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July 3, 2012

Mr. Bheem Kothur, P.E., DEE
Division of Waste Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Response to Request for Additional Information
EPA I.D. No. FLR 000 168 203
Walton County - Used Oil Processor
Florida Transformer, Inc.
Mittauer & Associates, Inc. Project No. 1202-01-1

Dear Mr. Kothur:

In response to your RAI dated May 30, 2012, on behalf of Florida Transformer, Inc., Mittauer & Associates, Inc. provides the following responses to your comments:

SPECIFIC COMMENTS

Comment No. 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.**

Response No. 1 The revised Figure B-3d within Attachment B.3 identifies the onsite laboratory. Additionally, there are designated drum storage areas located throughout the facility in each repair shop.

Comment No. 2 **Please clarify that the Florida Transformer, Inc. (FTI) laboratory is certified by the National Environmental Laboratory Accreditation Program (NELAP).**

Response No. 2 The FTI laboratory is not certified by NELAP. The FTI laboratory institutes a Quality Control/Quality Assurance program to include the following:

- 1: An analytical method that follows guidelines as presented by EPA SW-846 Method 8082- Polychlorinated Biphenyls (PCBs) by Gas Chromatography.
- 2: Calibration of GC instrumentation by using traceable, certified standards procured from commercial vendors.
- 3: Each analytical sample batch contains calibration check samples.
- 4: Quality Control/Proficiency Testing performed quarterly using a "blind" check sample as provided by a commercial standards vendor, this vendor is different from the provider of the daily calibration standards.
- 5: Documented Standard Operating Procedures (SOPs) for laboratory procedures and analytical methodology.
- 6: Documented Chemical Hygiene Program.
- 7: GC Detection Devices licensed under the states of Florida and Maryland.

Comment No. 3 **Attachment C.3, Facility Operations, Fourth Paragraph, Page 1: The first sentence states that “Non-(PCB (2-49 ppm) oil pumped from non-PCB contaminated units into one of two aboveground storage tanks...” Please identify the “units” from which the oil is being pumped.**

Response No. 3 The revised Attachment C.3 properly identifies the units from which the oil is being pumped.

Comment No. 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.**

Response No. 4 The revised Attachment C.4 lists and describes the treatment processes that will have verification analysis performed prior to and following the process within the *Treatment* section.

Comment No. 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 4,000 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.

Response No. 5 The revised Attachment C.5 includes the additional constituents to be tested within the *Sampling Frequency* section.

FTI acknowledges any out-going shipments sold as on-specification oil shall be analyzed by a DOH ELCP certified lab and will receive the analytical results prior to selling a batch of used oil as “on-specification” oil.

Comment No. 6 Attachment C.5, Operation/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.

Response No. 6 The revised FTI Used Oil Flow Diagram within Attachment C.5 properly identifies Tank C, T, PO-1 and PO-2 within the Flow Diagram.

Comment No. 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.

Response No. 7 The revised Attachment C.6 reflects the correct phone number for FDEP and includes the Florida State Warning Point phone number on the Emergency Response Contacts.

Comment No. 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.

Response No. 8 The revised Attachment C.6 includes the addresses for the emergency contacts.

Comment No. 9 Attachment C.6, Regulatory Contact, Page 1: Please correct the phone number for the 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”.

Response No. 9 The revised Attachment C.6 reflects the correct phone number for FDEP and includes the State Warning Point number in the Regulatory Contacts.

Comment No. 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.

Response No. 10 The revised Attachment C.6 removes the “*” from Tank Q, as this tank will be used for storage of sludge generated from the centrifuge portion of the used oil processing equipment.

Comment No. 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.

Response No. 11 The revised Attachment C.6 has been updated to include all appropriate contact information. The revised Attachment C.7 includes the required Emergency Coordinator and Alternate Emergency Coordinator information. Please note the change in coordinator personnel due to recent management reorganization.

Comment No. 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.

Response No. 12 The FTI SPCC Table 1 is correct in indicating that Tanks C & T store mineral oil and that Tanks PO-1 & PO-2 store processed oil. This overall FTI SPCC is not specific to the used oil process, and as such, FTI desires to keep the SPCC as is. For information regarding storage for used oil processing activities, please refer to the Facility Storage Table on Page 2 located in the *Facility Storage* section of the revised Attachment C.6.

No more than thirty (30) 55-gallon drums and fifteen (15) 250-gallon totes will be located in the Inprocessing Department for the storage of used oil to be processed at any certain time. As mentioned in Response No. 1, drums and totes used for temporary storage are stored throughout the facility for repair and decommission processes.

Comment No. 13 **Attachment C.6, Table 6 - Potential Spill Prediction, Page 13: The storage capacity of PO-1 (Processed Oil) is "8,225" not "8,000" gallons. Please review and revise as appropriate.**

Response No. 13 Table 6 is constructed in accordance with the General Requirements of a Spill Prevention Control and Countermeasure Plan [40 CFR 112.7 (b)] and provides estimated amounts of material likely to be released in the event of equipment failure. Tank PO-1 is listed in conjunction with Tank G simply due to the similar tank capacities. However, these tanks are never filled to capacity and, for the purposes of this table, the estimated amount likely to be released from Tank PO-1 at 8,000 gallons is sufficient. Additional information on storage for used oil processing activities can be located in the *Facility Storage* section of the revised Attachment C.6.

Comment No. 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.**

Response No. 14 Please refer to Figure B-3e within Attachment B.3 for tank capacities, contents, and the PCB-1000 used oil processing equipment. Figure 3A is included as an Appendix to comply with the General Requirements of FTI's overall SPCC plan.

Comment No. 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.**

Response No. 15 The revised Attachment C.6, Appendix D includes the Storm Water Removal Report Form.

The Attachment E Supporting Documents contains the Daily/Weekly Inspection Form and the Maintenance Logs in the form of past Non-Hazardous Waste Manifests.

The list of emergency response equipment can be found in Table 5 of FTI's SPCC on Page 11.

A Secondary Containment Structure Integrity Form is not included as Integrity Assessments and Thickness Tests are only required for field erected tanks. All FTI tanks are shop fabricated.

Comment No. 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.**

Response No. 16 The revised Attachment C.8 includes documentation for FTI's daily/weekly and monthly inspections. The attachment-Supporting Documents includes the last two (2) annual FDEP inspections.

Presence of water is removed during periodically scheduled interior tank cleaning. In addition, material stored in FTI's aboveground storage tanks has a rapid turnover rate and, under normal conditions, is not held more than 48 hours before transfer.

The PCB-1000 system will be inspected daily, weekly and monthly.

Comment No. 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 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.**

Response No. 17 The Closure Plan and corresponding Closure Cost Estimate reflect closing the facility as it relates to Used Oil Processing activities. Should FTI discontinue the practice of the Used Oil Processing and implement its Closure Plan, this would be strictly related to the processes and equipment utilized for the Used Oil Processing. Therefore, only the four (4) tanks included in the Used Oil Processing would need to be fully closed down. The other tanks will still be active as part of other processes FTI implements, and will continue to implement, within the facility.

Additionally, the oil within these tanks will not require disposal as FTI utilizes processing/recycling outlets for non-PCB contaminated oil. FTI will simply transfer the oil to an approved processor and will not incur any disposal charge.

Comment No. 18 Attachment C.9, Facility Closure Plan: Please paginate Table of Content.

Response No. 18 The revised Attachment C.9 includes a paginated Table of Contents.

Comment No. 19 Attachment C.9 Section 2.0 Facility Contact Information / Responsible Personnel, Page 1: Please add addresses of responsible personnel to the contact information.

Response No. 19 The revised Attachment C.9 lists the addresses of the responsible personnel to the contact information.

Comment No. 20 Attachment C.9, Section 7.0, Justification Sampling, Page 4: Tank cleanup should be performed according the Chapters 62-762.801 and 62-770, Florida Administrative Code. Please review and revise the section as appropriate.

Response No. 20 The revised Attachment C.9 indicates within the *Decontamination Procedures* section that the cleanup shall be performed according to the Chapters 62-762.801 and 62-770, Florida Administrative Code.

Comment No. 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.

Response No. 21 The revised Attachment C.10 clarifies that the hazardous materials training included in FTI's Employee Training Program is USDOT Hazardous Materials Training. This training is outsourced and is in accordance with 40 CFR 172.

GENERAL COMMENTS

Comment No. 1 The headings in the table of contents to not always correspond with the headings in the body of the text. Please review the Figures and Titles and compare with the Table of Contacts to be consistent. This comment applies throughout the application.

Response No. 1 Noted. While there is no overall Table of Contents for the Application

Submittal Package, an attempt was made to relate the attachments required by the Used Oil Processing Permit Application Form to the headings and corresponding attachments FTI has prepared.

Comment No. 2 Facility needs to submit a site map in an electronic format (pdf preferred) so that this map can be inserted into the permit.

Response No. 2 The Facility Layout map, Figure B-3d, was submitted in electronic pdf format on the DVD provided in the initial submittal. The revised Figure B-3d can be found within the overall revised electronic pdf document provided along with this response submittal.

Comment No. 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.

Response No. 3 The Tank and Piping Diagram, Figure B-3e, and Attachment C.6 - Preparedness & Prevention Plan both included a used oil tank table and were submitted in electronic pdf format on the DVD provided in the initial submittal. These revised attachments can be found within the overall revised electronic pdf document provided along with this response submittal.

Comment No. 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.

Response No. 4 The last two (2) detailed FDEP inspections and most recent certification for the tanks are included within Attachment E Supporting Documents.

Thickness Tests and Tank System Integrity Assessments are required for field erected tanks. All FTI tanks are shop fabricated.

The frequency of sludge removal is documented within Attachment E Supporting Documents through the Non-Hazardous Waste Manifest logs.

Comment No. 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.

- Response No. 5 These are two separate figures and should be treated as such. Figure B-3e is an accurate, to scale, drawing of the Tank Farm area where the used oil processing will occur, and Figure 3A is strictly FTI's Bulk Storage Tank Layout.
- Comment No. 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).**
- Response No. 6 Noted.
- Comment No. 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.**
- Response No. 7 Noted. FTI will advise Waste Management of the advice received from FDEP Air Program.
- Comment No. 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.**
- Response No. 8 The facility coordinates listed on Page 9 of the FDEP Application Form (30°47'08"N, 86°07'14"W) are correct and match with the decimal form of (30.785742, -86.120885) FTI has on record.
- Comment No. 9 Need to include an explanation of the procedures for the storage, disposal, or reprocessing of used oil that is not properly processed.**
- Response No. 9 The revised Attachment C.4 explains the procedures for any used oil that is not properly processed.
- Comment No. 10 Need to include a discussion of the process for the disposal and/or management of laboratory testing materials.**
- Response No. 10 The revised Attachment C.4 includes a discussion of the process for disposal/management of laboratory testing materials.
- Comment No. 11 The substantially equivalent used oil record keeping form (Form 62-710.901(2), Florida Administrative Code) is missing some elements. Is**

Mr. Bheem Kothur
July 3, 2012
Page 10

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?

Response No. 11 The revised substantially equivalent used oil record keeping form (Form 62-720.901(2), FAC) implemented by FTI indicates FTI is the transporter and destination facility. However, the "Used Oil End Use Code" as (N) "Not end use" shown above the log table indicates that FTI is not always the end user/processor of used oil received at the facility.

FTI's oil flow process allows either processing by FTI or direct transfer of non-processed, non-PCB contaminated oil to vendors in the event the PCB-1000 is offsite at a customer location.

Used oil processed at the facility by the PCB-1000 will be tracked according to requirements set forth by EPA. Any processed oil transferred directly from FTI to another processor via approved vendor is tracked by the use of the Used Oil Tracking Record included in Attachment C.5.

We trust that these responses satisfy the Department's questions and comments.

Please feel free to contact me via phone at 904.278.0030 or e-mail at admin@mittauer.com if you should require any additional information or have any further questions.

Sincerely yours,
Mittauer & Associates, Inc.



Joseph A. Mittauer, P.E.
President

JUL - 3 2012

JAM/KAL/kl
Enclosures



cc: Ronald Shaw, FTI with encl.
 Jessica Pennington, FTI with encl. (2 copies)
 Jim Byer, FDEP Northwest District Office with encl.

Attachment B.3

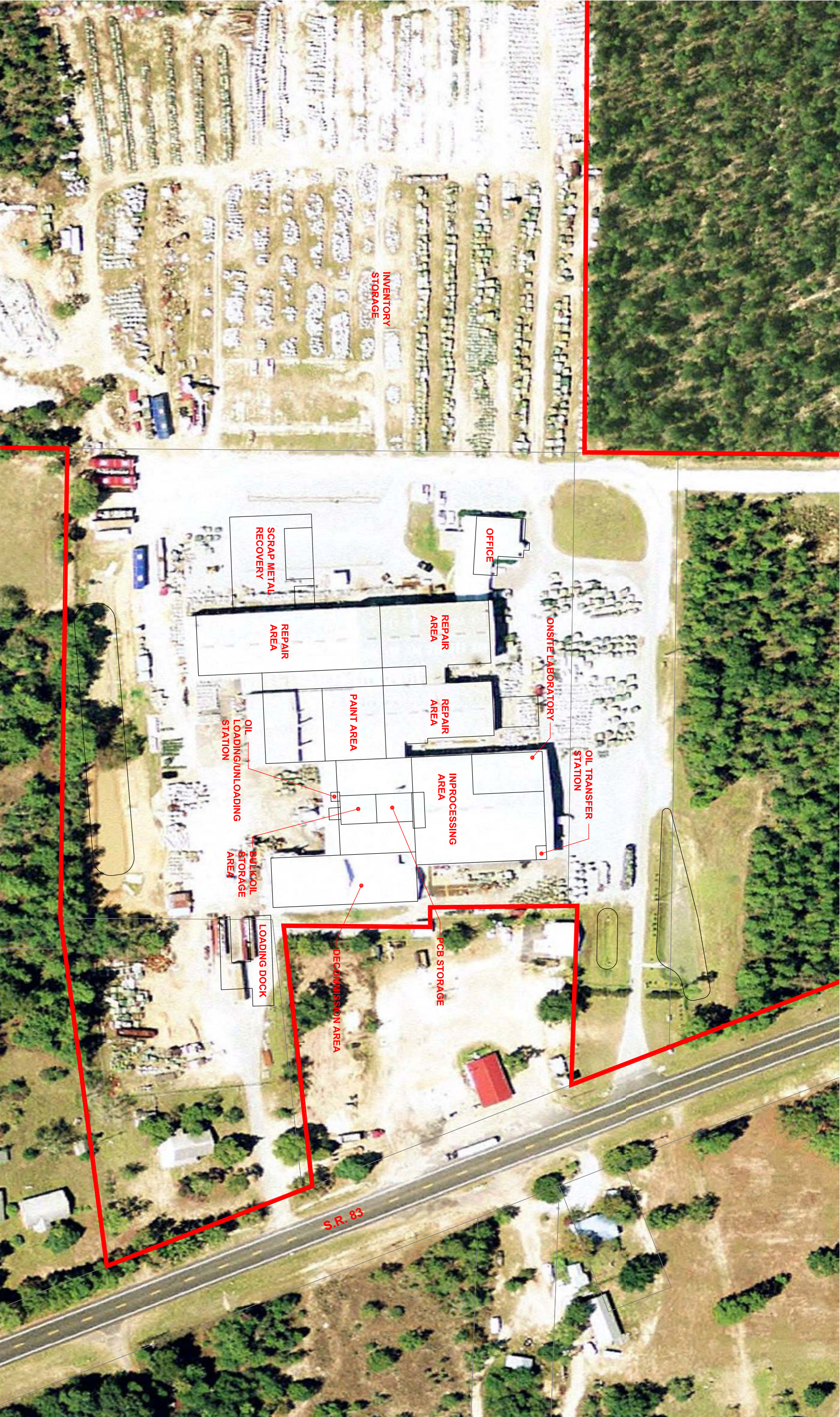
Florida Transformer, Inc.

DEP Used Oil Processing Facility Permit

Mittauer & Associates, Inc. Project 1202-01-1

Maps and Figures

SCALE: 1" = 100'

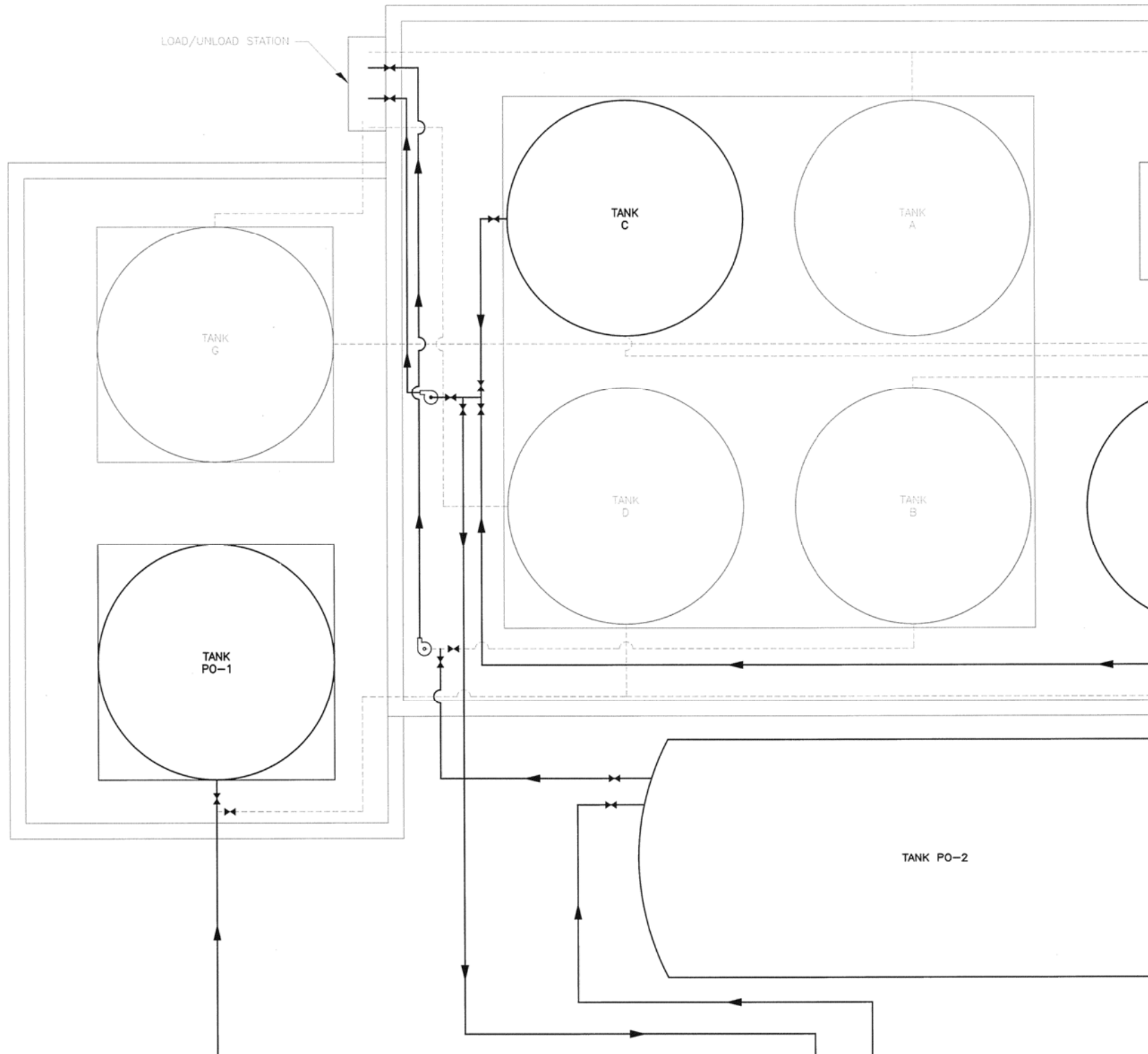


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FLORIDA TRANSFORMER, INC.
Used Oil Permit Processing Application
Facility Layout
Walton County, Florida

FIGURE
B-3d
July 2012
Project No.
1202-01-1

LOAD/UNLOAD STATION



Attachment C.3

Florida Transformer, Inc.

DEP Used Oil Processing Facility Permit

Mittauer & Associates, Inc. Project 1202-01-1

Facility Operations



Facility Operations

This portion of the application shall serve as an overview of facility processes and the general intentions of Florida Transformer, Inc. (FTI) to process used and Polychlorinated Biphenyl (PCB) contaminated oil to non-detectable levels of PCB concentration for the availability of specific vendors for transfer to approved processing facilities for further recycling.

FTI receives and transports electrical distribution equipment for testing and evaluation purposes. The equipment is evaluated for required PCB testing upon arrival at the facility. Analytical results, in conjunction with customer specifications, will determine the disposition of the equipment, whether it shall be repaired or decommissioned.

Electrical equipment is received at FTI by the Inprocessing Department. Each piece of equipment receives a specific job number upon arrival. PCB analysis by Gas Chromatography (GC) is performed at the onsite laboratory unless current and valid PCB results are provided by the customer prior to pick-up. All equipment is entered into the FTI database with the associated PCB result.

Non-PCB (2-49 ppm) oil is pumped from non-PCB contaminated electrical equipment units (various sizes and types of transformers including pole-mounted, pad-mounted, recloser, substation, and regulator types) received by FTI into one of two aboveground storage tanks (Tank C and/or T). This oil is collected periodically from a designated vendor. Drained non-PCB contaminated units are disassembled by the FTI Decommissioning Area. Hardware (bushings, switches, breakers, etc.) is removed from the units. Non-ferrous metals are separated from coils. Empty carcasses, metals and coils are stored until purchased by a designated vendor.

When a unit is determined PCB contaminated (50-499 ppm) or PCB (> 499 ppm), it is relocated to the designated PCB storage area. PCB contaminated oil is pumped from PCB contaminated units into one of five PCB designated aboveground storage tanks (PCB-1 – PCB-5) or approved PCB storage containers as specified by in FTI's EPA Region 4 issued approval to commercially store PCBs.

Drained PCB contaminated (50-499 ppm) electrical equipment is disassembled by the FTI SMRO/PCB Disposal Area. Hardware (bushings, switches, breakers, etc.) is removed from the units. Non-ferrous metal is separated from coils. All material (with the exception of the carcass) is processed via the High Temperature Scrap Metal Recovery Oven for PCB Thermal Destruction per 40 CFR 761.72 – a process fully permitted and approved by EPA Region 4. PCB contaminated equipment carcasses are processed by the Double Wash/Rinse Method per 40 CFR 761 Subpart S.

Drained PCB electrical equipment is stored for transfer to an approved treatment, storage and disposal facility for the PCB equipment.

Drained electrical equipment evaluated and designated for repair will be relocated from Inprocessing to the appropriate repair department based on unit type. FTI also incorporates a painting operation to repaint repaired units if applicable. After repair is complete and all customer specifications have been met, the unit is filled with new transformer mineral oil and shipped to various customers.

In an effort to lessen the environmental footprint of its customers, FTI intends to process used oil by dechlorination up to 1,500 ppm PCB for further recycling. The oil will be removed from the electrical equipment, segregated and transferred to the appropriate bulk storage tank based on the PCB concentration by the same procedure currently in place.

A mobile dechlorination system manufactured by Redragon Oil & Gas Systems International Inc. (Mobile Oil Processing Plant PCB-1000) will be placed adjacent to the existing bulk tank storage area where material will be transferred from its respective tank(s) based on PCB concentration into the system. Material will not be mixed or blended prior to entering the system. (i.e. All non-PCB (2-49 ppm PCB) material will be processed alone and PCB contaminated (50-1,500 ppm PCB) material will be processed alone).

