

LIQUID RECYCLING

used oil | parts cleaning | anti-freeze | filters & absorbents | wastewater | chemicals

SAFETY ISSUE

Preventing Fall Hazards

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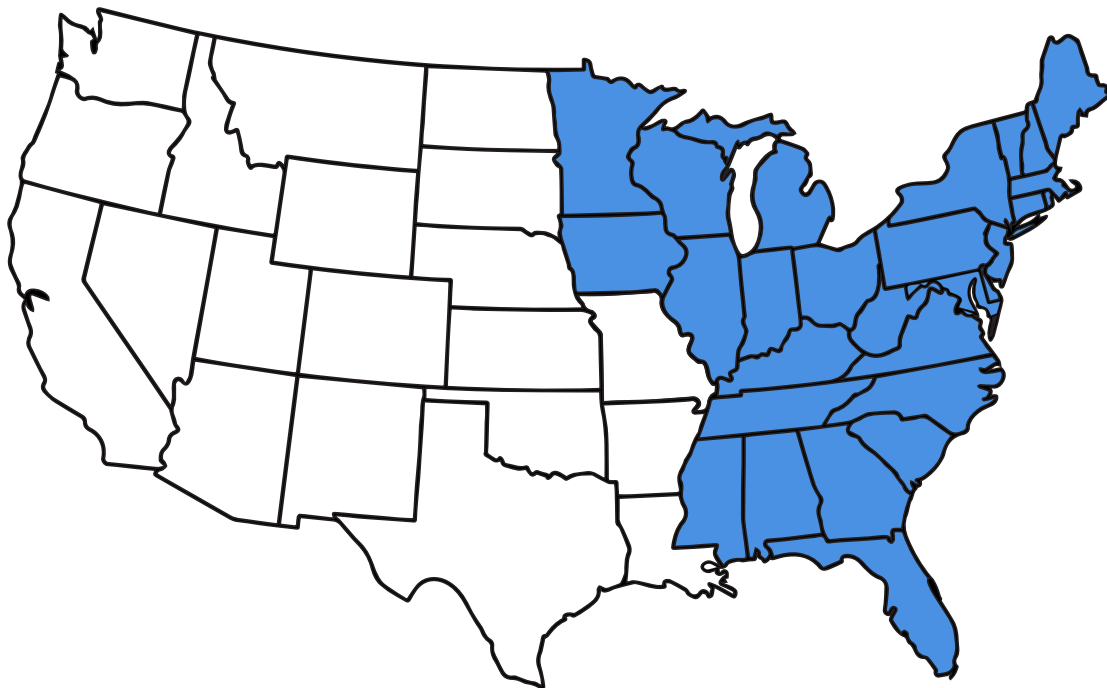
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**Michigan Recycled Used Oil Ban
A Loss and a Win**

On June 20, 2023, Judge David Newblatt upheld the original Michigan Department of Energy, Great Lakes and Energy (EGLE) permit to install a hot mix asphalt plant in Genesee Township, Michigan. That area abuts the City of Flint.

The permit included a ban on Recycled Used Oil (RUO) at the encouragement of the US Environmental Protection Agency (EPA).

Background

On December 21, 2020, an application to install a Genesee Township asphalt plant was submitted. EGLE issued a draft permit on July 1, 2021 that included RUO as a backup fuel.

Because of the lead issue in Flint drinking water, EGLE knew the permit would constitute a “known public controversy” and therefore held public hearings and a public comment hearing.

As part of the public comment period, EPA Region 5 issued a letter to EGLE citing environmental justice (EJ) concerns with the project. The letter stated, “EPA is committed to advancing environmental justice and incorporating equity considerations into all aspects of our work.”

The EPA letter contained 27 “comments and recommendations” including, “We recommend that the permittee consider not using RUO as a fuel for the proposed source. Although EGLE has established requirements that apply when combusting RUO, eliminating the use of RUO as a fuel could reduce air toxics and sulfur impacts on the local community.” No evidence was provided to support this recommendation.

On November 15, 2021, EGLE approved the final permit which banned the use of RUO as a backup fuel. A series of lawsuits were filed challenging the permit.

NORA's Actions

After reviewing this issue with members, the NORA Board of Directors approved funds from the NORA Defense Fund to file an amicus brief arguing against the RUO ban.

While it is disappointing the judge upheld the ban of RUO, NORA's significant efforts have limited the impact and spread of the ban.

EGLE's prohibition of burning used oil fuel in the Ajax facility permit is contrary to Michigan's laws and policies. EGLE used RUO as a boogey man. NORA's 19 page Amicus Brief corrected multiple erroneous EGLE assertions about RUO.

The judge mentioned that the Flint asphalt plant is “surely controversial”. Fortunately, the judge emphasized that this was a site specific issue related to RUO.

While this judgment is a loss for those that believe used oil can be beneficially reused in an environmentally safe manner, it appears that NORA can claim victory in limiting this issue to this site.

NORA has recently received reports from other asphalt plants in Michigan that have been permitted to allow the use of RUO.

NORA will continue to defend the right of members to responsibly recycle used oil and related materials. To make a donation to the NORA Defense Fund, see page 38 or visit www.noranews.org/defensefund. ■

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Know someone who should be a NORA member? Contact marketing@noranews.org or 703-753-4277 and if they join you get a \$100 Amazon Gift Card.

INDUSTRY CALENDAR

(meeting dates are tentative and subject to change)

2023

ILMA Annual Meeting
October 7 - 10, 2023
JW Marriott Desert Springs Resort & Spa;
Palm Desert, California

2023 NORA Annual Conference & Trade Show

November 8 - 11, 2023
JW Marriott Hill Country Resort & Spa;
San Antonio, Texas

2024

NAPA Annual Meeting
January 28 - 31, 2024
Omni Orlando Resort at ChampionsGate;
Orlando, Florida

2024 NORA Winter Meeting and EH&S

March 6 - 8, 2024
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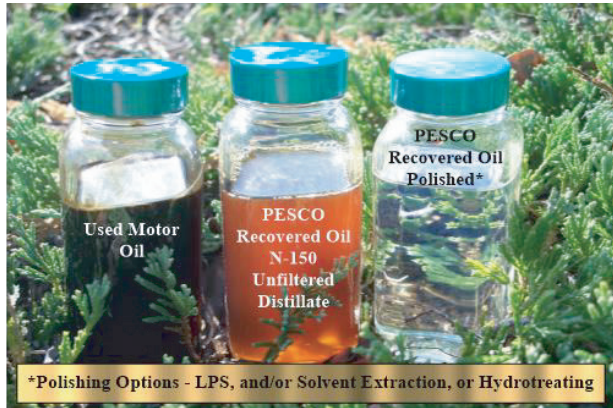
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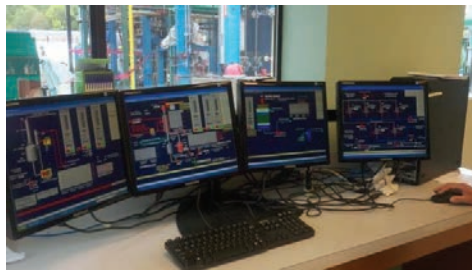
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Industry News

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Noble Oil Services, Inc. Announces the Death of Its President, CEO & Founder, Jim Noble

With a heavy heart, NORA informs you that Jim Noble of Noble Oil Services, Inc. passed away on June 10, 2023.

