	Langford	7	Mesachie Lake	7
Johnsons Landing	6	Langley	1	Metchosin	7
Jordan River	7	Lantzville	8	Meziadin Junction	5
Juskatla	11	Lavington	4	Mica Creek	2
Kaleden	4	Lax Kw'alaams	5	Midway	6
Kamloops	4	Lazo	8	Mill Bay	7
Kaslo	5	Lejac	9	Milnes Landing	7
Keats Island	8	Leo Creek	5	Minstrel Island	10
Keefers	4	Liard River	5	Miracle Beach	8
Kelowna	4	Likely	2	Mirror Lake	6
Kemano	10	Lillooet	4	Mission	1
Kemes Mines	5	Lions Bay	4	Moberly Lake	3
Kent	1	Lister	6	Monte Creek	4
Keremeos	4	Little Fort	4	Monte Lake	4
Kersley	2	Little River	8	Montney	3
Kettle Valley	6	Logan Lake	4	Montrose	6
Kildonan	8	Lone Butte	4	Moose Heights	2
Killiney Beach	4	Lone Prairie	3	Moresby Camp	11
Kimberley	6	Long Harbour	8	Moricetown	9
Kimsquit	10	Longworth	2	Mount Currie	4
Kincolith	5	Loos	2	Mount Robson	2
Kingcome Inlet	10	Louis Creek	4	Mount Washington	8
Kingsgate	6	Lower Nicola	4	Moyie	6
Kispiox	9	Lower Post	5	Muncho Lake	5
Kitamaat Village	9	Lumby	4	Nahmint	8
Kitchener	6	Lund	10	Nakusp	6
Kitimat	9	Lytton	4	Namu	10
Kitkatla	10	Mackenzie	3	Nanaimo	7
Kitsequecia	9	Madeira Park	4	Nanoose Bay	8
Kitwancool	9	Magna Bay	4	Naramata	4
Kitwanga	9	Mahood Falls	4	Nass Camp	5
Kleena Kleene	10	Malahat	7	Nazko	2
Kleindale	4	Malakwa	4	Needles	6
Klemtu	10	Manning Park	4	Nelson	6
Knutsford	4	Manson Creek	5	Nelson Forks	5
Kokish	8	Mansons Landing	10	Nelway	6
Kootenay Bay	6	Maple Ridge	1	Nemaiah Valley	10
Kragmont	6	Mara	4	New Aiyansh	5
Kuper Island	8	Marguerite	2	New Brighton	4
Kyuquot	8	Marysville	6	New Denver	6
Lac La Hache	4	Masset	11	New Hazelton	9
Lac Le Jeune	4	Matsqui	1	New Westminster	1
Ladner	1	McBride	2	Newgate	6
Ladysmith	7	McLeese Lake	2	Nicola	4
Lake Country	4	McLeod Lake	2	Nimpo Lake	10
Lake Cowichan	7	McLure	4	Noralee	9
Lake Errock	1	Meadow Creek	6	North Bend	4

North Cowichan	7	Prince George	2	Saratoga Beach	8
North Pine	3	Prince Rupert	9	Sardis	1
North Saanich	7	Princeton	4	Sarita	8
North Vancouver	1	Pritchard	4	Saturna	8
Nukko Lake	2	Procter	6	Savona	4
Oak Bay	7	Progress	3	Sayward	8
Ocean Falls	10	Prophet River	5	Scotch Creek	4
Okanagan Centre	4	Quadra Island	8	Seal Cove	9
Okanagan Falls	4	Qualicum Beach	8	Sechelt	4
Old Bella Bella		Quathiaski Cove	10	Seton Portage	4
(Waglisla)	10	Quatsino	8	Sewell Inlet	11
Oliver	4	Queen Charlotte Islan	ds11	Seymour Arm	4
Oona River	10	Quesnel	2	Shalath	4
Ootsa Lake	9	Quilchena	4	Shawnigan Lake	7
Osoyoos	4	Radium Hot Springs	6	Shearwater	10
Otter Bay	8	Red Rock	2	Shelley	2
Oyama	4	Redstone	4	Shelter Bay	6
Panorama Resort	6	Refuge Cove	10	Shoreacres	6
Parksville	8	Reid Lake	2	Sicamous	4
Parson	6	Remac	6	Sidney	7