Regenerated, non-detect oil (<2 ppm PCB) generated from the processed used oil (2-49 ppm PCB) may be used for insulating liquid in repaired transformers, given FTI receives prior approval from the owner of the equipment. This oil will be transferred from the dechlorination system after processing to a new bulk storage tank (PO-1) for regenerated oil only. The remaining processed material will be transferred to a holding tank (PO-2) until it is picked up by an appropriate vendor for further recycling.

Regenerated, non-detect oil from processed PCB contaminated oil (50-1,500 ppm PCB) proven to have a post process concentration of <2 ppm will also be transferred to a holding tank (PO-2) until it is picked up by an appropriate vendor for further recycling.

Additionally, FTI intends to offer field service to electrical cooperatives, municipalities and utilities by making the mobile dechlorination system available for onsite tasks. The mobile unit will be used to remove digressed insulating fluid from large electrical equipment and replace with processed, regenerated, non-detect oil (<2 ppm PCB) back into the equipment. This service is primarily for customers who cannot afford to shut down an active transformer just to extend the transformer's service life by replacing only the insulating fluid. The mobile service will also be provided for large PCB contaminated electrical equipment in an effort to remove the PCB contaminated oil, process the fluid to a non detectable PCB concentration (<2 ppm) and replace with non-detect oil (<2 ppm PCB) to minimize liability of the equipment.

FTI employs approximately 130 people at the facility and does not expect to immediately increase the number of employees after the used oil processing begins. Existing employees will be properly trained in the various procedures that will take place during the used oil processing.

Attachment C.4

Florida Transformer, Inc.

DEP Used Oil Processing Facility Permit

Mittauer & Associates, Inc. Project 1202-01-1

Facility Process Description



Process Description

This portion of the application shall serve as a detailed description of Florida Transformer, Inc.'s (FTI) proposed used oil process to remove Polychlorinated Biphenyl (PCB) from used transformer oil containing up to 1,500 ppm PCB resulting in Non-Detect levels of PCB in mineral oil (<2 ppm). Process flow will include analysis, treatment, storage and processing from incoming material to shipment departure. Detailed site maps of the facility with legal boundaries can be found in Attachment B.3. A copy of FDEP's September 27, 2011 letter to FTI regarding their current Stormwater Permit can be found at the end of this Attachment C.4.

Overall Scope

FTI's proposed scope is to process non-PCB used transformer oil (2-49 ppm PCB) and PCB contaminated oil with PCB levels ranging from 50-1,500 ppm to non-detectable levels (<2 ppm) of PCB concentration to provide specific vendors mineral oil acceptable for transfer to approved processing facilities for further recycling and/or use. The goal of the processing is aimed at making material offered for purchase more amenable with other products for the purposes of recycling and manufacturing of quality product for distribution back into the market. This regenerated oil can then be recycled within the facility, incorporated into the repaired transformers or sold to various customers for further processing or use.

Analysis

Verification analysis will be performed prior to and following each treatment process, as described in the following Treatment Sections. All incoming material will be sampled according to current FTI Company Procedures to determine PCB in oil content by Gas Chromatography (GC).

Incoming material is also subjected to Halogen screening per the existing FTI Hazardous Waste Analysis Plan to ensure there is no transport, receipt, transfer or processing of material with Halogen content greater than 1,000 ppm, which may be considered a Hazardous Waste.

Analysis points for PCB in oil concentration will be taken as individual samples from all incoming equipment prior to pump out and as a bulk material sample before processing, as well as immediately after processing, before the material is offered as a product. Analysis points are identified on the FTI Used Oil Flow Diagram located in Attachment C.5. Additionally, FTI will designate the appropriate laboratory to conduct analysis for moisture in oil, dielectric strength, halogens, etc. and to obtain a Certificate of Analysis for regenerated oil that will be used in the FTI transformer repair process.

FTI carries out the management and disposal of PCB laboratory testing material and debris through a long term contract with an approved waste disposal company, Chemical Waste Management. All lab testing debris liquids are segregated from solids. All the debris is stored in Packing Group II Hazardous Waste storage containers and stored adjacent to FTI's PCB Commercial Storage area.

Treatment

The used oil treatment process will occur entirely within the Redragon Oil & Gas Systems International Inc. PCB-1000 Unit (PCB-1000). The process within the PCB-1000 includes dechlorination by a chemical reaction between the used oil and a sodium reactant. The process starts with degasification, followed by sodium dispersion, mixing, condensate removal and centrifuge. Approximately 265 gallons of used oil will be processed per batch.

Storage

Prior to processing, non-PCB used oil (2-49 ppm PCB) will be transferred from the incoming electrical equipment or incoming temporary storage containers (totes, drums) to one of two 8,400 gallon aboveground vertical storage tanks (Tank C, Tank T). PCB contaminated oil (50-1,500 ppm PCB) is transferred into one of five PCB designated aboveground storage tanks (PCB-1-PCB-5).

The dechlorination system, the PCB-1000, will be used in a contiguous fashion. The PCB-1000 will be placed "in-line" with the flow of oil transfer from preliminary storage (pre-treatment) to secondary storage (post-treatment).

As previously stated, preliminary storage will include two (2) 8,400 gallon aboveground vertical storage tanks for used oil (2-49 ppm PCB) and five (5) 1,295 gallon aboveground rectangular storage tanks for PCB contaminated oil (50-1,500 ppm PCB). Secondary storage will include one (1) 8,225 gallon aboveground vertical storage tank (Tank PO-1) for regenerated oil that was initially used oil with PCB levels ranging from 2-49 ppm and has achieved a sufficient Certificate of Analysis to be used in FTI's repair process. Post-treatment secondary storage will also include one (1) 15,000 gallon horizontal holding tank (Tank PO-2) for storage of processed oil. This Tank PO-2 will store the regenerated oil for supply to various approved vendors for further processing, recycling or use.

Processing

The PCB-1000 dechlorination unit FTI proposes to utilize for processing of used transformer oil is in accordance with 40 CFR 279.1.

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 product's favorability. Other processing may also include the use of the DBPC-additive system as part of the PCB-1000 dechlorination unit to reduce oxidation rate of transformer oil in an effort to extend its useful life.

Filter mechanisms for will be placed at the influent side of the PCB-1000 dechlorination unit for moisture and particulate removal in order to maintain the integrity of the PCB-1000 and its associated equipment, piping, and filters.

Material for reprocessing that was not properly processed to achieve the desired results of < 2 ppm PCB initially will immediately be reintroduced into the dechlorination equipment. Analysis is completed for each batch of processed material. Desired results are confirmed almost immediately. If equipment malfunction or operator error has resulted in improperly processed material, the material may simply be treated a second or third time. If the material fails to be properly processed, it will be transferred to a structurally sound 55-gallon drum or temporary tote storage until the appropriate method of disposal has been determined. Temporary storage and containment of this material will be inspected on a daily basis.



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

September 27, 2011

Jessica Pennington
Florida Transformer Inc.
4509 State Highway 83 N
PO Box 507
Defuniak Springs, FL 32433

RE: **Facility ID: FLR05G407-002**
Florida Transformer, Inc.
County: Walton

Dear Permittee:

The Florida Department of Environmental Protection has received and processed your *Notice of Intent to Use Multi-Sector Generic Permit for Stormwater Discharge Associated with Industrial Activity* (NOI) and the accompanying processing fee. This letter acknowledges that:

- your NOI is complete;
- your processing fee is paid-in-full; and
- you are covered under the *Multi-Sector Generic Permit for Stormwater Discharge Associated with Industrial Activity* (MSGP).

Your facility identification number is **FLR05G407-002**. Please include this number on all future correspondence to the Department regarding this permit.

This letter is not your permit. A copy of your permit is available online at www.dep.state.fl.us/water/stormwater/npdes/industrial5.htm or by contacting the NPDES Stormwater Notices Center. Your facility falls under **Sector AC** of the MSGP.

Your permit coverage became effective **September 25, 2011** and will expire **September, 2016**. To terminate coverage prior to this expiration date, you must file a *National Pollutant Discharge Elimination System (NPDES) Stormwater Notice of Termination*, DEP Form 62-621.300(6). To renew your coverage beyond the expiration date, you must submit a new NOI and processing fee to the Department no later than two days before coverage expires.

Attachment C.5

Florida Transformer, Inc.

DEP Used Oil Processing Facility Permit

Mittauer & Associates, Inc. Project 1202-01-1

Operating/Analysis Plan



Operating/Analysis Plan

Purpose and Scope

This document shall serve as the analysis plan for the determination of halogen content within the used oil processed by Florida Transformer, Inc. (FTI), as required by the Florida Department of Environmental Protection (FDEP) in reference to 40 CFR 279.53 and 279.55, as well as Chapter 62-710.

Site Specific Practices

FTI practices pick up, transportation and processing of used oil in one of two forms:

- 1) Used transformer oil delivered separately from its electrical equipment that receives analytical results via FTI onsite Gas Chromatography (GC) laboratory or other certified lab; or**
- 2) Used transformer oil accompanied by its electrical equipment and received at Inprocessing.**

This analysis plan shall provide means of determining halogen content for both instances in which FTI will process oil received at the facility.

1) Used Transformer Oil with Pre-Certified Results

Used transformer oil that is delivered independent of its electrical equipment to the FTI laboratory for Polychlorinated Biphenyl (PCB) content analysis by GC will also be analyzed for halogen content. The lab will provide the transportation department with both the GC PCB content 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).

In some cases, PCB in oil and halogen analysis test results will be provided by the customer from an accredited lab other than FTI. If the result of the halogen content in used oil does not exceed 1,000 ppm, the oil is deemed suitable for receipt and processing.

2) Used Transformer Oil without Pre-Certified Results

Used transformer oil without certified results for receipt into the facility must be delivered within the electrical equipment or accompanied by the electrical equipment the used oil was removed from and labeled as such. The halogen content of this used oil will be documented by analysis provided by FTI in <2-49 ppm PCB used transformer oil and will be determined suitable for processing.

Processing Method: Dechlorination

Used oil (2-49 ppm PCB) and PCB contaminated and PCB oil (50-1,500 ppm PCB) treatment consists of dechlorination by a chemical reaction between the oil and a sodium reactant. The process begins with degasification followed by sodium dispersion, mixing, condensate removal and centrifuge. The “post-treatment” analysis result will be <2 ppm PCB. Approximately 265 gallons of oil will be processed per batch.

Sampling Method: 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.

Sampling Frequency

Sampling will be completed as mentioned above on all incoming shipments of used oil prior to processing. After the material has been transferred to bulk aboveground storage, a sample will be retrieved to determine the halogen content of the oil prior to processing.

Analysis will also be completed on every batch processed and prior to preparing the oil for shipment to determine the PCB content is less than 2 ppm PCB. Additionally, for any quantity of used oil that must meet “on-specification” criteria as specified in 40 CFR Part 279.11 prior to being available for shipment to a vendor will be sampled by FTI and submitted to an alternate certified lab recognized by the Florida Department of Health for analysis to ensure the following criteria are met:

- Arsenic: 5 ppm max
- Cadmium: 2ppm max
- Chromium: 10 ppm max
- Lead: 100 ppm max
- Sulfur: 0.4% max
- Flash Point: 100°F min
- Total Halogens: 1,000 ppm max
- Halides: 4,000 ppm max

FTI shall be in receipt of all associated laboratory analytical results prior to offering a shipment of used oil for purchase.

Distinct points of analysis can be seen in the Flow Diagram attached.

Byproduct Management

Any sludge removed from treatment equipment will be handled according to existing facility-wide product transfer procedures to take all necessary precautions to avoid material release of any degree.

Sludge is removed from the dechlorination treatment process by an inline centrifuge system. The purpose of the centrifuge is for settling and removal of sludge from the chemical process of sodium dispersion and mixing with oil. The centrifuge is self cleaning by an automated timer system. The centrifuge is equipped with a sludge discharge pump to transfer sludge from the centrifuge to a separate holding tank with high and low level sludge indicators. Once the tank has reached capacity, it will be emptied via the discharge valve into the appropriate storage container. The sludge will then be transferred into one (1) 560 gallon aboveground storage tank for the purposed of accumulation until arrangements are made for pick up and transfer to the appropriate treatment and disposal company.

Sludge and/or byproduct that requires removal and disposal will previously be determined Non-Hazardous prior to processing. However, characterization analysis for purposes of disposal will be completed as required by the disposal company prior to transfer of material.

Record Keeping and Tracking

The transportation department is responsible for the completion of the FTI Used Oil Record Keeping Form (attached) to indicate the source of used oil and amount supplied and transported on a daily basis. If a delivery of used oil be refused based on lab results indicating halogen levels exceeding 1,000 ppm, this determination shall be noted 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 (bill of lading) when filed.

All bulk shipments of oil, received or supplied, are documented on the FTI Used Oil Tracking Record (attached). All analysis of used oil halogen content shall be filed within the respective customer folder in the laboratory.

INSTRUCTIONS FOR
CLOR-D-TECT® 1000

Used Oil Screening Kit

Test kit for chlorine contamination in used oil

EACH KIT CONTAINS:

1. Tube #1 - A plastic test tube with a white dispensing cap containing a colorless ampule (bottom) and a yellow-dotted, gray ampule (top).
2. Tube #2 - A plastic test tube with yellow cap containing 7 ml of buffer solution, a yellow-dotted ampule (bottom) and a red-green ampule (top).
3. A 1 ml polypropylene sampling syringe and a tissue wipe.
4. A plastic filtration funnel.
5. A glass ampule contained in a cardboard sleeve and plastic tube designated as "Disposal Ampule".

**READ CAUTION AND INFORMATION SECTIONS ON BACK BEFORE
PERFORMING TEST. WEAR RUBBER GLOVES AND SAFETY GLASSES.**

DIRECTIONS

1. PREPARATION Remove contents from box. Check contents to ensure that all items are present and intact. Place the two plastic tubes into the holder at the front of the box.

2. SAMPLE PREPARATION Unscrew the white dispensing cap from Tube #1. Work the plunger on the empty sampling syringe a few times to ensure that it slides easily. Place the tip of the syringe into the oil sample to be tested and slowly pull back on the plunger until it reaches the stop and cannot be pulled further. Remove the syringe from the oil sample and wipe any excess oil from the outside of the syringe with the enclosed tissue. Place the tip of the syringe in Tube #1 and dispense the oil sample by depressing the plunger. Replace the white dispensing cap securely.

DEXSIL® CLOR-D-TECT 1000 IS A TRADEMARK OF THE DEXSIL CORPORATION
AND IS COVERED UNDER U.S. PATENT: 5,013,667.

3. REACTION Break the bottom (colorless) ampule in the tube by compressing the sides of the tube. Mix thoroughly by shaking the tube vigorously for about 30 seconds. Break the top (gray) ampule in the tube and shake thoroughly for about 20 seconds. Allow the reaction to proceed for an additional 40 seconds (total of one minute), while shaking intermittently several times.

4. EXTRACTION Remove the caps from both tubes and pour the clear buffer solution from Tube #2 (yellow cap) into Tube #1. Replace the white cap tightly on Tube #1 and shake vigorously for about 10 seconds. Vent the tube carefully by partially unscrewing the dispensing cap. Close securely and shake well for an additional 10 seconds. Vent again, tighten cap and stand tube upside down on its cap. Allow the phases to separate for a full two minutes.

5. ANALYSIS Place the plastic filtration funnel into Tube #2. Position Tube #1 over funnel and open nozzle on the dispensing cap. Be sure to point the nozzle away from the operator while opening it, and check that the nozzle is open completely before dispersing the clear solution. Dispense 5 ml of the clear solution through the filter into Tube #2 (up to the 5 ml line) by squeezing the sides of Tube #1. Close the nozzle on the dispensing cap on Tube #1 and remove the filter funnel from Tube #2. Replace the yellow cap on Tube #2 and break the bottom (colorless, yellow-dot) ampule and shake for 10 seconds. Break the top (colored) ampule and shake for 10 seconds.

6. RESULTS Observe the resultant color immediately and compare to the color chart below for chlorine determination.

7. DISPOSAL Open the "Disposal Ampule" container and drop the ampule into Tube #2. Replace the cap on the test tube. Crush the ampule by squeezing the sides of the tube. Shake for 5 seconds. This reagent immobilizes the mercury so that the kit passes the EPA's TCLP test. See caution section below for additional information on disposal.

SUGGESTIONS FOR USING THE CLOR-D-TECT® 1000 TEST KIT

- To test at 500 ppm chlorine instead of 1000, double the oil sample size by filling the sampling syringe twice.
- The kit is designed for testing used oils, and is not intended for use on water/oil mixtures that contain more than 20% water. For samples that contain more than 20% water, contact Dexsil about our Hydroclor-Q® kit designed for testing samples for chlorinated organic compounds in water.
- The kit works well on all types of waste and used oils including crankcase, hydraulic, diesel, lubricating, fuel oils and kerosene. It is designed for use only on oils which are hydrocarbon-based. Some oil, such as cutting oils which contain more than 3 or 4% sulfur, may give false positive results, false negatives are, however, unlikely. For any questions regarding the applicability of the kit on your sample, contact Dexsil's technical service department.
- The kit should be examined upon opening to see that all of the components are present and that all the ampules (5) are in place and not leaking. The liquid in Tube #2 (yellow cap) should be approximately ½ inch (1 cm) above the 5 ml line and the tube should not be leaking. The ampules are not intended to be completely full.
- Perform the test in a warm, dry area with adequate light. In cold weather, a truck cab is sufficient. If a warm area is not available, Step 3 should be performed while warming Tube #1 in palm of hand.
- Always crush the clear ampule in each tube first. If this sequence has not been followed, stop the test immediately and start over using another complete kit. When an incorrect testing sequence is followed, a false negative may result which may allow a contaminated sample to pass without detection.
- In Step 4, tip Tube #2 to an angle of only 45° to prevent the ampule holder from sliding out.

CAUTION

- When crushing the glass ampules, press firmly in the center of the glass ampule **ONCE**. Never attempt to recrush broken glass as it may come through the plastic and cut fingers.

- In case of accidental breakage or spillage onto skin or clothing, wash immediately with large amounts of water. All the ampules are poisonous and should not be taken internally.
- Do not carry kits on passenger aircraft.
- The gray ampule in the white-capped test tube contains metallic sodium. Metallic sodium is a flammable solid and is water reactive.
- Wear rubber gloves and safety glasses while performing test.
- Dispose of used kits properly. The mercury in Tube #2 is made insoluble by the disposable ampule and used kits will pass the USEPA TCLP test for land disposal. More stringent state and local regulations may apply. Contact Dexsil if you have any specific questions concerning disposal procedure.
- Read the Material Safety Data Sheet before performing the test.
- Keep Out of Reach of Children.

MANUFACTURER'S WARRANTY

This kit is warranted to be free of defects in material and workmanship until the expiration date stamped on the box. Manufacturer's sole and exclusive liability under this warranty shall be limited to replacement of any kit that is proven to be defective. Manufacturer shall not be liable for any incidental or consequential damages.

Reliable test results are highly dependent upon the care with which the directions are followed and, consequentially, cannot be guaranteed.

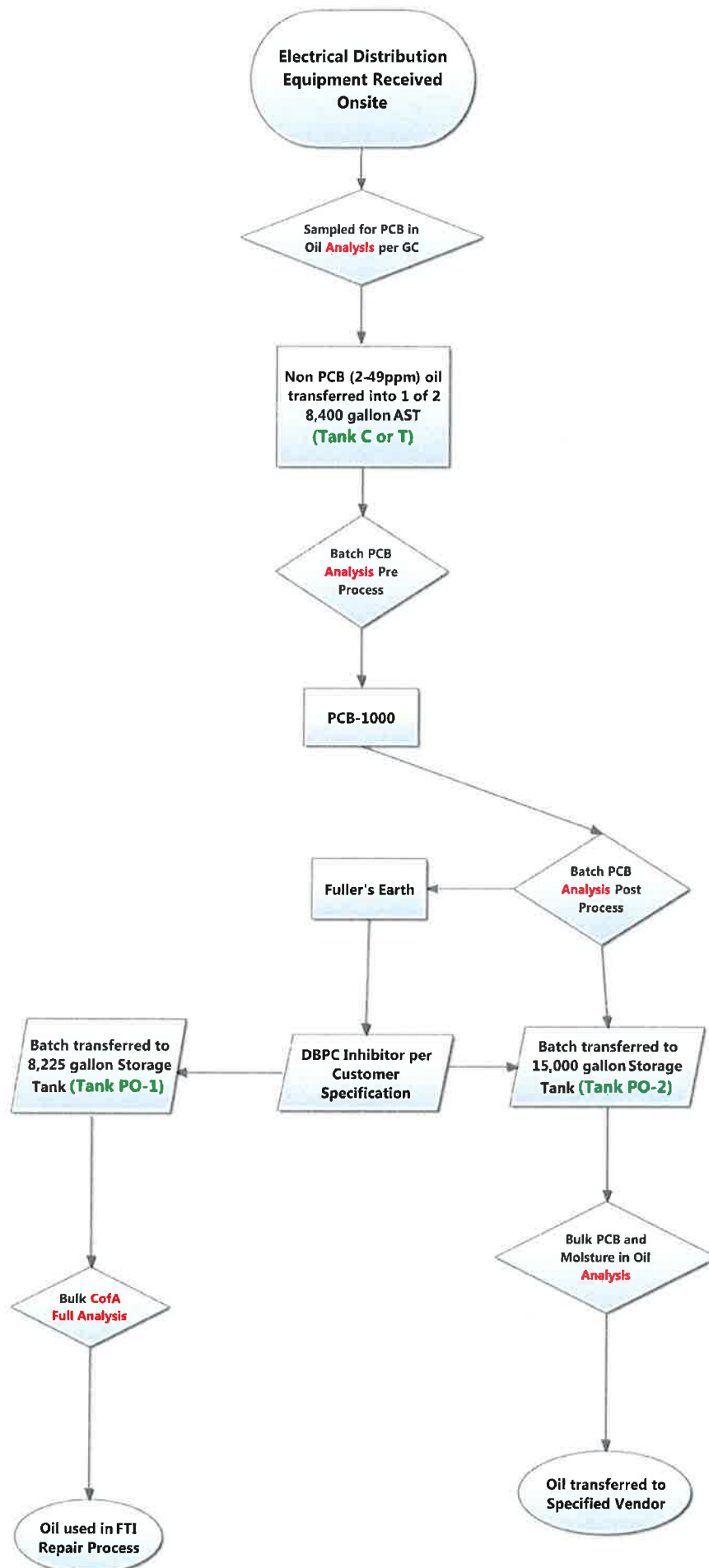
This kit is manufactured by **DEXSIL[®]** Corporation
One Hamden Park Drive, Hamden, Connecticut 06517
(203) 288-3509 FAX: (203) 248-6523
<http://www.dexsil.com>



Printed on recycled paper

Revision 4, ver.1, 6/04

Florida Transformer, Inc. Used Oil Flow Diagram



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

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



Oil Tracking Record

GENERATOR INFORMATION:

Facility Name Florida Transformer, Inc
Address 4509 State Highway 83 North DeFuniak Springs, FL 32433
EPA ID # FLR 000 168 203

Facility Representative Signature _____ Printed Name _____ Date _____

TRANSPORTER INFORMATION:

Name of Transporter _____
EPA ID # _____

Driver Signature _____ Printed Name _____ Date _____

MATERIAL TRANSPORTED

Metered Volume (Gallons)	Check Description Below	Description of Material	FTI Certification #	PCB PPM	Karl-Fischer %	Analysis Date
	<input type="checkbox"/>	Used Mineral Oil, Unregulated (0-2 ppm)				
	<input type="checkbox"/>	Used Mineral Oil, Unregulated (2-49 ppm)				
	<input type="checkbox"/>	Used Mineral Oil, PCB-Contaminated (50-499 ppm)				
	<input type="checkbox"/>	Used Mineral Oil, PCB (>500 ppm)				
Meter Reading Verified By:			FTI Rep. Initials:		Driver Initials:	

DESTINATION INFORMATION:

Facility Name _____
Address _____
EPA ID # _____



Oil Tracking Record (Bulk Used Oil Received)

GENERATOR INFORMATION:

Facility Name _____

Address _____

EPA ID # _____

TRANSPORTER INFORMATION:

Name of
Transporter _____

EPA ID # _____

Driver Signature

Printed Name

Date

MATERIAL TRANSPORTED And RECEIVED

Estimated Volume (Gallons)	Check Description Below	Description of Material	FTI Cert #	PCB PPM Results**	Karl-Fischer %	Analysis Date	Indicate Color and/or Presence of Odor
	<input type="checkbox"/>	Used Mineral Oil, Unregulated (0-2 ppm)					/ Y N
	<input type="checkbox"/>	Used Mineral Oil, Unregulated (2-49 ppm)					/ Y N
	<input type="checkbox"/>	Used Mineral Oil, PCB-Contaminated (50-499 ppm)					/ Y N
	<input type="checkbox"/>	Used Mineral Oil, PCB (>500 ppm)					/ Y N

****Attach Customer Certified Results**

MATERIAL RECEIVED BY Facility Representative Signature _____ Date _____

Facility Name FLORIDA TRANSFORMER, INC.

