

INTEROFFICE MEMORANDUM

Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Locn.: _____	
To: _____	Locn.: _____	
To: _____	Locn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: File

FROM: *AT* Jeff Tobergte

DATE: January 5, 1984

SUBJECT: Management of PCB Oils by Florida Power & Light Company
Equipment Repair Center prior to 1976

A hazardous waste compliance inspection of the FPL Equipment Repair Center (in Miami) was made on October 13, 1983. During the inspection, Eloy Villasuso, Jr. (Supervisor/Transmission-Distribution Operations) explained that PCB oils have been sent to Ensco, Inc. (in Arkansas) for incineration since 1976.

The question was then asked what was done with the PCB oils prior to 1976. Mr. Villasuso indicated that he believed the oils were sent to landfills.

However, on December 5, 1983 a letter was received from James J. King (FPL Senior Environmental Coordinator). In this letter Mr. King indicates that the PCB oils were sent to Monsanto prior to 1976, and not to landfills as the inspection report states. Mr. King also said via telephone conversation that Mr. Villasuso later denied making the comment about landfills.

At the request of Mr. King, this memo is being placed in the file in order to clarify Florida Power & Light Company's position concerning this matter.

JT:cj

cc: Craig Diltz
James J. King - FPL
State of Arkansas Pollution Control
Monsanto Company

STATE OF FLORIDA
DEPT. OF ENVIRONMENTAL REGULATION
P.O. BOX 3858
WEST PALM BEACH, FL 33402

FILE

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cc: Craig Diltz
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State of Arkansas Pollution Control
Monsanto Company



DER-WPB	Copy <input checked="" type="checkbox"/> Action A	Route #
DM	PER.	DADE
MM	ENT.	BROW.
P.P.	T/A	P.3CH.
AA	BAG	B. RD.
REMARKS: <i>cl → to file?</i>		
<i>PT</i>		

December 2, 1983

Mr. Roy M. Duke
 Manager
 State of Florida
 Department of Environmental Regulation
 3301 Gun Club Road
 P. O. Box 3858
 West Palm Beach, FL 33402

Dear Mr. Duke:

Attached is an FDER Hazardous Waste Compliance Report that was recently received. After reading the narrative on page two and after some discussion with FPL Equipment Repair Center personnel we would like to bring to your attention an item underlined toward the end of the page.

"Prior to that, the oils were sent to landfills, according to Mr. Villasuso."

This statement is not correct. Florida Power & Light Company prior to 1976 was sending the PCB fluids to Monsanto and not to a landfill.

Florida Power & Light Company would like to make this correction and see it entered in the permanent record. If there is anything I may do to help in this or other related hazardous waste matters please feel free to call (863-3643).

Sincerely,

A handwritten signature in blue ink that reads "James J. King".

James J. King
 Senior Environmental Coordinator

JJK/os

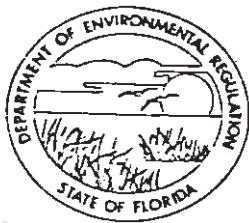
cc: Eloy Villasuso
 Ed Ahrens

RECEIVED

DEC 5 1983

Dept. of Environmental Reg.
 West Palm Beach

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



SOUTHEAST FLORIDA
DISTRICT

P.O. BOX 3858
3301 GUN CLUB ROAD
WEST PALM BEACH, FLORIDA 33402-3858

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ROY M. DUKE
DISTRICT MANAGER

HAZARDOUS WASTE COMPLIANCE REPORT

1. FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
HAZARDOUS WASTE [GENERATOR/TSD/TRANSPORTER]
COMPLIANCE REPORT _____ COMPLAINT X ROUTINE _____ FOLLOW-UP _____ PERMITTING _____
FACILITY NAME FPL Equipment Repair Ctr. DER/EPA ID FL D 0 0 0 8 0 7 5 8 6 6
ADDRESS 6001 N.W. 70 Avenue, Miami, Florida 33166
COUNTY Dade Phone (305) 552-4636 DATE 10/13/83 TIME 11:15
PARENT COMPANY & MAILING ADDRESS (IF DIFFERENT) Florida Power & Light Company.
Post Office Box 529100, Miami, Florida 33152

TYPE OF FACILITY: _____ CONTAINER STORAGE _____ LANDFILL _____ LAND TREATMENT
N/A _____ TANK STORAGE _____ WASTE PILE _____ THERMAL TREATMENT
_____ TRANSPORTER _____ INCINERATOR _____ CHEM/PHYS/BIO TRT.

2. Applicable Regulations:
40 CFR 261.5, 40 CFR 261.6(a)

3. Responsible Official: (Name & Title)
Eloy Villasuso, Jr. - Supervisor/Transmission-Distribution Operations

4. Survey Participants & Principal Inspector
Jeff Tobergte - Department of Environmental Regulation
Eloy Villasuso - Florida Power & Light Company

5. Facility Latitude: 25° 49' 35"
Longitude: 80° 18' 40"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

RECEIVED

DEC 5 1983

Dept. of Environmental Reg.
West Palm Beach

FPL

This Florida Power & Light Company Equipment Repair Center (ERC) has been operating since about 1975. The facility repairs electrical transmission and distribution equipment, mostly transformers and such things as capacitors.

A solvent, "M-2", is applied to handrags for manually cleaning items. The solvent has a flash point of 150°F, according to the label, and is allowed to evaporate. About one gallon per week is used.

Some items, particularly transformers, are painted in a spray booth. A flowing "water screen" captures paint that is dispersed in the air. This paint sludge is placed in drums and shipped as a hazardous waste to Alabama for disposal. About one drum per month is generated. Mineral spirits and lacquer thinner (both D001) are used to clean spray guns. The cleaning spray then disperses in the booth.

Transformer oils are filtered before reuse. Excess oil is either sold or burned in the power plants. All oils are analyzed before reuse. If the oil contains more than 50 ppm PCBs (polychlorinated biphenyls), the oil is not reused. Instead, the contaminated oil is sent to Ensco, Inc. (1015 Louisiana Street, Little Rock, Ark. 72202, phone 501/375-8444). Ensco, Inc. then incinerates the contaminated oil.

The transformers that once held contaminated oil are shipped to Alabama, along with the filter materials and the previously mentioned paint sludge. A manifest showed 81 55-gallon drums of these materials. The shipment was described on the manifest as "Solid PCB"; the manifest also stated "EPA Waste ID # not applicable". Transformers that contained oils with less than 50 ppm PCBs are resold for salvage.

The facility maintains excellent records of the wastes generated. The facility is also clean and orderly. PCB - contaminated oils have been sent to Ensco, Inc. since 1976. Prior to that, the oils were sent to landfills, according to Mr. Villasuso.

The FPL Equipment Repair Center qualifies as a small quantity generator pursuant to 40 CFR 261.5. The paint sludge is the only hazardous waste generated, according to management.

No hazardous waste violations were noted.

No reinspection is necessary.

JT:cj/d