



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

April 11, 2011

Jessica Pennington
Florida Transformer Inc
4509 State Highway 83 N
Defuniak Springs, FL 32433- 3960

BE IT KNOWN THAT

Florida Transformer Inc
4509 State Highway 83 N
Defuniak Springs, FL 32433- 3960

IS HEREBY REGISTERED AS A USED OIL

Transporter, Transfer Facility

pursuant to Chapter 62-710, Florida Administrative Code (F.A.C)

The Department of Environmental Protection hereby issues

Registration Number **FLR000168203** on April 11, 2011

Insurance Carrier: **ZURICH AMERICAN INSURANCE**

Insurance Policy #: **BAP6550966**

Insurance Ex. Date: **08/18/2011**

Transporter Type: **FH**

This registration will expire on 06/30/2012

This certificate documents receipt of your annual registration and annual report. It shall be displayed in a prominent place at your facility. This certificate and your cancelled check are your receipts.

Aprilia Graves
Engineering Specialist IV
Hazardous Waste Regulation Permitting



FLORIDA TRANSFORMER, INC.

P.O. BOX 507 • DEFUNIAK SPRINGS, FLORIDA 32435

February 21, 2011

Received

FEB 24 2011

BSHW

FL Department of Environmental Protection
Waste Management Division – HWRS, MS4560
2600 Blair Stone Road
Tallahassee, FL 32399-2400

To Whom It May Concern:

Please find enclosed the required documentation for the Annual Registration of Florida Transformer, Inc. as a Used Oil Transporter/Transfer Facility, as well as, the Used Oil Annual Report. The following enclosures may be found:

- 1) Annual Report by Used Oil Handlers [Form 62-710.901(3)]
- 2) 8700-12FL – Florida Notification of Regulated Waste Activity [Form 62-730.900(1)(b)]
 - i. Certificate of Liability Insurance [Form 62-710.901(4)]
 - ii. FTI Used Oil Transporter SOP
 - iii. FTI Used Oil Transporter Analysis Plan
 - Note: the training program outlined in the documents specific to Florida Transformer, Inc. Used Oil Transporter Procedures are operating as stated and being adhered to.
- 3) A check for the required annual registration amount of \$100.00

Please acknowledge receipt of the enclosed information and feel free to contact me with any questions.

Sincerely,

Jessica Pennington
Environmental Compliance Manager



8700-12FL - FLORIDA NOTIFICATION OF REGULATED WASTE ACTIVITY

DEP Waste Management Division-HWRS, MS4560
2600 Blair Stone Rd. Tallahassee, FL 32399-2400
(850) 245-8772

Date Received
(for Public Use Only)

FEB 24 2011

ESH/W
RCRA Info

EPA ID

F L R 0 0 0 1 6 8 2 0 3

MTS

1. Reason for Submittal

Mark 'X' in
correct box:

- ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities).
- ☒ To provide subsequent notification (to update status and facility identification information).
- ☐ Is this the final notification (see instructions) for the facility?

2. Facility or Business Name

FLORIDA TRANSFORMER, INC

FEID No.

2 0 4 4 0 2 0 3 2

3. Facility Operator (List additional Operators in the comments section).

Name of Operator:

Versatile Processing Group, Inc.

☐ New Operator

Date became Operator: 08 / 18 / 06
mm dd yy

Street or P.O. Box:

9820 Westpoint Dr Suite 300

Phone Number:

317-577-9300

City or Town:

Indianapolis

State:

IN

Zip Code:

46256

Operator Type: ☐ Private

☐ Federal

☐ Municipal

☐ State

☒ Other

Corporation

4. Facility Physical Location Information

Physical Street Address:

4509 State Highway 83 North

City or Town:

DeFuniak Springs

State:

FL

Zip Code:

32433

County:

Walton

If available, please attach a map or sketch of the facility boundaries.

Latitude: 3 0 7 8 5 7 37

dd mm ss .ssss

Longitude: 8 6 1 2 0 9 25

dd mm ss .ssss

Method:

Datum:

5. Facility North American Industry Classification System (NAICS) Code(s)

A.

335311

B.

C.

D.