Address 4509 HWY 83 NORTH DEFUNIAK SPRINGS, FL 32433

EPA ID # FLR 000 168 203

Attachment C.6

Florida Transformer, Inc.

DEP Used Oil Processing Facility Permit

Mittauer & Associates, Inc. Project 1202-01-1

Preparedness & Prevention Plan



FLORIDA TRANSFORMER, INC. USED OIL PROCESSING PREPAREDNESS & PREVENTION PLAN

This Preparedness & Prevention Plan shall serve as the prevention plan for the used oil processing equipment to process used oil for complete processing of used mineral oil dielectric fluid to remove Polychlorinated Biphenyl (PCB) concentrations to Non-Detect levels.

The oil processing equipment may be used onsite at Florida Transformer, Inc. (FTI) or on customer property away from FTI. This prevention plan will apply to both circumstances and should be adhered to accordingly.

This document shall serve as the prevention plan specific to FTI for the used oil processing, all ancillary equipment and all subjected areas. The FTI Facility Spill Prevention Control and Countermeasure Plan (SPCC) is a separate document attached at the end of this section and shall serve as FTI's overall facility plan. Various items required for Attachment C.6 may be found in Attachment C.7 – Contingency & Emergency Action Plan.



Facility Owner and Operator Information

Florida Transformer, Inc.
 4509 State Highway 83
 DeFuniak Springs, FL 32433
 (850) 892-2711

Facility Contacts:

Name	Title	Work Telephone	Home Telephone	Home Address
Jessica Pennington	Environmental Mgr	(850) 892-2711	(850) 951-3086	629 Beck Bridge Rd Westville, FL 32464
Danny Shaw	Processing Supervisor	(850) 892-2711	(850) 892-2413	77 Phil Harris Drive DeFuniak Springs, FL 32433
Ron Shaw	General Manager	(850) 892-2711	(850) 830-8071	4604 St Hwy 2 W DeFuniak Springs, FL 32433
Steve Holland	Plant Manager	(850) 892-2711	(334) 449-0982	306 S 2 nd Avenue Hartford, AL 36344

Facility Description

Operations Overview

Florida Transformer, Inc. (FTI) is a power distribution equipment repair and decommission facility. The facility handles many different types of equipment including transformers, regulators and reclosers which all contain mineral oil. In support of the facility's processing operations, used mineral oil is stored onsite in aboveground tanks. Each of the tanks employed for bulk storage of used oil have been listed in the table below. The table also lists containers of significant volume which are working/temporary holding tanks or equipment. Mineral oil to be processed is received at the facility via common carrier tank trucks or within equipment received for repair and test/evaluation purposes. These storage tanks are named and accounted for in this plan.

The standard hours of operation for this facility are 7:00 A.M. to 3:30 P.M. Monday through Friday. In order to meet customer requirements, the facility often operates outside of these standard hours to include late afternoons and weekends. Processing also occurs offsite at

customer-owned facilities and locations. A section of this plan will be dedicated to Spill Prevention in the field.

Used oil processing is completed by the use of a Mobile Dechlorination Unit (PCB-1000). Treatment includes a chemical reaction between oil and sodium. The process begins with degasification followed by sodium dispersion, mixing, condensate removal and centrifuge. The PCB-1000 is a batch process. Maximum batch size is 265 gallons.

The PCB-1000 unit is completely automated and requires limited supervision. FTI designates at least one (1) employee to supervise the process while at the facility and at least two (2) employees for process operations while offsite on customer property. FTI employs approximately 130 people. All oil pumping and material transfer operations are manually initiated and monitored by onsite personnel.

Facility Storage

In support of operations at FTI, several aboveground storage tanks are used for material storage. A description of these may be found in the Facility SPCC plan. The list below contains the storage containers used in direct conjunction with the PCB-1000 and the used oil processing.

TANK ID	TANK USE/LOCATION	CONTENTS	GALLON CAPACITY
TK-3/4	MIXING TANK/PCB-1000 MOBILE PLANT	MINERAL OIL	265
	BULK STORAGE TANKS		
TANK C	USED OIL / TANK FARM	MINERAL OIL	8,400
TANK T	USED OIL / TANK FARM	MINERAL OIL	8,400
TANK PO-1	PROCESSED OIL FOR REPAIR / TANK FARM	MINERAL OIL	8,225
TANK PO-2	PROCESSED OIL FOR VENDOR TRANSFER / TANK FARM	MINERAL OIL	15,000
PCB-1*	PCB OIL STORAGE/PCB ROOM INPROCESS	MINERAL OIL	1,295
PCB-2*	PCB OIL STORAGE/PCB ROOM INPROCESS	MINERAL OIL	1,295
PCB-3*	PCB OIL STORAGE/PCB ROOM INPROCESS	MINERAL OIL	1,295
PCB-4*	PCB OIL STORAGE/PCB ROOM INPROCESS	MINERAL OIL	1,295
PCB-5*	PCB OIL STORAGE/PCB ROOM INPROCESS	MINERAL OIL	1,295
TANK Q	VERTICAL SKID HOLDING TNK SLUDGE / INPROCESS	OIL/SLUDGE	560
	TEMPORARY STORAGE CONTAINERS		
DRUMS	USED OIL/INPROCESS (30 DRUMS x 55 GAL. EACH)	MINERAL OIL	1,650 MAX
TOTES	USED OIL/INPROCESS (15 TOTES x 250-350 GAL. EACH)	MINERAL OIL	3,750 MAX

* - Are not involved with the Used Oil Processing for non-PCB oil (< 50 ppm PCB)

Drainage Pathway and Distance to Navigable Waters

Water leaving the FTI facility travels eastward into the ditching along State Highway 83. Once the water enters the ditch, it travels southward along the roadway to a cross culvert approximately 0.1 miles south of the facility. Here the water crosses under State Highway 83 and continues a general south-south easterly path where it eventually enters the headwaters of West Sandy Creek.

Spill History

There have been no spill events at this facility. Any spills that occur during operations will be recorded as a Chemical Release Incident detailing the date of release; amount and type of material released, reason for release and preventive measures to minimize recurrence.

Prevention Measures

Engineering Controls and Containment

Two (2) major drainage paths exist at FTI. The South Retention Pond collects all runoff from the southern portion of the facility. This includes any runoff from the tanker loading and unloading area or connection points to and from the PCB-1000 mobile plant. The holding capacity of the retention pond is large enough to contain the contents of an entire tanker truck in the event of an accident. There is an additional stormwater retention pond northeast of the facility to capture additional runoff from the grounds and the parking lot.

The main bulk storage area, which houses Tanks C, T, and PO-1 in addition to other tanks not involved with used oil processing, has poured concreted walls. Tanks C and T are under roof and within secondary containment. Tank PO-1 is within secondary containment although not under roof. Tank Q is a portable tank staged within secondary containment. Tank PO-2 is a double-walled horizontal tank equipped with means for interstitial monitoring. Tanks PCB-1, 2, 3, 4, and 5 are housed in the PCB room within secondary containment as required by the facility approval to commercially store PCB waste. Secondary containment calculations for these areas are provided in Appendix F the facility SPCC plan.

All bulk storage tanks have visual liquid level gauges that allow a quick assessment of the tank contents. Storage tank inventory is monitored for available capacity. In addition, tanks C and T have high level alarms installed to protect against overfilling. If the high level alarms are activated, an audible alarms sounds in the oil handling area.

Additionally, the oil processing equipment used at the facility is housed within a 40 foot container trailer with steel frame construction and Kemlite paneling. A temporary/removable containment berm will be used under the container to prevent any release of drips or leaks that may occur at piping connections while in the field at customer locations.

Along with secondary containment, drainage control, observation, inspections, training and spill response materials are included in facility prevention measures. These items are discussed in detail below and in the SPCC.

Bulk Storage Area Drainage Control

If water is collected in the bulk storage secondary containment, it is visually inspected for oil contamination. Non-contaminated water is drained by sump pump within the containment to the South Retention Pond. If the water appears to have oily sheen, it will be transferred to a temporary storage container (i.e. 55 gallon drum) and processed for disposal. Each time the containment area is inspected for condition and amount of water collection, an entry will be made onto the Record of Water Removal from Bulk Storage Area form noting the date, time, amount of water removed and if oil was present.

A temporary/removable containment berm will be used under the container at connection points while the system is used off site at customer locations.

Underground Storage Tanks

There are no buried or partially buried storage tanks at this facility and the PCB-1000 will not be used in conjunction with any buried or partially buried underground storage tanks.

Aboveground Storage Tank Inspection

The bulk storage tanks used in conjunction with the PCB-1000 are observed throughout working hours. A more formal, thorough inspection for leaks, deterioration and maintenance is completed monthly and recorded. This monthly inspection also includes all transfer piping. Any defects found are noted and promptly reported so that appropriate action can be taken. A record of these inspections is kept onsite and is available for review. Informal inspections occur each workday by our employees in conjunction with their regular duties.

FTI also receives an Annual Storage Tank Facility Inspection from the Florida Department of Environmental Protection (DEP). The results of these inspections are kept onsite and available for review. Proper aisle space for the tanks, various containers and associated equipment is also verified at this time.

Additionally, tanks, pipes and fittings are inspected daily before each use as part of a pre-operation inspection of the PCB-1000.

Corrective Actions for Spills/Leaks

Any identification of leaks, corrosion, wear or other damage to tanks, piping or containment is recorded during monthly inspections and the actions taken are further detailed within the FTI SPCC and within Attachment C.8 – Unit Management Plan.

Personnel Training/Safety Measures

FTI's Environmental Manager, Jessica Pennington, is responsible for oil spill prevention personnel training and overall implementation of the SPCC plan.

The facility SPCC is made available to all personnel. This document and all guidelines and procedures for spill prevention are annually presented as a facility-wide employee safety meeting topic.

Each employee at the facility is provided the Employee Spill Prevention and Response Procedural Overview. This document is signed by the employee and placed in employee records with Human Resources.

Associates directly responsible for oil handling during processing and operation of the oil processing equipment either at the facility or on customer property will participate in onsite manufacturing training to include procedures specific to the PCB-1000. This will include product transfer from tank to truck/tanker. This training documentation will be kept with employee file.

Every facility employee utilizes individual handheld radio communication devices to allow for constant contact between employees and continued communication from the various facility areas. Telephones are located in several locations throughout the facility and are capable of contacting 911 and any emergency response team. Each employee in direct contact with the used oil processing is required to have a working cellular phone on them at all times in case of an emergency.

Spill/Fire Response Materials

Spill response material is located in every department in the event of a release. A mobile spill response cart mounted on wheels is kept onsite that contains granular absorbent material, oil absorption pads and socks, five-gallon buckets, shovels and brooms for easy access and timely retrieval should a spill occur. Where used oil processing occurs, a spill response kit is housed and stocked with response material in the event of a release. Figure 3 within the facility SPCC plan provides a map with the locations of the Spill response Stations and the Mobile Spill Recovery Units. A Fire Extinguisher Map can also be found at the end of this section providing locations of each fire extinguisher onsite.

Site Security

All areas of the FTI are protected against vehicular entry. All entrance gates are securely locked when the facility is unattended. In addition, all tank valves which would provide a direct outflow of oil are locked in the closed position when the facility is not attended. Adequate lighting is provided around the facility to deter potential vandals and to allow the detection of an oil spill. FTI also employs 24-hour weekend security and 12-hour night time security throughout the week.

Emergency Response Contacts

In the event of a spill that threatens to enter any water source or waterway, the following are a list of Emergency Contacts to be used. This Preparedness & Prevention Plan, the FTI SPCC and the Contingency & Emergency Action Plan will be supplied to all local emergency response authorities. The transmittal letter from FTI to these agencies can be found at the end of this Attachment.

National Response Center **1-800-424-8802**

Local Regulatory Contacts:

Florida Division of Emergency Management	1-800-226-4329
Florida Department of Environmental Protection	850-595-8300
Florida State Warning Point	1-800-320-0519

Region 4 / Southeast (**MS, TN, AL, GA, FL, KY, SC, NC**): 1-800-241-1754 or 404-562-9900

DeFuniak Springs Fire Department	911 or 850-892-8503
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Walton County Sheriff's Department	911 or 850-892-8111
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Walton County Emergency Management	850-892-8065
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Regional Regulatory Contacts:

Region 1 / New England (**ME, NH, VT, MA, RI, CT**): 1-888-372-7341

Region 2 **NY and NJ**: 212-637-4050

Region 3 / Mid-Atlantic (**DE, MD, PA, VA, WV, DC**): 1-800-438-2474

Region 5 / Upper Midwest (**IL, IN, MI, MN, OH, WI**): 312-353-2000

Region 6 / South Central (**AR, LA, NM, OK, TX**): 214-665-2210

Region 7 / Midwest (**IA, KS, MO, NE**): 1-800-223-0425

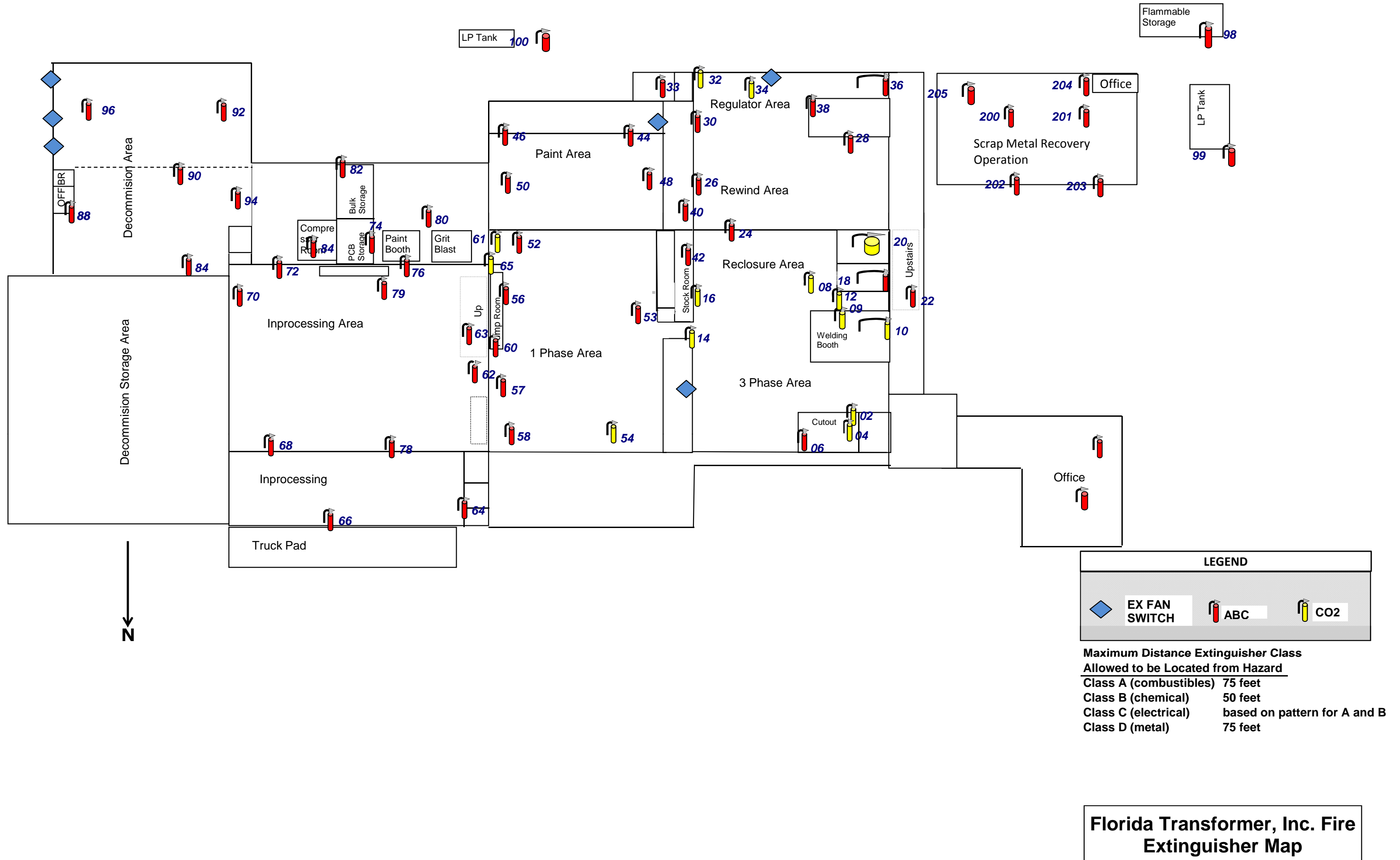
Region 8 / Mountains and Plains (**CO, MT, ND, SD, UT, WY**): 303-312-6312

Region 9 / Pacific Southwest (**AZ, CA, HI, NV, Guam, American Samoa**): 415-947-8713

Region 10 / Pacific Northwest (**AK, ID, OR, WA**): 1-800-424-4372 or 206-553-4973

Florida Transformer, Inc. Emergency Spill Response Contractor

SWS First Response	1-800-852-8878
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FLORIDA TRANSFORMER, INC.

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

March 5, 2012

Local Emergency Planning Committee
Mr. Richard Delp
West Florida Regional Planning Council
P.O. Box 11399
Pensacola, Fl. 32524-1399

RE: Florida Department of Environmental Protection Used Oil Processing Facility Permit
Application Form and Instructions

Mr. Delp,

In an effort to comply with the requirements of the Florida DEP Facility Permit Application to process used oil, the Local Emergency Planning Committee is receiving a copy of the Florida Transformer, Inc. (located at 4509 State Hwy 83 North, DeFuniak Springs, Walton County, FL) Emergency Action Plan. It has been updated as of January 2012 to address procedures taken at the facility in the event of fire, explosion, chemical spill and other possible emergencies. The Emergency Action Plan is presented as a training topic facility wide on an annual basis and re-distributed after modifications, if any, are made.

The Florida Transformer, Inc. facility is actively pursuing a permit to process used transformer oil to remove polychlorinated biphenyls (PCBs) and further purify transformer mineral oil to make it more amenable for recycling. As part of the application process the facility Emergency Action Plan must be submitted to local authorities and emergency response officials. This letter and the attached document is merely an effort to do so. Please see enclosure.

Please be advised; this activity will not change the facility Hazardous Chemical Inventory as of the last submitted Tier Two Report. Should any quantitative changes occur the Local Emergency Planning Committee will be notified as applicable.

A copy of this letter and attached plan are being sent to:

Local Fire Department
Chief Jonathon Day
Argyle Volunteer Fire Department
P.O. Box 61
Argyle, Fl 32422

Sincerely,

Jessica Pennington
Environmental Compliance Manager



FLORIDA TRANSFORMER, INC.

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

March 5, 2012

Chief Jonathon Day
Argyle Volunteer Fire Department
P.O. Box 61
Argyle, Fl 32422

RE: Florida Department of Environmental Protection Used Oil Processing Facility Permit
Application Form and Instructions

Chief Day,

In an effort to comply with the requirements of the Florida DEP Facility Permit Application to process used oil, the Argyle Fire Department is receiving a copy of the Florida Transformer, Inc. (located at 4509 State Hwy 83 North, DeFuniak Springs, Walton County, FL) Emergency Action Plan. It has been updated as of January 2012 to address procedures taken at the facility in the event of fire, explosion, chemical spill and other possible emergencies. The Emergency Action Plan is presented as a training topic facility wide on an annual basis and re-distributed after modifications, if any, are made.

The Florida Transformer, Inc. facility is actively pursuing a permit to process used transformer oil to remove polychlorinated biphenyls (PCBs) and further purify transformer mineral oil to make it more amenable for recycling. As part of the application process the facility Emergency Action Plan must be submitted to local authorities and emergency response officials. This letter and the attached document is merely an effort to do so. Please see enclosure.

Please be advised; this activity will not change the facility Hazardous Chemical Inventory as of the last submitted Tier Two Report. Should any quantitative changes occur the Fire Department will be notified as applicable.

A copy of this letter and attached plan are being sent to:

Local Emergency Planning Committee
Mr. Richard Delp
West Florida Regional Planning Council
P.O. Box 11399
Pensacola, Fl. 32524-1399

Sincerely,

Jessica Pennington
Environmental Compliance Manager

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN UPDATE

Prepared For:

**FLORIDA TRANSFORMER, INC.
P.O. Box 507
DEFUNIAK SPRINGS, WALTON COUNTY,
FLORIDA**

Prepared By:

**CDG Engineers & Associates, Inc.
1830 Hartford Highway
Dothan, Alabama 36301**

CDG Project # 231210400

MARCH 2012



Original Date of Plan: January 1991

Date of Last Plan Amendment/P.E. Certification: February 2012

Date of Last Plan Review: March 2012

Designated person accountable for spill prevention: Ms. Jessica Pennington

CERTIFICATION

By means of this certification, I attest that I am familiar with the requirements of provisions of 40 CFR Part 112, that I or my designated agent have visited and examined the facility, that this SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of this Part, that procedures for required inspections and testing have been established, and that the Plan is adequate for the facility. This certification does in no way relieve the owner and operator of the facility of his or her duty to fully implement this SPCC Plan in accordance with the requirements of 40 CFR 112.

Engineer: Rex Allen Thompson

Signature: 

Registration Number: 48377

State: Florida

Date: 3/9/12



LIMITATION STATEMENT

The information described within this SPCC Plan has been developed from oral/written information provided by the facility representatives, physical observations during field work conducted and CDG Engineers and Associates (CDG) interpretation of applicable regulations. CDG will not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed by facility or site representatives at the time this plan was prepared. This plan was solely prepared for the Florida Transformer, Inc. – DeFuniak Springs, Florida facility. The facility may release the information to other third parties, who may use and rely upon the information at their discretion. However, any use of or reliance upon the information by a party other than specifically named above shall be solely at the risk of such third party and without legal recourse against CDG, or its respective employees, officers or directors, regardless of whether the action in which recovery of damages is sought is based upon contract, tort, statute, or otherwise. This information shall not be used or relied upon by a party that does not agree to be bound by the above statement.

