Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Florida Transformer Inc

On-Site Inspection Start Date: 12/12/2013 **On-Site Inspection End Date:** 12/12/2013

ME ID#: 74617 **EPA ID#:** FLR000168203

Facility Street Address: 4509 State Highway 83 N, Defuniak Springs, Florida 32433-3960

Contact Mailing Address: 4509 State Highway 83 N, Defuniak Springs, Florida 32433-3960

County Name: Walton **Contact Phone:** (850) 892-2711

NOTIFIED AS:

LQG (>1000 kg/month)
Transporter
Used Oil

INSPECTION TYPE:

Routine Inspection for LQG (>1000 kg/month) facility

Routine Inspection for TSD Facility Unit Type(s)

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector:	Aaron Mitchell, Inspector
Other Participants:	Jessica Pennington, Environmental Specialist; Chris Stoll, Inspector; Javier Garcia, EPA Investigator

LATITUDE / LONGITUDE: Lat 30° 47' 9.6599" / Long 86° 7' 16.1428"

SIC CODE: 3612 - Manufacturing - transformers, except electronic

TYPE OF OWNERSHIP: Private

Introduction:

Florida Transformer Inc.(FTI), is a transformer repair and processing facility located in Defuniak Springs, Florida. The facility operations include transformer repair, used oil processing, and transformer sales and service. FTI notified the Department as a small quantity generator of hazardous waste. The facility has been in operation for over 38 years and has approximately 100 employees. The facility is situated on 25 acres, of which 15 acres are actively used while 10 are not. The inspection was facilitated by Jessica Pennington (Environmental Compliance Officer) and Jerome Stuckey (Plant Manager).

Process Description:

On December 10, 2013, Department personnel Aaron Mitchell and Chris Stoll and EPA inspector Javier Garcia conducted a routine inspection of the FTI transformer sales and service site. An inspector from the Alabama Department of Environmental Management (ADEM), Ms. Donna Adams, conducted a PCB inspection under the supervision of the EPA. The State of Florida does not regulate PCBs and thus does not have a program in place to ensure compliance with the applicable rules and regulations governing their management. The inspection consisted of a records review and visual site inspection.

Visual Inspection:
The visual inspection consisted of the following: Intake processing, Laboratory, hazardous waste storage area, PCB Ancillary area/Universal Waste storage area, PCB-contaminated oil storage area, middle paint room, Red Dragon used oil processor, and tank farm. Jessica Pennington facilitated the visual inspection of the facility.

Intake Processing:
The facility receives transformers from Alabama, Mississippi, Georgia, Tennessee, Florida, North Carolina, South Carolina, and Maryland. The facility uses contracted drivers to transport all out-of-state pickups. FTI only has one employed driver that conducts all in-state transformer transporting. The transformers are unloaded onto a conveyor system.

Any transformers that are shipped for disposal must be accompanied by oil analysis test documents before being received by facility. The transformers that are not designated for disposal have oil samples taken once they arrive at the facility. Each transformer has its own barcode attached to it once it enters the facility. This barcode follows the transformer throughout its processing. The transformers with PCB-contaminated oils receive a red and orange tag and the transformers with non-PCB oils receive a white tag. FTI uses in-house software to scan the transformer barcodes before weighing and emptying the them of their oil. The empty transformers are then scanned again and weighed. The empty weight is used to calculate the amount of oil removed.

The removed oils that are found to have less than two parts per million (ppm) of PCBs are filtered, visually inspected for moisture and place into a storage tank. The removed oils that range between 2-49 ppm of PCBs are pumped to one of three holding tanks. These oils are then processed via the onsite processing equipment (Red Dragon) and subsequently stored in a 15,000 gallon tank. The processed oils are marketed as a lubricant. Transformer oils that have between 50 and 499 ppm of PCB content are pumped into one of four 1,295-gallon storage tanks located in the PCB storage room. Transformers that have a content of 3,000 gallons or more of used oil are not processed onsite. These transformers are moved to the PCB storage room and transferred to another TCI location in Pell City, Alabama. FTI also receives customer generated used oils and consolidates those with the facility generated used oils.

