

**Thursby, Kim**

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**From:** Jessica Pennington [jessica@floridatransformer.com]  
**Sent:** Thursday, May 31, 2012 8:41 AM  
**To:** Epost HWRS  
**Subject:** RE: Florida Transformer, Inc., FLR000168203, Request for Additional Information

## Jessica Pennington

Florida Transformer, Inc.  
Environmental Compliance  
Phone: 850-892-2711  
Fax: 850-892-6428

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**From:** Epost HWRS [<mailto:EpostHWRS@dep.state.fl.us>]  
**Sent:** Wednesday, May 30, 2012 3:07 PM  
**To:** Jessica Pennington  
**Cc:** Bahr, Tim; Coates, John; Byer, James; Mitchell, Aaron; Kothur, Bheem; Wick, Fred; Hornbrook, Frank; Miller, Randy J.; [admin@mittauer.com](mailto:admin@mittauer.com)  
**Subject:** Florida Transformer, Inc., FLR000168203, Request for Additional Information

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us). (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr  
Environmental Administrator  
Hazardous Waste Regulation  
Department of Environmental Protection  
E-Mail Address: [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us)

*Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).*



# 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

May 30, 2012

## SENT VIA E-MAIL

[Jessica@floridatransformer.com](mailto:Jessica@floridatransformer.com)

Mr. Ronald Shaw, General Manager  
Florida Transformer, Inc.  
4509 State Highway 83 North  
DeFuniak Springs, FL 32433

RE: Florida Transformer, Inc.  
EPA I.D. No. FLR 000 168 203  
Permit Numbers: 0311571-HO-001  
Used Oil Processing Facility New Permit  
Request for Additional Information

Dear Mr. Shaw:

The Florida Department of Environmental Protection (the Department) has reviewed your permit application dated April 27, 2012 and received on May 01, 2012 to operate a Used Oil Processing facility in DeFuniak Springs, Florida.

The review of the permit application indicates that it is incomplete. Please provide the information requested in the enclosed Attachment. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

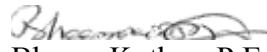
The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be scheduled as needed prior to your submittal of an official response to minimize the time and effort required to formulate adequate replies to the comments. This exchange of ideas will assist you in developing a complete and adequate response that should eliminate the need for additional official responses and therefore accelerate the permit renewal process.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit three copies of your written response (two copies to the Tallahassee Solid and Hazardous Waste Regulation Section, and one to the Southwest District Office). If you cannot submit all this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Mr. Ronald Shaw, General Manager  
Florida Transformer, Inc.  
May 30, 2012  
Page Two

If you have any questions, please contact me at (850) 245-8781 or e-mail:  
[Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us)

Sincerely,

  
Bheem Kothur, P.E. III  
Hazardous Waste Regulation

BK/art

Enclosure: Attachment

cc: Jim Byer, DEP/Pensacola, [James.Byer@dep.state.fl.us](mailto:James.Byer@dep.state.fl.us)  
Fred Wick, DEP/Tallahassee, [fred.wick@dep.state.fl.us](mailto:fred.wick@dep.state.fl.us)  
Randy Miller, OGC/Tallahassee, [Randy.J.Miller@dep.state.fl.us](mailto:Randy.J.Miller@dep.state.fl.us)  
Frank Hornbrook, DEP/Tallahassee, [frank.hornbrook@dep.state.fl.us](mailto:frank.hornbrook@dep.state.fl.us)  
Joseph Mittauer, Mittauer & Associates, [admin@mittauer.com](mailto:admin@mittauer.com)

## ENCLOSURE

Florida Transformer, Inc.