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN REVIEW DOCUMENTATION PAGE

In accordance with 40 CFR 112.5, a review and evaluation of this SPCC Plan is conducted at least once every five years. As a result of this review and evaluation, Florida Transformer, Inc. will amend the SPCC Plan within six months of the review to include more effective prevention and control technologies if the technology will significantly reduce the likelihood of a spill event from the facility, and the technology has been field proven at the time of the plan review. Implementation of amendments made to this plan will be carried out as soon as possible, but no later than six months following the preparation of any amendment. Any technical amendments to this plan will require certification by a licensed Professional Engineer in accordance with 40 CFR 112.3.

Documentation of SPCC Plan Review and Evaluation

Review Dates	"I have completed review and evaluation of the SPCC Plan for Florida Transformer, Inc. – DeFuniak Springs, FL." <u>Signature of Reviewer</u>	**Are amendments to the SPCC Plan required based on the review/evaluation for this date (YES/NO)

** Amendments required will be documented on the revision history log found at the end of this plan to track the revision history of this document.

MANAGEMENT APPROVAL

Florida Transformer, Inc. is committed to the prevention of discharges of oil to navigable waters and the environment, and maintains high standards for spill prevention control and countermeasures through regular reviews, updating, and implementation of this Spill Prevention Control and Countermeasure Plan for the Florida Transformer, Inc. facility in DeFuniak Springs, Florida.

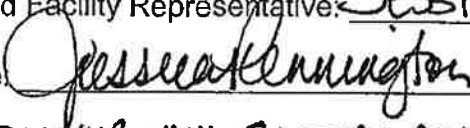
Authorized Facility Representative: JESSICA PENNINGTON
 Signature:  Date: 3/16/12
 Title: ENVIRONMENTAL COMPLIANCE MGR

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APPENDIX E	Employee Training Documentation
APPENDIX F	Secondary Containment Capacity Calculations

1.0 EMERGENCY CONTACT INFORMATION

FLORIDA TRANSFORMER - DEFUNIAK SPRINGS FACILITY

Contact Person	Title	Work Telephone	Mobile Telephone	Address
Jessica Pennington	Environmental Manager	(850) 892-2711	(850) 951-3086	629 Beck Bridge Rd Westville, FL 32464
Ron Shaw	General Manager		(850) 830-8071	4604 St Hwy 2W DeFuniak Springs, FL 32433
Steve Holland	Plant Manager		(334) 449-0982	306 S 2 nd Ave Hartford, AL 36344

GOVERNMENT AGENCIES

REGULATORY CONTACT

OFFICE

NATIONAL RESPONSE CENTER	1-800-424-8802
FLORIDA DIVISION OF EMERGENCY MANAGEMENT	1-800-226-4329
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	1-850-595-8300
FLORIDA DEPARTMENT OF TRANSPORTATION	1-850-245-1500
US EPA REGION IV BRANCH CHIEF (8:00AM-5:00PM M-F)	1-800-564-7577
US EPA REGION IV SPILL REPORTING (24 HR NUMBER)	1-404-562-8700
US COAST GUARD (DESTIN, FL)	1-850-244-7147
HAZARDOUS MATERIALS/WASTE INCIDENTS	1-800-843-0699
FLORIDA STATE WARNING POINT	1-800-320-0519

EMERGENCY SERVICES

DEFUNIAK SPRINGS FIRE DEPARTMENT	911 OR 850-892-8503
WALTON COUNTY SHERIFF'S DEPARTMENT	911 OR 850-892-8111
WALTON COUNTY EMERGENCY MANAGEMENT AGENCY	850-892-8065

EMERGENCY SPILL CLEANUP CONTRACTORS

CONTACT

OFFICE#

SWS FIRST RESPONSE	1-800-852-8878
--------------------	----------------

2.0 FACILITY OWNER AND OPERATOR INFORMATION

2.1 FACILITY GENERAL MANAGER

RON SHAW
850-892-2711 OFFICE
850-830-8071 MOBILE
4604 STATE HWY 2 W
DEFUNIAK SPRINGS, FL 32433

FACILITY ENVIRONMENTAL MANAGER

JESSICA PENNINGTON
850-892-2711 OFFICE
850-951-3086 MOBILE
629 BECK BRIDGE RD
WESTVILLE, FL 32464

FACILITY PLANT MANAGER

STEVE HOLLAND
850-892-2711 OFFICE
334-449-0982 MOBILE
306 S 2ND AVE
HARTFORD, AL 36344

2.2 Name and Location of Facility

Florida Transformer, Inc.
4509 State Highway 83
DeFuniak Springs, Walton County, FL 32433

2.3 Designated Person Responsible for Spill Prevention

Ms. Jessica Pennington
Office (850) 892-2711
Mobile (850) 951-3086
Fax (850) 892-6428

3.0 FACILITY DESCRIPTION

3.1 Facility Operations

Florida Transformer, Inc. is a power distribution equipment repair and de-commission facility. The facility handles many different types of equipment including transformers, regulators, and reclosers which are filled with mineral oil. In support of the facility's repair and decommission operations, new and used mineral oil is stored on-site in aboveground containers. Mineral oil is received at and removed from the facility via common carrier tank trucks and in equipment received for repair and returned after repair. Other types of oil which are incidental to the facility operations, such as diesel fuel, are also stored on-site.

The standard hours of operation for this facility are 7:00 A.M. to 3:30 P.M. Monday through Friday. In order to meet customer requirements, the facility often operates outside of these standard hours to include late afternoons and weekends. The facility employs approximately 140 people. All oil pumping and transfer operations are manually initiated and monitored by on-site personnel.

Figure 1 (Site Location Map) in **Appendix A** is a topographic map of DeFuniak Springs, Florida depicting the location of the Florida Transformer, Inc. facility.

Figure 2 (Site Layout Map) in **Appendix A** provides a facility layout of the Florida Transformer, Inc. facility and identifies fuel and lubricant storage areas that are covered by this SPCC Plan. **Figure 3** provides an overall detail of the oil storage processing areas of the facility. **Figures 3A** and **3B** provide layouts of the bulk oil containment areas included in the Plan.

3.2 Facility Bulk Oil Storage

The design and construction of the bulk storage containers are compatible with the characteristics of the petroleum product they contain, and with temperature and pressure conditions.

The tank capacities and types of oil products stored in bulk at the Florida Transformer, Inc.-DeFuniak Springs, FL facility are provided in **Table 1** below.

Table 1 Bulk Storage Tank Information			
Tank Identification Number	Product Stored	Capacity (gallons)	Discharge Prevention Method
A	Mineral Oil	8,400	Secondary Containment
B	Mineral Oil	8,400	"
C	Mineral Oil	8,400	"
D	Mineral Oil	8,400	"
E	Diesel Fuel	2,350	"
F	Mineral Oil	650	"
G	Diesel Fuel	8,000	"
H	Mineral Oil	740	"
I	Mineral Spirits	210	"
K	Mineral Oil	530	"
L	Mineral Oil	530	"
M	Mineral Oil	530	"
T	Mineral Oil	8,400	"
U	Mineral Oil	2,131	"
PCB – 1	Mineral Oil	1,295	"
PCB – 2	Mineral Oil	1,295	"
PCB – 3	Mineral Oil	1,295	"
PCB – 4	Mineral Oil	1,295	"
PCB - 5	Mineral Oil	1,295	"
PO-1	Processed Oil	8,225	"
PO-2	Processed Oil	15,000	Double Wall Tank
Temporary/Working Tanks and Equipment			
Tank Identification Number	Product Stored	Capacity (gallons)	Discharge Prevention Method
O	Mineral Oil	178	Secondary Containment
P	Mineral Oil	510	"
Q	Sludge Holding Tank	580	"
R	Mineral Oil	1,245	"
S	Mineral Oil	1,050	"
V	Mineral Oil	580	"
W	Mineral Oil	1,010	"
X	Mineral Oil	187	Inside Storage
Drum Storage	Mineral Oil / Other	55 gallons each	Secondary Containment
Portable Tote Storage	Mineral Oil/Other	250 gallons each	"
Various Transformers	Mineral Oil	Various capacity	"

3.3 Oil Storage Containers

The in-processing facility uses several drums for the storage of PCB contaminated oil. All of these drums are kept in the diked drum storage area which provides a secondary containment volume well in excess of the requirements. For detailed volume calculations for this area, see **Appendix A**.

There are several drums/totes in the Florida Transformer, Inc. facility which are used for temporary oil storage. Though the likelihood is small that a spill from one of these drums would escape beyond the interior of the building, the front and rear lagoons provide adequate secondary containment to prevent oil from escaping from the premises. The location of the oil storage containers are depicted on **Figure 2**.

3.4 Drainage Pathway and Distance to Navigable Waters

Storm water drainage leaving the Florida Transformer, Inc. facility travels eastward into the ditching along State Highway 83. Once the water enters the ditch, it travels southward along the roadway to a crossunder culvert approximately 0.1 miles south of the facility. Drainage then proceeds under State Highway 83 and continues on a general south-south easterly path where it eventually enters the headwaters of West Sandy Creek.

4.0 SPILL HISTORY

This section provides documentation of oil product spills/releases experienced during the operational life of the facility. There have been no reported petroleum product spills related to the operation of the Florida Transformer facility at the time of this SPCC revision/update.

Table 2 Petroleum Discharge History		
Description of Discharge	Corrective Actions Taken	Plan for Preventing Recurrence

Any spills that occur during future operations of the facility will be recorded on the form located in **Appendix B** of this plan. Information to be included will consist of:

- Date of release;
- Amount of material released;
- Type of product released;
- Cause of the discharge including a failure analysis of system(s) in which the failure occurred; and
- Preventive measures taken to minimize the possibility of recurrence.

Spills/releases will trigger review, evaluation and update of this SPCC Plan if improvements in engineering controls or procedures are identified to reduce the likelihood of recurrence.

5.0 DISCHARGE PREVENTION MEASURES PROVIDED

5.1. Drainage Control and Diversionary Structures

Storage Tank Secondary Containment

The main bulk storage area, which houses Tanks A, B, C, D, E, F, H, T,U and PO-1, and the adjacent drum storage area have poured concrete floors and walls of concrete poured inside of concrete blocks. This area is under cover and provides containment volume well in excess of the minimum requirements. Additionally, the secondary containment, which houses Tank G has a poured concrete floor and walls of concrete poured inside of concrete blocks. The design of these areas is sufficient to contain an oil spill for 72 hours without failure. Calculations of the storage capacities of the secondary containment areas are provided in **Appendix E**.

The main bulk storage area is under cover and will only collect water during storms with southerly winds. If water is collected, the storm water is visually inspected for oil contamination. Non-contaminated water is drained to the retention pond via a sump pump in the southwest corner. If the retained water is found to contain oil, it is pumped from the area into 55 gallons drums and processed for disposal. After each occurrence water is removed from the bulk storage areas (contaminated or non-contaminated). The responsible employee will record the date, time, volume removed, and identify whether oil was present. This information will be documented on Form 2B, which can be found in **Appendix D**.

The calculated containment capacity of the respective containment areas utilized at the Florida Transformer facility is provided in the following table:

Table 2 Bulk Oil Storage Tank Secondary Containment Information		
Storage Tank Containment Identification	Containment Area Description	Estimated Containment Area Capacity (Gallons)
Bulk Storage Area	Poured concrete floor and walls of concrete poured inside of concrete blocks	18,257
Diesel Fuel Storage	Poured concrete floor and walls of concrete poured inside of concrete blocks	21,667
PCB Bulk Storage	"	7,102
Process Oil Storage (PO-1)	Poured concrete floor and walls of concrete poured inside of concrete blocks	21,667
Processed Oil Storage (PO-2)	Double Walled Tank	15,000
Bermed Oil Storage Area	Poured concrete floor with 6" curbing and epoxy coating	1,282

5.2 Loading/Unloading Areas

All bulk oil that is delivered to or sent out from Florida Transformer, Inc. is via common carrier tanker trucks. Florida Transformer personnel work with the truck drivers to insure that all loading/unloading operations are in accordance with applicable DOT regulations. All loading/unloading operations are attended and closely monitored by a designated FTI employee to ensure limited environmental exposure in the event of oil spillage.

The loading/unloading area is sloped directly to the south retention pond which is capable of retaining the contents of an entire tanker truck if an accident were to occur. This area is also equipped with warning signs to prevent vehicular departure during the transfer operations. Signs are also posted to remind both the driver and Florida Transformer personnel to check the lowermost drains and all outlets on the tanker for leakage before the truck exits the loading/unloading area.

ASTs are filled only when a representative from Florida Transformer is present at the unloading area. Designated facility personnel will inspect tank product levels prior to authorizing filling operations to ensure adequate capacity is available in the tank receiving product. The following procedure will be followed during product deliveries to the onsite ASTs:

1. Ensure the truck and trailer brakes are applied. Put in place a system to prevent accidental vehicular departure prior to disconnection of transfer lines. This can be a physical barrier like the use of wheel chocks.
2. Apply grounding cable, if available.
3. Check tank level to ensure product will not overfill tank.
4. Ensure correct product is being discharged in the correct tank.
5. Connect product hose, open belly/hand valves and discharge product.
6. After compartment is empty, discharge remaining product from product hose into tank drop. Secure fuel/lubricant drop equipment into proper storage area for transport.
7. Secure tank and check vehicle for any possible leaks or discharges before traveling back through the Florida Transformer facility.
8. During Vendor Unloading Procedures the driver of the vehicle is to remain within 50 feet of the vehicle at all times. This is to monitor the entire unloading process and for accidental spills, ruptures or overfills of product.

In the event of a release during petroleum product loading/unloading operations, spill containment material will be located where it is readily available for response.

5.3 Product Inventory Control

Storage tank inventory is routinely monitored to verify available capacity. Prior to bulk oil/fuel/lubricant deliveries, storage tank levels are measured by Florida Transformer personnel to verify the tanks have the available capacity to receive the volume of delivery or transfer.

6.0 DISCHARGE COUNTERMEASURE PROCEDURES

This section describes the response and cleanup procedures in the event of a product discharge. The uncontrolled discharge of fuel or oil to groundwater, surface water, or soil is prohibited by state and possibly federal laws. Immediate action must be taken to control, contain, and recover discharged product

6.1 Identification/Notification

The guidelines noted below will be followed in the event of a spill or other discharge of fuel and/or other hazardous substance.

- Any employee who discovers a discharge of oil and/or other hazardous substance should determine the source of the spill. If the source of the spill is immediately obvious, the employee should report the spill to **Jessica Pennington**. Designated Florida Transformer personnel will determine the cause of the discharge, take action to clean up the spill, and implement measures to prevent a recurrence. In the event the release is beyond the response capabilities of on-site resources, the spill response contractors listed on the Emergency Contact List will be notified to mobilize to the site and provide support.
- If a spill occurs, is not fully contained, and has the potential to reach the waters of the United States, the Manager or alternate should be notified immediately who will in turn notify the appropriate agencies identified on the **Emergency Contact List** provided in **Section 1.0** when required.

The designated Florida Transformer representatives will notify appropriate officials provided in **Section 1.0** as appropriate. The following information should be provided:

- Exact address or location and phone number of the facility;
- Weather conditions; or probability of rainfall;
- Date and time discharge began;
- Type of material discharged;
- Estimates of the total quantity discharged;
- Source of the discharge;
- Cause of discharge;
- Condition of container;
- Description of all affected media;
- Damages or injuries resulting from the discharge;
- Actions being taken to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation may be needed; and
- Names of individuals and/or organizations who have also been contacted

In accordance with 40 CFR 112.3, discharges of oil products in volumes greater than **1,000 gallons** in a single event or **42 gallons** in each of two events into navigable waters within a twelve month period will require notification to the EPA Regional Administrator within 60 days of the event. Information required to be submitted will be as follows:

- Name of the facility;
- Name of the owner/operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

Facility Response Plan

Pursuant to 40 CFR 112.20, owners or operators of an oil storage facility that, because of its location, could reasonably be expected to cause substantial harm to the environment by discharging oil into or on navigable waters must prepare and submit a facility response plan (FRP) to the EPA Regional Administrator.

EPA has developed "Substantial Harm" criteria found in 40 CFR 112 Appendix C to apply in evaluating whether a facility is subject to the FRP requirements of 40 CFR 112.20. If a facility meets any of the identified criteria, the owner/operator is required to prepare and submit a FRP to the EPA Region IV Administrator for review and approval. The Substantial Harm Criteria Checklist and certification of applicability has been included as **Appendix C**. Based on information provided by Florida Transformer the facility **is not subject** to the requirements of 40 CFR 112.20.

6.2 Containment and/or Collection

Once the discharge has been identified and reasonable efforts have been made to stop further discharge, containment methods should be employed. Barriers, and/or absorbent pads and absorbent materials should be used, if necessary, to prevent the discharge from reaching storm-water conveyance systems or off site areas.

In extreme situations, an emergency spill cleanup contractor may be contacted to assist in cleanup. A list of potential spill cleanup contractors is provided in **Section 1.0**.

Based on an overall evaluation of the release, collection and disposal of the discharged product may be appropriate. Equipment and materials available onsite may be utilized to contain and collect the discharged product. Available on-site spill response equipment that can be utilized to respond to a release is discussed in **Section 6.3.**

6.3 Spill Response Material/Equipment

Florida Transformer maintains a spill response cart on-site which contains several items to help contain any spill which may occur. This cart contains granular absorbent material, oil absorption pads and socks, five gallon buckets, shovels, and brooms. This cart is mounted on wheels and can be moved to the any area where a spill may occur. In addition, spill response stations have been setup at various locations throughout the facility. The general staging location for this spill response cart as well as the location of the spill response stations is depicted on **Figure 3.**

An inventory of the spill response materials available for use at the Florida Transformer facility as well as its location is contained in the table below:

Table 5 Spill Response Material/Equipment		
Description of Response Equipment	Minimum Quantity to be Maintained	Location of Equipment
Absorbent Socks	10-15	Spill Response Cart
Oil Dri (or equiv.)	1- 50 # bag/4 buckets	Spill Response Cart
Absorbent pads	1 Bundle	Spill Response Cart
Rags	8 Packs	Spill Response Cart
Brooms/Buckets	4	Spill Response Cart
Shovels	3	Spill Response Cart
Axe/Hatchet	1	Spill Response Cart
Oil Dri/Shovels/Brooms	Varies	Spill Response Stations

6.4 Recovered Material Management

Once the discharge material has been adequately contained and/or collected, the designated representative should determine the most feasible method for handling the discharged material. Options that should be considered include collection of petroleum containing liquids and transferring off site for petroleum recovery and collection of petroleum residue debris/soil and transporting to an approved treatment/disposal facility.

An accurate log of the date, time, personnel, equipment and sequence of events regarding spill response and cleanup will be documented and kept on file. This information will be utilized to audit the effectiveness of this SPCC Plan.

The following alternatives should be considered for disposal, based upon the feasibility of each method:

- Reclamation or reprocessing of recoverable oil products at a permitted approved reprocessing facility; and/or
- Disposal of oil residue and oil contaminated materials at a RCRA treatment/disposal facility permitted to accept such material.

6.5 Potential Spill Prediction

This facility is provided with spill containment structures for storage tanks used to contain petroleum products. These containment structures are intended to prevent spillage from reaching and entering navigable water. However, because there is a reasonable potential for equipment failure that could cause a release, the following table has been provided to comply with the requirements of 40 CFR 112.7(b).

The predictions described are based upon the failure of normal storage facilities and the additional failure of collection and containment facilities that prevent spillage from escaping the facility. **Table 6** includes a description of oil storage capacity, the most likely type of failure, estimated flow rate, and estimated total quantity of oil that could be discharged as a result of the type of failure for the main bulk storage areas of the facility. **Figure 2** provides the potential flow directions expected for an oil release from the facility. Assumptions used to arrive at these volumes have been included. This table should be used in conjunction with the above referenced figure to aid in response to a release.

Table 6- Potential Spill Prediction				
Area/Activity Description	Storage Capacity	Type of Failure	Estimated Release Rate in Gallons per Minute (gpm)	Estimated Release Volume in Gallons
Tanks A, B, C, D and T (Mineral Oil)	8,400 each	Rupture	140	8,400
		Leak	5.8	2,100
		Overfill	150	75
		Line Failure	90	45
Tank E (Diesel Fuel)	2,350	Rupture	39.2	2,350
		Leak	1.6	360
		Overfill	90	45
		Line Failure	90	45
Tank F (Mineral Oil)	650	Rupture	10.8	650
		Leak	0.45	756
		Overfill	90	45
		Line Failure	90	45
Tank G (Diesel Fuel) PO-1 (Processed Oil)	8,000	Rupture	133	8,000
		Leak	5.6	2,016
		Overfill	90	45
		Line Failure	90	45
Tank H (Mineral Oil)	740	Rupture	12.3	740
		Leak	0.51	185
		Overfill	90	45
		Line Failure	90	45
Tank I (Mineral Spirits)	210	Rupture	3.5	210
		Leak	0.15	52.5
		Overfill	30	15
		Line Failure	30	15
Tanks K, L and M (Mineral Oil)	530	Rupture	8.8	530
		Leak	0.36	132.5
		Overfill	90	45
		Line Failure	90	45
Tank U Mineral Oil)	2,131	Rupture	35.5	2,131
		Leak	1.48	532.8
		Overfill	90	45
		Line Failure	90	45
PO-2 (Processed Oil)	15,000	Rupture	250	15,000
		Leak	10.4	3,750
		Overfill	90	45
		Line Failure	90	45
PCB 1 – PCB 5 (Mineral Oil)	1,295 each	Rupture	21.6	1,295
		Leak	0.9	323.8
		Overfill	90	45
		Line Failure	90	45
Working Tanks Staging Area	1,245 (Largest Tank)	Rupture	20.75	1,245
		Leak	0.9	323.8
		Overfill	90	45
		Line Failure	90	45

Notes:

1) Rupture-Release rate based tank failure that would empty the tank contents within 1 hour.

2) Leak- Release rate based on the rate required to empty the tank in a 24 hour period.

Total volume base on a maximum detection/response time of 6 hours for tanks and 5 min. for tanker.

3) Overfill- Release rates based on a delivery rate of 90 gpm for all tanks excluding Tank I which was 30 gpm. Release volume based on 30 second response time.

7.0 INSPECTIONS, TESTS AND RECORDS

7.1 Inspection of Storage Tanks and Containment Areas

Visual inspections of the product storage equipment will be conducted by Florida Transformer personnel on a daily basis to verify the integrity of the operation. The visual inspections may include but are not limited to the following items:

- Physical condition of storage tanks;
- Condition of transfer piping and associated equipment;
- Inspection of containment areas for cracks/damage and the presence of petroleum products; and
- Conditions that may affect the performance of the containment system or hinder the inspection.

The results of these daily inspections will not be documented unless a problem is identified. A more thorough inspection will be conducted on a monthly basis utilizing the inspection form found in **Appendix D**. Inspection records will be signed by the appropriate personnel and forwarded to the manager who will review and insure appropriate corrective actions have been implemented when required. The results of these inspections will be maintained on file for a period of three years.

7.2 Aboveground Storage Tank Integrity Testing

40 CFR 112.8(c)(6) (July 2002 Revision) requires integrity testing of bulk containers "on a regular schedule." The regulations further provide that visual inspections must be combined with another non-destructive testing technique to verify the structural integrity of the container. In March 2004, a settlement agreement was executed between EPA and the American Petroleum Institute (API) specifically clarifying EPA's position on integrity testing of shop-built containers.