Laboratory:
The facility conducts all sampling tests in the onsite laboratory located adjacent to the Intake Area. All sample containers are matched to the barcode that is applied to the individual transformers in the intake area. The samples have hexane and hydrosulfuric acid added to them in preparation for use in the facility's gas chromatic spectrometer to determine the PCB content of the oil samples. Once the PCB contents have been established, the samples are satellite accumulated in five-gallon buckets or in cardboard boxes that have individual spaces for each sample vial. The contents of the boxes and buckets is then transferred to the PCB storage area located to the east of the intake area. These samples are sebsequently consolidated into "PCB"-labeled gaylord boxes before eventual transport by a registered transporter. All waste containers are labeled as "PCB waste" only.

Hazardous waste
The hazardous waste storage area is located in the northeast corner of the intake processing area. At the time of this inspection, thirty-four 55-gallon drums of used mineral spirits (24 drums for recycle) and processing sludge (10 drums) were in storage. Mineral spirit waste is generated from the rinsing of the drums/transformers that contained PCB contaminated used oil and the sludge is generated from the operation of the facility used oil processing machine (Red Dragon). The mineral spirits stored in this area are distilled and then reused in the cleaning process. The mineral spirits are re-used 2-3 times before being transported for disposal by a registered transporter. The still bottoms from the mineral spirits recycling are containerized and shipped out as hazardous waste by Chem Waste. The PCB-storage area is located south of the hazardous waste storage area in the building. All containers were labeled with their contents ("Used Mineral Spirits" or "Sludge") but not

with the words "Hazardous Waste", and no storage start dates were assigned to some of the drums.

PCB Ancillary Area/PCB contaminated used oil Storage Room:
The PCB Ancillary Area (PAA) is located to the south of the intake area. Separated from the Intake Area by a concrete berm, the PAA houses transformers that contain used oils having between 50-499 ppm of PCBs. The oils generated in the PAA are pumped into the PCB storage room. There are five 1,295-gallon tanks in this PCB Storage Room. Four tanks are in use while the fifth is not currently online. There are also PCB oils that are not stored in the tanks but are stored in 55-gallon drums. The drums are stored in three rows. The PCB oils are stored here until they can be transported offsite by Clean Harbors LLC (FLD980729610). The facility also stores its universal wastes in this area. There were five boxes of universal waste lamps and one bucket of universal waste light ballasts. The oldest accumulation date observed was April 30, 2013.

Middle Paint Booth:
FTI has three paint booths located onsite. Two booths are internal to the building and one is external. A visual inspection of the middle paint booth was conducted. The facility paints all transformers that are being repaired/refurbished. The wastes generated in this area are paint booth filters, waste solvent and waste paint. The filters and liquids are satellite accumulated in two 55-gallon drums. At the time of the inspection, these dums were not properly labeled or closed. The facility procedure is to label the containers after the drum is full, topoff any drum with water with the filters inside and then move the drums to the 90-day storage area.

Tank Farm/Red Dragon Used Oil Processor:
The Tank Farm and Red Dragon used oil processing area is located to the south of the Intake Processing building. There are a total of 13 storage tanks located in the facility tank farm. Four of the thirteen tanks contain RCRA regulated used oils. Tank-T holds used oils that have a PCB content of 2-49 ppm. Tanks B and F contain used oils that have less than 2 ppm PCBs. Tank-C contains non-PCB used oils. All of these tanks have a capacity of 8,400-gallons. Tanks PO-1 and PO-2 are for storing processed used oils and have a capacity of 8,225-gallons and 15,000-gallons respectively. Oil in Tank PO-1 is for onsite repair purposes and oil in Tank PO-2 is for vendor purposes. Tanks T, B, F, C, and PO-1 are in a concrete secondary containment unit. Tank PO-2 is a double-walled, above-ground storage tank. FTI's Red Dragon Used Oil Processor is located to the south of the Tank Farm. The waste generated from the operation of the Red Dragon are sludges contaminated with toluene and benzene. Inspectors observed 21 drums of hazardous waste being stored outside of the Red Dragon used oil processor. 19 drums contained hazardous waste sludge, one drum contained paint-related debris, and the last drum contained contaminated media blast. The drums were not labeled with the words "Hazardous Waste", or storage date.

