

MANUAL FOR REGISTERED COLLECTORS AND PROCESSORS

July 2023



FOREWORD

Interchange Recycling (a trade name and trade mark of British Columbia Used Oil Management Association, referred to in this manual as "Interchange" or "Interchange Recycling") operates a Used Oil and Antifreeze Materials (as defined below in section 1.0) stewardship program in accordance with an *Extended Producer Responsibility Plan Lubricating Oil, Empty Oil Containers, Oil Filter Products, Antifreeze Products* (the "Program") approved by the British Columbia Ministry of Environment and Climate Change Strategy (the "Ministry of Environment") under the *Recycling Regulation (BC)*.

Interchange is a not-for-profit organization of oil, antifreeze and oil filter manufacturers and retailers. It is incorporated under the British Columbia *Societies Act (BC)*, 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 Interchange's Program.

This manual is designed to provide Processors and Collectors with a broad knowledge of Interchange's 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) **Carrier** - a transporter that crosses provincial borders and is registered with Transport Canada.
- 5) **Collector** – an Interchange Recycling 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 Interchange Recycling.
- 6) **Commingling** - introduction of non-Interchange Recycling materials into the separate waste streams. It includes all materials on which an EHC has not been remitted.
- 7) **Compliance Review** - is the compliance review process for Processors and Collectors described in section 6.4.
- 8) **Desk Review** - is the desk review process for Processors and Collectors described in section 6.4.
- 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 as 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 Interchange Recycling 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) **Field Review** - is the field review process for Processors and Collectors described in section 6.4.

- 14) **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.
- 15) **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.
- 16) **Ineligible Used Oil and Antifreeze Material** - Used Oil and Antifreeze Materials that are not eligible for RI under the Program as prescribed by Interchange Recycling 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 Interchange Recycling.
- 17) **Interchange Recycling or Interchange** - means the British Columbia Used Oil Management Association doing business under the trade name Interchange Recycling.
- 18) **Interchange Recycling Website** – interchangerecycling.com
- 19) **Letter of Regulatory Compliance** - is a letter certifying that a Processor or Collector has had a third-party audit for compliance with all applicable legislation and regulations.
- 20) **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.
- 21) **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.
- 22) **Pelletized Plastic** - small particles created by compressing oil containers, which are washed and turned into plastic resin that is useable for clean marketable feedstock.
- 23) **Processor** - an Interchange Recycling-registered receiver of one or more Used Oil and Antifreeze Materials that processes these materials into saleable products.

- 24) **Program** - the British Columbia *Extended Producer Responsibility Plan Lubricating Oil, Empty Oil Containers, Oil Filter Products, Antifreeze Products* approved under the *Recycling Regulation* (BC) and administered by Interchange Recycling.
- 25) **Receiving Docket** - documentation of the transfer of material between Collectors and Processors or between Processors.
- 26) **Recovered Energy** - to recover and use the inherent energy of the product in a thermal process.
- 27) **Recycled** - turning Used Oil Filters and Oil Containers into a different marketable product.
- 28) **Recycle Docket** - a document that verifies the pick-up of an eligible Used Oil and Antifreeze Material by a Collector from a Generator.
- 29) **Return Collection Facility (RCF)** - an Interchange Recycling-registered facility that agrees to receive Used Oil, Antifreeze, Filters and/or Oil and Antifreeze Containers from Do-It-Yourself consumers at no charge.
- 30) **Return Incentive (RI)** - an incentive payment made by Interchange Recycling to registered Processors for the collection and processing of eligible Used Oil and Antifreeze Materials.
- 31) **Re-Use** - removing the impurities in Used Oil and Antifreeze so it can be used again.
- 32) **RI Premium** - is the premium that may be claimed under section 5.3 to offset the additional costs of servicing RCFs that accept drop offs of Used Oil and Antifreeze Material from DIY consumers.
- 33) **Shredded Flake** - Small particles created by shredding oil containers, which are reusable for marketable feedstock.
- 34) **Stockpile** - allowing unprocessed and processed material to accumulate in a Processors yard.
- 35) **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.
- 36) **UOMA** - is Used Oil Management Associations, which include: Alberta Recycling Management Authority (ARMA); Interchange Recycling; 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 (UOMA NB) and Société de gestion des huiles usages – Used Oil Management Association - Prince Edward Island (UOMA PE), Atlantic Used Oil Management Association (UOMA NL) & (UOMA NS).

