

Presentation in Response to:
Notice of Opportunity to Show
Cause

Florida Transformer Inc.

FLR 000 168 203

Re: Inspection 12/12/2013

October 9, 2014

#1, Page 4

In-Processing Area:

The In-Processing Area is a roofed concrete floor with nine conveyor lines. Upon receipt, the transformers (units) are offloaded onto one of the conveyor lines. Units are processed on a first in, first out basis. Each unit is labeled with a unique bar code (job number) and scanned into FTI's Application Computer Software (ACS). The ACS issues a sequence number to track management of PCBs regulated units. If the unit has no manufacturer plates or was manufactured before 1983, an oil sample from the unit is collected and analyzed for PCB content determination. The laboratory is adjacent to the In-Processing Area. At the time of inspection, no PCB markings were observed on the outside side of the wall, that separates the In-Processing Area from the offloading/loading docks. (See pictures 1 and 2)

Pursuant to Approval Conditions III.A.1-4 all approved PCB storage areas, as well as any temporary PCB storage area or ancillary pallet storage area authorized under shall be marked as required in 40 C.F.R. § 761.40(a)(10).



#1, Page 4 Continued

- Condition III.A.1. PCB/PCB Contaminated equipment may be stored in FTI's "Inprocessing Facility" outside of the "approved PCB storage areas" up to 30 days from RFS in accordance w/ 40 CFR 761.65(c)(1).
- Condition III.A.2. For PCB contaminated equipment designated for disposal, all free flowing liquid shall be removed and transferred to containers or tanks in the "approved PCB storage unit" within 30 days as specified in III.A.1 – Alternatively, non leaking, structurally undamaged PCB contaminated equipment, including bushings may be stored on pallets next to the "approved PCB storage unit" in accordance with 40 CFR 761.65(c)(2). Storage for disposal of PCB contaminated articles from which liquid has been removed is not regulated.
- Condition III.A.3. PCB Equipment drained or undrained shall be transferred to an "approved PCB storage area" within 30 days as stated in III.A.1.
- Condition III.A.4. Plastic bags and oil pads shipped to FTI with leaking equipment are managed as PCB waste. FTI may store these in a suitable container up to 30 days from fill start date. After that, the container must be transferred to the "approved PCB storage unit" or the container may be placed in the PCB marked secondary containment area next to the "approved PCB storage unit."

#1, Page 4 Continued

- 40 CFR 761.40(a)(10) – Each storage area used to store PCBs and PCB Items for disposal....preceded by 761.40(a) that says each of the following items must be marked with the PCB Mark.
- FTI's Inprocessing Department is not a Storage Area for PCBs/PCB Items for disposal. This is a working area to receive and/or determine PCB contamination of electrical equipment. The transformers move along the rails of the Inprocessing department on a daily basis in order to match production goals of departments.
- Research shows in 2013, FTI received/processed for disposal 1,748 PCB contaminated items and 118 PCB (≥ 500 ppm PCB) Items out of a total of 56,421. (3% of the total number of pieces received at the facility last year.)

#1, Page 4 Continued

- FTI has implemented procedures and physical boundaries, as well as, required marking for its approved PCB storage area that is referred to in the PCB Commercial Storage Approval. These measures dictate limited access, authorized personnel only, etc.
- Marking the entire Inprocessing area housing equipment of unknown PCB concentration would be much the same as requiring a Cooperative to mark all of the utility poles in their system.
- Additionally, all equipment in the Inprocessing area is not for disposal. Production records indicate 30% is for repair/re use. 40 CFR 761.40(a)(10) marking applies only to storage areas for PCBs and PCB Items for disposal.

#1, Page 4 Continued

- The required marking is on the approved PCB Storage areas at FTI.



#1, Page 4 Continued

- Finally, the listed reasons are supportive of why FTI does not and has not, in the past, marked the Inprocessing Department as a whole. This topic was a matter of discussion during our 2009 TSCA Inspection. No allegation or citation followed as a result.

