

MOBILE OIL CHANGE BUSINESS REQUIREMENTS

The waste requirements overseen by the Waste and Hazardous Materials Division (WHMD) vary depending on the type of services provided by the mobile oil change business. Contracts between the oil change company and vehicle and equipment owner should identify who is responsible for properly managing and recycling/disposing of the used oil and any other wastes generated, as well as the location where the service will occur. Obtain the property owner's permission to service vehicles or equipment on their land.

Implement best management practices to avoid releases into the environment such as using wide drip pans or special equipment to collect the fluids and putting sorbent pads under the collection area. Have additional [sorbents](#) easily available in case there is a spill. Make sure your employees are properly [trained to clean-up the spill](#), or call a professional contractor for a major spill. Report the release when required. [Reporting requirements](#) will depend on what was released, how much was released, whether the release went into water or onto the ground, and if it occurred at a job site or from a traffic accident.

Mobile businesses should check with local officials regarding local ordinances for this type of activity. It may not be allowed in some communities. The office to check with varies by community, but may be the zoning or clerk's office or the waste water treatment plant if work will be done in areas where releases may get into the city sewer system. If other repair work is being performed besides oil changes, there may be additional requirements. A [mechanic certificate](#) may be required by the Department of State. Call them at 517-241-0137 to discuss. Some businesses offer additional services like cleaning vehicles. See the [Mobile Power Washing](#) guidance and discuss your operations with the [DEQ district office](#). Also contact your insurance company to determine if you will have any special coverage requirements.

1. SERVICING A VEHICLE OR EQUIPMENT OWNED BY SOMEONE ELSE

If the mobile business changes the oil and leaves the oil at the job site, then the vehicle and/or the equipment owner is considered the generator and are responsible for meeting the used oil generator requirements. See the [Other Used Oil Generator Requirements guidance](#).

If the mobile business changes the oil in a person's private vehicle or oil containing equipment at a public or company parking lot, or other location, and transports the oil off-site, then the mobile business must:

- Obtain a site identification number by either applying electronically through [MiTAPS](#) or by submitting the form [EQP5150](#). There is an application fee. Under the regulated waste activities, it is necessary to select the used oil transporter, liquid industrial waste transporter, and liquid industrial waste generator boxes and any other applicable activities. If you need assistance, contact the Environmental Assistance Center at 800-662-9278 or call the WHMD at 517-335-2690 and ask to speak to a notification coordinator.
- Become a permitted and registered [liquid industrial waste transporter](#). (The application form, regulations, fee worksheet, and other information are available on the Internet at www.michigan.gov/deqwaste "Hazardous and Liquid Industrial Waste Transporter.") Direct transportation waste questions to the WHMD [District Office](#).
- Use a waste manifest or alternative shipping record as described in the [Other Used Oil Generator Requirements guidance](#) and take the oil for recycling.



- If the used oil will be taken back to the mobile business location to be consolidated before it is being shipped off-site for recycling, notify the WHMD that you are operating a [used oil collection center](#). You may notify electronically through [MiTAPS](#) or by submitting the form [EQP5150](#).
- If the used oil is being taken directly to another used oil collection center for recycling, check with those sites for their requirements to take your oil to their collection. Some limit the accepted amounts to less than 5 gallons at any one visit. Check with the [local recycling coordinators](#) for used oil recycling locations near you. Confirm those sites have notified the Waste and Hazardous Materials Division of their used oil collection center activities. Follow these steps to search the [Waste Data System](#) (WDS) to confirm if collection programs have notified the DEQ:
 1. Select advanced search in the top banner
 2. For a list of all Michigan facilities, choose MI from the drop down menu in the state field, or enter other general site information to narrow the results for a geographic area
 3. Click on the "Hazardous & Liquid Industrial Waste Site Activity Information" banner
 4. Select "Used Oil Collection or Aggregation Point that Accepts Do-it-Yourself Used Oil" and "Used Oil Collection or Aggregation Point"
 5. Select the Green Search rectangular button on the bottom or top of screen

If the business maintains documentation that supports they are only servicing a person's private vehicle or equipment (e.g. vehicle or equipment that is not used for any business purpose) at that owner's property, contact the WHMD district to discuss a possible exemption from the above requirements under the rule for household generated waste. If you meet the exemption, see the [Household Do-It-Yourself \(DIY\) Used Motor Oil and Filters](#) guidance for tips on handling the oil. It is anticipated most businesses will not limit their customers and meet this exemption.

2. SERVICING EQUIPMENT OR VEHICLES OWNED BY THE MOBILE SERVICE COMPANY WHEN ANOTHER COMPANY IS LEASING IT

The mobile service provider and leasing company are considered co-generators and they are both responsible for the used oil generated from servicing forklifts, vehicles, or other equipment. It is recommended the service contract clearly identify who is responsible for properly managing and recycling/disposing of the used oil.

The mobile service provider may transport the used oil without being a permitted and registered transporter but must:

- Notify the Waste and Hazardous Materials Division electronically through [MiTAPS](#) or by submitting the form [EQP5150](#) they are:
 - transporting their own liquid industrial waste
 - generating liquid industrial waste, and
 - operating a [collection center or aggregation point](#) if they are taking the used oil to their location to consolidate it before recycling it.
- Provide the customer with either a waste manifest or alternative shipping record as described in the [Other Used Oil Generator Requirements guidance](#).

If the used oil is left on-site at the leasing company's location by the mobile service provider, then the leasing facility must meet the generator requirements for properly managing and recycling the oil.