Jim joined NORA in 1991. He served as the Executive Vice President of NORA as well as a Board Member. He was an industry leader and was active in the association's role in helping develop the Used Oil Management Standards. He will be missed.

A Memorial Service was held Saturday, June 24, 2023 at 1 PM at The Shepherd's Church in Cary, North Carolina. NORA was be present to offer condolences on behalf of members.

NORA & IAPA Partner to Defend On-Spec Used Oil Market

NORA has recently partnered with the Illinois Asphalt Pavement Association (IAPA) to defend the market for on-specification used oil (sometimes referred to as Recycled Fuel Oil or RFO) in Illinois. NORA and IAPA believe that the Illinois Environmental Protection Agency has incorrectly defined on-specification used oil as Residual Fuel Oil. Even though Recycled Fuel Oil and Residual Fuel Oil share the same acronym, they are different products with different regulatory requirements.

DOBER CHEMISTRY AND TECHNOLOGY

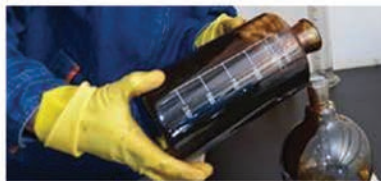
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PREVENTING FALL HAZARDS

Millions of people each year are injured in falls. Sadly, some fall-related injuries are fatal. The risk of fall-related injuries varies by industry, but even when working in the office or at home, there are steps we can all take to help reduce fall-related risks. **Most fall hazards are preventable!**

Here are a few things to keep in mind:

- Keep floors and surfaces clear of clutter
- Keep electrical and phone cords out of traffic areas
- Properly arrange furniture to create open pathways
- Keep the work area clear of hazards and immediately clean up spills
- Read all instructions and safety precautions on your equipment
- Keep file cabinets and desk drawers closed
- Never stand on chairs, tables or any surface with wheels
- Ensure adequate lighting

Check out the infographic below for more tips and some eye-opening statistics.

PREVENTING FALLS*

from **SLIPS and TRIPS**

ONE STEP AT A TIME * Falls that occur on the same level

That's approximately **28,353** slips and trips annually

About **12%** of all accepted injury claims are from a slip or trip.

To PREVENT falls:

- USE appropriate, non-slip flooring material
- PROVIDE adequate lighting

PRACTICE good housekeeping:

CLEAN up all spills and debris immediately

MARK or **IDENTIFY** spills and wet areas

KEEP walkways clear of clutter and other obstacles

CLOSE file cabinets and storage drawers immediately

COVER or **TAPE** down cords or cables

SELECT and WEAR proper footwear:

MATCH your footwear to all the hazards of your job

KEEP shoes in good repair, clean and free from contaminants

Statistical source: Association of Workers' Compensation Boards of Canada, Injury Statistics Across Canada, 2015

5 WAYS to REDUCE the RISK of Slipping or Tripping

<p>SLOW down and pay attention to where you are going</p>	<p>KEEP walking areas clear from clutter or obstructions</p>
<p>PLACE each foot firmly and flat on the floor</p>	<p>KEEP flooring in good condition</p>
<p>ADJUST your stride to be suitable for the walking surface and the task</p>	<p>USE installed light sources that provide sufficient light for your tasks</p>
<p>WALK with your feet pointed slightly outward</p>	<p>USE a flashlight if you enter a dark room</p>
<p>MAKE wide turns at corners</p>	<p>DO NOT LET objects you are carrying or pushing block your view</p>

Common CAUSES

Slips

- Slippery materials (water, ice, snow, oils, powders, granular solids)
- Slippery surfaces (polished tile or stone, smooth painted concrete or metal)
- Inappropriate footwear for the surface

Trips

- Uneven walking surfaces
- Unexpected or unseen steps, platforms or thresholds
- Wrinkled carpeting, or loose rugs or mats
- Obstructions such as an open bottom file cabinet drawer
- Exposed or loose cables, wires or cords
- Clutter on the floor or stairs

Employers should make sure the health and safety program includes slips and trips prevention:

CONDUCT regular inspections

IDENTIFY high-risk areas such as stairs, entrances, and high-traffic areas

TRAIN managers, supervisors and workers

Canadian Centre for Occupational Health and Safety



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PFAS PERSPECTIVES

Newly Released DoD Specifications Fuel the Transition from AFFF to F3

MITCH OLSON, PH.D., P.E., EMERGING CONTAMINANT DIRECTOR, TRIHYDRO CORPORATION
KYLE MCDONALD, CES, ASSOCIATE PROJECT SCIENTIST, TRIHYDRO CORPORATION

This PFAS Perspectives article is part of a series of recurring Liquid Recycling articles to keep NORA members up to date on the evolving challenges (and opportunities) related to per- and polyfluoroalkyl substances (PFAS).

As you may be aware, NORA recently joined the Barnes & Thornburg PFAS Coalition, an influential group that is closely plugged into the United States Environmental Protection Agency (U.S. EPA) and state-level regulatory programs. These recurring PFAS Perspectives articles will provide PFAS regulatory updates and insights, including information provided by Barnes & Thornburg in the PFAS Coalition's monthly calls. Articles will also include focus topics; this article's focus is aqueous film-forming foams (AFFFs).

Challenges of Fluorine-Free Foams: Meeting Department of Defense Firefighting Standards

The use of PFAS-containing AFFFs has been well-established as an effective means of combating flammable liquid fires ("class B" fires) since the 1960s. However, we are now witnessing a long-awaited transition toward fluorine-free foams (F3). AFFFs containing PFAS are known to be reliable and effective, particularly in situations involving extreme danger to life and property. However, increasing concerns about the health risks of PFAS have prompted a reassessment of the risk-benefit tradeoff related to AFFF use. F3 represents an alternative to AFFFs containing PFAS; however, widespread adoption has

been limited due to their historical inability to meet the U.S. Department of Defense's (DoD) firefighting performance standards. With its purchasing power and performance specifications, the DoD holds considerable influence over firefighting product development and will serve as a key factor in the ongoing transition from AFFF to F3.

Newly Released Specifications May Accelerate Large-Scale Shift Away from AFFF

On January 6, 2023, the DoD accelerated the anticipated transition from AFFF to F3 with its release of F3 specifications (the specifications can be found via a web search for MIL-PRF-32725). The DoD has been investing in F3 product development since 2017, and the January F3 specifications release complies with the 2020 National Defense Authorization Act (NDAA). The NDAA requires the DoD to cease purchasing PFAS-containing foam by October 2023 and replace all AFFF with F3 by October 2024.