#2, Page 5

According to condition III.A3 of FTI's PCB Approval Letter, which corresponds to 40 C.F.R. § 761.65(c)(1), PCB regulated units that are stored for disposal need to be stored in a PCB compliant storage area within 30 days from the date the PCB concentration is determined. It is a concern to the EPA that at the time of the inspection, FTI had no information in its ACS tracking system indicating the location and status of units A25846 and A20432. (See pictures 3 – 7)



Pic 3



Pic 4



Pic 5



Pic 6

#2, Page 5 Continued

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FLORIDA TRANSFORMER, INC.          ACS MASTER v7.2.1
mji iq Job Inquiry                 10/02/14 10:39 AM T000 FS
Job A25846                          History
Quote                               01F By L23
Cust # 0000                         DC / /
S CITY OF OP L23 JOB ENTERED. FROM JOB A25845 11/18/13 06:40 ec 11/08/13
O UTILITIES LMS JOB INVOICED. INVOICE# 0108271 01/10/14 14:27 em / /
L P O BOX 61 JOB CLOSED 03/25/14 10:02 mp 07/03/14
O OPP, AL 36 AKG JOB RE-OPENED 06/26/14 08:37 hp 12/31/13
Credit Stat ARM JOB CLOSED 06/26/14 09:01 nv 12/31/13
Cust P.O.# TAC JOB RE-OPENED 07/02/14 10:39 alid 030
AKG JOB CLOSED 07/02/14 10:49 Via Slm
LGA JOB RE-OPENED 07/03/14 07:36 010
Job Desc
Contact D
Priority 9
Repl Item
Repl Pric .00 # Units 1 Inv 0108271 Inv$ 120.80
```

- JOB NUMBER A25846
 - ASD 11/12/13
 - Pump Out Date 11/25/13
 - Oil Manifest Date 12/09/13, Carcass Manifest Date 11/27/13 (FTI SMRO)
 - Oil Disposal Date 12/18/13, Carcass Disposal Date 12/11/13
 - Oil Manifest No: 007352445JJK: Company Clean Harbors
 - See Disposal Documentation (Attachment 1)
 - See ACS Data Entry page. Data entered on 6/26, 7/2 and 7/3/14

#2, Page 5 Continued

FLORIDA TRANSFORMER, INC. ACS MASTER v7.2.1
mli iq Job Inquiry 10/02/14 10:39 AM T000 PS
SPEC JOB A2043

Job Status

Quote	SHI	By	L23
Cust # 0003	DC	/	/
S MISSISSIPPI	ec	10/07/13	
O SOUTHERN C	rm	/	/
L P.O. BOX 8	mp	08/18/14	
D BIRMINGHAM	hp	/	/
Credit Stat	nv	/	/
	alid	030	

Via SIm
040

Job Desc
Contract D
Priority 9
Repl Item

L23	JOB CLOSED	11/08/13 13:02
ARM	JOB RE-OPENED	08/18/14 14:43
LMS	JOB CLOSED	08/18/14 14:44

Rep Price .00 # Units 1 Inv .00

- JOB NUMBER A20432
 - ASD 10/11/13
 - Oil and Carcass Manifest Date 10/14/13
 - Oil and Carcass Disposal Date 12/05/13
 - Oil and Carcass Disposal Manifest No: 007352432JJK: Company TCI
 - See Disposal Documentation (Attachment 2)
 - See ACS Data Entry page. Data entered on 8/18/14

#2, Page 5 Continued

- Entering the information into the FTI in house storage database is no Regulatory Requirement. It is only used as a backup of electronically available data in reference to any particular job.
- FTI's Annual Document Log is where all Regulatory required "data entry" takes place.
- ACS data input will lag due to its status on the list of required tasks to complete pertaining to PCB disposal.
- Note the disposal dates for equipment and oil for both job numbers. The equipment had been removed from Inprocessing well before the inspection date and almost all waste pertaining to those jobs had been disposed of prior to the inspection date.

#2, Page 5 Continued



Picture 7: **PCB transformers** in the In-Processing Area

- FTI practices marking all equipment ≥ 50 ppm PCB. While marking of PCB contaminated (50-499ppm PCB) equipment is not required by 40 CFR part 761, it is not prohibited. FTI continues to implement this action due to the other processes that take place at the facility. Marking with the PCB ML is an additional marking to ensure the transformer does not get mixed with units for repair or Non PCB units for decommission.

#3, Page 5

In the laboratory, the inspectors observed several boxes of sample vials and one open top container with vials from the GC-MS sampler. These vials contained sample residues. The boxes and the open top container had the proper PCB markings; however, they were not marked with the words “Hazardous waste” or with other words that describe their content, as required in 40 C.F.R.

§ 262.34(c)(1)(ii). (See pictures 8 – 11)



Picture 8: Container for the accumulation of laboratory RCRA regulated waste and PCB regulated waste



Picture 10: Container for the accumulation of laboratory RCRA regulated waste and PCB regulated waste



Picture 9: Container for the accumulation of laboratory RCRA regulated waste and PCB regulated waste



Picture 11: Container for the accumulation of laboratory RCRA regulated waste and PCB regulated waste

#3, Page 5 Continued

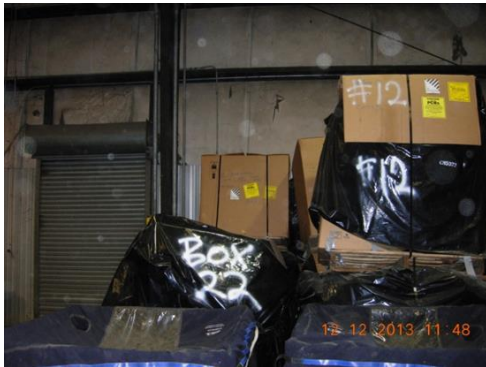