6. Facility or Business Mailing Address

Street Address or P.O. Box:

PO Box 507

City or Town:

DeFuniak Springs

State:

FL

Zip Code:

32435

7. Facility or Business Contact Person

First Name:

Jessica

Last Name:

Pennington

Title:

Environmental Mgr

Phone Number:

850-892-2711

Extension:

12

E-Mail:

jessica@floridatransformer.com

Street or P.O. Box:

4509 State Highway 83 North

City or Town:

DeFuniak Springs

State:

FL

Zip Code:

32433

8. Real Property (Land) Owner of the Facility's Physical Location (List additional real property owners in the comments section.)

Name of Real Property (Land) Owner:

Versatile Processing Group, Inc.

☐ New Owner

Date became Owner: 08 / 18 / 2006
mm dd yy

Street or P.O. Box:

9820 Westpoint Dr Suite 300

Phone Number:

317-577-9300

City or Town:

Indianapolis

State:

IN

Zip Code:

46256

Owner Type: ☐ Private

☐ Federal

☐ Municipal

☐ State

☒ Other

Corporation

9. Type of Regulated Waste Activity (Mark 'X' in all that apply):**A. Hazardous Waste Activities:****(1) Generator of Hazardous Waste**

(Choose only one of the following three categories.)

- ☐ a. Large Quantity Generator (LQG):
Generates in any calendar month 1,000 kilograms or greater per month (kg/mo) (2,200 lbs.) of *non-acute* hazardous waste; or Greater than 1 kg (2.2 lbs) of *acute* hazardous waste
- ☒ b. Small Quantity Generator (SQG):
Generates in any calendar month greater than 100kg/mo but less than 1,000 kg/mo (>220 to <2,200 lbs.) of *non-acute* hazardous waste and/or 1 kg (2.2 lbs) or less of *acute* hazardous waste
- ☐ c. Conditionally Exempt SQG (CESQG):
Generates in any calendar month 100 kg/mo or less (220 lbs.) of *non-acute* hazardous waste and 1 kg (2.2 lbs) or less of *acute* hazardous waste

In addition, indicate other generator activities that apply.

- ☐ d. United States Importer of hazardous waste
- ☐ e. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 7, mark 'X' in all that apply.

(2) Treater, Storer, or Disposer of Hazardous Waste

(at your facility) Note: A hazardous waste permit may be required for this activity.

- ☐ a. Operating Commercial TSD
- ☐ b. Operating Non-commercial TSD
- ☐ c. Non-operating: Postclosure or Corrective Action Permit or Consent Order (HSWA, etc.)

(3) Recycler of Hazardous Waste (at your facility)Specify: ☐ Commercial; ☐ Non-Commercial.

A permit is required for storage prior to recycling.

(4) Exempt Boiler and/or Industrial Furnace

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

(5) Person Authorized to Manage Conditionally Exempt Waste Generated at Other Facilities - Choose this management activity ONLY if you attach EITHER a copy of your application for such authorization OR the authorization you received from FDEP.**(6) Underground Injection Control - Mark an 'X' even if the UIC well at your facility does not receive hazardous waste.****(7) Transporter of Hazardous Waste [Note: A Certificate of Liability Insurance is required along with this registration.]**Registration must be renewed annually. ☐ a. For own waste only ☐ b. For commercial purposes**c. Hazardous Waste Transporter Insurance Information**

Insurance Company _____

Address _____

Contact _____

Telephone _____

Policy Number _____

Expiration date _____

d. **Transportation Mode** ☐ Air ☐ Rail ☐ Highway ☐ Water ☐ Other - specify _____e. ☐ **Hazardous Waste Transfer Facility:**

Storage Volume _____

☐ **Initial notification**

The following items are required to be submitted with the initial notification for a transfer facility [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)]:

- ☐ Certification by a responsible corporate officer of the transporter that the proposed location satisfies the criteria of Section 403.7211(2), Florida Statutes (F.S.) [Rule 62-730.171(3)(a)1., F.A.C.]
- ☐ Evidence of the transporter's financial responsibility [Rule 62-730.171(3)(a)3., F.A.C.]
- ☐ A brief general description of the transfer facility operations [Rule 62-730.171(3)(a)4., F.A.C.]
- ☐ A copy of the facility closure plan [Rule 62-730.171(3)(a)5., F.A.C.]
- ☐ A copy of the contingency and emergency plan [Rule 62-730.171(3)(a)6., F.A.C.]
- ☐ A map or maps of the transfer facility [Rule 62-730.171(3)(a)7., F.A.C.]
- ☐ Notification of changes in above items
- ☐ Annual update notification