While most major foam suppliers have already introduced F3 products in the market, the release of F3 specifications does not guarantee that the current products meet the performance requirements. Nonetheless, the specifications represent an essential step toward large-scale AFFF-to-F3 transition. Private industry transitions remain voluntary, with no definitive estimate on when, or if, a broader ban on PFAS-containing AFFF may be imposed.

Given the ubiquitous presence of PFAS in society, creating

any truly 'PFAS-free' product is often beyond the direct control of product manufacturers. In accordance with the DoD's newly released specifications, F3 products must have non-detectable concentrations of individual PFAS compounds reported by U.S. EPA Method 1633, have total PFAS contents of less than 1 part per billion as measured via a total organic fluorine method, and accompany a written certification from the manufacturer that PFAS have not been intentionally added to the product.

Considerations When Exploring AFFF Alternatives

Many NORA members have started exploring alternatives to AFFFs containing PFAS at their facilities. When searching for alternatives to AFFF, it is important to recognize that the transition process is more complex than a simple task like changing the oil in a car. Facilities planning to explore the use of F3 should consider the following aspects to navigate the transition from AFFF to F3 while ensuring safety, compliance, and optimal performance in firefighting operations:

1. Equipment Compatibility: F3 products are not direct substitutes for legacy or modern AFFFs. Different foams have varying viscosities and may not readily mix together. It is crucial to evaluate the compatibility of existing equipment such as nozzles and storage tanks with the new foam. Taking steps to ensure equipment compatibility can be the difference between a system that performs as expected in an emergency and one that fails to meet expectations.

2. Ongoing Advancements: While the release of DoD specifications is a step forward, it does not imply that the ideal F3 product is immediately available. Considerable research and development are underway to advance F3 performance.

3. Equipment Contamination: A non-fluorinated F3 product can become contaminated by PFAS through contact with even a small amount of residual PFAS-containing foam. During the transition from AFFF to F3, careful inspection of equipment is necessary to identify and decontaminate or replace any components that have had contact with AFFF.

4. Performance Differences: F3 may exhibit different firefighting performance and behavior compared to AFFF. Larger quantities of F3 may be required compared to AFFF. Facilities undergoing the transition should allocate sufficient time for product testing and provide personnel with appropriate training to ensure they are familiar with the new foam's characteristics.

5. Communications: Facilities replacing AFFF with F3 should communicate to potential mutual aid partners that they have transitioned to a PFAS-free foam. This ensures that inadvertent deployment of PFAS-containing foam does not

occur at a facility where it has been replaced.

6. AFFF Disposal: The process of replacing AFFF with F3 involves handling and disposing of AFFF. It is essential to approach AFFF disposal with proper engineering practices to prevent inadvertent release or disposal that could create future liabilities. Disposal methods such as incineration, landfilling, or deep-well injection may be considered. However, it is important to note that while the EPA has issued interim guidance, none of these approaches have received final endorsement for PFAS disposal. Incineration, which was widely used for AFFF disposal, currently has a temporary moratorium issued by the DoD pending final EPA guidance on PFAS destruction/disposal. Private industry and non-DoD entities can still consider incineration as an option for AFFF disposal.

7. AFFF Management: For facilities that have not yet transitioned to F3, it is recommended to have an AFFF management plan in place. This plan should include strategies for containment, recovery, and proper disposal of AFFF in the event of emergency response deployment.

The DoD's release of F3 specifications is an important and intriguing development in the gradual phase-out of PFAS. However, the transition is expected to play out over multiple years. As the DoD's mandatory transition away from AFFF progresses, we expect to see continuous F3 developments in performance, cost, and availability.

The Broader PFAS Perspective

The transition from AFFF to F3 is only one of many areas of recent PFAS developments. Over the last year, U.S. EPA has proposed regulations to designate several PFAS compounds as "hazardous substances" under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund, and proposed maximum contaminant levels (MCLs) for several PFAS compounds under the National Primary Drinking Water Regulation (NPDWR; see Trihydro's article, *Proposed PFAS MCLs/MCLGs Are Here: What to Know Now*, in the 2023 Liquid Recycling Issue 1 for more information on proposed MCLs).

Recent regulatory updates highlight the increasing awareness of the widespread impacts of PFAS, driving the race for comprehensive measures and solutions in various sectors. Look to future PFAS Perspectives articles in *Liquid Recycling* to keep apprised of developments. ■

How Serious are you About Reducing Cell Phone Distractions in Your Fleet?

BY WILL FUNK / SAFETY RESEARCH CONSULTANTS, INC.



I've had a front-row seat watching how cell phones have affected driving over the past 25-plus years both as someone who investigated traffic collisions in the field and by spending the past two decades trying to prevent crashes. It has been an interesting show. I have had the fortune to work with many companies, municipalities, and school districts over this time. With respect to fleets, I've made some observations that I would like to share in hopes it might help to improve the safety for everyone on the roads, from your drivers to my family.

Let's start with the premise that we are striving to be safe, not just "legal." You can easily be legal and still not safe. How is that? I watched the era of "hands-free" phones enter the world, knowing that having our hands busy, although bad, is not the most important factor causing distractions.

There are three primary components to distractions: Our hands being busy, our eyes being taken off the road, and our brain thinking about something else other than driving. They are all a problem, but can you guess which one is the most dire?

Your brain. Usually by a large margin.

Bluetooth connections, speaker phones and now all the integrated methods we have to connect our handheld computers (we really need to stop thinking of them as phones, since there is more power in the latest generations of "cell phones" than NASA had to put people on the moon and bring them back, plus they have better resources) to our vehicles gives a false sense of security that we are okay as long as we are not touching our phones. We are not.

We used to hear about the glories of multitasking 20 years ago and how it was going to help us be more productive, efficient, and allow us to get work done faster. There were books and management seminars and other media extolling the benefits of doing multiple things at one time. Then something funny happened. People started studying multitasking and guess what. It doesn't exist. It's a 50-year-old term related to computers that you could argue was never true with computers back then. Our brains only process one thing at a time. They put that on hold to process something else and then go back to the other task. It is called task switching.

So, while your driver is hurling down the road at 50 mph

and using his legal hands-free device, during multiple segments of time the driver is thinking about the contents of the call, not where your \$200,000, 40,000-pound investment is traveling. Where would you like their focus?

In my experience, often what is contained in a fleet policy is not what is happening in the real world. I'm pragmatic, understanding this is true to a certain extent in most things in life. But to what extent regarding cell phone policies? Frequently supervisors and management will tell me that they follow DOT requirements. Great start, until I ask what that means. Often I'll just receive a blank stare back at me. Sadly, it's not uncommon for a supervisor to tell me that DOT requirements are followed but not know what the law is.

Another policy issue arises when fleet managers tell me that they have a "zero tolerance" policy for cell phones. When I ask about technologies they use with their fleet, they advise that all drivers are provided with company cell phones. Do we see the potential for a problem here?