- Pictures 8 and 9 are representative of container storage in the lab used for discarded glass sample prep vials with residual spent solvent and acid mixed with potentially PCB contaminated oils. Labeling has been applied as instructed.



- Pictures 10-11 are representative of a container that is used for plastic, paper and other oily residue. This container may not be used for the storage of discarded glass vials and liquid or solvent per the FTI waste disposal profile.

#4, Page 6

At the time of the inspection, none of the hazardous waste containers were dated with the date upon accumulation of the waste started or identified with the words “hazardous waste.” Furthermore, there was not adequate aisle space between the containers to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment. (See pictures 11 – 25)



Picture 20: PCB and RCRA regulated hazardous waste containers in the PCB Ancillary Storage Area



Picture 15: Hazardous waste containers (Redragon sludge and spent solvents) in the PCB Ancillary Storage Area



Picture 13: Redragon hazardous waste sludge container in the PCB Ancillary Storage Area



Picture 12: Redragon hazardous waste sludge containers and spent solvents in the PCB Ancillary Storage Area



Picture 21: PCB and RCRA regulated hazardous waste containers in the PCB Ancillary Storage Area

#4, Page 6 Continued

- According to 40 CFR 261.2(e)(1), Materials are not solid wastes when they can be shown to be recycled by being (ii) used or reused as effective substitutes for commercial products.
- FTI's mode of production was to attempt waste minimization by distilling used mineral spirits for reuse. It is also an attempt to reduce costs of purchasing new mineral spirits solvent (i.e. used as an effective substitute for a commercial product.) This is the reason the drums of used mineral spirits discussed in this portion of the report are not labeled "Hazardous Waste"
- Additionally, FTI had previously operated under the Small Quantity Generator of Hazardous Waste status allowing it to store wastes up to 180 days.
- The 180 day storage allotment resulted in lacking aisle space as discussed with inspectors on day of inspection. Items were organized diligently based on space available.
- Below are pictures taken since the inspection of the storage area discussed in this portion of the report.



10/7/2014



9/26/2014

#4, Page 6 Continued

- Additionally, the Environmental Compliance Mgr informed inspectors the notice of change had not yet been submitted to modify FTI's status to LQG (Large Quantity Generator) due to operation of oil processing equipment (Not actively in Production mode until March 2013) because of not having the opportunity to calculate the increase in wastes at the time of inspection. However, after inspector's reviewed manifests with Management, the collective determination was the status should, in fact, be changed.
- FTI Management submitted the updated notification of Regulated Waste Activity to FDEP inspectors on 12/20/2013, immediately following the inspection. See Attachment 3, letter dated 12/16/13. FDEP responded with 01/08/2014.

#5, Page 6

PCB Storage area is in the back end of the In-Processing Area. The PCB Storage area includes a bermed section abutting the In-Processing Area, which FTI refers to as the PCB Processing Storage Area. The concrete floors in these areas are coated with an acrylic concrete sealant. At the time of the inspection, the floor sealant in some areas of the storage room was cracked and appeared to lack integrity. (See photographs 25A, 32A, and 33-35.) *40 C.F.R. §761.65(b)(1)(iv) requires a PCB storage area floor and curbing to be constructed of Portland cement, concrete, or a continuous, smooth, non-porous surface...to prevent or minimize penetration of PCBs. Permit Requirement III, PCB Storage Management: J. Inspection Requirements 3., states the condition of floor, joints, and curbing in the approved PCB Storage Unit and the integrity of the Secondary Containment Area metal drip pans shall be inspected at least semi-annually. Any needed repairs noted during such inspections shall be made within 30 days of the inspection date unless a longer repair period is authorized by EPA.*



#5, Page 6 Continued

- FTI performs daily written inspections that includes the integrity of the sealant of the approved storage areas and floors as required. No inspection has indicated needed repair as of yet.
- As a result of this inspection, FTI plans to resurface/recoat the approved PCB storage area floors and curbing and notify the Agency when repairs are complete with photo documentation of such.

#6, Page 7

