From: Kothur, Bheem
To: Mayberry, Eric;
Subject: FW: Florida Transformer Inc. PCB-1000
Date: Wednesday, August 15, 2012 12:01:53 PM

Eric,
Please insert the below e-mail into OCULUS under permit application related documents.
Facility I.D.: FLR 000 168 203;

Thanks.
Bheem

From: Lilybeth Colon [mailto:Colon.Lilybeth@epamail.epa.gov]
Sent: Wednesday, August 15, 2012 11:52 AM
To: Jessica Pennington; Kothur, Bheem
Cc: Amy Hensley; Winston Lue
Subject: RE: Florida Transformer Inc. PCB-1000

ORCR has no issue with FTI performing a shakedown of their equipment using MODEF under 50 ppm, as long as dilution did not occur to get to the under 50 ppm concentration.

We will be including the following language in the FTI approval to demonstrate the disposal of PCBs, but FTI does not have to wait for the approval to start their shakedown with under 50 ppm MODEF.

Shakedown Phase: The shakedown phase is composed of the mechanical shakedown and running of MODEF oil through the equipment. The mechanical shakedown involves testing the equipment to ensure the chemical, mechanical, electrical, and instrument reliability of the mobile unit.

During this task, FTI shall check the PCB-1000™ unit by turning on the equipment and where necessary, calibrate instrumentation and perform any necessary training for its operator(s). During the shakedown phase, FTI shall only use MODEF oil containing less than 50 parts per million (50 ppm) PCBs where the original source was less than 50 ppm.

Thank you,

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

T: (703) 308-2392
F: (703) 308-0509

Jessica Pennington ---08/15/2012 11:00:18 AM---Bheem, This was well received.

From: Jessica Pennington <jessica@floridatransformer.com>
To: "Kothur, Bheem" <Bheem.Kothur@dep.state.fl.us>
Cc: "Bahr, Tim" <Tim.Bahr@dep.state.fl.us>, "Tripp, Anthony" <Anthony.Tripp@dep.state.fl.us>, "Byer, James" <James.Byer@dep.state.fl.us>, "Mitchell, Aaron" <Aaron.Mitchell@dep.state.fl.us>, Lilybeth Colon/DC/USEPA/US@EPA, Winston Lue/DC/USEPA/US@EPA
Date: 08/15/2012 11:00 AM
Subject: RE: Florida Transformer Inc. PCB-1000

Bheem,

This was well received.

The trial runs will commence as early as Friday (08/17) and continue as necessary through Friday (08/24). I will provide a progress report on the trial runs by Wednesday August 22.

The EPA Demonstration will be held on August 27, 28 and 29. Following the demonstration, the Department will receive a copy of the EPA Demonstration Test Report/Results. At that time, supporting documentation of the Non PCB Shakedown Trial Runs will also be submitted.

Thank you,

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

From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]
Sent: Wednesday, August 15, 2012 8:52 AM
To: Jessica Pennington
Cc: Bahr, Tim; Tripp, Anthony; Byer, James; Mitchell, Aaron
Subject: RE: Florida Transformer Inc. PCB-1000

Hi Jessica,
As we all discussed this morning through conference call with EPA,
DEP do not have any objection to use the PCB-1000 process equipment for trial runs for Used Non PCB Oil contaminated (2- 49 ppm PCB).

Please let us know your trial run schedule.

Also provide the test results and notify if you encounter any problems during trial runs.

If you have any questions with this approval, please let me know.

Thanks.

Bheem

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

From: Jessica Pennington [mailto:jessica@floridatransformer.com]
Sent: Tuesday, August 14, 2012 9:38 AM
To: Kothur, Bheem
Subject: FW: Florida Transformer Inc. PCB-1000
Importance: High

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

From: Jessica Pennington
Sent: Tuesday, August 14, 2012 8:36 AM
To: Lilybeth Colon (Colon.Lilybeth@epamail.epa.gov); Lue.Winston@epamail.epa.gov
Subject: Florida Transformer Inc. PCB-1000
Importance: High

Lilybeth/Winston,

Thank you in advance for your consideration on this matter.

The State of Florida Department of Environmental Protection is requesting a determination on the Agency's part that no approval is needed from the Agency to introduce Non PCB contaminated (2-49ppm PCB) used mineral oil dielectric fluid into the PCB-1000 dechlorination equipment for the purposes listed below.

To elaborate on FTI's intentions for the Redragon PCB-1000 Dechlorination equipment at this point:

FTI wishes to use Used Non PCB oil (2-49ppm PCB) at this time within the PCB-1000 equipment to process "trial" batches of oil in order to ensure the reagent mechanisms, high/low level indicators and dispersion system is functioning properly. We have to be sure that this portion of the equipment is supplying enough of the reagent and at the right time for the correct amount of time, to efficiently process a batch of used oil to the desired level of <2ppm PCB. We cannot see this desired result if we only use Non Detect (<2ppm PCB) as trial batch material.

It is not the intention of FTI to market this processed oil prior to receiving a formal processing approval from the State of FL DEP nor is it the intention of FTI to dechlorinate PCB contaminated oil (>49ppm PCB) prior to the EPA demonstration dates of August 27-29, 2012.

The amounts of used oil (2-49ppm PCB) will be recorded in gallons and analyzed to determine successful processing. Again, the trial runs will aid in our fine tuning of the equipment, training, preparation for EPA demonstration for PCB destruction and determining oil quality post process.

I would appreciate the Agency's input on this temporary/intermediate processing approval from the State of Florida DEP in order to achieve the intentions as mentioned above.
I have a conference call number available all day today for both regulatory groups and myself to discuss this matter. Please let me know at your nearest convenience when the Agency is prepared to speak with the State and I will facilitate that.

Thank you,

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