EPA stated in the settlement agreement that well-designed shop-built containers with a capacity of 30,000 gallons or less would be generally provided with equivalent environmental protection to that offered by other forms of testing if appropriate visual inspections were combined with the measures described below:

- Elevation of a shop-built container in a manner that decreases corrosion potential (as compared to a container in contact with soil) and makes all sides of the container, including the bottom, visible during inspection (e.g., where the containers are mounted on structural supports, or saddles).
- Placement of a barrier between the container and the ground, designed and operated in a way that ensures that any leaks are immediately detected.

Per the STI SP001-03, a Category 1 Shop-Fabricated AST that contains between 5,001 and 50,000 gallons would be subject to periodic AST inspections and a Formal external inspection by a certified inspector every twenty (20) years.

There are seven (7) storage tanks currently utilized at the Florida Transformer facility that are greater than 5,000 gallons in capacity and will be subject to the formal external inspection requirement. A formal external inspection should be conducted on each of these tanks prior to them reaching 20 years in age to comply with the STI SP001-03 Standard.

As a best management practice, it is recommended to also include the remaining vertical storage tanks in this inspection program to verify the continued structural integrity of these tanks.

Tank tests and inspections conducted at the facility shall be retained on site for the useful life of the storage tank.

7.3 Field-Constructed Aboveground Containers

There are no field-constructed aboveground containers utilized at the Florida Transformer facility.

7.4 Diked Storage Area Inspections

The diked area containing the bulk storage tanks is under roof but could be subject to a small accumulation of rainwater during a storm with a southerly wind. For this reason, the area is equipped with a manually operated sump pump which facilitates rain water removal. If an accumulation of water occurs, the water is inspected for oil before the pump is turned on and a record is made of the operation on a form such as the one in **Appendix D – Form 2 B**. These forms are kept at the sump pump on/off switch for a period of at least three years. The water which leaves the diked area flows to the retention pond on the southern end of the facility.

7.5 Product Overfill Protection

Bulk oil tanks are equipped with site gauges which allow personnel to visually observe product levels. Facility personnel are present throughout the filling operations to monitor the product level in the tanks.

7.6 Spill Response Equipment

An inventory of the spill response materials/equipment available for use at Florida Transformer as well as its location is discussed in **Section 6.3**. Inspection of locations will be conducted by designated facility personnel as part of the monthly facility inspection to ensure the areas remain adequately stocked. Items identified that need to be replaced will be noted on the **Monthly Facility Inspection Form** included in **Appendix E** and forwarded to Jessica Pennington for follow-up.

8.0 SITE SECURITY

8.1 Fencing/Camera Surveillance

All areas of the Florida Transformer facility are protected against vehicular entry. All entrance gates are securely locked when the facility is unattended. In addition, all tank valves which would provide a direct outflow of oil are locked in the closed position when the facility is not attended. Security surveillance cameras are placed in strategic area at the facility to assist with monitoring operations and detect unauthorized activities. .

8.2 Lighting adequate to detect spills

Facility lighting of the Florida Transformer facility shall be utilized and located in a manner to assist both operating personnel in daily operations and discovery of discharges occurring during hours of darkness. Facility lighting shall completely illuminate the Aboveground Storage Tank Area and off loading area. This lighting will also assist the general public and law enforcement in the discovery of possible discharges.

9.0 PERSONNEL TRAINING PROCEDURES

9.1 Personnel training

All new hires are required to review the oil spill prevention and response guidelines at the time of hire. This document is signed and filed in the personnel folder of each new hire. A copy of this document can be found in **Appendix E**. In addition, all new hires receive on the job instruction from personnel familiar with our spill prevention and response procedures. As a means of refresher training, these same spill prevention and response procedures, along with other new or important spill prevention information, are periodically reviewed at our monthly safety meetings. The minutes of these meetings are maintained and available for review upon request.

Employees involved in handling petroleum products will receive SPCC training as part of their orientation program. All employees involved in the operation and maintenance of equipment will be instructed in methods and actions to prevent discharge of petroleum or petroleum by-products as part of this training program. In addition, all personnel involved in the management of petroleum products will be instructed in the following:

- Overview of the SPCC Plan and its purpose;
- Operation and maintenance of equipment to prevent petroleum discharge;
- Applicable pollution control laws, rules, and regulations;
- Fluid level monitoring in tanks;
- Material delivery monitoring/observations;
- Inspection/recordkeeping requirements; and
- Spill response procedures.

9.2 Designated Person Accountable for Spill Prevention

The person at Florida Transformer who is responsible for oil spill prevention, personnel training, and the overall implementation of this SPCC is the Environmental Compliance Manager, **Ms. Jessica Pennington**. Though responsible for the overall implementation, Ms. Pennington may delegate certain responsibilities as she deems appropriate.

9.3 Spill prevention briefings

Spill prevention briefings will be conducted on an annual basis at the facility. These briefings will cover the following areas:

- Review of the plan to assure personnel have an adequate understanding of the contents of the plan;
- Discussion of any known spill events or failures, malfunctioning components; and
- Recently developed precautionary measures to aid in spill prevention.

Documentation of these briefings will include the date of the briefing, attendees and items covered during the meeting. This documentation should be retained and filed at the facility for future reference.

10.0 Facility Tank Truck Loading/Unloading

Florida Transformer requires all drivers to comply with Department of Transportation (D.O.T.) requirements and facility loading/unloading procedures. All drivers must be authorized to load or unload product in accordance with this regulation.

ASTs will never be filled without a representative from Florida Transformer present at the unloading area. Personnel will inspect tank product levels prior to authorizing filling operations to ensure adequate capacity is available in the tank receiving product. ASTs will never be filled beyond 90% to provide an additional level of protection against overfilling. Any vehicles preloaded at the facility must remain in containment and be secured. **Section 5.3** details tanker truck loading/unloading procedures at the facility.

11.0 Facility Transfer Operations

11.1 Underground Transfer Piping

Florida Transformer, Inc. currently has no buried pipelines on their facility. Any new underground oil transfer piping placed into service at Florida Transformer-DeFuniak Springs, FL will require corrosion protection to meet the requirements specified in 40 CFR 280. Integrity and leak testing of buried piping will be conducted at the time of installation, modification or replacement.

11.2 Transfer Piping Management

There are numerous aboveground pipes installed for moving oil between the bulk storage areas and the oil pumping stations. These pipes are installed in view of facility personnel such that leaks would be readily detectable. The vast majority of this piping is also under roof which protects the piping from deterioration and provides for an easier cleanup if a spill were to occur. The piping is visually inspected monthly for wear or deterioration which could lead to a leak.

All transfer lines will be capped or blank-flanged at the termination point when not in use and identified as to its source. Pipe supports will be designed and installed to minimize abrasion and corrosion and to allow for expansion and contraction due to temperature changes. Transfer lines will be located to protect against damage from vehicular traffic.

Aboveground piping, valves and appurtenances will be inspected on a routine basis as part of the monthly facility inspection to verify their integrity. Integrity concerns noted during these inspections will be noted on the inspection form and forwarded to the manager for follow-up. These inspections are recorded on *Form 2B* provided in **Appendix D**. The inspection results are maintained on-site and are available for review.

12.0 DOCUMENT REVISION STATUS AND DISTRIBUTION

12.1 REVISION HISTORY LOG

[illegible]

APPENDIX A

Figures

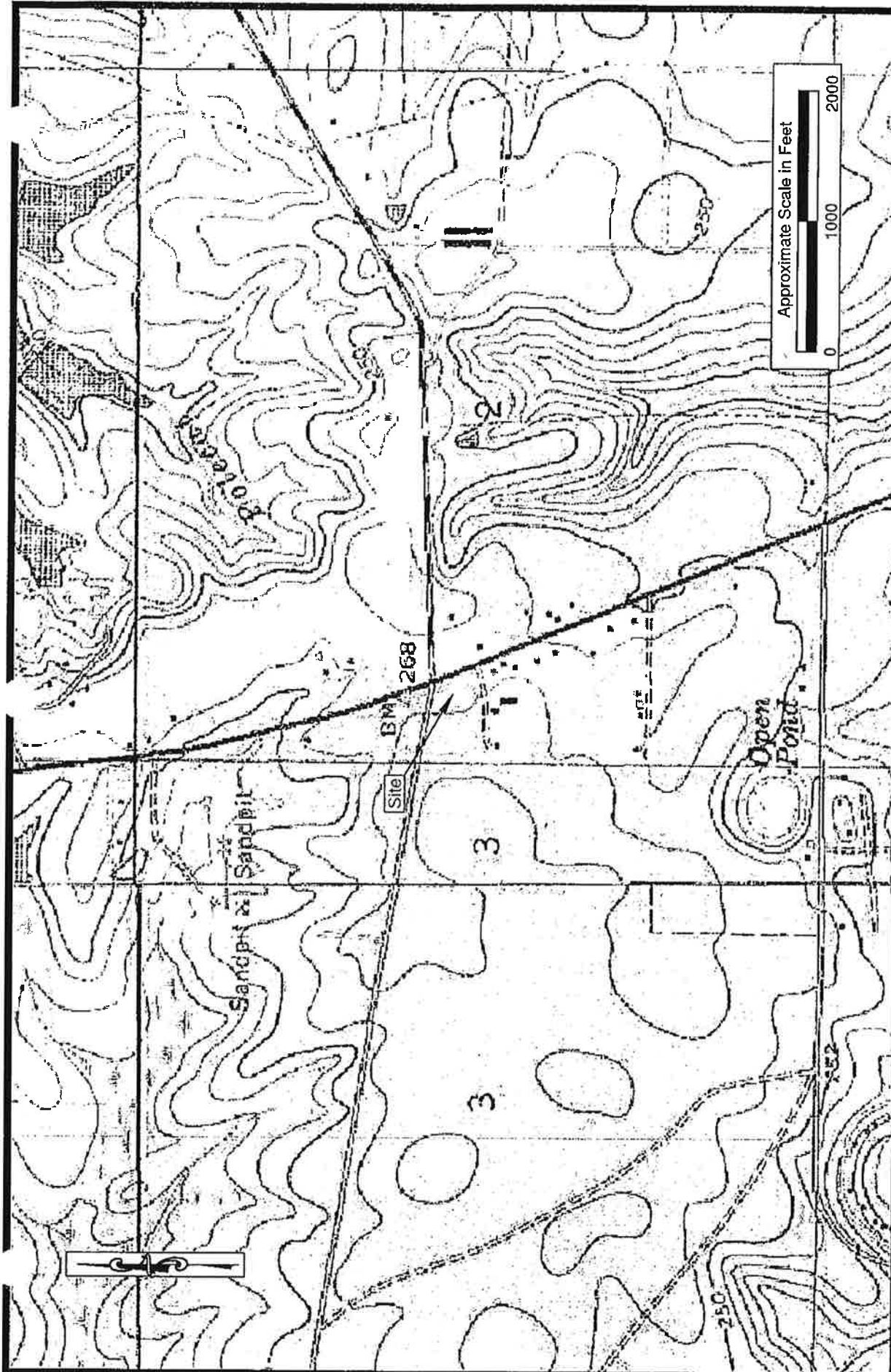
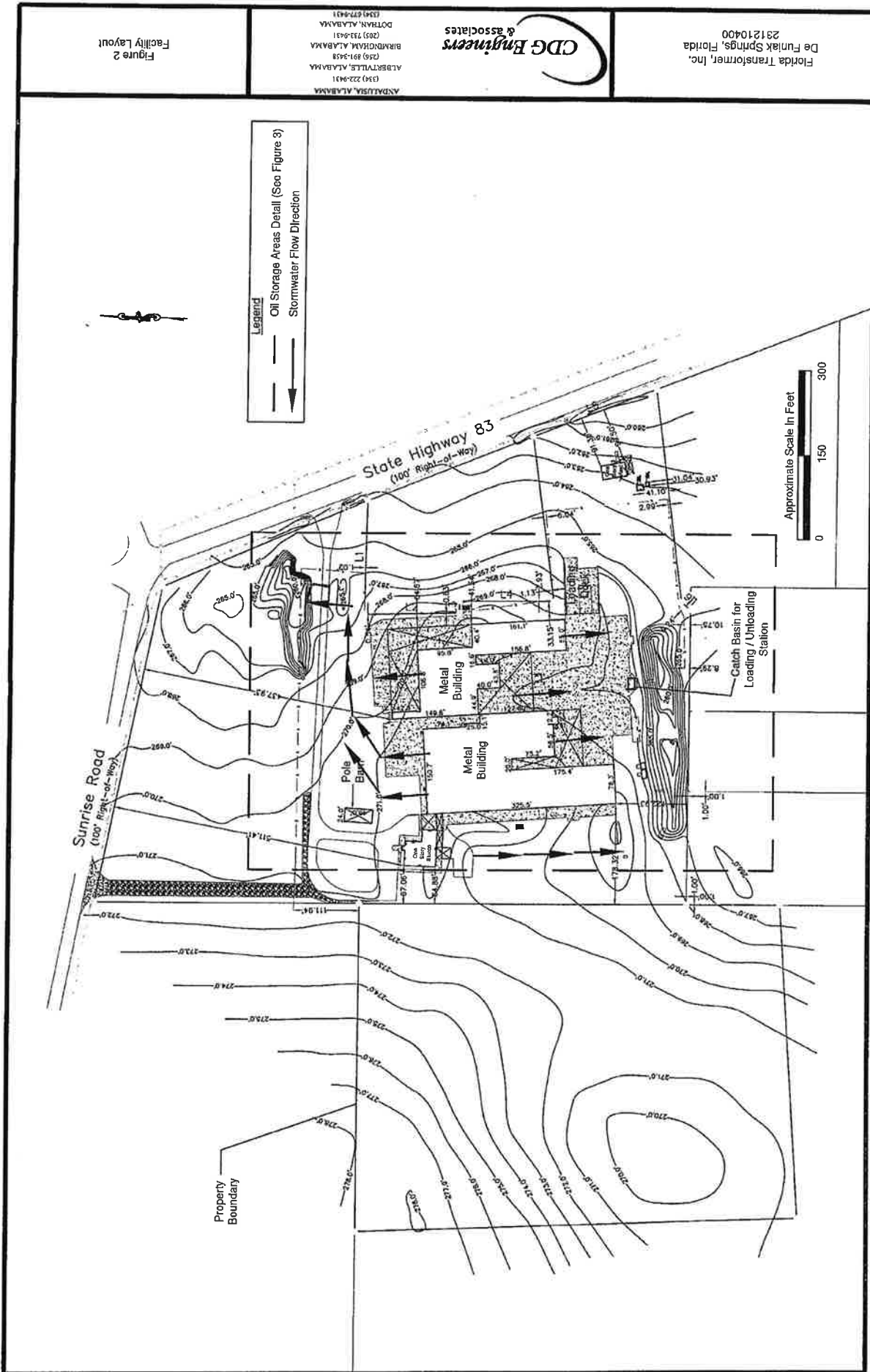


Figure 1
Site Location Map

ANDALUSIA, ALABAMA
(334) 222-9431
ALBERTVILLE, ALABAMA
(256) 891-3453
BIRMINGHAM, ALABAMA
(205) 733-9431
DOTHAN, ALABAMA
(334) 677-9431



Florida Transformer, Inc.
De Funiak Springs, Florida
231210400

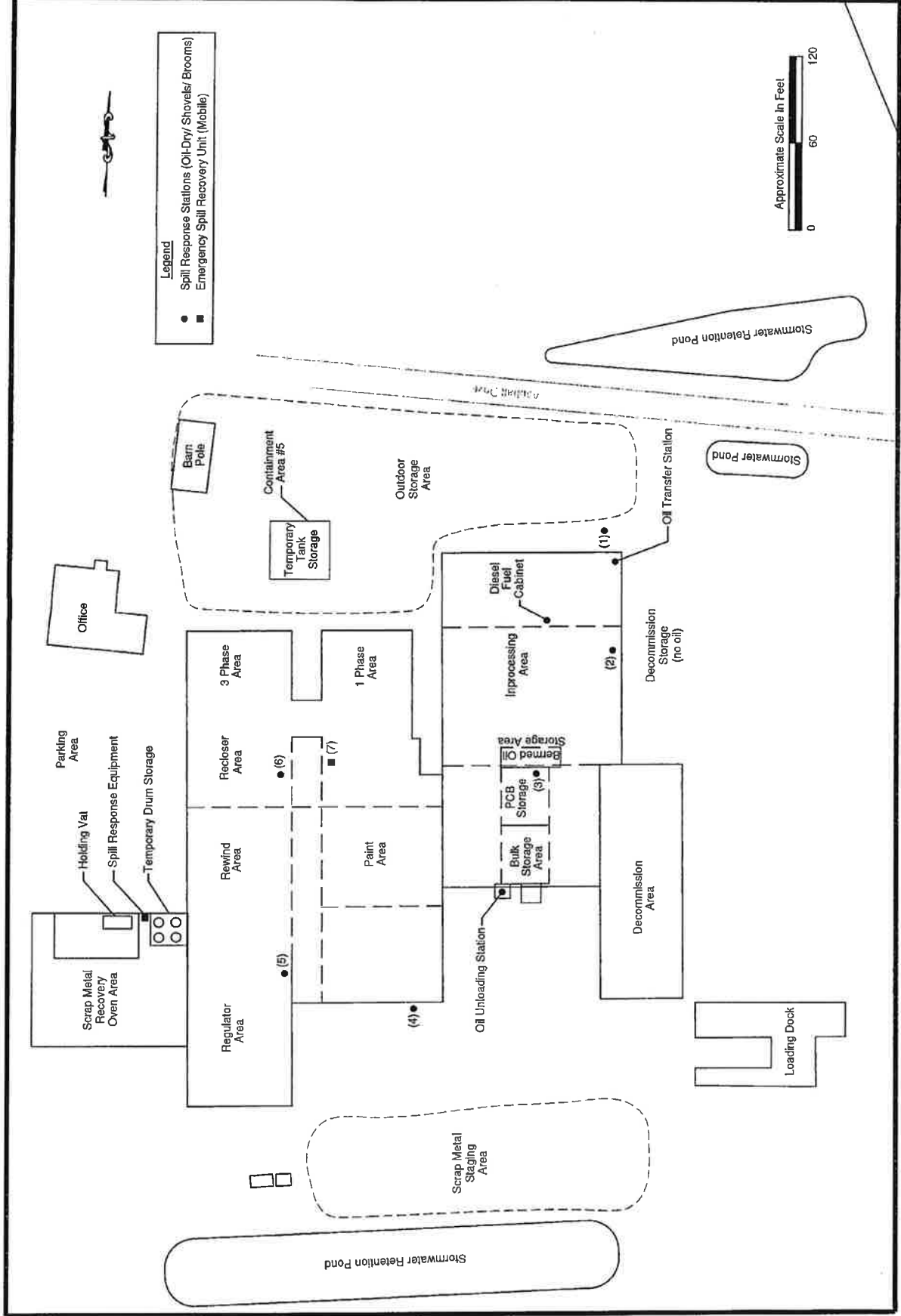


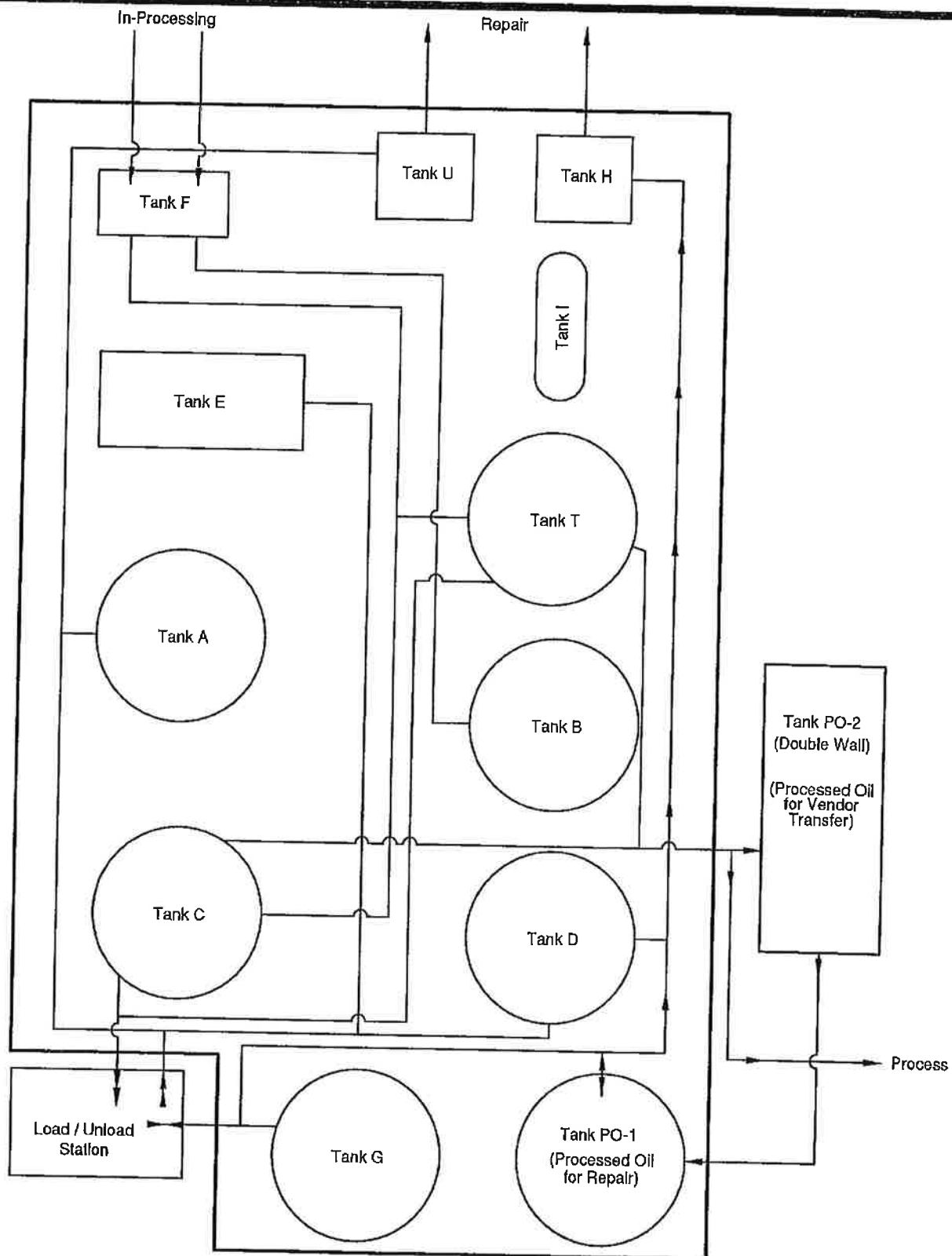
Florida Transformer, Inc.
De Funiak Springs, Florida
231210400



ANDALUSIA, ALABAMA
(334) 222-9311
ALBANY, ALABAMA
(256) 891-3458
BIRMINGHAM, ALABAMA
(205) 733-9431
DOthan, ALABAMA
(334) 677-9431