One fleet I worked with posted how many minutes each driver used their company-issued cell phone

each month in the driver room in an attempt to show and curb excessive use. I applaud efforts toward this goal. However, when it shows that most drivers are spending HOURS each day on the phone you either have a massive problem with productivity, or more than likely, cell phone use while driving. This didn't even take into account personal cell phone use, which was likely higher than company device use.

Enough about the problem, let's work toward solutions. Understandably, fleets need to be in communication with their drivers in the field, especially in the liquid recycling industry. Having fleet drivers operating from remote terminals, tasked with overnight routes, and otherwise needed to stay in communication is reasonable. So how do we do this safely?

Setting clear and unambiguous expectations is a necessary starting point. Here is your phone, you are NEVER to use it while your vehicle is in motion, and if you miss a call, check it when you are stopped off the road to see if you need to return a call to dispatch, a supervisor, or someone else. It is important for supervisors and dispatchers to understand that they are going to have to wait for a return call and no, texting is NOT an option. I have heard from many drivers that dispatchers and

A study by the Traffic Institute and Virginia Tech found that the risk of crashes for commercial drivers who are texting increases by a factor of more than 23 times!

supervisors get mad at them for taking too long to call back. This cannot be the case.

When drivers do call in, confirm where they are. Often it is apparent when someone is driving while on the phone, it sounds different. Staff should thank the driver for getting to a safe place before calling. Drivers also need to understand they must stop in a safe location, not in a location where they could be struck by another inattentive driver. Likewise, all lighting equipment should be functioning, and all reflectorized equipment in place on the vehicles.

Without getting too far into the weeds, the electronic technologies we are using are addictive. Most of us are now wired to the point where if it buzzes, pings, or makes any sound, we feel compelled to pick up our phone. By having a phone in a location where it is not within easy view, the temptation can be reduced. Some companies use boxes for the drivers to keep their phones in. They can hear it ring, it must be company business, so using the guidelines discussed prior drivers will check it when they get to the appropriate location.

Texting poses an even more severe risk to drivers. A study by the Traffic Institute and Virginia Tech found that the risk of crashes for commercial drivers who are texting increases by a factor of more than 23 times! Most distractions increase crash risk somewhat but not to this level. It is not surprising considering professional drivers have wider vehicles, so there is less room to drift before being in another lane, or worse, into oncoming traffic. Stopping distances for commercial vehicles is further than for passenger vehicles already, so adding a distraction that takes up all three areas - hands, eyes, and cognitive



ability - increases the risk of rear-end collisions significantly. When watching in-cab commercial truck rear-end collisions, we commonly see too close of a following distance coupled with some form of distraction.

This is also true with backing collisions, already a common source of fleet crashes. We recommend companies have an absolute zero tolerance policy for any type of distractions, especially communication devices while backing. Drivers who are distracted by a call frequently become fixated on one mirror, failing to check the other mirror or cameras when available. They will also be less likely to hear something that should cue them to stop.

Drivers should be trained to understand the “why” behind company policies related to cell phones and distractions. There should be consistency with supervisors and management, with this group leading by example and not talking on their phones while driving. It is difficult to convince a driver

they need to pull over and talk when they are being called by a supervisor who is on the road.

You may have noticed by now that we haven’t even brought up the “DOT rules.” That’s because if you are not touching or talking on your cell phone when you are driving there is no possibility of breaking the rules. We recommend fleets focus on creating an environment for safe drivers above trying to find workarounds to being “legal” yet while being distracted.

Fleets who take eliminating distractions in their vehicles and by their drivers seriously are helping to save lives. They will also suffer less downtime from vehicles involved in collisions and have issues with drivers receiving traffic citations. Focusing on safety will allow the other components to follow. ■



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2023 Mid-Year Meeting and Environmental Health & Safety Forum June 7-9, 2023 | Indianapolis, Indiana

2023 NORA Mid-Year Meeting Wrap Up

From June 7-9, over 120 industry leaders gathered in Indianapolis, Indiana for networking opportunities, business development and updates on various issues related to the liquid recycling market.

The event started with tenth annual NORA Environmental Health & Safety (EH&S) Forum. Over 50 members participated in the program that featured five educational sessions and an interactive roundtable discussion. The presentations are now on the members' only section of www.noranews.org. See page 20 for information.

The NORA Mid-Year Meeting took place on the next day. Interactive committee sessions addressed various issues facing NORA members and provided valuable information. The following committees met during the event: Wastewater Working

Group, Membership & Marketing, Advanced Processors Working Group, Industrial & Environmental Services Council, Conference Committee, Guiding Principles Committee, Used Oil Recycling Council and Government Affairs Committee.

The NORA Mid-Year Meeting started with the latest information on what NORA is doing to assist members with PFAS. The Meeting also featured an update on EPA's effort to change the used oil management standard. See page 22 on how to access this information.

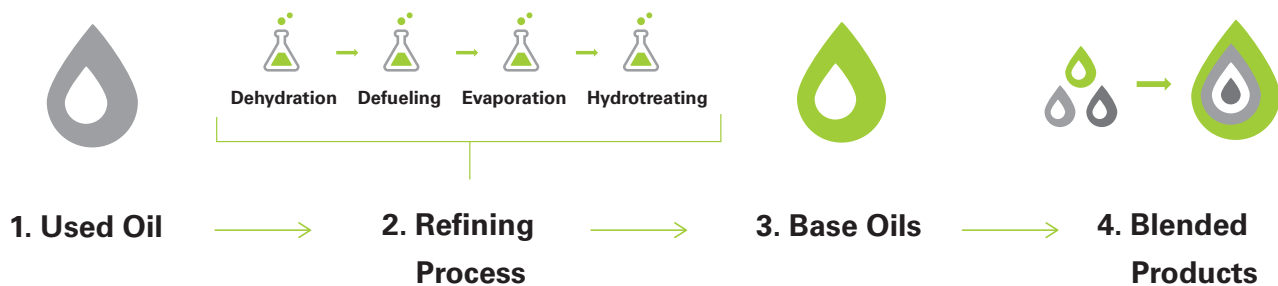
The event was wrapped up with a reception allowing NORA members to network and discuss the day's topics amongst their peers.

NORA thanks the sponsors of NORA Mid-Year Meeting. See page 18.

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2023 Mid-Year Meeting

Indianapolis, Indiana | June 2023

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2023 Mid-Year Meeting

Indianapolis, Indiana | June 2023

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2023 NORA EH&S Presentations

*These presentations were made at the 2023 NORA EH&S Forum.
Visit the Members Only Resource Center at noranews.org to view them online.*



Pre-Trip/Post-Trip Inspection: Ultimate Guide *Presented by: Will Funk and Bob Landman, Safety Research Consultants*

Pre-trip inspections allow truck drivers to ensure their tractor and trailer are safe to operate before hitting the road. Former police officer and current safety consultants conducted this inspection on an actual NORA member vehicle that was onsite. This session provided valuable training for you to help train your drivers.