B. Universal Waste (UW) Activities (Mark 'X' in all that apply) ("accumulated" means at any one time):

- ☐ Large Quantity Handler (LQH) = 5,000 kg (11,000 lb) or more of any combination of UW accumulated
- ☒ Small Quantity Handler (SQH) = always less than 5,000 kg accumulated
- ☐ Mercury-containing devices LQH = 100 kg (220 lb) or more accumulated by for-hire handler
- ☐ Mercury-containing devices SQH = less than 100 kg accumulated by for-hire handler
- ☐ Mercury-containing lamps LQH = 2,000 kg (4400 lbs/8,000 lamps) or more accumulated by for-hire handler
- ☐ Mercury-containing lamps SQH = less than 2,000 kg (8,000 lamps) accumulated by for-hire handler
- [Note: 4 lamps = 1 kg, 62-737.200(10)]
- ☐ Pharmaceuticals LQH = 5,000 kg or more of universal pharmaceutical waste (UPW) accumulated
- ☐ Pharmaceuticals LQH = more than 1 kg (2.2 lb) of acutely hazardous ("P-listed") pharmaceutical waste accumulated
- ☐ Pharmaceuticals SQH = always less than 5,000 kg of UPW and always 1 kg or less of acutely hazardous UPW accumulated

(1) For those Managing	Generate/ Accumulate	Transport (see note in instructions)	Handle at Transfer Facility	(2) Enter your estimate of the maximum amount (in pounds) of each type of UW on site or transported at any one time.
a. Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	500 pounds
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Pharmaceuticals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Mercury Containing Devices	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Mercury Containing Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	50 pounds

(3) Mercury Recovery and/or Reclamation Facility ☐ [Chapter 62-737, F.A.C.]

Note: A hazardous waste permit is required for this activity. [Rule 62-737.800, F.A.C.]

(4) Reverse Distributor of UW ☐ Pharmaceuticals ☐ Lamps ☐ Devices ☐

(5) Destination Facility for UW ☐ Note: for this activity, a facility must treat, dispose or recycle a UW. A permit is required for storage prior to recycling.

C. Used Oil Activities:**(1) Used Oil Transporter - indicate type(s) of activity(ies):**

- ☒ a. Transporter
- ☒ b. Transfer Facility

(2) ☐ Collection Center**(3) ☐ Used Oil Processor** (A permit is required for this activity.)**(4) ☐ Off-Specification Used Oil Burner****(5) ☐ Used Oil Fuel Marketer****(6) Used Oil Filter**

- ☐ a. Transporter
- ☐ b. Transfer Facility
- ☐ c. Processor
- ☐ d. End User

(8) Specific Certification to be signed by all Used Oil Transporters

I certify as a Used Oil Transporter that the training program and financial responsibility required under Section 62-710.600, F.A.C., are in place, current and being adhered to. If any modifications have been made to the originally approved training program, they are explained in attachments to this registration form. Evidence of financial responsibility is demonstrated by the attached Used Oil Transporter Certificate of Liability Insurance, DEP form 62-710.901(4), F.A.C.


Signature of Authorized Person

Jessica Pennington/Env Mgr

Print Name of Authorized Person

(7) Used Oil Transporters, Transfer Facilities, Collection Centers, Off-Specification Burners and Marketers must pay an annual \$100 registration fee. Used Oil Processors are exempt from this fee. If applicable, enclose a check or money order, in the amount of \$100, payable to Florida Department of Environmental Protection.

☒ A check is enclosed.

(9) The records required under the provisions of Rule 62-710.510, F.A.C., are kept at (check one):

- ☐ our mailing (business) address
- ☒ The site (facility) address

D. Other State Regulated Waste Activities:☐ **Petroleum Contact Water (PCW) Handler** [Chapter 62-740, F.A.C.]

Note: A water facility permit may be required for this activity.

10. Waste Codes for Federally Regulated Hazardous Wastes: List the waste codes of the Federal hazardous wastes handled at your facility. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112).