Paterson	6	Revelstoke	6	Sikanni Chief	5
Pavilion	4	Richmond	1	Silver Creek	4
Peachland	4	Riondel	6	Silverton	6
Pemberton	4	Riske Creek	4	Simoom Sound	10
Pender Harbour	4	River Jordan	7	Sinclair Mills	2
Pender Island	8	Rivers Inlet	10	Sirdar	6
Penny	2	Roberts Creek	4	Skidegate	11
Penticton	4	Robson	6	Skookumchuk	6
Phillips Arm	10	Rock Bay	8	Slocan	6
Pinantan Lake	4	Rock Creek	6	Slocan Park	6
Pink Mountain	5	Rogers Pass	6	Smith River	5
Pitt Meadows	1	Rolla	3	Smithers	9
Pleasant Camp	5	Roosville	6	Smithers Landing	9
Port Alberni	8	Rose Prairie	3	Snug Cove	8
Port Alice	8	Rosedale	1	Soda Creek	2
Port Clements	11	Rossland	6	Sointula	8
Port Coquitlam	1	Rosswood	9	Sooke	7
Port Edward	9	Royston	8	Sorrento	4
Port Essington	9	Rutland	4	South Hazelton	9
Port Hardy	8	Rykerts	6	South Slocan	6
Port Kells	1	Saanich	7	South Wellington	7
Port McNeill	8	Saanichton	7	Southbank	9
Port Mellon	4	Salmo	6	Spallumcheen	4
Port Moody	1	Salmon Arm	4	Sparwood	6
Port Neville	10	Salt Spring Island	8	Spences Bridge	4
Port Renfrew	7	Saltery Bay	10	Spillmacheen	6
Pouce Coupe	3	Sanca	6	Springhouse	4
Powell River	10	Sandon	6	Sproat Lake	8
Prespatou	3	Sandspit	11	Spuzzum	4

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Squamish	4	Trout Lake	6	Wynndel	6
Squilax	4	Tsawwassen	1	Yahk	6
Steveston	1	Tulameen	4	Yale	4
Stewardson Inlet	8	Tulsequah	5	Yarrow	1
Stewart	5	Tumbler Ridge	3	Ymir	6
Stikine	5	Tupper	3	Youbou	7
Stoner	2	Ucluelet	8	Yuquot	8
Strathnaver	2	Union Bay	8	Zeballos	8
Stuart Island	10	Upper Fraser	2		
Stuie	10	Usk	9		
Sturdies Bay	8	Valemount	5		
Sullivan Bay	10	Vallican	6		
Summerland	4	Vananda	10		
Summit Lakes	2	Vancouver	1		
Sunset Prairie	3	Vanderhoof	2		
Surge Narrows	10	Vavenby	4		
Surrey	1	Vermilion Crossing	6		
Swartz Bay	7	Vernon	4		
Ta Ta Creek	6	Vesuvius	8		
Tachie	9	Victoria	7		
Taghum	6	View Royal	7		
Tahsis	8	Village Bay	8		
Takla Landing	5	Waglisla			
Takysie Lake	9	(Old Bella Bella)	10		
Tappen	4	Walhachin	4		
Tatalrose	9	Waneta	6		
Tatla Lake	10	Wardner	6		
Tatlayoko Lake	10	Warfield	6		
Tatogga	5	Wasa	6		
Taylor	3	Wells	2		
Tchesinkut Lake	9	West Vancouver	1		
	8	Westbank	4		
Telegraph Crook	o 5				
Telegraph Creek		Westbridge	6		
Telkwa	9	Westview	10		
Terrace	9	Westwold	4		
Tete Jaune Cache	2	Whaletown	10		
Texada Island	10	Whalley	1		
Thetis Island	8	Whistler	4		
Thompson Sound	10	White Rock	1		
Three Valley	4	Williams Lake	4		
Thrums	6	Willow River	2		
Tlell	11	Windermere	6		
Toad River	5	Winfield	4		
Tofino	8	Winlaw	6		
Tomslake	3	Winter Harbour	8		
Topley	9	Wonowon	3		
Topley Landing	9	Woodfibre	4		
Trail	6	Woss	8		
Tranquille	4	Wycliffe	6		