Figure 3
Site Map with Building Details



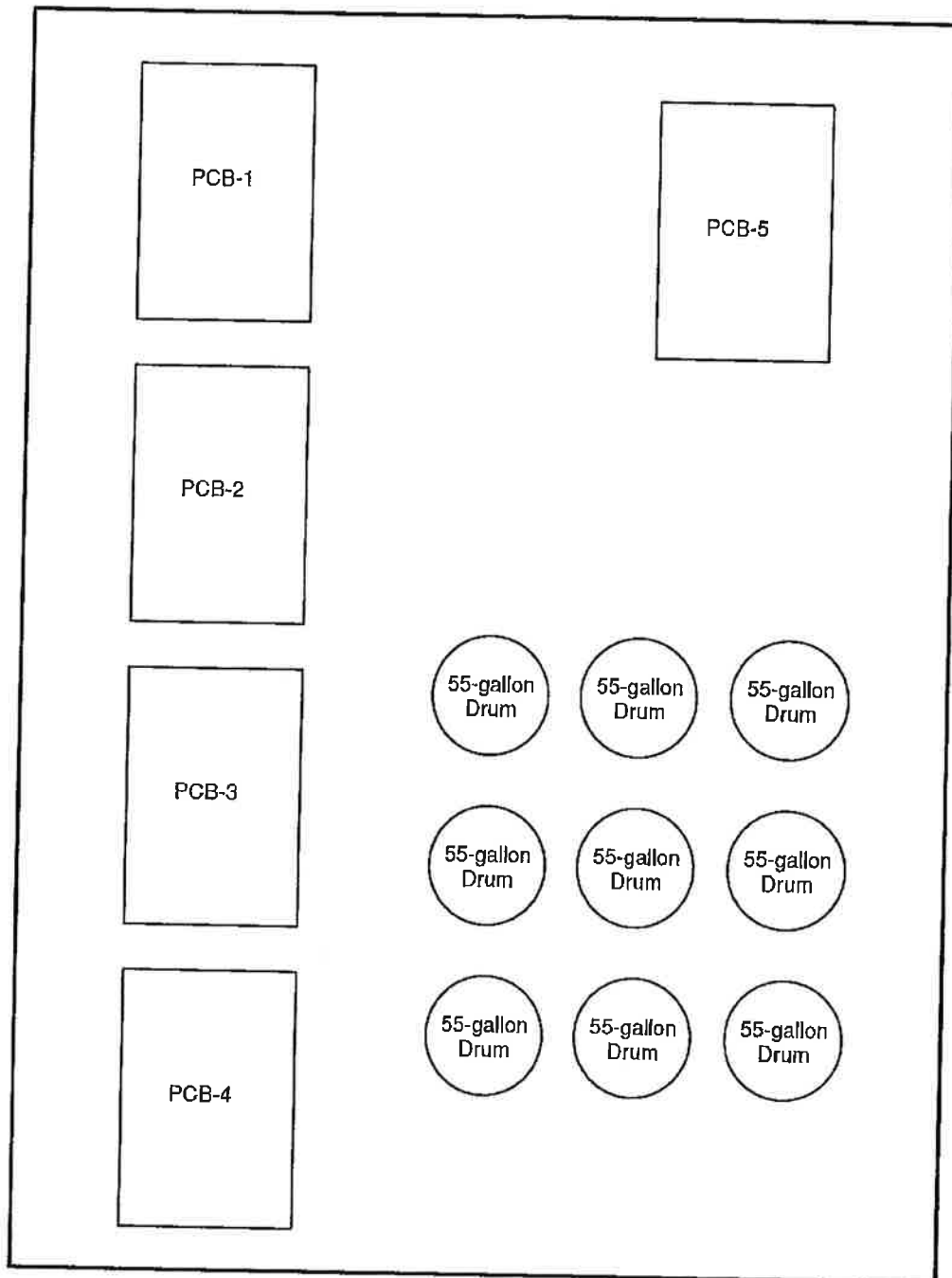


Florida Transformer, Inc.
De Funiak Springs, Florida
231210400



ANDALUSIA, ALABAMA
(334) 222-9431
ALBERTVILLE, ALABAMA
(256) 891-3458
BIRMINGHAM, ALABAMA
(205) 733-9431
DOTHAN, ALABAMA
(334) 677-9431

Figure 3A
FTI Bulk Storage Tank Layout
Not to Scale



Florida Transformer, Inc.
De Funiak Springs, Florida
231210400

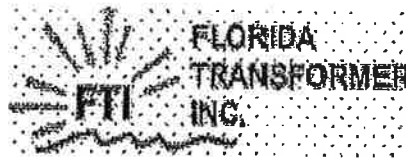


ANDALUSIA, ALABAMA
(334) 222-9431
ALBERTVILLE, ALABAMA
(256) 891-3458
BIRMINGHAM, ALABAMA
(205) 733-9431
DOTHAN, ALABAMA
(334) 677-9431

Figure 3B
FTI PCB Bulk Storage
Not to Scale

APPENDIX B

Spill Release Form



CHEMICAL RELEASE INCIDENT INVESTIGATION

1. NAME OF PERSON REPORTING RELEASE: _____
2. DATE AND TIME OF RELEASE: _____
3. TYPE OF CHEMICAL RELEASED (IF TRANSFORMER OIL PCB ppm VALUE):

4. LOCATION OF RELEASE: _____
5. DURATION OF THE RELEASE: _____
6. WHAT MEDIA WAS THE CHEMICAL RELEASED TO (LAND, WATER, AND/OR AIR)?

7. APPROXIMATE QUANTITY OF CHEMICAL RELEASED: _____
8. ANY INJURIES OR DAMAGE DUE TO RELEASE : _____

9. MEASURES TAKEN TO STOP RELEASE: _____

10. HOW DID RELEASE OCCUR: _____

11. COSTS INVOLVED IN CONTAINING AND CLEAN UP OF RELEASE (MATERIAL & LABOR)

12. CORRECTIVE ACTIONS TAKEN TO PREVENT REOCCURANCE: _____

IMMEDIATE SUPERVISOR SIGNATURE & DATE _____

PRODUCTION MANAGER SIGNATURE & DATE _____

FORWARD COMPLETED COPY TO ENVIRONMENTAL SUPERVISOR AND HUMAN
RESOURCES

APPENDIX C

Certification for Applicability of the Substantial Harm Criteria Checklist

Date _____

APPENDIX D

Facility and Tank Inspection Forms

Monthly Inspection Checklist

Instructions: Place a check mark in the appropriate column to indicate a yes/no response. Corrective Actions/Notes should be detailed in Notes section.

ABOVEGROUND STORAGE TANKS	NOTES	Leaks?		Corrosion?		Wear?		Other?	
		Y	N	Y	N	Y	N	Y	N
TANK FARM									
Tank A									
Tank B									
Tank C									
Tank D									
Tank E									
Tank F									
Tank G									
Tank H									
Tank I									
Tank U									
Tank T									
Tank PO-1									
Tank PO-2 (15000)									
INPROCESS									
Tank Q (Sludge)									
PCB-1									
PCB-2									
PCB-3									
PCB-4									
PCB-5									
THREE PHASE									
Tank K									
Tank L									
Tank M									
Tank R									
Tank S									
Tank V									
Tank W									
Tank X									
DECOM									
Tank N (Water Supply)									
Tank O									
Tank P									
SMRO									
SMRO-01									
SMRO-02									
EQUIPMENT									
Inprocess Piping									
Pole Area Piping									
3 Phase Area Piping									
Recloser Area Piping									
Regulator Area Piping									
Containment Walls									

Signature: _____

Inspection Date: _____

Record of Water Removal from Bulk Storage Area Dike

[illegible]

APPENDIX E

Employee Training Documentation

Employee Spill Prevention and Response Procedural Overview

Prevention

- Individual employees are responsible for monitoring the condition of routinely used equipment for excessive wear or conditions which may cause oil leakage. Problems should be reported to your immediate supervisor.
- Individual employees are expected to take reasonable precautions when using or handling oil to prevent spills from occurring.
- All oil pumping operations should be monitored continuously to prevent overfilling of the vessel being pumped into.
- Any oil which is spilled onto a sealed concrete floor will be immediately cleaned up using rags, oil absorbent granular material, or other methods.
- When moving oil-filled equipment, extreme precaution will be used to prevent spillage during transit. All applicable safe handling methods will be used to prevent the unit from being dropped or otherwise mishandled.
- The emergency spill cart contains materials allocated for an emergency spill. Do not borrow or remove items from this cart.

Response

- If you identify an oil spill taking place, immediately call for help.
- If you hear people calling for help with an oil spill, immediately stop your work, if possible, and respond to their call for assistance.
- When responding to an oil spill, focus first on locating and securing the source of the spill.
- After the source of a spill has been identified and stopped, turn your attention to containing the spilled oil in as small an area as possible.
- When the oil has been contained, begin cleaning up the oil using whatever means is available.
- After cleanup of a spill has been completed, thoroughly inspect the area to be sure no trace of oil or oily material remains.
- Return to your work area when released by the supervisor overseeing the cleanup operation.

By signing, I acknowledge that I have read and understood the above statements concerning oil spill prevention and response.

Signature

Date

Note: This form is completed at the time of hire and filed in the personnel folder located in the human resources department.

Form 4B

APPENDIX F

Secondary Containment Capacity Calculations

Existing Available Volume Calculations for Dike Containment Areas

Notes:

1) Volume occupied by drums based on a worst case storage volume of 123 drums.

Florida Transformer, Inc.
DeFuniak Springs, Florida
Containment Area Calculations

3) Tank G and PO-1 Containment Area						
Containment Area Dimensions (Total Capacity)						
Containment Area Dimensions	Length (ft)	Width (ft)	Avg. Depth (ft)	Volume (ft ³)	Volume (gal)	
	14.00	26.00	3.75	1365.00	10209.42	0.00
				1365.00		
Containment Area Available Capacity						
Structures within Containment Tank G and PO-1	Diameter (ft)	Area (sf)	Depth (ft)	No. of Tanks	Volume (ft ³)	Volume (gal)
	10	78.5	3.75	2	588.75	4403.52
Total	78.5				588.75	4403.52
3) Tank G Containment Area (Proposed)						
Total Volume of Containment Area Diesel Storage + Bulk Storage Area				4648.88		
Minus Volume of Structures Inside Containment Area				1431.72		
Total Available Volume (ft ³)				3,217.2	24062.49	
Total Available Volume (Gallons)				24,062		
Largest Storage Tank Capacity in Service				8,400		
Available Capacity Percentage ¹				286.46%		
Note:						
1) Revised containment capacity assumes common wall between Bulk Storage and Diesel Storage lowered to utilize larger containment area release overflow from Diesel and PO-1 storage containment.						
4) PCB Transformer Temporary Storage						
Containment Area Dimensions (Total Capacity)						
Containment Area Dimensions	Length (ft)	Width (ft)	Avg. Depth (ft)	Volume (ft ³)	Volume (gal)	
	42.00	14.00	0.50	294.00	2198.95	
				294.00		
Structures within Containment Transformers	Diameter (ft)	Area (sf)	Depth (ft)	No. of Tanks	Volume (ft ³)	Volume (gal)
	2.5	4.9	0.5	50	122.66	917.40
Total	4.9				122.66	917.40
Total Volume of Containment Area				294.00		
Minus Volume of Structures Inside Containment Area				122.66		
Total Available Volume (ft ³)				171.3	1281.55	
Total Available Volume (Gallons)				1,282		
Largest Storage Tank Capacity in Service				20		
Available Capacity Percentage				6407.77%		

Attachment C.7

Florida Transformer, Inc.

DEP Used Oil Processing Facility Permit

Mittauer & Associates, Inc. Project 1202-01-1

Contingency & Emergency Action Plan



**FLORIDA TRANSFORMER, INC.
CONTINGENCY &
EMERGENCY ACTION PLAN**

I. EMERGENCY PLAN COORDINATOR

NAME: **Meredith Allred**
TITLE: **HR / Safety Manager**
TELEPHONE NO: **(850) 892 –2711 x 39**
ADDRESS: **460 Dr. Roberts Drive, DeFuniak Springs, FL 32433**

II. PREFERRED MEANS OF REPORTING FIRES AND OTHER EMERGENCIES

Emergencies that could be encountered in the workplace include:

- Fire
- Explosion
- Tornado/Weather
- Bomb Threat
- Chemical Spill/Leak
- Violence
- Medical

All Florida Transformer, Inc. (FTI) emergencies will be reported by the appropriate manager or designee by dialing ext. 32, 11, or 39 and reporting to the Emergency Coordinator that there is a specific emergency. If necessary, as each specific event dictates, the Emergency Coordinator, or their designee will then contact the appropriate emergency service.

FTI Emergency Coordinators are:

Ron Shaw	General Manager	-ext. 11
	Cell # 850-830-8071	
	4604 St Hwy 2 W, DeFuniak Springs, FL 32433	
Meredith Allred	Human Resources Manager	-ext. 39
	Home # 850-797-0626	
	460 Dr. Roberts Drive, DeFuniak Springs, FL 32433	

These associates can be contacted for further information or explanation of duties.

Depending on the magnitude of the emergency, use of the Company Intercom (press *Intercom* *70) may be appropriate. Contact emergency services (dial 911) as needed.

III. ELEMENTS

A. Emergency Escape Procedures and Routes

Emergency escape procedures and route assignments have been posted in each work area, and all associates have been trained by supervision in the correct procedures to follow. New associates are trained when assigned to a work area. A sample escape procedure and escape route sheet of the type posted in work areas is given in Appendix A.

B. Procedure for Associates Who Remain to Operate Critical Operations Before They Evacuate

Appendix B describes operations, procedures and personnel required in order for critical operations to be performed before the assigned personnel evacuate during emergencies. A description of the special training provided is also included.

C. Associate Accountability Procedures After Evacuations

Each supervisor is responsible for accounting for all assigned associates, personally or through a designee, by having all such associates report to a predetermined designated rally point and conducting a head count. Each assigned associate must be accounted for by name. All supervisors are required to report their head count (by name) to the Emergency Evacuation Coordinator. A summary of the evacuation rally points, along with the identities of supervisors and assigned associates who must report to each, is listed in Section F – Training.

D. First Aid

FTI will ensure that there is an adequate number of first aid trained associates. See Appendix C for review.

E. Alarm System

The alarm system for notifying all associates in case of an emergency is:

- **Company Intercom (press *Intercom* *70)**

In some cases, Company Intercom use may not be permitted. When this happens, associates will be given verbal instructions by management or other authorized persons.

When so required by specific OSHA Standards, the organization will comply with OSHA Standard 1910.165, Associate Alarm Systems.

F. Training

The following personnel have been trained to assist in the safe and orderly emergency evacuation of other associates.

NAME	TITLE	WORK AREA	SPECIAL ASSIGNMENT
Billy Godwin	Lead Person	Pad Mount, LT, Welding	
Kenneth Evans	Lead Person	Pad Mount, LT, Welding	Alternate
Danny Shaw	Supervisor	Fabrication	
Derek Vaughan	Lead Person	Fabrication	Alternate
Ronald Edwards	Supervisor	Regulator, 3Ø Recloser, Panel	
Joe Ross	Panel Repair	Regulator, 3Ø Recloser, Panel	Alternate
Teresa Cook	Purchasing	Stock Room	
Nancy Cook	Stock Clerk	Stock Room	Alternate
Billy Burgess	Lead Person	Pole, Test	
Carson Anderson	Pole Repair	Pole, Test	Alternate
Larry Shepherd	Lead Person	Paint	
Bobbie Jean Shiver	Paint Room	Paint	Alternate
Dwane Burkett	Lead Person	Inprocessing	
Lessia Hardy	Inprocessing	Inprocessing	Alternate
Dean Penzo	Lab Manager	Lab	
Lisa Mathes	Lab Tech.	Lab	Alternate
Ronald Edwards	Maintenance Supervisor	Maintenance, Housekeeping	
Carl Holloway	Maintenance Tech.	Maintenance, Housekeeping	Alternate
Don Carroll	Transportation Supv.	Transportation	
Darryal Senn	Transportation	Transportation	Alternate
Jessup Nolin	Supervisor	Decommission	
Tony Kelley	Lead Person	Decommission	Alternate
Kenneth Evans	Lead Person	1Ø Recloser	
Jerry Wilson	Recloser Repair	1Ø Recloser	Alternate
Carle Collins	Supervisor	Upstairs Offices	
Marty Trant	Production	Upstairs Offices	Alternate
Alice Kaye Green	Office	Office/Admin	
Kathy Parker	Office	Office/Admin	Alternate
Tim Shiver	PCB Decommission	PCB Decommission	
Frankie Cook	PCB Decommission	PCB Decommission	Alternate

Training is provided for associates when:

1. The plan was initiated
2. Responsibilities change
3. New associates are hired or transferred

IV. EMERGENCY SHUTDOWN PROCEDURES

During some emergency situations, it will be necessary for some specifically assigned and properly trained associates to remain in work areas that are being evacuated long enough to perform critical operations. These assignments are necessary to ensure proper emergency control.

Assignments:

WORK AREA	NAME	TITLE	DESCRIPTION OF ASSIGNMENT
Decommission	Jessup Nolin	Lead Person	Turn Off Propane Supply at Tank
Decommission	Andy Hall (Alternate)	Supervisor	Turn Off Propane Supply at Tank
Oil Supply	Bobby Jones	Inprocessing	Turn Off Oil Pumps
Oil Supply	Dwane Burkett (Alternate)	Inprocessing	Turn Off Oil Pumps
Shop	Carl Holloway	Maintenance Tech.	Shop Power Supply
Shop	Charles Cordle (Alternate)	Maintenance Tech.	Shop Power Supply
PCB Decommission	Tim Shiver	PCB Decommission	Oven Power Supply (South Wall) Propane Emergency Shut-Off (East Wall)
PCB Decommission	Frankie Cook (Alternate)	PCB Decommission	Oven Power Supply (South Wall) Propane Emergency Shut-Off (East Wall)

V. SPECIAL TRAINING

The preceding individuals have received special instructions and training by their immediate supervisors to ensure their safety in carrying out the designated assignments. A training record describing the instructions provided and the detailed procedures to be followed is maintained in the Emergency Plan and Fire Protection Plan Coordinator's Office.

Emergency and Fire Protection Plan Coordinator: **Steve Holland**

Title: **HR / Safety Manager**

VI. ASSOCIATE ACCOUNTABILITY PROCEDURES FOLLOWING AN EMERGENCY EVACUATION

Each supervisor is responsible for accounting for each assigned associate following an emergency evacuation. The supervisor or designee will have a list of all associates working in the plant on that shift and will keep this in their possession in order to account for all associates by name.

VII. ASSOCIATE ACCOUNTABILITY

1. Rally points have been established for all evacuation routes and procedures. These points are designated on each posted work area escape route.
2. All work area supervisors and associates must report to their designated rally points immediately following an evacuation.
3. Each associate is responsible for reporting to his or her supervisor so that an accurate head count can be made. Supervisors will check off the names of all those reporting and will report those not checked off as missing to the Emergency Evacuation Coordinator.
4. The Emergency Evacuation Coordinator will be located at one of the following locations:
 - A. Primary Location: **Main Office**
 - B. Secondary Location: **Plant Manager Office**
5. The Emergency Coordinator will determine the method that will be utilized to locate missing associates. If there is the need to reenter the evacuated area, fire department and/or rescue squads will be used to locate missing associates.

VIII. SEVERE WEATHER

The Emergency Plan Coordinator or other authorized associate shall announce severe weather alerts (such as tornados) by plant intercom system. All associates shall immediately retreat to a **Designated Storm Area** until the threat of severe weather has passed, as communicated by the Emergency Plan Coordinator or his/her designee.

The **Designated Storm Areas** are:

1. The outside grit blast booth
2. The hallway in front of the stock room
3. Interior rooms and hallways inside the main office

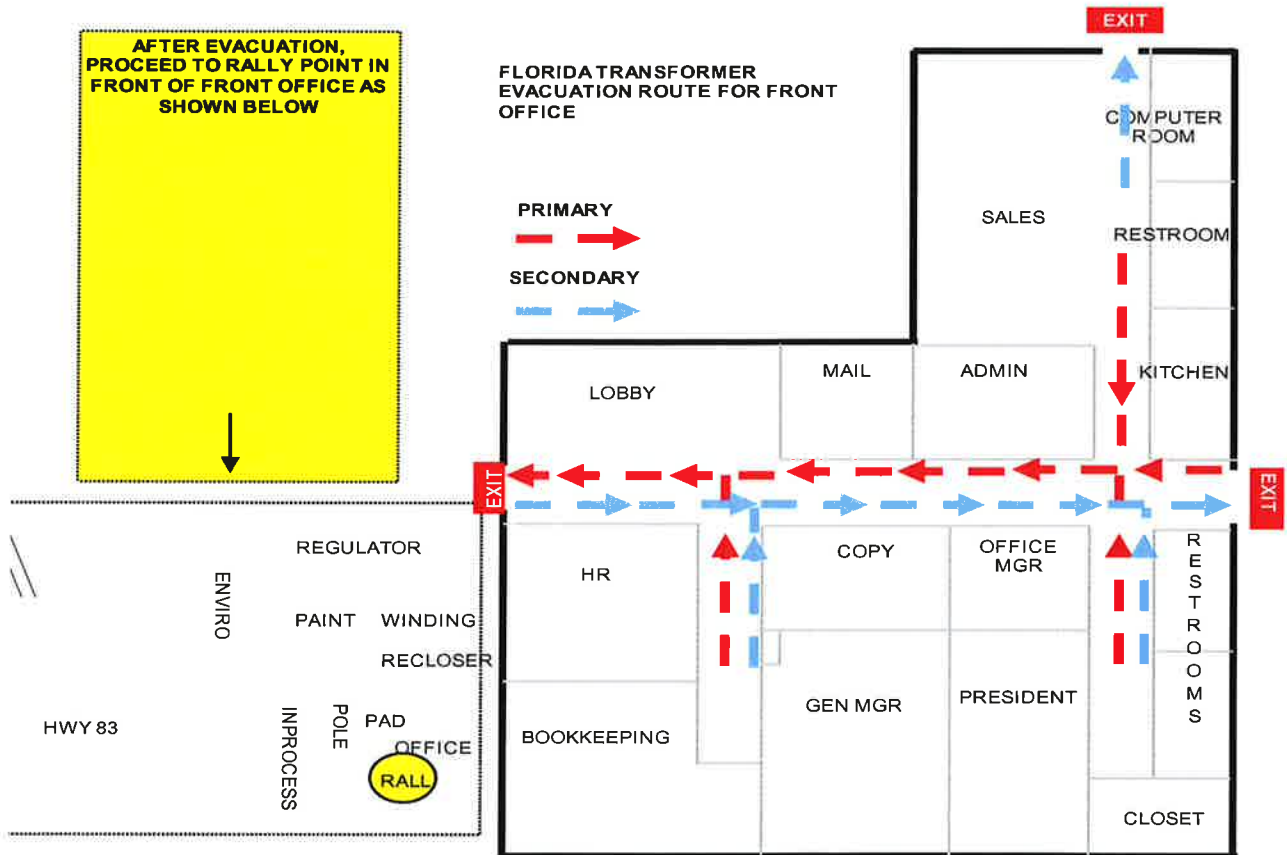
In the event that evacuation to a **Designated Storm Area** is not feasible, associates may need to shelter-in-place.

The following should be used as shelters of last resort:

1. Inprocessing office
2. Under a work desk or heavy table
3. The old paint room / new maintenance room
4. PCB room

APPENDIX "A"

- A sample escape procedure and escape route sheet of the type posted in work areas is as follows:
- The evacuation rally point is the grassy area directly in front of the main office.



APPENDIX “B”

Critical Operations

The following operation at Florida Transformer is considered to be of critical nature, and where possible, special procedures for evacuation should apply.

1. **Front Office:** Depending upon the severity and location of each emergency, it may be possible for the office associates to remain at their stations. Should it become necessary to evacuate the office, again where possible, two (2) office associates should remain in the area to assist with emergency communications (telephone). **When necessary, the associates will be instructed to evacuate their area immediately.** This instruction will typically come from their immediate supervisor, but in special circumstances, this instruction will come from the Emergency Coordinator.