Hazardous waste transporters list codes routinely or usually transported. Use an additional page if more spaces are needed.

1	D001	2	D002	3	D005	4	D007	5	F003	6	F005	7	
8		9		10		11		12		13		14	
15		16		17		18		19		20		21	
22		23		24		25		26		27		28	

11. Other Status Changes (Mark 'X' in all that apply):**A. Non-Handler of Regulated Waste at This Facility**

- ☐ (1) Business no longer generates, transports, treats, stores, or disposes of hazardous waste
- ☐ (2) Waste generated by business has been delisted.
- ☐ (3) Other (explain) _____

B. Facility Closed

- ☐ (1) Closed at this location and **moved or moving** to another - submit a new Form 8700-12FL for the new location if you will be handling regulated waste there.
- ☐ (2) Out of Business - Business closed on _____ (Date). Please provide a contact person, mailing address, and phone number where you can be reached after closing.

Contact _____ Phone _____

Address _____


City, State, Zip _____

☐ **C. Property Tax Default**☐ **D. Petition for Bankruptcy Protection**

12. Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. If I have notified as a transfer facility, I am aware that transfer facilities must comply with the requirements of Rule 62-730.171, FAC, and Rule 62-730.182, FAC.

Signature of owner, operator, or an authorized representative

Print Name and Title

Date Signed
(mm-dd-yyyy)

Ronald T. Shaw / General Manager

02-21-2011

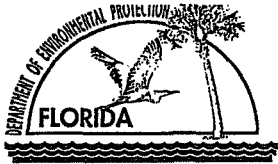
If the person who filled in this form is not the Facility Contact or Operator, please complete the information below:

(Name of person completing this form)

(Phone Number)

(E-mail Address)

13. Comments:



Certificate of Liability Insurance Used Oil Transporters

Please Print or Type Form

1. Zurich American Insurance Company, (the Insurer), 1400 American Lane, Schaumburg, IL 60196
(Name of the Insurer) (Address of the Insurer)

hereby certifies that it has issued liability insurance to: Florida Transformer, Inc. (the Insured),
(Name of the Insured)

4509 State Hwy., 83 N., Defuniak Springs, FL 32433 whose EPA Identification number is FLR000168203
(Address of the Insured)

This insurance complies with the insured's obligation to demonstrate the financial responsibility required by Florida
Administrative Code Rule 62-710.600(2)(e). [See page 2 on the back side of this Form]

The insurance is primary and the company shall be liable for amounts up to \$ 1,000,000 less the deductible or
retention of \$ _____ for each accident exclusive of legal defense costs. If a deductible or retention is applied,
its amount may not exceed 10% of the equity of the Insured.

This coverage is provided under policy number BAP 6550966, issued on 8/18/2010.
(Date)

The expiration date of said policy is 8/18/2011 or the annual renewal date is 8/18/2011.
(Date) (Date)

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under this policy.
- The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer.
- Whenever requested by the Secretary (or designee) of the Florida Department of Environmental Protection (FDEP), the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
- Cancellation of the insurance, whether by the Insurer or the Insured or by any other termination of the insurance (e.g. expiration or non-renewal), will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Secretary of the FDEP as evidenced by certified mail return receipt.
- The Insurer shall not be liable for the payment of any judgment or judgments against the insured for claims resulting from accidents which occur after the termination of the insurance described herein, but such termination shall not affect the liability of the Insurer for the payment of any such judgments resulting from accidents which occur during the time the policy is in effect.

I hereby certify that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States, including Florida.

Kelly Cada
(Signature of Insurer or Authorized Representative)

Authorized Representative of

Kelly Cada
(Type Name)

Zurich American Insurance Company
(Name of Insurer)

VP Enterprise Support Services
(Title)

1400 American Lane, Schaumburg, IL 60196
(Address of Representative)



Department of Environmental Protection

FDEP, MS 4555, 2600 Blair Stone Road Tallahassee, Florida 32399-2400

DEP Form #62-710.901(3)
Form Title Annual Report by Used Oil
and Used Oil Filter Handlers
Effective Date June 9, 2005

Annual Report by Used Oil and Used Oil Filter Handlers*

(*Handlers are any persons subject to the registration requirements of rule 62-710.500 and 62-710.850, F.A.C. [See Section A, Box 5 below])
for reporting period January 1, 2010 through December 31, 2010