Used Oil Facility Application for Operating Permit No.: 0311571-HO-001

Facility I.D.: FLR 000 168 203

Request for Additional Information

**Specific Comments:** Application Form for Used Oil Processing Facility Permit.

1. Attachment B.3, Maps and Figures, Facility Layout: Please provide a figure that identifies the location of the on-site laboratory, and the drum storage area.
2. Please clarify that the Florida Transformer, Inc. (FTI) laboratory is certified by the National Environmental Laboratory Accreditation Program (NELAP).
3. Attachment C.3, Facility Operations, Fourth Paragraph, Page 1: The first sentence states that "Non-PCB (2-49 ppm) oil is pumped from non-PCB contaminated units into one of two aboveground storage tanks..." Please identify the "units" from which the oil is being pumped.
4. Attachment C.4, Process Description, Analysis, Page 1: Please list the "treatment processes" for which analysis will be performed prior to and following that process.
5. Attachment C.5, Operating/ Analysis Plan, Page 1: If FTI is claiming used oil meets the on-specification requirements of 40 CFR Part 279.11, the used oil must be tested to demonstrate that the following criteria are met: Arsenic 5 ppm maximum, Cadmium 2 ppm maximum, Chromium 10 ppm maximum, Lead 100 ppm maximum, Sulfur 0.4% maximum, Flash Point 100 degrees Fahrenheit (F°) minimum, and Total Halogens 1,000 ppm maximum , PCB 2 ppm maximum, and maximum Halides 4000 ppm. Please add these constituents to the existing list.

Marketing of On-Specification Oil: If any FTI out-going shipments are to be sold as on-specification oil, the batch of oil shall be analyzed by a DOH Environmental Laboratory Certification Program (ELCP) certified laboratory in solid and chemical matrix for the analytical and test combinations to be performed. FTI shall be in receipt of the laboratory analytical results before selling the selected batch of used oil as "on-specification" oil.

6. Attachment C.5, Operating / Analysis Plan, FTI Used Oil Flow Diagram: Please identify Tank C, Tank T, Tank PO-1, and Tank PO-2 in the applicable portions of the Flow Diagram.
7. Attachment C.6, Emergency Response Contacts, Page 6: Please correct phone number for the Florida Department of Environmental Protection to 850-595-8300 instead of 1-800-246-2118. Also, add the "Florida State Warning Point" to the list with the phone number as 1-800-320-0519.

8. Attachment C.6, Section-1, Emergency Contact Information, Page 1: In addition to the phone numbers, we require addresses for the emergency contacts. Please review and revise as appropriate.
9. Attachment C.6, Regulatory Contact, Page 1: Please correct the phone number for Florida Department of Environmental Protection, Northwest District Office as "850-595-8300" instead of "1-850-245-2118". Also add to this list the State Warning Point number "800-320-0519".
10. Attachment C.6, Facility Storage, Page 2: The note at the bottom of the table indicates that Tank Q is not involved in used oil processing for non-PCB oil (<49 ppm PCB). If Tank Q is not involved, please explain where the sludge from the process of non-PCB oil is stored.
11. Attachment C.6, Section 2.0 Facility Owner and Operator Information, Page 2: In addition to the facility owner and operator information, we require Emergency Coordinator and Alternator Emergency Coordinator names, office phones, cell phones, and addresses.
12. Attachment C.6, Spill Prevention Control and Countermeasure Plan, Table 1, Page 4: Please revise this table to indicate where used oil is being stored (e.g. Tank C & T) and where product is being stored. Also, for 55-gallon drums and 250-gallon totes, indicate the maximum number that will be used for the storage of used oil.
13. Attachment C.6, Table 6- Potential Spill Prediction, Page 13: The storage capacity of PO-1(Processed Oil) is "8225" not "8,000" gallons. Please review and revise as appropriate.
14. Attachment C.6, Appendix A, Figure 3A, Bulk storage area layout: Please add Tank capacities and contents. Also, add PCB-1000 to the process diagram.
15. Attachment C.6, Preparedness & Prevention Plan, Appendix D: Please attach the following Forms: The Daily Inspection should be documented by a form that is signed and dated by the person conducting the inspection. The list of emergency response equipment should include the quantity/amount of each item; Maintenance Log; Storm Water Removal Report Form; Secondary Containment Structure Integrity Form.
16. Attachment C.8, Unit Management Plan, Page 1: Appendix D-Facility and Tank inspection indicates only monthly inspections. Please provide the documentation for daily/weekly/monthly and annually performed inspections. Also, please explain how you are checking for the presence of water at the lowest possible points inside the tanks and how water found is removed. The PCB-1000 system will also require documentation of daily/weekly/monthly inspections.
17. Attachment 9-Closure Plan, Section 3-Closure Cost Estimate, Page 5, and Figure 3A, Bulk Storage Area Layout Map: The facility needs to clarify the contents of the storage