APPENDIX “C”

Associates trained in first aid

1. Danny Shaw – Winding/Upstairs Office
2. Kenneth Evans – Recloser Repair
3. Ronald Edwards – Maintenance/Regulator
4. Anthony Mitchem – Field Decommission
5. Jessup Nolin – Decommission
6. Larry Shepherd – Paint
7. Dean Penzo – Lab
8. Carl Holloway – Maintenance
9. Billy Burgess – Pole/Upstairs Office
10. Dwane Burkett – Inprocessing

Associates trained in CPR & AED

1. Danny Shaw – Winding/Upstairs Office
2. Kenneth Evans – Recloser Repair
3. Ronald Edwards – Maintenance/Regulator
4. Anthony Mitchem – Field Decommission
5. Jessup Nolin – Decommission
6. Larry Shepherd – Paint
7. Dean Penzo – Lab
8. Carl Holloway – Maintenance
9. Billy Burgess – Pole/Upstairs Office
10. Dwane Burkett – Inprocessing

Attachment C.8

Florida Transformer, Inc.

DEP Used Oil Processing Facility Permit

Mittauer & Associates, Inc. Project 1202-01-1

Unit Management Plan



Unit Management Plan

This document shall serve as the unit management plan for the used oil processing at Florida Transformer, Inc. (FTI) for managing, maintaining and inspecting all tanks, containers, and miscellaneous equipment involved with the process.

Containers

FTI manages and maintains numerous 55-gallon drums onsite containing used oil with varying concentrations of polychlorinated biphenyl (PCB) within contained facility locations. The containers are properly labeled based upon the type of oil inside. These containers are cleaned regularly and will be recycled or scrapped at the end of their useful lives. Residuals are pumped out of the containers and into a storage tank and finally removed off the facility grounds from specific approved vendors.

Containers are inspected daily and inspections are recorded monthly to ensure aisle space is adequate, that the containers are properly labeled, and that they are not leaking and are suitable for handling its contents, and that they are located in a properly contained area.

Tanks and Related Equipment

All tanks, piping, valves and related equipment directly dealing with the used oil processing can be found on the Tank & Piping Diagram in Attachment B.3. All tanks are either carbon or stainless steel and are inspected routinely per the SPCC and inspection results are recorded and logged on a daily/weekly and monthly basis to ensure they are of sound condition. The Daily/Weekly and Monthly Inspection Checklist can be found at the end of this Attachment. All tanks are properly labeled according to their contents. Corrective actions are taken based on the inspection results, if necessary.

All piping is either ductile iron or galvanized steel with flanged connections for pumps, valves and equipment. All piping is above ground and is inspected regularly for any leaks, blockage or malfunctions.

Secondary containment is available for all the storage tanks except for PO-2, which is a double-walled tank. Containment calculations can be found in the Appendix F of the SPCC. The containment areas consist of a reinforced concrete slab floor with concrete-filled concrete block walls. The primary containment area is covered and is therefore protected from the elements. The primary containment area and the containment area for Tank G and Tank PO-1 can be pumped out if necessary via sump pump.

Planned Corrective Actions

Any identification of leaks, corrosion, wear or other damage to tanks, piping or containment is noted on the following Daily/Weekly and Monthly Inspection Checklist forms. The form is submitted monthly and filed as an integral part of FTI's SPCC.

General observations during inspections include verification that labels are correct and remain legible.

**** Containment Walls** refers to all secondary containment throughout the facility. Any notes made or deficiencies listed will be investigated by the Environmental Compliance Manager upon receipt of the Monthly Inspection Checklist unless the issue creates a nature of emergency upon which immediate action will be taken to address the situation.

FTI employs its own in-house maintenance crew which resolves most maintenance problems, including repair of piping or containment. To date, no large aboveground storage tank repairs have been necessary. If this need for repair arises, a licensed professional tank manufacturer will be summoned for recommendations on best management practices for repair or maintenance. Otherwise, small working tanks have been and will continue to be taken out of service and decommissioned if the condition of the tank becomes a liability.

The procedure for removal of accumulated precipitation from secondary containment is outlined in the SPCC. Accumulated stormwater is inspected visually for the presence of oil by observation of sheen/color. If oil is found, the water is containerized and disposed of properly. Otherwise the stormwater is released according to FTI's Stormwater Management Plan.

Daily/Weekly Tank Farm Inspection Checklist

Instructions: The inspection of all tanks, piping and ancillary equipment involved in Used Oil Processing Activities must be completed daily. Place a check mark in the appropriate column to indicate a satisfactory/unsatisfactory condition. Any unsatisfactory conditions should be detailed in Notes section.

W/E ____ / ____ / ____

	Mon ____		Tues ____		Wed ____		Thurs ____		Fri ____	
	S	U	S	U	S	U	S	U	S	U
TANK FARM										
Tank A										
Tank B										
Tank C										
Tank D										
Tank E										
Tank F										
Tank G										
Tank H										
Tank I										
Tank U										
Tank T										
Tank PO-1										
Tank PO-2 (15000)										
INPROCESS										
Tank Q (Sludge)										
PCB-1										
PCB-2										
PCB-3										
PCB-4										
PCB-5										
Containment Wall										

Satisfactory - indicates tank conditions are acceptable for ending shift. There are no leaks, drips, spills evident from the tank or connected piping. There is no evidence that the tank or ancillary piping may cause a release after normal operation hours.

Unsatisfactory - indicates tank conditions are not acceptable for ending shift. There is presence of leaks, drips, spills evident from the tank or connected piping. There is reason to suspect the tank or ancillary piping may cause a release after normal operation hours.

Notes -

Signature: _____ Date: _____

Monthly Inspection Checklist

Instructions: Place a check mark in the appropriate column to indicate a yes/no response. General observations during inspection should also include labeling is legible and correct.

Corrective Actions/Notes should be detailed in Notes section.

ABOVEGROUND STORAGE TANKS	NOTES	Leaks?		Corrosion?		Wear?		Other?	
		Y	N	Y	N	Y	N	Y	N
TANK FARM									
Tank A									
Tank B									
Tank C									
Tank D									
Tank E									
Tank F									
Tank G									
Tank H									
Tank I									
Tank U									
Tank T									
Tank PO-1									
Tank PO-2 (15000)									
INPROCESS									
Tank Q (Sludge)									
PCB-1									
PCB-2									
PCB-3									
PCB-4									
PCB-5									
THREE PHASE									
Tank K									
Tank L									
Tank M									
Tank R									
Tank S									
Tank V									
Tank W									
Tank X									
DECOM									
Tank N (Water Supply)									
Tank O									
Tank P									
SMRO									
SMRO-01									
SMRO-02									
EQUIPMENT									
Inprocess Piping									
Pole Area Piping									
3 Phase Area Piping									
Recloser Area Piping									
Regulator Area Piping									
Containment Walls**									

Signature: _____

Inspection Date: _____

Attachment C.9

Florida Transformer, Inc.

DEP Used Oil Processing Facility Permit

Mittauer & Associates, Inc. Project 1202-01-1

Facility Closure Plan



Used Oil Processing Facility Closure Plan

**FLORIDA TRANSFORMER, INC.
4509 STATE HIGHWAY 83 NORTH
DEFUNIAK SPRINGS, FLORIDA 32433**

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1.0 Florida Transformer: Introduction

This facility closure plan applies to the Used Oil Processing activities conducted at Florida Transformer, Inc., (FTI) 4509 Highway 83 North, DeFuniak Springs, Florida 32433. There is no intent for closure of these facilities at this time. This closure plan is applicable to the Used Oil Processing equipment for the Polychlorinated Biphenyl (PCB) removal in mineral oil up to 1,500 ppm PCB. This Closure Plan is applicable to the requirements listed in 40 CFR Part 279.54(h) and FAC 62-710.800(5).

This Closure Plan and the associated financial assurance for closure is prepared in accordance with the requirements of 40 CFR Part 279.54(h) – Used Oil Management; Closure, FAC 62-710.800(5) – Permits for Used Oil Processing Facilities; Closure.

The Closure Plan is applicable to testing, decontamination and disposal of the treatment process and equipment and all associated byproduct or waste. The majority of the work at the time of closure will be performed using FTI personnel under the supervision of a third-party consultant. The items associated with this Closure Plan and Closure Cost Estimate include all waste items and materials associated with the clean up and closure of the process equipment and associated tanks, piping and ancillary equipment. This Closure Plan addresses the shipment offsite for treatment/disposal of waste items and materials as well as decontamination of the process area and equipment.

2.0 Facility Contact Information/Responsible Personnel

Florida Transformer, Inc.

Physical Address: 4509 State Highway 83 North, DeFuniak Springs, FL 32433

Mailing Address: PO Box 507, DeFuniak Springs, FL 32435

EPA/RCRA Identification Number FLR 000 168 203

Jessica Pennington
Telephone

FTI Environmental Compliance Manager
850-892-2711
850-951-3086

Address
Email

629 Beck Bridge Road, Westville, FL 32464
jessica@floridatransformer.com

Ron Shaw
Telephone

FTI General Manager
850-892-2711
850-830-8071

Address
Email

4604 St Hwy 2 W, DeFuniak Springs, FL 32433
ron@floridatransformer.com

3.0 Facility Description

FTI's core business is the service, repair and decommission of power distribution equipment. As part of the services FTI provides, paint is purchased and stored at the facility to complete the painting process following repair. Materials and metals from the decommissioning of electrical equipment are segregated and recycled or stored for disposal. The paint, repair and decommission processes involve accumulation of solid waste materials and spent solvents for disposal. All disposals are carried out via long term contracts with EPA approved disposal facilities.

Used (2-1,500 ppm PCB) oil is processed to Non-Detect levels of PCB (<2 ppm) by means of dechlorination using the PCB-1000 processing unit. The PCB-1000 is a manufactured system using sodium dispersion to break down chlorine found in the PCB compound resulting in Non-PCB oil. The PCB-1000 is a mobile unit and may also be used offsite at FTI customer property. The PCB-1000 is placed in-line with oil transfer and processes approximately 265 gallons per batch. Associated storage may consist of byproduct storage to be disposed of. All material waiting to be processed or finished processed material is stored in bulk aboveground storage tanks.

4.0 List of Equipment to be Cleaned

This Closure Plan is for the cleaning and closure of the three (3) 8,225-8,400 gallon vertical aboveground used oil storage tanks (<50 ppm PCB), one (1) 15,000 gallon horizontal aboveground processed used oil storage tank (<2 ppm PCB), temporary storage containers, secondary containment system, the PCB-1000 oil dechlorination unit, associated areas and ancillary equipment used for or involved in the transfer and processing of used oil at the FTI facility.

The aboveground storage tanks are made of carbon steel with epoxy coating. The piping is mostly galvanized steel with some flexible hose piping systems. There may be 55-gallon metal drums used for solid waste storage for disposal. The containment system is made of concrete block and mortar.

The PCB-1000 unit is comprised of metal tanks, containers and associated piping all housed in a 41' long container trailer.

5.0 Notification of Closure

At least 60 days before initiation of closure activities, FTI will notify the Florida Department of Environmental Protection (DEP) and the United States Environmental Protection Agency (EPA), Region IV, Air, Pesticides, and Toxics, Management Division that FTI will begin closure activities on a date specified in the notice.

FTI intends to complete closure within 90 days of the notification. FTI will submit a Certification of Closure within 30 days following completion of closure activities.

6.0 Decontamination Procedures

All decontamination procedures will be completed in such a fashion that all equipment, tanks and piping may be reused at a later date or offered for recycling. It will be the goal of this Closure Plan to complete sufficient decontamination in an effort to reduce waste or decommission of usable, resourceful equipment.

At the determined time that clean up and closure must be initiated, the Environmental Manager will ensure all processing activities are stopped immediately and the processing equipment is placed out of service. The Environmental Manager will begin clean-up procedures by assessing inventory of used oil at the facility to be processed. Arrangements will be made for pickup of the used oil without processing by approved vendors for the transfer of the material to EPA-approved processing facilities for recycling. All processed material at the time of closure will be transferred to the appropriate vendor so that all aboveground storage tanks will be empty for commencement of closure activities. All byproduct and solid waste for disposal generated from processing activities will be analyzed for proper characterization and arranged for pick up by the appropriate disposal facility. All tanks will be rendered free of pollutant vapors, if any should exist, at time of closure.

The Closure Cost Estimate found in Attachment D is based on maximum amounts for any given expenditure. For example, initial disposal and removal of material for closure will be calculated as if all four (4) used oil tanks are completely full of material to be emptied. Other items will include the disposal of sludge byproduct removed from the equipment during processing (i.e. a maximum of the 560 gallon sludge holding tank). These items are detailed in Attachment D.

6.1 Tanks

FTI routinely has the facility's used oil storage tanks cleaned by an approved company for the transportation and treatment of non-hazardous wastewater and used oil. Cleaning is completed by a wash/rinse method using Alkaline Detergent Cleaner. If available, FTI will employ the same approved company to complete the cleaning of residual oil from all storage tanks used for processed and material to be processed. If the same company is not available, only an EPA-recognized and approved company will be sought out for tank cleaning purposes. All tank cleanup shall be performed as described in Chapters 62-762.801 and 62-770, Florida Administrative Code.

Note that only the two (2) used oil storage tanks (Tank C & T) will be cleaned initially. The processed material storage tanks, Tanks PO-1 & PO-2, will first be sampled to determine the quality of the processed oil for reuse purposes prior to closure.

6.2 Piping

Piping will be flushed with an aqueous-based surfactant until there is no visible resemblance of oily product flowing from the pipes. All integral piping will be removed and manways will be secured to prevent access.

6.3 PCB-1000

All tanks, containers, pumps, piping, fittings and hoses will be purged with mineral oil <2 ppm PCB to ensure the solvency of any PCB containing oil left in the lines of the system prior to the sodium introduction phase. Initial purging of the system will be completed by processing a normal batch of material (265 gallons).

6.4 Concrete Containment

All concrete containment areas will be triple washed/rinsed with an aqueous-based solution to remove any oil residue.

7.0 Justification Sampling

7.1 Tanks

A wipe test using the following procedures will be done on the interior walls of the tanks to ensure decontamination was successful. (Note: only associates with Confined Space Entry Training may enter tanks to complete sampling). A gauze pad moistened with 10 ml of N-Hexane solvent will be applied to a surface 100 cm². The samples will be properly packaged and sent to a contracted lab for characterization analysis to confirm there are no hazardous constituents present in the sample taken from the tanks. The diameter of the four (4) tanks requiring sampling is 10 ft. The floor of the tank will be divided into four (4) equal parts. A wipe sample will be taken from the wall, floor and ceiling of each section. There will be twelve (12) wipe samples taken from each tank to confirm decontamination for reuse at a later date.

7.2 Piping

The effluent from the cleaning of the piping after flushing will be the origin of sample for confirmation of decontamination of all piping. The aqueous-based surfactant used to flush pipes will be containerized and the proper amount of sample based on the amount retrieved will be sent to a contract lab for characterization analysis to confirm no hazardous constituents are present in the rinsate ready to be disposed or in the piping so that it may be made available for recycling.

7.3 PCB-1000

The effluent from the cleaning of the equipment after purging will be the origin of sample for confirmation of decontamination of processing equipment and ancillary piping, containers, pumps, etc. The purged oil used for solvent will be containerized and the proper amount of sample based on the amount retrieved will be sent to a contract lab for characterization analysis to confirm no hazardous constituents are present in the material ready to be disposed or in the processing equipment so that it may be offered to the manufacturer for reuse or decommissioned into recyclable parts.

7.4 Concrete Containment

The concrete containment is finished with an epoxy coating and therefore the same sampling plan and design will be used that is in place for sampling the “low-risk” areas listed in the facility’s PCB Commercial Storage Permit Approval Closure Plan. The Tank & Piping Diagram located in Attachment B.3 depicts the sampling area for the process area and tank farm where all material prior to being processed and after being processed is stored. No wipe sample shall be representative of more than 300 square feet. Wipe samples will be submitted to a contracted lab for characterization analysis to ensure no hazardous constituents remain on the surface of the containment area.

If concrete wipe samples are found to be contaminated, chip sampling will be initiated to verify the extent of contamination. Concrete chip samples will be collected by chiseling the top one (1) inch of a 10 cm x 10 cm area. The same sampling scheme will be followed for collecting concrete media as is listed for the retrieval of containment area wipe samples.

If sampling results in evident contamination, decontamination may consist of tank removal and the physical extraction of a minimum 0.25” of concrete using abrasive blasting, grinding or planing. Appropriate personal protective equipment will be utilized (respirators, safety glasses, gloves, etc.) and tarps, tents or other means of cover will be used to minimize particulate release into the air.

8.0 Decontamination Wastes

Waste generated from decontamination procedures may include rinsate (aqueous or hydrocarbon-based solvents), mineral oil, residues, concrete media, soil, rags, absorbent material, personal protective clothing and equipment. All media will be segregated by type and characterization analysis will be performed to determine if the material will be shipped offsite to an approved hazardous waste facility or non hazardous waste handler.

9.0 Groundwater Sampling

Should analysis results of concrete media be found to be contaminated, groundwater sampling will be initiated. A contracted group capable of retrieving groundwater samples via Geoprobe (or similar method) will be sought out to perform this work. A minimum of eight (8) samples will be taken. These consist of two (2) samples under the Inprocessing area where oil filled electrical equipment is stored, two (2) samples under the tank farm where the bulk of used oil processing and other material processed is stored, two (2) samples under the concrete pad which drains to the South Stormwater Retention Pond and two (2) samples of the pond itself. Should groundwater samples be found to be contaminated, appropriate environmental regulatory agency personnel will be contacted for further instruction on the necessary action to be implemented. FTI is not a hazardous waste treatment, storage or disposal facility and follows procedures to ensure hazardous waste is not received or processed at the facility. Therefore, there is a limited possibility that FTI would be required to initiate post-closure activities.

10.0 Closure Cost Estimate

The FDEP Form No. 62-710.901(7) “Used Oil Processing Facility Closing Cost Estimate Form”, the FTI Closure Cost Estimate Summary and the accompanying Financial Assurance Document (Letter of Credit) can be located within Attachment D.

Attachment C.10

Florida Transformer, Inc.

DEP Used Oil Processing Facility Permit

Mittauer & Associates, Inc. Project 1202-01-1

Employee Training Plan



FTI Used Oil Processing Facility Employee Training Program

Training applicable to Used Oil Processing activities at the facility and on customer property consists of:

- Facility Spill Prevention Control and Countermeasure Plan
 - 40 CFR Part 112
 - Overview of SPCC plan and its purpose
 - Operation and maintenance of equipment to prevent petroleum discharge
 - Applicable pollution control laws, rules and regulations
 - Fluid level monitoring in tanks
 - Material delivery monitoring/observations
 - Inspection/recordkeeping requirements
 - Spill Response Procedures
- Hazard Communication
 - Hazardous Materials Identification System
 - Scope, purpose and utilization
- Container Labeling
 - 40 CFR Part 279 – Standards for the Management of Used Oil
 - Storage, condition, labeling and response to Release of Material stored in containers
 - FTI specific storage locations for empty, used and new storage containers
- Emergency Preparedness and Contingency Plan
 - FTI Emergency Action Plan
 - Scope, purpose and utilization
- USDOT Hazardous Materials Handling and Transportation
 - 49 CFR Part 172
 - General awareness/familiarization training
 - Function-specific training
 - Safety training
 - Security awareness training
- PCB Handling
 - Training provided in conjunction with function-specific Hazardous Materials Training as listed above

- PCB-1000 Operating Procedures Redragon Training
 - Standard Operating Procedure and Hands-On Training initially provided by PCB-1000 Manufacturer to managers, supervisors, and administrators
 - Subsequent training provided to additional associates based on initial training received from manufacturer

These training presentations are documented and signed by each employee to verify attendance and participation in training.

Documentation of training is kept in each employee file and a description of the training provided.

Attachment D

Florida Transformer, Inc.

DEP Used Oil Processing Facility Permit

Mittauer & Associates, Inc. Project 1202-01-1

Closing Cost Estimate Form

Florida Transformer, Inc.
Closure Cost Estimate Summary

**Closure Cost Estimates And List of Activities Based on Florida Transformer, Inc. Used Oil
Processing Facility Closure Plan**

Description/Activity	Quantity	Unit	Unit Cost*	Total
Disposal of Oily Waste / Byproduct Inventory Prior to Clean Up				
1 Sludge				
a Disposal	560	Gallons	\$0.95	\$532.00
b Transportation	140	Miles	\$1.00	\$140.00
2 Solid Waste (Fuller's Earth, Absorbent Material, PCB-1000 filters)				
a Disposal	0.25	Tons	\$28.00	\$7.00
b Transportation	140	Miles	\$1.00	\$140.00
Clean Up Activities/Disposal				
1 Tank Cleaning (4 Tanks, 8 hrs/tank)				
a Crew and Vac Truck	32	Hours	\$195.00	\$6,240.00
b Material Costs	4	Tanks	\$480.00	\$1,920.00
2 Pipe Flush	110	Gallons	\$0.50	\$55.00
3 Containment Wash	110	Gallons	\$0.50	\$55.00
4 Decontamination Solid Waste Disposal (rags, absorbent, PPE)				
a Disposal	0.25	Tons	\$28.00	\$7.00
b Transportation	140	Miles	\$1.00	\$140.00
5 Residuals/Sludge from Decontamination				
a Disposal	560	Gallons	\$0.95	\$532.00
b Transportation	140	Miles	\$1.00	\$140.00
Sampling and Analysis				
1 Tank Wipe Samples				
a PCB	48	Each	\$35.00	\$1,680.00
b Halogen	48	Each	\$96.00	\$4,608.00
2 Pipe Flush Samples				
a PCB	2	Each	\$60.00	\$120.00
b Halogen	2	Each	\$96.00	\$192.00
3 Containment Wash Samples				
a PCB	2	Each	\$60.00	\$120.00
b Halogen	2	Each	\$96.00	\$192.00
4 Concrete Wipe Samples				
a PCB	7	Each	\$35.00	\$245.00
b Halogen	7	Each	\$96.00	\$672.00
5 Soil Samples	8	Each	\$350.00	\$2,800.00

SUBTOTAL	\$20,537.00
Supervision and Administration (20%)	\$4,107.40
SUBTOTAL with Supervision/Admin	\$24,644.40
Contingency (10%)	\$2,464.44
TOTAL CLOSING COST	\$27,108.84

* - All unit costs listed are from Third Party Estimates

Attachment E

*Florida Transformer, Inc.
DEP Used Oil Processing Facility Permit
Mittauer & Associates, Inc. Project 1202-01-1*

Supporting Documents

Daily/Weekly Tank Farm Inspection Checklist

Instructions: The inspection of all tanks, piping and ancillary equipment involved in Used Oil Processing Activities must be completed daily. Place a check mark in the appropriate column to indicate a satisfactory/unsatisfactory condition. Any unsatisfactory conditions should be detailed in Notes section.

W/E ____/____/____

	Mon S U	Tues S U	Wed S U	Thurs S U	Fri S U
TANK FARM					
Tank A					
Tank B					
Tank C					
Tank D					
Tank E					
Tank F					
Tank G					
Tank H					
Tank I					
Tank U					
Tank T					
Tank PO-1					
Tank PO-2 (15000)					
INPROCESS					
Tank Q (Sludge)					
PCB-1					
PCB-2					
PCB-3					
PCB-4					
PCB-5					
Containment Wall					

Satisfactory - indicates tank conditions are acceptable for ending shift. There are no leaks, drips, spills evident from the tank or connected piping. There is no evidence that the tank or ancillary piping may cause a release after normal operation hours.