- 37) **Used Antifreeze** - automotive Antifreeze after it has been used for its initial purpose but does not include Ineligible Used Oil and Antifreeze Material.
- 38) **Used Oil** - Lubricating Oil after it has been used for its initial purpose but does not include Ineligible Used Oil and Antifreeze Material.
- 39) **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.
- 40) **Waste-to-Energy** - A facility that turns waste into energy.
- 41) **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).
- 42) **Zone** - any one of nine regions in British Columbia defined by Interchange Recycling for the purpose of calculating RIs 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 Interchange Recycling 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 Interchange Recycling;
 - 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 Interchange Recycling; and
 - the product is not contaminated; i.e., mixed with solvents, PCBs, paint, etc.
- Interchange Recycling 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 will be allowed provided it is approved to meet Interchange Recycling'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, Interchange Recycling has established nine (9) 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. From time-to-time 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 Interchange Recycling Website.

The Zone Map is set out in Appendix B and on the Interchange Recycling 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 Interchange Recycling by completing and submitting the Interchange Recycling Processor and Collector Registration Application Form (available on the Interchange Recycling 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, Interchange Recycling will review the application. If approved, Interchange Recycling 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 Interchange Recycling Website.) The date of renewal will be 2 years after the last Letter of Regulatory Compliance was approved.
- Interchange Recycling maintains an active database of registered Processors and Collectors who provide the services required for Interchange Recycling to fulfill the mandate of the Program. The list of registered Processors and Collectors is posted on the Interchange Recycling 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 (*i.e.* 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 Interchange Recycling.

Weigh Scales – Filters and Oil and Antifreeze Containers

Interchange Recycling 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. The latest copy of the Scale Calibration Certificate must be provided with the registration package and the renewal package every 2 years.

Calibration of weigh scales may be requested periodically by Interchange Recycling 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

Interchange Recycling-registered facility or combination of facilities that processes Used 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* (BC) 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* (BC) 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* (BC) or applicable government standards in other states or provinces; or
- for other uses that meet the intent of the *Hazardous Waste Regulation* (BC) 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 "Coliwas 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* (BC) and is not an Interchange Recycling approved use. The application of Used Oil in oil-fired furnaces is not an Interchange Recycling approved use.

Organizations that purchase the "bulked Oil" 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 Interchange Recycling onsite Field Reviews and review for confirmation of usage for Interchange Recycling-incentivized products
- Agreement to notify the processor and Interchange Recycling immediately of any changes to said letter

Antifreeze Processor

Interchange Recycling-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.

Organizations that purchase the "bulked Antifreeze" 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 Interchange Recycling onsite Field Reviews and review for confirmation of usage for Interchange Recycling - incentivized products

- Agreement to notify the processor and Interchange Recycling immediately of any changes to said letter

Filter Processor

Interchange Recycling-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-Interchange Recycling metal should be sent to the metal recycler in a separate bin.

Organizations that purchase the “Crushed Oil Filters” 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 Interchange Recycling onsite Field Reviews and review for confirmation of usage for Interchange Recycling-incentivized products
- Agreement to notify the processor and Interchange Recycling immediately of any changes to said letter

Oil and Antifreeze Container Processor

Interchange Recycling-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 purchase 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 Interchange Recycling onsite Field Reviews and review for confirmation of usage for Interchange Recycling-incentivized products
- Agreement to notify the processor and Interchange Recycling immediately of any changes to said letter

4.4 Program Confidentiality

Under the Interchange Recycling 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 Interchange Recycling, in its sole discretion, to assist Interchange Recycling in the administration of its Program (including in respect of an Interchange Recycling Audit pursuant to Section 6.1, 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 Interchange Recycling regarding collected and processed Used Oil and Antifreeze Material.

Interchange Recycling 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 Interchange Recycling 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

Interchange Recycling requires either;

- Excel copies of Interchange Recycling RI Claim Forms and Zone Summary Forms to be sent to claims@interchangerecycling.com.
- Web-based data transfer to the Interchange Recycling system

All claims information is due in the Interchange Recycling office within 60 days from the date the material is received at the Processor facility. (Alberta based Filter Processors should contact Interchange Recycling Program Admin if they are unable to meet this criterion.)

RI claims sent to Interchange Recycling 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://interchangerecycling.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 Interchange Recycling.

Annual Reporting Requirements

Interchange Recycling will require Processors to prepare Annual Sales and Inventory Forms (see Interchange Recycling 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 Interchange Recycling's CEO, 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 British Columbia 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 Interchange Recycling 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

Interchange Recycling 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 Interchange Recycling.

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 "Coliwas 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.

Interchange Recycling 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, Interchange Recycling follows the federal regulation allowing up to 2 ppm.

Used Antifreeze Claims

Interchange Recycling 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 of 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. Interchange Recycling 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

Interchange Recycling 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 Interchange Recycling.