After the Injury: Challenges & Solution for Return to Work *Presented by: Renee Wallace, CATALYST RTW*

Despite the best efforts of companies with strong safety programs, injuries and workers' comp claims still can occur. Sometimes, getting employees back to work can be a challenge. An expert in the field shared tips and best practices to get your team back to full strength.



Environmental Field Contracting: Minimize Exposures

Presented by Bridget Bulthaupt, XL Insurance, Division of AXA

Managing environmental, health and safety issues in the controlled environment of a NORA member facility is simpler than when conducting services in the field. With more variables comes increased liability and exposures. Attendees learned how to structure their insurance coverages and other practical ideas to protect your company, employees and customers.



PFAS: Upcoming Regulations & Their Impact for NORA Members

Presented by: Mitch Olson, Trihydro Corporation

NORA members who collect wastewater and/or operate Centralized Waste Treatment (CWT) facilities play a vital role in ensuring water stays clean and safe. The US Environmental Protection Agency continues to propose new rules related PFAS. This session provided an executive summary of the proposed rules and explored the possible impact on the operations of NORA members.



Telematics Assessment: How to Choose the Right Solution

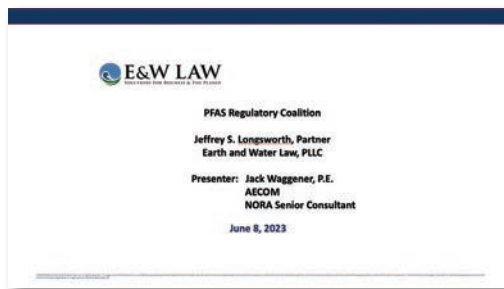
Presented by: Paul Cianciarulo, Alec Ching and Carl Sebastian Morello, Granite Rock Company

Modern telematics can dramatically improve safety for commercial drivers. However, there are so many different providers and systems that make evaluating and picking the right solution difficult. This session featured a company that recently went through the evaluation process and shared how they did it, from a customer perspective.



2023 NORA Mid-Year Presentations

*These presentations were made at the 2023 NORA Mid-Year Meeting.
Visit the Members Only Resource Center at noranews.org to view them online.*



Regulatory Update: What is NORA Doing to Assist Members with PFAS

Presented by: Jack Waggener

Clean water is a policy everybody can agree on. From cooking to cleaning to agriculture, we all rely on clean water for public health. NORA members who collect wastewater and/or operate Centralized Waste Treatment (CWT) facilities play a vital role in ensuring water stays clean and safe.

On March 14, 2023, the U.S Environmental Protection Agency (EPA) released proposed maximum contaminant levels (MCLs) and maximum contaminant level goals (MCLGs) for six per- and polyfluoroalkyl substances (PFAS). According to the EPA, “PFOA and PFOS are likely to cause cancer (i.e., liver and kidney), and that there is no dose below which either chemical is considered safe.” Since it is reported that commercial laboratories can measure PFAS at 4 parts per trillion (or 1 part PFAS for every 2.5 billion molecules of water), this is now the proposed “enforceable level.”

Regardless of how the PFAS regulations eventually get finalized, NORA members will be impacted. Recognizing the significant impact that PFAS regulations will have on members, the NORA Board of Directors has approved \$10,000 annually for NORA to join the PFAS Regulatory Coalition. This session provided an executive summary of the latest PFAS regulatory update.



Part 279: Update on EPA's Effort to Change the Used Oil Management Standard

Presented by: Scott D. Parker, Executive Director of NORA

On October 13, 2022, the United States Environmental Protection Agency (EPA) presented information on their Resource Conservation Recovery Act (RCRA) “Permitting Updates Proposed Rulemaking” project that will begin in 2023. As part of that proposal, EPA indicated they intend to “request comment on adding language to Part 279 to address used oil and wastewater mixtures.”

EPA has not added language to Part 279 (outside of corrections) in over three decades. Part 279 is the regulatory foundation for used oil recyclers and oily wastewater processors. It has effectively established the framework that has allowed this industry to responsibly collect and recycle billions of gallons of used oil and related materials.

Potential changes to Part 279 rightfully should cause concern for NORA members. This session provided a recap how we got to where we are today, what is driving this new EPA action and what the potential threats are. In addition, an update on EPA's new timeline for this project and what actions NORA has taken since the Winter Meeting to prepare for this was provided.

A photograph of a water treatment facility at sunset. The sky is a mix of orange, yellow, and blue. In the background, there are two large white cylindrical tanks and a tall metal tower. In the foreground, there are several rectangular basins filled with water, with a series of metal weirs or spillways in the center. The water is flowing over the weirs, creating a series of small cascades. The overall scene is industrial and serene.

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*Sights from the 2023 NORA
Mid-Year Meeting in Indianapolis*







*More Sights from the 2023 NORA
Mid-Year Meeting in Indianapolis*







2023 NORA CONFERENCE & TRADE SHOW

SAN ANTONIO HILL COUNTRY

★ ★ ★

NOVEMBER 8-11, 2023

The 2023 NORA Annual Conference and Trade Show is the liquid recycling industry's premier networking and education event. Now is the time to begin making plans to attend. Everything you need for your plans is included in this magazine.

AGENDA

The tentative agenda is on page 30. It includes the timing of the various networking events, trade show hours as well as the conference sessions. Most attendees will arrive Wednesday, November 8th. Depending on travel plans, exhibitors may want to arrive on Tuesday to be on site for booth set up. Most attendees will depart on Saturday, November 11th.

BOOK YOUR ROOM

The event will be hosted at the JW Marriott San Antonio Hill Country Resort & Spa. The block of discounted rooms for NORA members are available through October 17 or until it sells out. See page 32 for information about the resort.

REGISTER NOW

Register online at www.noranews.org to attend the Conference or use the form on page 33. To save money, register early. Please note that Non-Exhibiting Supplier/Vendor Members have a separate registration rate. Supplier/Vendor Members who exhibit receive one free registration.

TRADE SHOW

The NORA Trade Show already has over 30 companies displaying the latest products and services available to the liquid recycling industry. See page 34 for the NORA Exhibitor Showcase. Booths are still available. Contact Casey Parker at 703-753-4277 or casey@noranews.org to reserve your space.

SPONSOR THE EVENT

Many sponsorship and advertising opportunities are available for the 2023 NORA Conference & Trade Show. For as little as \$175, you can support your industry as well as promote your brand. See page 36 for details and how to secure your sponsorship.



KEYNOTE SPEAKER: Mark Nutsch
12 Strong: An Extraordinary Mission of Commitment, Purpose, Heroism and Hope

Green Beret Mark Nutsch takes audiences behind-the-scenes of the first successful Special Forces campaign that happened in the immediate aftermath of 9/11. Nutsch and his team's powerful story inspired the major motion picture, 12 Strong, starring Chris Hemsworth as "Mitch Nelson" (Mark Nutsch). The team's unwavering valor was also fortified by their unique, strategic partnership with their Afghan counterparts. While leveraging guerilla tactics on horseback, his 12-man team successfully outmaneuvered the full military force of the enemy to a historic victory. On stage, Mark shares insights on leadership and team dynamics in overcoming insurmountable odds in what was described as "the most important mission of the free world."

