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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

RECEIVED

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**NORTHWEST FLORIDA
DEP**

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**

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.