Records:
The facility used oil shipping records, used oil tank inspections, hazardous waste and used oil training, and used oil/PCB sampling data were inspected and no descrepencies observed. Hazardous waste storage weekly inspection checklists were reviewed and found to lack a time stamp annotation and the inspector name printed on the checklist. The facility's Contingency Plan was reviewed and found to be missing information specific to the Resource Conservation and Recovery Act (RCRA) within the plan. The facility had not designated an emergency coordinator or an alternate. The plan did not contain specific procedures on what to do during an emergency that involved hazardous wastes being released. Mrs. Pennington forwarded to the Department on January 10, 2014 a revised Contingency Plan with the required information specific to the RCRA program. There were no records to review for offsite used oil processing by the Red Dragon due to no offsite activities being conducted to date.

A review of facility hazardous waste manifests showed that FTI exceeded the small quantity generator limit (200-1,999 kg per month) at various times during a calendar year the and generated hazardous waste at the large quantity generate rate (>2,000 kg per month). The Mrs. Pennington contacted the Department on January 10, 2014, with a copy of their new notification letter that signified their official change from a small quantity generator to a large quantity generator.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.34(a)(3), 262.34(a)(4), 262.34(c)(1), 262.34(c)(1)(i), 262.34(c)(1)(ii), 262.34(c)(2), 262.34(d)
Explanation:	FTI has generated in excess of 1000 kilograms of hazardous waste per month since the activation of its Red Dragon Used Oil processor. The waste by-product that is generated is a characteristically hazardous for corrosivity due to the pH range of 12-14 and hazardous for toxicity due to benzene. The facility's lab wastes generated from testing of oil samples for PCB content are hazardous for corrosivity (pH 0-2.0). FTI's paint related wastes are hazardous due to xylene, toluene, acetone, and barium content. The containers from the waste streams were not labeled with the words "Hazardous Waste" or the "accumulation start date" while in storage.
Corrective Action:	The facility needs to ensure that it notifies the Department of its change in generator status from small quantity generator to large quantity generator. The facility must also ensure that all hazardous waste is propoerly disposed of within the required 90-day time period. The facility also needs to ensure that all containers in storage are correctly labeled with the words "Hazardous Waste" and the "accumulation start date".

Type:	Violation
Rule:	265.16(a)(1), 265.16(d)(1), 265.16(d)(2), 265.16(d)(3)
Explanation:	Training documents reviewed by inspectors showed that FTI did not adequately cover the required training for proper management of hazardous wastes generated at the facility.
Corrective Action:	FTI needs to ensure that the training provided to new and current employees adequately covers the responsibilites expected from each employee as it pertains to their job duties.

Type:	Violation
Rule:	265.35, 62-730.160(7)
Explanation:	FTI did not have the required ailse space for the PCB/Hazardous waste storage area. The gaylord boxes that are used to store the waste generated from the operation of the facilities laboratory where not properly spaced. This lack of proper spacing did not allow inspectors to adequately inspect the storage containers.
Corrective Action:	40 CFR 264.35 states that "The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency". FTI needs to ensure that adequate aisle space is provided for all storage areas in the facility.

Type:	Violation
Rule:	265.52(b)
Explanation:	The facility contingency plan did not contain information that was specific to the emergency procedures that would be implemented in case of a hazardous waste spill or release.
Corrective Action:	FTI needs to ensure that its facility contingency plan is updated to include details specific to a hazardous waste spill or release as stated in 40CFR 264.52.

Type:	Violation
Rule:	62-730.160(6)
Explanation:	FTI did not have the required time stamp and legibly printed name on the weekly inspection checklists of the hazardous waste storage area.
Corrective Action:	FTI needs to ensure that all the required information is present on the inspection forms and completely filled out according to F. A. C. 62-730.160(6).

PHOTO ATTACHMENTS:

Intake Processing

Distillation Unit

180-Day Storage

PCB Storage

Tank Farm/Red Dragon HW Drums

Paint Booth HW Drum

Conclusion:

During the course of the records review inspectors observed that the facility did not count any wastes generated in the laboratory as a part of their monthly hazardous waste generation rate. These wastes were being counted in the facility's PCB waste generation only. RCRA regulations apply to PCB waste that contain a hazardous waste or hazardous waste characteristic. The facility needs to ensure that a proper hazard waste determination is conducted on all wastes generated onsite per state and federal hazardous waste and used oil regulations.

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Aaron Mitchell	Inspector	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
Aaron Mitchell	FDEP	7/14/2014
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

Supervisor: **James Byer**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.