



FLORIDA TRANSFORMER, INC.

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

Received

JUL 09 2012

BSHW

Thirty (30) Day Notification of Demonstration

July 6, 2012

RECEIVED
RCRA

JUL 09 2012

Hazardous Waste Regulation

Director, Office of Resource Conservation and Recovery
Suzanne Rudzinski
5301P
U.S. Environmental Protection Agency
Potomac Yards North
2733 S. Crystal Drive
Room #N-6622
Arlington, VA 22202

Ms. Rudzinski,

Please find this a 30 day notice to demonstrate the use of a non thermal, alternative method of disposal of Polychlorinated Biphenyls (PCBs) by Florida Transformer, Incorporated (FTI), 4509 State Highway 83 North, 850-892-2711.

Contact: FTI Environmental Compliance Manager, Jessica Pennington

A copy of this notice is being sent to the following individuals:

Mr. Winston M. Lue
Chemical Engineer
Office of Resource Conservation
and Recovery
U.S. Environmental Protection Agency
Potomac Yards North
2733 S. Crystal Drive
Rm # N-6331
ARLINGTON, VA 22202
703 305-1617

Ms. Lilybeth Colón
Office of Resource Conservation
and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (5303P)
Washington, DC 20460
703-308-2392

Mr. Ken Feely
Regional PCB Coordinator
USEPA Region 4
Sam Nunn Atlanta Federal Center, 9T25
61 Forsyth St., SW
Atlanta, GA 30303
404-562-8512

Ms. Terri Crosby-Vega
Environmental Engineer
USEPA Region 4 RCRA Division
Atlanta Federal Center 9T25
61 Forsyth Street SW
Atlanta, Georgia 30303
404-862-8497

✓ Mr. Bheem Kothur, P.E., DEE
Division of Waste Management
Florida Department of Environmental Protection
2600 Blair Stone Rd
Tallahassee, Florida 32399-2400
850-245-8781

Mr. Jim Byer, Supervisor
Hazardous Waste
Florida Department of Environmental Protection
160 W. Government St, Suite 308
Pensacola, FL 32502-5740
850-595-8300

Chief Jonathon Day
Argyle Volunteer Fire Department
P.O. Box 61
Argyle, FL 32422
850-892-9730

Mr. Richard Delp
West Florida Regional Planning Council
P.O. Box 11399
Pensacola, FL 32524-1399
850-332-7976

A Dechlorination system known as PCB-1000 will be used to treat used mineral oil dielectric fluid with PCB concentrations from 2 – 1500ppm PCB for the removal of PCBs to a non detect level of less than 2ppm PCB. The treatment process includes dechlorination by a chemical reaction between oil and a metallic alloy reactant. The process will start with degasification followed by reagent dispersion, mixing, condensate removal and centrifuge. Additional processing will include the use of the PCB-1000 add on feature fuller's earth system to further purify and decolorize the processed oil in an effort to enhance the products favorability. Other processing may also include the use of the DBPC additive system as part of the dechlorination unit to reduce oxidation rate of transformer oil in an effort to extend its useful life.

Only mineral oil dielectric fluid containing up to 1500ppm PCBs of will be treated with the PCB-1000 dechlorination process. Concentrations up to, but not exceeding 2,000ppm PCB will be used in order to efficiently demonstrate this.

Approximately 264 gallons of PCB oil will be treated in three batches to demonstrate the use of the PCB-1000, a total of approximately 795 gallons. The oil is removed from electrical equipment received by the FTI facility that has been designated for disposal.

The demonstration will be held Aug 6-8, 2012.
The demonstration schedule is as follows.

8/6/2012 8:00 A.M. Miscellaneous Test Demonstration
(~264 gallons Non Detect (<2ppm PCB) oil

1:00 P.M. Demonstration Test no. 1
(~264 gallons \leq 2000ppm PCB)

8/7/2012 8:00 A.M. Demonstration Test no. 2
(~264 gallons \leq 2000ppm PCB)

1:00 P.M. Demonstration Test no. 3
(~264 gallons \leq 2000ppm PCB)
to include shut down of system
according to Closure Plan

8/8/2012 In the event the above schedule cannot
be adhered to, Day 3 will be reserved
for continuance of postponed
demonstration due to unforeseen
complications/conditions.

The demonstration will take place at the Florida Transformer, Inc. facility, 4509 State Highway 83 North, DeFuniak Springs, FL 32433. Please contact myself or facility General Manager, Ron Shaw (850-892-2711, ron@floridatransformer.com) with any questions or concerns regarding this information.

Sincerely,



Jessica Pennington
Florida Transformer, Inc.
Environmental Compliance Manager
office 850-892-2711; mobile 850-951-3086
jessica@floridatransformer.com