Biography

As portrayed by actor Chris Hemsworth in the major motion picture, 12 Strong, Mark Nutsch (aka Mitch Nelson in the film) shares lessons learned in the now-declassified saga of a U.S. Special Forces team that overcame seemingly insurmountable odds to help achieve a historic military victory.

Mark Nutsch shares the true-life story of helping lead what is considered the most successful unconventional warfare campaign in modern history, a victory that changed the course of our country and the world.

In October 2001 following the attacks on 9/11, Nutsch led a heroic 12-man team of U.S. Special Forces on a covert mission to Afghanistan, where they would ride to war on horses to fight the enemy—side by side with their Muslim counterparts—capture the strategic city of Mazar-i-Sharif within a matter of weeks, and successfully overthrow the Taliban. Now a consultant to Special Operations Command, he earned a Bronze Star with valor for his bravery. Nutsch, as "Captain Mitch Nelson," is portrayed by actor Chris Hemsworth in the 2018 major motion picture 12 Strong, based on the best-selling book Horse Soldiers by Doug Stanton.



On stage, Nutsch enralls audiences with an edge-of-your-seat, behind-the-scenes account of how this almost unbelievable event played out, impacted the world, and earned them the gratitude of a nation. He also shares perspectives on preparing his team of "guerrilla diplomats" for ever-evolving on-the-ground circumstances, and how resourcefulness, inventiveness, and commitment, along with adaptability, a diverse team, and a capacity to persevere enabled them to successfully accomplish their mission.

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2023 NORA ANNUAL CONFERENCE & TRADE SHOW AGENDA

NOVEMBER 8 - 11, 2023 | San Antonio, Texas

WEDNESDAY, NOVEMBER 8

10:00 AM - 2:00 PM	Exhibitor Check- In and Booth Set Up
2:00 PM - 7:00 PM	Attendee Check-In/Registration
3:00 PM - 4:00 PM	NORA Board of Directors Meeting
4:00 PM - 4:30 PM	NORA Board of Directors Reception for New Members/First Time Attendees
4:30 PM - 8:30 PM	Grand Opening Reception in Trade Show All exhibitors, attendees, registered spouse/companions welcome

THURSDAY, NOVEMBER 9

7:30 AM - 11:45 AM	Conference Check-In/Registration
7:30 AM - 8:30 AM	Continental Breakfast in Trade Show
8:30 AM - 10:00 AM	NORA Opening Session & Keynote Speaker
10:00 AM - 10:40 AM	Refreshment Break in Trade Show
10:30 AM - 11:30 PM	Spouse/Companion Brunch, Open to Registered Spouses/Companions
10:40 AM - 12:00 PM	Conference Sessions
1:00 PM - 7:00 PM	NORA Golf Tournament
1:00 PM - 4:00 PM	Spouse/Companion Tour

FRIDAY, NOVEMBER 10

8:00 AM - 9:00 AM	Continental Breakfast in Trade Show
9:00 AM - 10:40 AM	Conference Sessions
10:40 AM - 11:15 AM	Refreshment Break in Trade Show
11:15 AM - 1:00 PM	Conference Sessions
11:15 AM	Trade Show Tear Down
12:45 PM - 4:30 PM	Friday Excursion
6:00 PM - 10:00 PM	Closing Party All exhibitors, attendees, speakers, and registered spouses/companions are invited to attend this great event! Wristband required

SATURDAY, NOVEMBER 11

All day	Activities on your own (shopping, tours, departures, etc.)
---------	--

Items in bold indicate the trade show is open.

Tentative / Subject To Change



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Book your room today!



RESERVATION INFO

Room Rate: \$259/night

The cut off for reservations in the NORA block is October 17, 2023.

A daily REDUCED resort charge of \$25.00 (normally \$56.00) includes:

- Wireless Internet
- Two welcome drinks in Crooked Branch
- Access to Lantan Spa Fitness Center
- Golf bag storage at TPC San Antonio
- Tennis and Pickleball facility access
- Use of Sports Court
- Admission to the resort's 9-acre River Bluffs Water Experience

Hotel Reservation Cancellation Policy: Please note that if you need to cancel your reservation, please ensure that you do so at least 7 days prior to arrival to prevent a cancellation fee of one night's room and tax.

Reserve by phone:

(210)-276-2500 (mention the NORA Group when booking over the phone)

If you need assistance in securing a room, please contact NORA at 703-753-4277 or visit www.noranews.org/2023ConfHotel for more information.

AIRPORT / TRAVEL INFO

Book Your Flight: It is recommended that you book your flight early. Yes, there are many airfare deals - but the main reason is to secure your desired flight. According to travel industry sources, there are fewer flight options than normal. Booking early will help you get the best flight option. Members can fly into San Antonio International Airport(SAT).

San Antonio International Airport (SAT)

Distance from Hotel: 12 miles

Drive Time: 20 minutes

Parking at hotel:

- Valet Parking: \$29/day
- Self Parking: Free



San Antonio, Texas • November 8 - 11, 2023

2023 NORA Conference Registration Form

Complete one form for each person. Only one form required to include payment information.

EXHIBITORS: Do Not Use This Form - Use Exhibit Agreement Form or Additional Booth Personnel Form.

Contact Information

Name	Badge Name, If Different		
Company			
Address	City	State	Zip
Phone	Email		

Registration Choices

Full Registration (you may assign/change names to the registration at any time) includes all conference sessions, conference materials, opening reception (members only), two continental breakfasts, breaks and Friday Night Closing Party Dinner. Payment must be faxed or postmarked by the dates to be eligible for the discounted prices.

PRICES

	Early <i>(paid by September 4)</i>	Regular <i>(paid by October 23)</i>	Late <i>(after October 23)</i>
NORA Recycler Member: First person	<input type="checkbox"/> \$855	<input type="checkbox"/> \$885	<input type="checkbox"/> \$915
NORA Recycler Member: Additional person	<input type="checkbox"/> \$755	<input type="checkbox"/> \$785	<input type="checkbox"/> \$815
NORA Non-Exhibiting Supplier/Vendor Member	<input type="checkbox"/> \$1495	<input type="checkbox"/> \$1525	<input type="checkbox"/> \$1555
Non-Member: First person	<input type="checkbox"/> \$2400	<input type="checkbox"/> \$2500	<input type="checkbox"/> \$2600
Non-Member: Additional person	<input type="checkbox"/> \$2300	<input type="checkbox"/> \$2400	<input type="checkbox"/> \$2500

EXTRAS

- Spouse/Companion: Full Package \$300*
- Spouse/Companion: Friday Only \$250**
- Golf \$265
- Golf Club Rental \$110
- Spouse/Companion Tour TBD

If you selected spouse/companion package, please enter their name here: _____

If you selected golf, please include your average score: _____

Is this your first time attending a NORA Meeting? Yes No

**This package includes access to the opening reception on Wednesday including food and drinks, the Thursday spouse brunch, a spouse gift and the Friday night Closing Party. This package is for spouses and companions of registered attendees; this may not be used for employees of an attending company.*

***This package includes food and drinks at the Friday night Closing Party Dinner. This package is for spouses and*

Payment Options

Total Amount Due \$ _____

All payments are in US Dollars, drawn on US Bank.