Use the information recorded in your Record Keeping Form [62-710.901(2)] or equivalent] to complete this document

SECTION A TO BE COMPLETED BY ALL REGISTERED PERSONS

1. Company Name: FLORIDA TRANSFORMER INC. 2. Telephone No. (850) 892-2711

Site Address: 4509 Highway 83 North DeFuniak Springs, FL 32433

3. EPA ID No. FLR 000 168 203

☐ Check box if any of the above items (1-3) have changed since your last registration

4. Name of person preparing report (please print) Jessica Pennington

Title Environmental Manager Phone number (if different from #2, above) (____)

5. Type of operation (check as many as apply to your operations)

Used Oil: ☒ Transporter ☒ Transfer Facility ☐ Collection Center/Aggregation Point ☐ Processor ☐ Marketer

☐ Burner (of off-specification used oil)

Used Oil Filter: ☐ Transporter

☐ Transfer Facility

☐ Processor

☐ End User

SECTION B USED OIL (TO BE COMPLETED BY ALL REGISTERED USED OIL HANDLERS. USED OIL FILTER HANDLERS SEE SECTION C)

1. Amount (in gallons) of Used Oil and Oily Wastes collected

a. In Florida.....

b. From out of state.....

c. Beginning Inventory.....

d. Total (sum of totals from Lines a + b + c).....

Automotive	Industrial	Mixed	Total
	1430		1430
	2585		2585
			4015

2. Amount (in gallons) of Used Oil and Oily Wastes Managed

N - Not an end use, transferred to another facility for storage or processing.....

O - Marketed as an on-specification used oil fuel.....

F - Marketed as an off-specification used oil fuel.....

I - Marketed for an industrial process.....

B - Burned as an off-specification used oil fuel

D - Disposed of

Landfilled.....

Treated at a wastewater treatment unit.....

Incinerated.....

3. Total amount (in gallons) of used oil managed.....

4. End of year, on hand estimate (Difference between Lines 1D and Line 3).....

In State	Out of State
1430	2585
1430	2585
0	0

SECTION C USED OIL FILTERS (OPTIONAL) (USE TABLE BELOW FOR CONVERSIONS)

CHECK COLUMN IF OUT OF STATE ↓

1. Number of filters on hand from previous year.....
2. Number of used oil filters collected.....
3. Total number of used oil filters to manage (1 plus 2).....
4. Disposition of used oil filters collected:
 - a. Transferred to another registered facility.....
 - b. Burned for energy recovery at a Waste-To-Energy facility.....
 - c. Transferred directly to a metal foundry for recycling.....
 - d. TOTAL.....
5. End of year, on had estimate (Difference between Lines 3 and Line 4d).....
6. Gallons of used oil collected as a result of filter processing.....
7. Gallons of used oil transferred to a used oil handler (transporter or processor).....
8. Volume of oily waste collected and managed as a result of filter processing.....
9. Description of oily waste management.....

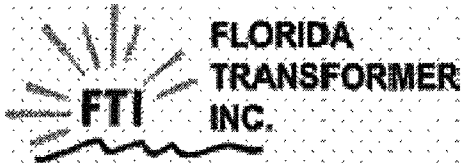
DIRECTIONS FOR SECTION C

Conversion Table

One 55 -gallon drum of crushed used oil filters = approximately 400 used oil filters
One 55 gallon drum of uncrushed used oil filters = approximately 250 used oil filters
One ton of drained used oil filters = approximately 2,350 used oil filters

1. Enter the number of Used Oil Filters on hand, from previous year's inventory.
2. Enter the number of Used Oil Filters collected.
3. Enter the sum of Line 1 + Line 2.
4. Enter the number of filters managed by your facility in blocks 4a-c. Enter the sum of 4a-c in block 4d .
5. Enter the number of filters on hand at your site as of December 31, last year.
6. Fill in the number of gallons of used oil collected by your filter operation.
7. Enter the number of gallons transferred to a used oil transporter or processor.
8. List the volume (gallons or cubic yards) of the oily wastes collected through your filter handling. Oily wastes are identified in Chapter 62-710.201(1) of the Florida Administrative Code and include bottom sludges, sorbents, wipes etc.
9. Describe how oily wastes were managed (sent to a WTE, hazardous waste facility, landfilled after appropriate testing, etc.).