tanks as to whether they are part of the used oil processing operations or contain other material. As presented it appears that there are a total of thirteen (13) tanks with a total potential capacity of 79,306 gallons of used oil to dispose when the facility decides to close the facility. For the closure cost estimate it is assumed that all used oil related tanks are full and require disposal. Therefore, it appears that the submitted closure cost estimates are insufficient to close the facility by a third party. The revised closure cost estimate could be as high as \$70,000.00 instead \$27,109.00. Please review and revise the application as appropriate. The application cannot be considered complete until financial assurance has been established for the approved closure costs.

18. Attachment C.9, Facility Closure Plan: Please paginate Table of Content.
19. Attachment C.9, Section 2.0 Facility Contact Information /Responsible Personnel, Page 1: Please add addresses of responsible personnel to the contact information.
20. Attachment C.9, Section 7-0, Justification Sampling, page 4: Tank cleanup should be performed according to Chapters 62-762.801, and 62-770, Florida Administrative Code. Please review and revise the section as appropriate.
21. Attachment C.10, Employee Training Plan: Please clarify if USDOT hazardous materials training is included in your employee training plan. If USDOT hazardous materials training is not include, please provide justification for this exemption.

**General Comments:**

1. The headings in the table of contents do not always correspond with the headings in the body of the text. Please review the Figures and Titles and compare with the Table of contents to be consistent. This comment applies throughout the application.
2. Facility needs to submit a site map in an electronic format ( pdf preferred ) so that this map can be inserted into the permit.
3. Facility needs to submit a used oil tank table in an electronic format (pdf preferred ) so that this can be inserted into the permit.
4. Tank Inspection: The facility must provide documentation of tank's last detailed inspection and certifications to the Department. Please explain in detail when was the last time that the thickness test and a tank system integrity assessment was performed according to API 653 Code in-service inspection and engineering evaluation by a professional engineer registered in the State of Florida. Also, the facility must specify the frequency of sludge removal from the tanks in the application.
5. Figure 3A, and Sheet B-3e: These two tank piping diagrams do not agree with each other. Please review these two maps and revise the piping connections as appropriate.

6. A hazardous waste determination will be conducted on any oily wastes or sludge generated at the facility that cannot be managed for energy recovery. These materials will be managed in accordance with 40 CFR Part 279.10(c) and (e).
7. PCB-1000 dechlorination unit on site or off site: The department suggests that FTI contact the FDEP Air Program to determine if the PCB-1000 unit is required to obtain an air permit.
8. Florida DEP Application, Form # 62-710.901(6), B.1- Site Information, and Page 9: Please correct the symbol for degrees for the coordinate of the facility. These coordinates appear to be for Bell's Country Store rather than Florida Transformers. Please check the coordinates for accuracy.
9. Need to include an explanation of the procedures for the storage, disposal, or reprocessing of used oil that is not properly processed.
10. Need to include a discussion of the process for the disposal and/or management of laboratory testing materials.
11. The substantially equivalent used oil record keeping form (Form 62-710.901(2), Florida Administrative Code,) is missing some elements. Is all used oil transported to Florida Transformer, Inc. by Florida Transformer, Inc. transporters? The note at the bottom of the form states that the destination for all oil is Florida Transformer, Inc. This would indicate that all used oil is only used and processed by Florida Transformer, Inc. and that none is sent off-site for processing or energy recovery. Is this correct?