The SRMO is in the northeastern corner of the operations building. In this area, FTI manages PCB contaminated transformer components and pole-top transformer carcasses (cans). The PCB-contaminated components are treated in the SRMO, while cans are decontaminated with mineral spirits using the double wash/rinse method. Ms. Pennington indicated that 10% of the washed cans are wipe-sampled to verify decontamination. The spent mineral spirits are collected in 55-gallon containers and transferred to the PCB ancillary storage where it is reclaimed. It is the EPA's understanding that the spent mineral spirits from the wash/rinse operation is only reclaimed once, before it is shipped off-site for disposal. Four 55-gallon drums containing transformer oil drained out of units were observed on a containment pallet in the SMRO area. The drums were labeled with PCB Large Marks. However, they were not labeled with the Removed from Service dates as required by 40 C.F.R § 761.65(c)(8). (See photographs 52, 54 and 55) Furthermore, the SMRO area is not designated as an approved PCB Storage Area in FTI's PCB Approval Letter. Therefore, storage in this area is limited to 30 days. Due to the lack of dates in the containers, FTI cannot show compliance with Approval Letter Condition III.B which indicates that all PCB waste accumulated in containers will be transferred to one of the approved storage areas within 30 days



Picture 46: Contaminated PCB oil open containers stored in the SRMO Area

#6, Page 7 Continued

- This requirement has been properly communicated to associates in the past including the 30 day removal time frame.
- Container Labeling Training is one of the 12 monthly topics covered in facility wide training.
- Additionally, signage has been posted in all drum accumulation areas of the proper labeling and storage requirements to minimize breakdown in communication.

#7, Page 7

from the container fill start date in accordance with 40 C.F.R. § 761.65(c)(1). In addition, FTI had two open 55-gallon drums, two 55-gallon drums with an open funnel placed in the bunghole, and one 55-gallon drum with a hose in the bunghole. (See pictures 39 – 51)



Picture 45: Contaminated PCB oil open containers stored in the SRMO Area



Picture 48: Contaminated PCB oil open containers stored in the SRMO Area

#7, Page 7 Continued

- Associates have been reminded of the requirement to keep containers closed except when adding waste.
- Again, signage has been placed in all drum accumulation areas as a reminder of container labeling and storage requirements.

#8, Page 7

54 and 55) No PCB Large Marks were observed at the dock entrance of the SMRO area. (See photographs 56-60) *According to Permit Condition III.C of FTI's PCB Approval Letter, all approved PCB storage areas as well as any temporary PCB storage area or ancillary pallet storage area authorized under Approval Conditions III.A.1-4 shall be marked as required in 40 C.F.R. § 761.40(a)(10).*



Picture 49: Exterior wall of the SMRO Area with no PCB markings



Picture 50: Exterior wall of the SMRO Area with no PCB markings



Picture 51: Exterior wall of the SMRO Area with no PCB markings

#8, Page 7 Continued

- Refer to Slide 19, Lines 11-12. “SMRO is not an approved storage area”.
- FTI does not consider the SMRO building an approved storage area hence, the 30 day removal requirement for container storage and that all transformers are drained before receipt.
- Additionally, the storage area around the drums is marked with yellow paint dictating caution, authorized personnel only, etc. The drums are marked with the PCB Mark Large.
- Finally, all equipment stored in the SMRO building is drained and <500 ppm PCB which does not require labeling per 761.40(a)(2) and 761.60(6)(ii)(B)

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This area is at the southern end of the facility and is used for the handling of large transformers. At the time of the inspection, FTI had three 250-gallon tote containers with used oil removed from the transformers. Two totes were neither labeled nor marked with the words “Used Oil” and the “Used Oil” label on the third container was faded. *40 C.F.R. § 279.22(c), as adopted by reference in F.A.C. 62-710.210(2), requires used oil containers to be marked or labeled with the words “Used Oil.”* (See pictures 52 - 54)



Picture 52: Unlabeled used oil container stored in the Outside Transformer Area



Picture 54: Used oil container stored in the Outside Transformer Area with faded “Used Oil” label



Picture 53: Unlabeled used oil container stored in the Outside Transformer Area

#9, Page 7 Continued

- The area discussed in this portion of the report is on the *North* side of the facility.