Any questions concerning this form may be referred to the Used Oil Coordinator, MS 4560, Department of Environmental Protection 2600 Blair Stone Road, Tallahassee, FL 32399-2400, Phone (850) 245-8755, email: aprilia.graves@dep.state.fl.us.



Florida Transformer Inc.
Document: Florida Transformer, Inc. Used Oil Transporter Standard Operating Procedure and Training Outline
Date: September 22, 2010

Purpose and Scope

This document shall serve as a standard operating procedure for Florida Transformer, Inc. (FTI) as it applies to the requirements set forth by EPA 40 CFR 279 Standards for the Management of Used Oil and the Florida Department of Environmental Protection Chapter 62-710 Used Oil Management in reference to Used Oil Transporters and Transfer Facilities. Each requirement and the procedures that shall be followed in order to comply are detailed in this document.

Definitions and General Requirements

40 CFR 279.1 and 279.40

Used oil is any oil that has been used and as a result of such use is contaminated by chemical or physical impurities. *(This definition does not apply to oil transported within electrical equipment. Used oil is only generated when it is removed from the equipment where its original purpose was served – i.e. oil removed from electrical equipment and placed into a 55 gallon drum). Additionally, this SOP is applicable only to used oil containing less than 50 ppm PCB. 40 CFR 279.10(i) states used oil containing PCBs at concentrations of 50 ppm or greater is not subject to the requirements of the Standards for the Management of Used Oil (40 CFR 279).*

A **used oil transporter** is one who transports used oil in shipments greater than 55 gallons.

A **used oil transfer facility** is any facility in which used oil is held for more than 24 hours and not longer than 35 days.

Chapter 62-710.500 of the FL DEP Used Oil Rule sets forth the following requirements to used oil transporters and transfer facilities.

- Register annually by March 1 as required by FL DEP.
- Maintain tracking records for the transportation of used oil.
- Provide documentation of halogen screening of used oil to ensure the material is not a hazardous waste.
- All records in reference to the transportation of used oil shall be maintained for 3 years.
- Submit the required annual report for the transportation of used oil by March 1.
- A training program shall be instituted and maintained that provides training to all associates involved in the transportation of used oil.

Annual Registration Forms and Reporting

FTI shall register annually by March 1 to the FL DEP as a used oil transporter/transfer facility using the required Form 62-730.900(1)(b), 8700-12FL – Florida Notification of Regulated Waste Activity accompanied by the appropriate fee and supporting documentation. The annual report for used oil transported each preceding year shall be submitted by March 1 as well using Form 67-710.901(3).

FTI shall use records such as Form 62-710.901(2) or similar to track all shipments of used oil. Please see the attached FTI Used Oil Record Keeping Form.

All records pertaining to the transportation of used oil shall be maintained at FTI for 3 years.

Halogen Screening

40 CFR 279.10(ii) *Rebuttable presumption for used oil*. Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste. The transporter must demonstrate that the used oil does not contain hazardous waste.

Chapter 62-710.600 of the FL DEP Used Oil Rule requires used oil transporters to provide a detailed description of the company's procedure for halogen screening at each pick up location.

It is the business of FTI to provide PCB content in oil analysis per Gas Chromatography to each shipment of 55 gallons or greater of used oil. In addition, each shipment shall receive pre certified results of halogen content prior to transporting. FTI will also generate initial analysis data of representative samples of used oil removed from electrical equipment. FTI shall use knowledge of the halogen content of such used oil to continue transportation.

Analysis data is generated based on methods ASTM D-5384 and USEPA SW-846 Method 9077 using Clor-D-Tect 1000 sample kits provided by Dexsil Corporation. Clor-D-Tect is used to determine allowable limits of used oil halogen content in comparison to that of PCB concentration. Used oil containing greater than 49ppm PCB is not applicable to this analysis.

Prohibitions

FTI transportation associates and drivers shall not allow/commence the pick up of any material in drums, totes or otherwise that contains questionable contents. Should a customer request pick up of used oil other than transformer oil, a sample shall be submitted to the FTI analytical laboratory to determine halogen content prior to pick up.