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 Interchange Recycling approved Waste-to-Energy facility that they accept the crushed paper Filters as a fuel source from the Processor.

Oil and Antifreeze Container Claims

Interchange Recycling 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.

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 Interchange Recycling.

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 Interchange Recycling. Prior to sending Used Oil bladder bags to a Waste-to-Energy facility the processor must get a sign-off from the Interchange Recycling approved Waste-to-Energy facility that accepts bladder bags as a fuel source.

5.3 RI Premium

Return Collection Facilities (RCFs) are an important part of the Interchange Recycling Program, providing a place for DIY consumers that do their own oil and antifreeze

changes, to drop off their oil and antifreeze for recycling at no charge. Because these facilities cannot charge fees to consumers, stop charges and other pick-up fees challenge their participation in the Interchange Recycling Program.

To offset additional costs of servicing these sites, Interchange Recycling has established a RI Premium that can be claimed for each litre of consumer generated oil and antifreeze picked up at Interchange Recycling RCFs. This RI Premium will be paid in return for a guarantee that no further stop charges or other pick-up fees will be assessed at these facilities.

If a Processor/Collector opts to receive the RI Premium they must offer a guarantee that stop charges and any other pick-up fees will not be assessed at any Interchange Recycling RCFs that they service; they cannot “cherry pick” when to use it and when to not use it. Once the Processor/Collector opts into the Program they must agree to give written notice of 6-months before they wish to terminate. Throughout the duration of payment of the RI Premium, no stop charges or pick-up fees can be charged at any RCF locations.

RCF locations fit into 2 categories. They are either 100% drop-off or a Mix of consumer drop-off and commercial use. The RI Premium will only be paid on the portion of the consumer drop-off. For RCFs that are a mix of consumer drop-off and commercial use, Interchange Recycling will determine the consumer portion of the pick-up quantity based on historical averages across the business category for the RCF. Below are the categories of RCFs and the average percentage of consumer generated oil and antifreeze at those facilities. These percentages will be tracked and adjusted over time.

Type of Facility	Consumer volume as % of total collected volume
Public Recycling Centre	100%
Retailer	75%
Auto Repair/Car Dealer	50%
Lube Shop	20%

All RI claim forms have been adjusted to reflect these changes. On the Oil and Antifreeze claims a second tab has been added to record the details of RCF pickups. This will transfer the RI Premium amount to the front page in summary format. On the RCF page, the Collector Name, Collector Zone Summary #, and the RCF Collection Docket # must be provided. There will be a drop down to choose the RCF location – as Registered with the Interchange Recycling Program - and the form will auto-populate the allowable % of product to be claimed based on the business type of the facility. This form will be updated as often as needed.

5.4 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 Interchange Recycling office by end of day of the 10th of the month for payment last working day of the month;
- Claims received in the Interchange Recycling 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 Interchange Recycling registered Processors and Collectors are required to provide Interchange Recycling 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 Interchange Recycling 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 being compliant with all applicable legislations and regulations. The required legislations and regulations would be those that pertain to but not limited to registration, licensing, transportation, collection activities, storage, operational and contingency plans. 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 list of Legislation and their related Regulations to be reviewed must include, where applicable, but not be limited to, Canadian Environmental Protection Act, Canadian Transportation of Dangerous Goods Act, National Fire Code of Canada, BC Environmental Management Act (including the BC Hazardous Waste Regulation), BC Transportation of Dangerous Goods Act, BC Motor Vehicle Act, BC Fire Services Act, BC Workers Compensation Act, BC Commercial Transportation Act, and all applicable Municipal and Provincial By-laws.

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

Interchange Recycling 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

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

Interchange Recycling'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 Interchange Recycling
- refusal by Interchange Recycling 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 Interchange Recycling.

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. Interchange Recycling acknowledges that Processors will have unique systems to secure, store, and report the information relating to their Return Incentive claims.

However, Interchange Recycling 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.

Interchange Recycling 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-Interchange Recycling 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 Interchange Recycling 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 (ie. if a generator is producing Used Oil/Antifreeze material from products that would fall outside of Interchange Recycling's Program);
 - 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 Interchange Recycling 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 they 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 versus 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 Interchange Recycling and non-Interchange Recycling material, against submitted claims;
- reconciliation of sale volumes/weights shipped from the Processor, for both Interchange Recycling and non-Interchange Recycling 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 A – POLLUTION PREVENTION HIERARCHY

Interchange Recycling Pollution Prevention Hierarchy (PPH) Reporting Procedures

Interchange Recycling 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.

Recover Energy from the Product: 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

Used Oil – 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**.

Used Antifreeze - 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**.

Filters – 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**.

Antifreeze and Lubrication Oil Containers – 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