Name On Card	Signature	
Card Number (American Express, Mastercard And Visa Accepted)	Exp. Date	Security Code

Submit Your Registration

Registration may be scanned and emailed to membership@noranews.org. Please do not email credit card information.

- Fax to 703-753-2445
- Phone in to Kim Litscher at 703-753-4277
- Mail to 7250 Heritage Village Plaza, #201 Gainesville, VA 20155
- Will pay online: following processing of paperwork, a secure payment link will be emailed to you

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NORA Rate \$259/night
To secure your room, call (844) 489-9663 and reference the NORA Group or reserve online by October 17, by visiting www.noranews.org/2023ConfHotel to book at a discount rate.

NORA Conference Exhibitors

For more information or to purchase a booth, contact Casey Parker at casey@noranews.org.



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CLOSING PARTY NAMING RIGHTS \$7500 | SOLD: VALICOR

Exclusive sponsorship. Only 1 available. Offered on a first-right of refusal basis. Includes prominent logo placement everywhere closing party is mentioned - large signage at event, NORA website, Conference Book cover, Liquid Recycling magazine, conference agenda and on each table at closing party. Also includes all Level 1 Closing Party Sponsor benefits.

PREMIER SPONSOR \$5000

Only one available. Your logo will be featured on the front cover of the Conference Book and on all name badges. You receive the back cover ad of the conference book. Your company will be thanked at the opening session and your logo will be screen-printed on the tote bags distributed at registration. Offered via lottery to be held on September 8, 2023.

WATER BOTTLE SPONSOR \$3000

Only one available. Your logo will be printed on reusable bottles of water that will be set at every seat at the beginning of the conference on Thursday morning. Offered via lottery to be held on September 8, 2023.

LANYARD SPONSOR \$3000

Only one available. Your company logo will be printed on the lanyard distributed to all attendees. Offered via lottery to be held on September 8, 2023.

NOTEBOOK SPONSOR \$3000

Only one available. Your logo will be on the notebook placed at each seat at the beginning of the conference on Thursday morning. Offered via lottery to be held on September 8, 2023.

AUDIO/VISUAL SPONSOR \$3000

Only one available. Your logo will be prominently displayed when the "splash screen" is displayed in the main meeting room on Thursday and Friday. This also includes a full page color ad printed in the committee book. Offered via lottery to be held on September 8, 2023.

CHARGING STATION SPONSOR \$3000

Only One Available. Custom logo charging station table near the registration desk to supply power for mobile devices. Offered via lottery to be held on September 8, 2023.

CAN COOLER SPONSOR (COOZIE STYLE) \$1500

Only One Available. Your company logo will be printed on the can coolers placed next to the bars in the Trade Show. Offered via lottery to be held on September 8, 2023.

KEY CARD SPONSOR \$3000

Only One Available. Your company logo and message will be printed on all room key cards given to attendees staying at the hotel. Offered via lottery to be held on September 8, 2023.

LIP BALM SPONSOR \$1000

Only one available. Your company logo will be printed on the lip balms placed in the conference bags distributed to attendees. Offered via lottery to be held on September 8, 2023.

LEVEL 1 CLOSING PARTY SPONSOR \$5000

Only 4 available. Your logo will be featured on the front cover of the Conference Book and displayed at the Closing Party. You also receive a reserved table for ten registered attendees/companions in premier location at the closing party, Closing Party Sponsor ribbon on badge, recognition at Closing Party dinner, full page color ad in Conference Book (\$625 value), color logo with company/exhibitor index in Conference Book, and logo on the "thank you" page in post-Conference Magazine.

LEVEL 2 CLOSING PARTY SPONSOR \$2000

Only 8 available. Your logo will be featured on the front cover of the Conference Book and displayed at the Closing Party. You also receive a Closing Party Sponsor ribbon on badge, recognition at Closing Party dinner, half page color ad in Conference Book (\$475 value), color logo with company/exhibitor index in Conference Book, and logo on the "thank you" page in post-Conference Magazine.

KEYNOTE SPEAKER SPONSOR \$2500

Your company will be thanked prior to the keynote address and your logo will be prominently displayed. In addition, you will have an exclusive opportunity to meet with the presenter before the event and will receive a commemorative item.

GOLD SPONSOR BUNDLE \$2200

Your logo will be printed on the front cover of the Conference Book and on large signage at the event. You receive a free full page color ad in the event book and your company will be thanked at the opening session. Includes a golf hole sponsorship and company logo printed on the conference bags. For logo on bag, please order by September 29 (10 available). For purchases after September 29, a level 4 closing party sponsorship will be substituted for the bag sponsorship.

DRINK TICKET SPONSOR \$1000
Your logo will be printed on the drink tickets for the Wednesday Opening Reception and your company will receive extra drink tickets for the event. Please order by October 13, 2023 to allow time for printing.

LEVEL 3 CLOSING PARTY SPONSOR \$1000
Only 12 available. Includes: Name on front cover of Conference Book, logo displayed at Closing Party, Closing Party Sponsor ribbon on badge, recognized at Closing Party dinner, black and white logo with Company Listing in Conference Book, logo on "Thank You" page in post-Conference NORA Magazine.

FLOOR STICKER SPONSOR \$850
Your full-color logo or ad will be displayed on 3 large floor decals in the lobby of the conference center.

EVENT PAGE LOGO \$600
Your company logo on the main event page on NORA website.

BAG SPONSOR \$550
Your logo will be printed on the conference bags distributed to attendees. Available through September 29, 2023 to allow time for printing.

LEVEL 4 CLOSING PARTY SPONSOR \$500
Your logo will be displayed at the Closing Party. You also receive a Closing Party Sponsor ribbon on badge, recognition at Closing Party dinner, black and white logo with company/exhibitor index in Conference Book, and logo on the "thank you" page in post-Conference Magazine.

GOLF LUNCH SPONSOR \$500
Your company will be recognized on the box lunches placed in each cart at the start of the tournament. This sponsorship includes a Golf Hole Sponsor Sign.

GRAND OPENING EXHIBIT RECEPTION \$450
Your logo will be prominently displayed on all signs for the reception and printed next to the event on conference agendas.

BAG INSERT SPONSOR \$325
You provide the insert and NORA will distribute it in the conference or golf bags. Examples include hats, fliers, etc. Please deliver items to hotel by November 6. Items for bag inserts may not be similar to an item that is offered as a NORA sponsorship.