Unsatisfactory - indicates tank conditions are not acceptable for ending shift. There is presence of leaks, drips, spills evident from the tank or connected piping. There is reason to suspect the tank or ancillary piping may cause a release after normal operation hours.

Notes -

Signature: _____ Date: _____

048100

**NON-HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

A1000085942148100

Manifest
Document No.2. Page 1
of

Job # M1417

3. Generator's Name and Mailing Address

4. Generator's Phone ()

Florida Transformer

5. Transporter 1 Company Name

ZWS 522 A10000859421

6. US EPA ID Number

A. Transporter's Phone

694-7500

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter's Phone

9. Designated Facility Name and Site Address

IWS, INC.
1980 AVENUE A
MOBILE, AL 36615

10. US EPA ID Number

A.L.O.O.O.O.8.5.9.4.2.1

C. Facility's Phone

(251) 694-7500

11. Waste Shipping Name and Description

12. Containers

No.

Type

13. Total
Quantity14. Unit
Wt/Vol

a.

Oil Waste Water (From Drums)

522

VT

1400

gal

b.

c.

d.

D. Additional Descriptions for Materials Listed Above

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name

Daniel K. Shaw

Signature

Daniel K. Shaw

Month Day Year

12 12 01

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Bryan Stanley

Signature

Bryan Stanley

Month Day Year

12 12 01

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in item 19.

Printed/Typed Name

IWS Inc.
Devin Reed

Signature

Devin Reed

Month Day Year

12 12 01

ORIGINAL - RETURN TO GENERATOR

048045

NON-HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

A100000859421

Manifest
Document No.

48045

2. Page 1

of 2

Job # M1417

3. Generator's Name and Mailing Address

IWS Job #
64651

4. Generator's Phone:

Florida Transformer, Inc

5. Transporter 1 Company Name

IWS 416

6. US EPA ID Number

A100000859421

A. Transporter's Phone

694-7500

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter's Phone

9. Designated Facility Name and Site Address

IWS, INC.
1980 AVENUE A
MOBILE, AL 36615

10. US EPA ID Number

A.L.O.O.O.O.8.5.9.4.2.1

C. Facility's Phone

(251) 694-7500

11. Waste Shipping Name and Description

12. Containers

No. Type

13. Total
Quantity14. Unit
Wt/Vol

a. Tank Oil Tank Tank (CCB)

11.8 VT 2,500 gal

b.

c.

d.

D. Additional Descriptions for Materials Listed Above

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name

M. Duane Burkett

Signature

M Duane Burkett

Month Day Year

17 12 07

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Bryan Stanley

Signature

Bryan Stanley

Month Day Year

17 12 07

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Devina Reed

Signature

Devina Reed

Month Day Year

10/12/07

GENERATOR

TRANSPORTER

FACILITY

TRANSPORTER #1

047826

**NON-HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

A10000859.421

Manifest
Document No.

47826

2. Page

of

3 of 2 Job # M1417

3. Generator's Name and Mailing Address

1

4. Generator's Phone ()

Florida Transformer Inc

5. Transporter 1 Company Name

IWS 416

6. US EPA ID Number

A10000859.421

A. Transporter's Phone

694-7500

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter's Phone

9. Designated Facility Name and Site Address

IWS, INC.
1980 AVENUE A
MOBILE, AL 36615

10. US EPA ID Number

A.L.O.O.O.O.8.5.9.4.2.1

C. Facility's Phone

(251) 694-7500

11. Waste Shipping Name and Description

12. Containers

No. Type

13. Total

Quantity

14. Unit

Wt/Vol

a.

Drums (water)

118 VT

80.0

gc

b.

c.

d.

D. Additional Descriptions for Materials Listed Above

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name

Daniel K. Shaw

Signature

Daniel K. Shaw

Month Day Year

17 12 07

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Dylan Stanley

Signature

Dylan Stanley

Month Day Year

17 12 07

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Devin Reed

Signature

Devin Reed

Month Day Year

10 7 12 07

TRANSPORTER #1

les work order # 106354
251-694-7500 No 56307

NON-HAZARDOUS
WASTE MANIFEST

1. Generator ID Number

2. Page 1 of

3. Emergency Response Phone

4. Waste Tracking Number

5. Generator's Name and Mailing Address

Generator's Site Address (if different than mailing address)

Generator's Phone: Florida Transformer, Inc. Defunak Springs FL

M-2274

6. Transporter 1 Company Name

LES

U.S. EPA ID Number

AL0000859421

7. Transporter 2 Company Name

U.S. EPA ID Number

8. Designated Facility Name and Site Address

LIQUID ENVIRONMENTAL SOLUTIONS
1980 AVE. "A" - MOBILE, ALABAMA 36615

U.S. EPA ID Number

AL0000859421

Facility's Phone: (251) 694-7500

9. Waste Shipping Name and Description

10. Containers

11. Total
Quantity

12. Unit
WL/Vol.

1.

Non Dst Reg Oil/water waste

523

1/4

1200

G

2.

3.

4.

13. Special Handling Instructions and Additional Information

556 Drums 880 B 16
wash water 320

14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offoror's Printed/Typed Name

Signature

Bobby Jones

Bobby Jones

Month Day Year
11 23 10

15. International Shipments

☒ Import to U.S.

☐ Export from U.S.

Port of entry/exit:

Date leaving U.S.:

Transporter Signature (for exports only):

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name

Signature

Demethis Adams

Demethis Adams

Month Day Year
11 23 10

Transporter 2 Printed/Typed Name

Signature

Month Day Year

17. Discrepancy

17a. Discrepancy Indication Space

☐ Quantity

☐ Type

☐ Residue

☐ Partial Rejection

☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator)

U.S. EPA ID Number

Facility's Phone:

17c. Signature of Alternate Facility (or Generator)

Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name

Signature

Lickety Robinson

LES mobile ad

Month Day Year

11 23 10

276122 776128

776125 776121

LES WORK ORDER 106999

NON-HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of 1	3. Emergency Response Phone 251-694-7500	4. Waste Tracking Number No 56372
5. Generator's Name and Mailing Address Florida Transformer			Generator's Site Address (if different than mailing address) M-2274 T		
6. Generator's Phone:			U.S. EPA ID Number AL0000859421		
7. Transporter 1 Company Name L.E.S. TRUCK # 204			U.S. EPA ID Number		
7. Transporter 2 Company Name			U.S. EPA ID Number		
8. Designated Facility Name and Site Address LIQUID ENVIRONMENTAL SOLUTIONS 1980 AVE. "A" - MOBILE, ALABAMA 36615 (251) 694-7500			U.S. EPA ID Number AL0000859421		
Facility's Phone:					
9. Waste Shipping Name and Description			10. Containers		11. Total Quantity
			No.	Type	
1. NON-POY Reg Waste Oil			204	B T	210
2.					6
3.					
4.					
13. Special Handling Instructions and Additional Information waste oil in 22 55 gallon drums					
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.					
Generator's/Officer's Printed/Typed Name M. Duane Burkett			Signature <i>M. Duane Burkett</i>		Month Day Year 11 23 10
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.			Port of entry/exit: Date leaving U.S.:		
Transporter Signature (for exports only):					
16. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name Ronny W. RAWO			Signature <i>Ronny W. RAWO</i>		Month Day Year 11 23 10
Transporter 2 Printed/Typed Name			Signature		Month Day Year
17. Discrepancy					
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
17b. Alternate Facility (or Generator)			Manifest Reference Number: U.S. EPA ID Number		
Facility's Phone:					
17c. Signature of Alternate Facility (or Generator)			Month Day Year		
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a					
Printed/Typed Name LES MOBILE, AT MIKE MAHOCK			Signature <i>Mike Mahock</i>		Month Day Year 12 13 10

776124

776123

LES WORK ORDER # 124996

NON-HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of 1	3. Emergency Response Phone OPS 694-7500	4. Waste Tracking Number 63155
5. Generator's Name and Mailing Address Generator's Site Address (if different than mailing address)					
Generator's Phone: Florida Trans Envr					
6. Transporter 1 Company Name LES					
7. Transporter 2 Company Name					
8. Designated Facility Name and Site Address LIQUID ENVIRONMENTAL SOLUTIONS 1980 AVE. "A" - MOBILE, ALABAMA 36615 Facility's Phone: (251) 694-7500					
U.S. EPA ID Number AL0000859421					
9. Waste Shipping Name and Description		10. Containers		11. Total Quantity	12. Unit Wt/Vol.
		No.	Type		
1. Non-Hal Reg. waste		503	YT	6	
2. Non-Hal Reg. waste				110	6
3. Non-Hal Reg. waste				870	60K
4.					
13. Special Handling Instructions and Additional Information					
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.					
Generator's/Officer's Printed/Typed Name		Signature		Month	Day Year
15. International Shipments		<input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:	
16. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name		Signature		Month	Day Year
Transporter 2 Printed/Typed Name		Signature		Month	Day Year
17. Discrepancy					
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
17b. Alternate Facility (or Generator)					
U.S. EPA ID Number					
Facility's Phone:					
17c. Signature of Alternate Facility (or Generator)					
Month Day Year					
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a					
Printed/Typed Name		Signature		Month	Day Year
LES MOBILE, AL MIKE MAHON		Mike Mahon		3	8 12

LES Work Order # 128496

NON-HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone (511) 694-7500	4. Waste Tracking Number 63622
5. Generator's Name and Mailing Address Generator's Site Address (if different than mailing address)					
Generator's Phone: Florida TRANSFormer M-2531					
6. Transporter 1 Company Name LES				U.S. EPA ID Number AL0000859421	
7. Transporter 2 Company Name				U.S. EPA ID Number	
8. Designated Facility Name and Site Address LIQUID ENVIRONMENTAL SOLUTIONS 1980 AVE. "A" - MOBILE, ALABAMA 36615				U.S. EPA ID Number AL0000859421	
Facility's Phone: (251) 694-7500					
9. Waste Shipping Name and Description			10. Containers		11. Total Quantity
			No.	Type	
1. Non Dot Reg waste oil, water			503	VT	750 G
2. 4 Drum of oil					220 G
3.					
4.					
13. Special Handling Instructions and Additional Information					
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.					
Generator's/Officer's Printed/Typed Name Daniel K. Shaw				Signature <i>[Signature]</i>	Month Day Year 05 29 12
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:					
Transporter Signature (for exports only):					
16. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name Phillips, Thomas				Signature <i>[Signature]</i>	Month Day Year 05 29 12
Transporter 2 Printed/Typed Name				Signature	Month Day Year
17. Discrepancy					
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
Manifest Reference Number:					
17b. Alternate Facility (or Generator)				U.S. EPA ID Number	
Facility's Phone:					
17c. Signature of Alternate Facility (or Generator)				Month Day Year	
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a					
Printed/Typed Name Michael Curtis				Signature <i>[Signature]</i>	Month Day Year 05 27 12



Florida Department of Environmental Protection
Twin Towers Office Bldg. 2600 Blair Stone Road. Tallahassee, Florida 32399-2400

Division of Waste Management
Bureau of Petroleum Storage Systems

Storage Tank Facility Annual Compliance Site Inspection Report

Facility Information:

Facility ID: 8945253 County: WALTON Inspection Date: 03/24/2011
Facility Type: C -Fuel user/Non-retail
Facility Name: FL TRANSFORMER INC # Of Inspected ASTs: 7
4509 HWY 83 N USTs: 0
DEFUNIAK SPRINGS, FL 32433 Mineral Acid Tanks: 0
Latitude: 30° 47' 10.0"
Longitude: 86° 7' 18.0"
LL Method: AGPS

Inspection Result:

Result : In Compliance
Description: Facility is In Compliance.

Financial Responsibility

Financial Responsibility: INSURANCE
Insurance Carrier: COMMERCE & INDUSTRY
Effective Date: 08/14/2010 Expiration Date: 08/14/2011

Signatures:

TKESPH - ESCAMBIA COUNTY HEALTH DEPARTMENT

Storage Tank Program Office

(850) 595-6707

Storage Tank Program Office Phone Number

Joseph S. Hale

INSPECTOR NAME

INSPECTOR SIGNATURE

scotty carrol

REPRESENTATIVE NAME

REPRESENTATIVE SIGNATURE

Reviewed Records

Facility ID: 8945253

Reviewed Records

Record Category	Record Type	From Date	To Date	Reviewed Record Comment
Two Years	Monthly Release Detection Results	04/08/2010	03/24/2011	
Two Years	Certificate of Financial Responsibility	04/08/2010	03/24/2011	
Two Years	Monthly Maint. Visual Examinations and Results	04/08/2010	03/24/2011	
Two Years	Repair, Operation and Maintenance Records	04/08/2010	03/24/2011	

Site Visit Comments

03/24/2011

Annual Inspection

Inspection Comments

03/24/2011

Visuals on AST . All tanks are steel and coated. Tanks are in block containment with drain.Level gauges and alarms for overfill protection.No contact with soil.



Florida Department of Environmental Protection
Twin Towers Office Bldg. 2600 Blair Stone Road. Tallahassee, Florida 32399-2400

Division of Waste Management
Bureau of Petroleum Storage Systems

Storage Tank Facility Annual Compliance Site Inspection Report

Facility Information:

Facility ID: 8945253 County: WALTON Inspection Date: 09/12/2011
Facility Type: C -Fuel user/Non-retail
Facility Name: FL TRANSFORMER INC # Of Inspected ASTs: 7
4509 HWY 83 N USTs: 0
DEFUNIAK SPRINGS, FL 32433 Mineral Acid Tanks: 0
Latitude: 30° 47' 10.0"
Longitude: 86° 7' 18.0"
LL Method: AGPS

Inspection Result:

Result : In Compliance
Description: Facility is In Compliance.

Financial Responsibility

Financial Responsibility: INSURANCE
Insurance Carrier: COMMERCE & INDUSTRY
Effective Date: 08/14/2011 Expiration Date: 08/14/2012

Signatures:

TKESPH - ESCAMBIA COUNTY HEALTH DEPARTMENT

Storage Tank Program Office

(850) 595-6707

Storage Tank Program Office Phone Number

David Brazile
INSPECTOR NAME

David Brazile - 9/12/2011

INSPECTOR SIGNATURE

Danny Shaw
REPRESENTATIVE NAME

Danny Shaw 9/12/11

REPRESENTATIVE SIGNATURE

Reviewed Records

Facility ID: 8945253

Reviewed Records

Record Category	Record Type	From Date	To Date	Reviewed Record Comment
Two Years	Monthly Release Detection Results	04/14/2011	08/15/2011	
Two Years	Certificate of Financial Responsibility	03/24/2011	09/12/2011	
Two Years	Monthly Maint. Visual Examinations and Results	04/14/2011	08/15/2011	
Two Years	Repair, Operation and Maintenance Records	04/14/2011	08/15/2011	

Inspection Comments

09/12/2011

Tank #E -2350 GL. Steel and Coated, Single Wall, Aboveground Storage Tank Placed Inside Of Block Secondary Containment Berm With Drain (No EQ #).

Tank #A -8400 GL. Steel and Coated, Single Wall, Aboveground Storage Tank Placed Inside Of Block Secondary Containment Berm With Drain (No EQ #).

Tank #B - 8400 GL. Steel and Coated, Single Wall, Aboveground Storage Tank Placed Inside Of Block Secondary Containment Berm With Drain (No EQ #).

Tank #C - 8400 GL. Steel and Coated, Single Wall, Aboveground Storage Tank Placed Inside Of Block Secondary Containment Berm With Drain (No EQ #).

Tank #D - 8400 GL. Steel and Coated, Single Wall, Aboveground Storage Tank Placed Inside Of Block Secondary Containment Berm With Drain (No EQ #).

Tank #T - 8400 GL. Steel and Coated, Single Wall, Aboveground Storage Tank Placed Inside Of Block Secondary Containment Berm With Drain (No EQ #).

Tank #G - 8000 GL. Steel and Coated, Single Wall, Aboveground Storage Tank Placed Inside Of Block Secondary Containment Berm With Drain (No EQ #).

Piping - Steel, Single Wall, Suction, Aboveground, No Contact with the soil.

Release Detection - Monthly Visual Inspection of AST System/SPCC Plan.

Overfill Protection - Level gauges and alarms for overfill protection.

Inspection Photos1

Added Date 09/13/2011

2011/09/12 Tanks Photo



Added Date 09/13/2011

2011/09/12 - Tanks Photo



Facility ID: 8945253

Added Date 09/13/2011

2011/09/12 -Tanks Photo





STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
STORAGE TANK REGULATION PROGRAM

COPY

2012-2013

FACILITY ID: 8945253 STCM ACCOUNT: 7608
FL TRANSFORMER INC
4509 HWY 83 N
DEFUNIAK SPRINGS FL 32433 WALTON COUNTY

****2012-2013 Storage Tank Registration Placard Enclosed ****

FL TRANSFORMER INC

PO BOX 507
DEFUNIAK SPRINGS FL -32433 0507

PLACARD NO: 384216
PLACARD ISSUED: 06/07/2012
REGISTRATION PAID: \$ 175

TANK SYSTEMS REGISTERED: 7

STORAGE TANK FACILITY ACCOUNT OWNER: PLEASE RETAIN THE TOP STUB FOR YOUR RECORDS

STORAGE TANK REGISTRATION

This placard certifies that the owner & facility named has complied with the registration requirements for petroleum &/or hazardous substance storage tanks regulated by the FL Department of Environmental Protection. The placard must be placed out of the weather and in plain view of storage tank compliance inspectors entering the facility.

SECONDARY CONTAINMENT INSTALLATION DEADLINES

12-31-2009: Single-wall USTs & UST small diameter piping in contact with the soil must have secondary containment.
01-01-2010: Single-wall field erected ASTs & AST single-wall bulk product piping in contact with the soil must have secondary containment unless deferred by an API 570 Integrity Assessment.

The Department has never issued an extension to an upgrade deadline since the storage tank rules were adopted in 1984. If you have questions about these or other deadlines – or need general technical assistance – consult Rule 62-761, F.A.C., or contact a storage tank inspector from the DEP district office, or from the local storage tank program office for your county.

DEPARTMENT OF ENVIRONMENTAL PROTECTION IS ON THE INTERNET

The Web address for DEP is <http://www.dep.state.fl.us>.

You can access the site for Storage Tank Regulation directly by using: <http://www.dep.state.fl.us/waste/categories/tanks>.
Look under the HIGHLIGHTS section to find links to storage tank rules, forms, database reports and other program information.

EMAIL registration-related questions and comments to: TankRegistration@dep.state.fl.us – or telephone (850) 245-8839.
Registration staff members will assist you with your questions and will respond to you by phone or reply to your email address.

**The Storage Tank Registration placard below must be posted at the facility.
It must be placed out of the weather and in plain view of inspectors entering the facility.**



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
STORAGE TANK REGISTRATION PLACARD

FACILITY ID: 8945253
FACILITY: FL TRANSFORMER INC
4509 HWY 83 N
DEFUNIAK SPRINGS FL 32433
WALTON COUNTY
FACILITY TYPE: Fuel user/Non-retail
STCM ACCOUNT: 7608
ACCOUNT OWNER: FL TRANSFORMER INC

PLACARD NO: 384216
PLACARD ISSUED: 06/07/2012
PLACARD EXPIRES: 06/30/2013

TANK SYSTEMS REGISTERED: 7

Jorge Caspary
Jorge Caspary, Director
Division of Waste Management
Department of Environmental Protection



Florida Department of Environmental Protection
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form # 62-761.900(2)

Form Title Storage Tank Registration Form

Effective Date July 13, 1998

DEP Application No. _____

(Filled in by DEP)

Storage Tank Facility Registration Form

Submit a completed form for the facility when registration of storage tanks or compression vessels is required by Chapter 376.303, Florida Statutes

Please review *Registration Instructions* before completing the form.

Check all that apply	<input type="checkbox"/> New Facility Registration	<input type="checkbox"/> New Owner	<input checked="" type="checkbox"/> New Tanks
	<input type="checkbox"/> Information for existing facility changed or updated	<input type="checkbox"/> Information for existing owner changed or updated	<input type="checkbox"/> Information for existing tank(s) changed or updated

FACILITY INFORMATION	County	Walton	DEP Facility ID Number	8945253
Facility Name	Florida Transformer, Inc.			
Address, City, Zip	4509 State Hwy 83 North DeFuniak Springs, FL 32433 Walton County			
Facility Contact	Jessica Pennington	Contact Telephone	850-892-2711	
Facility Type Description	Fuel User, Non Retail	Financial Responsibility	Insurance Carrier	
24 Hr Emergency Contact	SWS Emergency Spill Response	24 Hr Emergency Phone	800-852-8878	

RESPONSIBLE PARTY INFORMATION - Identify individual or business responsible for storage tank registration & registration renewal.

Name	Florida Transformer, Inc.		<input checked="" type="checkbox"/> Facility Account Owner - pays registration fees					
Mail Address	4509 State Hwy 83 North		STCM Account Number	7608				
City, State, Zip	DeFuniak Springs, FL 32433		Effective Date of Ownership					
Contact	Jessica Pennington		Provide Email Address for Contact in space below					
Telephone	850-892-2711		jessica@floridatransformer.com					
Check all roles that apply	Facility Owner	<input checked="" type="checkbox"/>	Tank Owner	<input checked="" type="checkbox"/>	Tank Operator	<input checked="" type="checkbox"/>	Property Owner	<input type="checkbox"/>

ADDITIONAL RESPONSIBLE PARTY INFORMATION - Identify additional individual or business responsible for storage tank management, fueling operations, and/or cleanup activities at the facility location above. Provide additional information in an attachment if necessary.

Name	Florida Transformer, Inc.	Other relationship type(s)	Effective Date
Mail Address	4509 State Hwy 83 North	Facility Owner	<input checked="" type="checkbox"/>
City, State, Zip	DeFuniak Springs, FL 32433	Tank Owner	<input checked="" type="checkbox"/>
Contact	Ron Shaw	Tank Operator	<input checked="" type="checkbox"/>
Telephone	850-892-2711	Property Owner	<input type="checkbox"/>

TANK/VESSEL INFORMATION - Complete one row for each storage tank or compression vessel system located at this facility.

Tank ID	T/V	A/U	Capacity	Installed	Content	Status/Effective Date	Construction	Piping	Monitoring
8	T	A	8200	04/12	L	U 04/12	C,P,K	B	D,6
9	T	A	15000	04/12	L	U 04/12	C,P,I	B	D,F

Certified Contractor - performing tank install/removal	DBPR License No
--	-----------------

NOTE: This Facility ID Number is for an Indigent "Approved" Facility.

Registration Certification - To the best of my knowledge and belief, all information submitted on this form is true, accurate, and complete.

Printed Name & Title	<input checked="" type="checkbox"/> Jessica Pennington Env. Mgr	Signature	<input checked="" type="checkbox"/> Jessica Pennington	Date	<input checked="" type="checkbox"/> 3/20/12
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FL DEP DISTRICT OFFICES	Central District 3319 Maguire Blvd, Suite 232 Orlando, FL 32803 407-894-7555	Southeast District 400 Congress Ave. W Palm Beach, FL 33416 561-681-6600	South District 2295 Victoria Ave, Suite 364 Fort Myers, FL 33901 941-332-8975
Northwest District 160 Governmental Center Blvd. Pensacola, FL 32501 850-595-8360	Northeast District 7825 Baymeadows Way, Suite 200 Jacksonville, FL 32256 904-448-4300	Southwest District 13051 N. Telecom Pkwy Temple Terrace, FL 33619 813-744-6100	Marathon Branch 2796 Overseas Hwy, Suite. 221 Marathon, FL 33050 305-289-2310