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BSHW

# FLORIDA TRANSFORMER, INC.

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

## Thirty (30) Day Notification of Demonstration

RECEIVED  
RCRA

JUL 25 2012

Hazardous Waste Regulation

July 23, 2012

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

Attention: Ms. Rudzinski

Due to unforeseen circumstances and schedules of both the Agency and Florida Transformer Inc. (FTI), the originally scheduled **Demonstration for Disposal of PCBs by Non Thermal Alternative technology via the PCB-1000** on the dates of August 6-8, 2012 as applied for by FTI **has been postponed.**

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

Contact: FTI Environmental Compliance Manager, Jessica Pennington

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

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

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

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

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

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

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

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

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

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

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

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

**The NEW demonstration dates are scheduled for Aug 27, 28 and 29, 2012.**  
The demonstration schedule is as follows.

**MON**  
**8/27/2012**

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

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

**TUES**  
**8/28/2012**

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

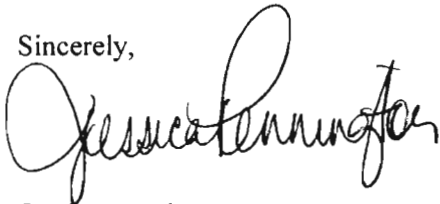
1:00  
P.M.      Demonstration Test no. 3  
(~264 gallons  $\leq$  2000ppm PCB)  
to include shut down of system  
according to Closure Plan

**WED**  
**8/29/2012**

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

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

Sincerely,



Jessica Pennington  
Florida Transformer, Inc.  
Environmental Compliance Manager  
office 850-892-2711; mobile 850-951-3086  
[jessica@floridatransformer.com](mailto:jessica@floridatransformer.com)