THURSDAY MORNING BREAK SPONSOR \$300
Your company logo will be displayed during the morning break on Thursday. Your company logo will appear on all Conference schedules

FRIDAY MORNING BREAK SPONSOR \$300
Your company logo will be displayed during the morning break on Friday. Your company logo will appear on all Conference schedules.

SPOUSE BRUNCH SPONSOR \$300
Your logo will be printed next to the event on conference agendas.

LEVEL 5 CLOSING PARTY SPONSOR \$250
Your logo will be displayed at the Closing Party. You also receive a Closing Party Sponsor ribbon on badge, recognition at Closing Party dinner, and logo on the "thank you" page in post-Conference Magazine.

THURSDAY CONTINENTAL BREAKFAST \$250
Your logo will be prominently displayed on signage at the breakfast and included next to this event on conference agendas.

FRIDAY CONTINENTAL BREAKFAST \$250
Your logo will be prominently displayed on signage at the breakfast and included next to this event on conference agendas.

GOLF HOLE SPONSOR \$225
Your logo will be printed on a sign placed at one of the holes during the golf tournament.

CANDY BOWL SPONSOR \$175
Only six available. Your logo will be displayed around the NORA Candy Bowl at the registration table.

2023 NORA CONFERENCE & TRADE SHOW BOOK ADVERTISING

BACK COVER \$1100
Included with Premier Sponsorship. Offered via lottery to be held on September 8, 2023.

INSIDE FRONT COVER \$1100
Offered via lottery to be held on September 8, 2023.

INSIDE BACK COVER \$950
Offered via lottery to be held on September 8, 2023.

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Ad is 7.5" by 10".

FULL PAGE B&W AD \$475
Ad is 7.5" by 10".

1/2 PAGE COLOR AD \$475
Horizontal ad is 7.5" by 5". Vertical ad is 3.75" by 10".

1/3 PAGE COLOR AD \$375
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LOGO IN COMPANY INDEX \$150
1" high.

LOGO IN EXHIBITOR INDEX \$150
1" high.

NORA Defense Fund

Members Encouraged to Donate as New Industry Threats Emerging

NORA was formed in 1984 to defend responsible recyclers of used oil from EPA's misguided attempt to classify used oil as a hazardous waste.

Since then, NORA has tackled many state and federal issues of importance to members. For most of these issues, NORA has been able to manage these projects utilizing the resources provided through the association's annual budget.

Occasionally, larger issues develop that pose a significant threat to members of the association. This is one of those times where multiple issues are before us that exceed the resources of NORA's annual budget.

All members are encouraged to make a donation to the NORA Defense Fund to help us tackle the two large issues that will impact members as described below.

If you have questions, contact Scott D. Parker at 703-753-4277 or sparker@noranews.org.

EPA's Upcoming Effort to Change Part 279

NORA has learned that the EPA will be seeking comments from the public later this year regarding Part 279 – the Used Oil Management Standards. Specifically, EPA has stated, "Used Oil - Request comment on adding language to part 279 to address used oil and wastewater mixtures, especially for situations when used oil is only a minute fraction; how to manage wastewater after separation; how emulsions are managed, how phase-separable mixtures are managed."

Our industry has defined and managed used oil and oily wastewater in a consistent and responsible manner for decades based on Part 279 and the CWT regulations. EPA appears to be placing the regulations under a microscope and raising questions about what is and is not "used oil" from a regulatory perspective. Part 279 and the CWT regulations work in tandem and create a highly efficient system that responsibly recycles billions and billions of gallons of used oil and oily wastewater.

PFAS

NORA has recently joined the PFAS Regulatory Coalition (Coalition) at a rate of \$10,000/year. The Coalition's members are a broad collection of potentially affected and interested parties engaged in and/or affected by PFAS-related developments. The members include trade associations, companies, and municipal entities and representatives.

Each year, NORA members responsibly manage well over a billion gallons of wastewater. NORA members collect wastewa-

ter and operate Centralized Waste Treatment (CWT) facilities that play a vital role in ensuring water stays clean and safe.

NORA will keep its members current on PFAS updates from the Coalition and will seek member input related to comments on proposed PFAS regulations.

Donate Today

All members are strongly encouraged to make a minimum \$500 contribution to the NORA Defense Fund today. With your help, NORA will be able to continue to protect and grow the industry.

Donation Levels

- \$5000
- \$2000
- \$1000
- \$500

Three Easy Ways to Donate Today

- Visit noranews.org/defensefund to donate online or access a donation form.
- Call 703-753-4277 and let us know your donation level. An invoice will be sent to you.
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NORA Supplier/ Vendor Directory



NORA Supplier/Vendor Members in good standing as of 6/20/2023 are listed below. Companies in **bold** have an ad in this magazine. Companies with a \$ are part of the **NORA \$ave** program by offering discounts/value added services to NORA members. Contact NORA to learn more about the NORA \$ave program. Companies in **red** are exhibiting at the 2023 NORA Conference & Trade Show as of 6/20/23.

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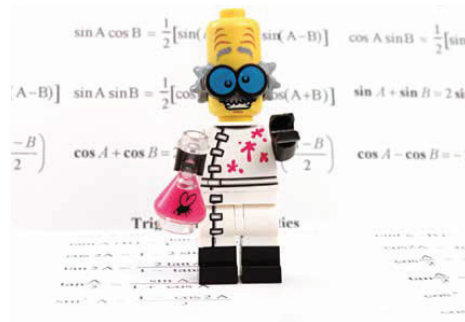
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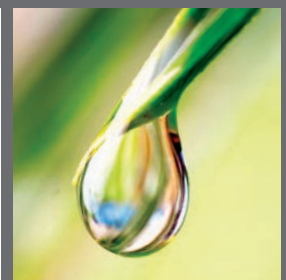
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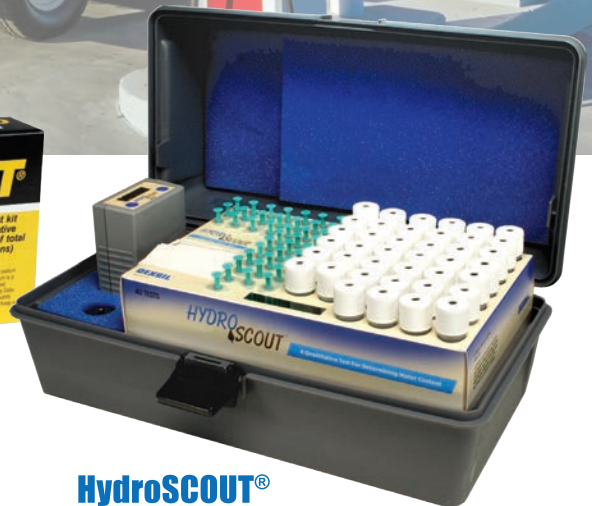
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