Training

Training shall be provided to all transportation associates. Training will include state and federal regulatory compliance requirements, proper spill response practices, the procedure for refusal of a shipment and the analysis procedure used by FTI for determining halogen content of used oil.

Used oil transporter training will be administered in conjunction with DOT training provided every three years. Additionally training shall be administered to new associates no later than 90 days after hire. Documentation shall be housed in the Human Resources department with the company's general training records and individual personnel files that applicable personnel have received the proper training.

Training Course Outline

Used Oil Transportation Training

- A. Introduction
- B. Definitions
- C. Federal Regulations 40 CFR 279.40 – 279.46
- D. Florida State Laws F.S. 403
- E. FL DEP rules F.A.C. 62-710
- F. Training Documentation

Florida Transformer, Inc. Used Oil Record Keeping Form

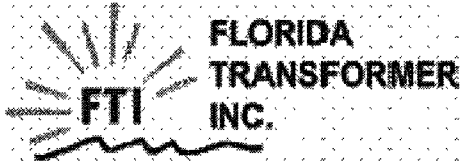
This form shall serve as a substantial equivalent to the requirement set forth by Rule 62-710.50 FAC to each registered person to maintain records using Form 62-710.901(2).

Used Oil Type Code – (I) Industrial

Used Oil End Use Code – (N) Not end use

Date	Used Oil Source Customer Name, Address, City, State, Zip Code, EPA ID # if applicable	Gallons of Used Oil

Destination - Florida Transformer, Inc. 4509 Hwy 83 North DeFuniak Springs, FL 32433
FLR000168203



Florida Transformer Inc.	
Document: Florida Transformer, Inc. Used Oil Transporter Analysis Plan / Procedure	
Date:	September 24, 2010

Purpose and Scope

This document shall serve as the analysis plan for the determination of halogen content of used oil transported by Florida Transformer, Inc. as required by the Florida Department of Environmental Protection Chapter 62-710 Used Oil Management.

Practices Specific to Florida Transformer, Inc.

Florida Transformer, Inc. practices pick up/transportation of used oil in one of two ways:

- 1) Used transformer oil that has received analytical results via FTI onsite GC laboratory
- 2) Used transformer oil accompanying the electrical equipment from which the oil was removed

This analysis plan shall provide means of determining halogen content for both instances in which FTI transports used oil.

Used Transformer Oil with Pre Certified Results

Used transformer oil that is submitted to the FTI laboratory for PCB content analysis per Gas Chromatography will be analyzed for halogen content as well. The lab will provide the transportation department with both GC result and halogen content result. Should the result of halogen content exceed 1,000 ppm the used oil will be refused for pick up unless the customer can demonstrate the used oil does not contain significant concentrations of halogenated hazardous constituents listed as described in 40 CFR 279.44(c).

Used Transformer Oil without Pre Certified Results

Used transformer oil without certified results must be accompanied by the electrical equipment the oil was removed from and clearly labeled as such. The halogen content of this used oil will be represented by the documented analysis provided by FTI of used oil halogen content in <2-49 ppm PCB used transformer oil.

Record Keeping

All analysis of used oil halogen content shall be filed in the respective customer folder in the laboratory.

The transportation department shall be responsible for the completion of the FTI Used Oil Record Keeping Form to indicate the source of used oil and amount picked up and transported on a daily basis. Should a shipment of used oil be refused due to instruction from the lab that the material exceeds 1,000 ppm Halogen content, indication shall be made on the FTI Golden Rod shipping paper and filed as normal by the transportation department. The lab result of halogen content should accompany the golden rod when filed.

Prohibitions

FTI transportation associates and drivers shall not allow/commence the pick up of any material in drums, totes or otherwise that contains questionable contents. Should a customer request pick up of used oil other than transformer oil, a sample shall be submitted to the FTI analytical laboratory to determine halogen content prior to pick up.

Clor-D-Tect 1000

All halogen content analysis data shall be generated based on methods ASTM D-5384 and USEPA SW-846 Method 9077 using Clor-D-Tect 1000 sample kits provided by Dexsil Corporation. Clor-D-Tect is used to provide a presence of chlorinated organics (halogens) at a level of 1,000 ppm. See attached description and kit instructions.