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Transportation/Used Oil: Alabama Department of Environmental Management and Montgomery Used Oil Transportation Company Enter into Consent Order

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The Alabama Department of Environmental Management (“ADEM”) and Buck Oil Services, Inc. (“Buck Oil”) entered into a January 31st Consent Order (“CO”) addressing alleged violations of the Alabama Used Oil Regulations. See Consent Order No. 24-XXX-CHW.

The CO provides that Buck Oil operates a used oil transportation company (“Facility”) in Montgomery, Alabama.

Because of its operations, the Facility is stated to be classified as a used oil transporter/transfer facility as such terms are defined in ADEM Admin. Code Div. 14. Further, the Facility holds an EPA identification number.

A representative of ADEM’s Industrial Hazardous Waste Branch conducted a Compliance Evaluation Inspection (“CEI”) of Buck Oil on July 27, 2023.

The CEI allegedly determined the following:

- Transportation of used oil without having received an Alabama Used Oil Transport Permit
- Failure to submit a correct and complete ADEM Form 8700-12 for 2022 and 2023
- Failure to provide secondary containment for containers of used oil stored in certain specified areas
- Failure to label containers and tanks of used oil in certain specified areas
- Failure to clean up a release of used oil
- Failure to demonstrate the length of time that used oil has been accumulated
- Failure to provide documentation that the Facility maintained a copy of the Contingency Plan with each vehicle transporting used oil
- Failure to provide documentation that the Facility maintained records of analyses on used oil collected for transport
- Failure to provide documentation that the Facility had maintained records of used oil shipments accepted or delivered for transport

Buck Oil neither admits nor denies ADEM’s contentions.

A civil penalty of \$13,120 is assessed.

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