- Not all tote and drum storage in this area is for “Used Oil”.
- As discussed during the inspection a portion of equipment serviced at FTI will be refilled with the original mineral oil dielectric fluid per customer specification.
- It is understood, if the oil is used and not to be returned to the equipment, the container should be labeled and legible as such with the words Used Oil.
- Again, FTI implements a Container Labeling SOP, as well as, completes Container Labeling training as part of its 12 month facility wide safety training.

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Paint Area:

This area includes three paint booths for painting of transformers to be reissued and an abrasive blasting unit. Access to two of the paint booths is through interior doors and access to the third paint booth is through an outside door. Because of the painting operations, FTI generates a spent solvent (D001) from equipment cleaning, spent air filters from the paint booths filtration system and spent grit from the abrasive blasting unit. FTI accumulates these waste streams in 55-gallon containers. At the time of the inspection, located adjacent to the paint booth identified as the middle paint booth, was a satellite accumulation area (SAA) container of spent grit. Outside the building, the inspectors observed another spent grid blasting media (D007) SAA container. Neither container was properly closed. Furthermore, the outside container was not labeled nor marked with the words “Hazardous Waste” or with other words that identify its content. (Pictures 55- 58)



Picture 55: Paint waste SAA container in the Paint Area lacking hazardous waste marking and not properly closed



Picture 57: Paint waste SAA container in the Paint Area lacking hazardous waste marking and not properly closed



Picture 56: Unlabeled Paint SAA container stored near the outside paint booth



Picture 58: Paint filters and spent blasting media SAA containers outside the Paint Area

#10, Page 7 Continued

- FTI has practiced applying the “Hazardous Waste for Disposal” label to all such drums as part of the preparation for shipping off site prior to the inspection.
- Following the inspection, all SAA’s have been furnished with the appropriate stencil to label containers immediately upon adding waste.
- Additionally, signage has been placed in all areas as a reminder of the labeling and storage requirements.

#11, Page 8

The Redragon solids exhibit the characteristics of corrosivity (D002) and toxicity for benzene (D018). At the time of the inspection, FTI had 19 55-gallon containers that contained Redragon solids stored near the treatment unit. Adjacent to the Redragon residues containers, FTI had one 55-gallon container with spent grit blasting media (D007) and one 55-gallon container that contained oil paint contaminated debris. All containers were labeled with their contents. However, the labels did not have the date in which accumulation started. Furthermore, the containers neither were marked nor labeled with the words “Hazardous Waste.” (See pictures 59 – 61)



Picture 59: Undated and unlabeled Redragon residue 55-gallon containers stored near the Redragon Oil Processing Unit



Picture 60: Undated and unlabeled Redragon residue 55-gallon containers stored near the Redragon Oil Processing Unit



Picture 61: Undated and unlabeled Redragon residue 55-gallon containers stored near the Redragon Oil Processing Unit

#11, Page 8 Continued

- FTI has practiced applying the “Hazardous Waste for Disposal” label to all such drums as part of the preparation for shipping off site prior to the inspection.
- Following the inspection, all SAA’s have been furnished with the appropriate stencil to label containers immediately upon adding waste.
- Additionally, signage has been placed in all areas as a reminder of the labeling and storage requirements.
- Please see pictures of area adjacent to Redragon. This is representative of the area since the inspection.



#12, Page 9

During the inspection, the inspectors reviewed manifests, inspections log for the storage areas, the contingency plan and training records. The RCRA inspection checklist did not include the time of the inspection and the printed name of the inspector. Furthermore, the inspection log did not cover the Redragon solids containers in storage next to the used oil-processing unit.

- The facility contacted the department via email on January 10, 2014 to notify it had made suggested changes required by 40 CFR 265.15 to its storage area and storage area inspection.
- An updated inspection form is attached (Attachment 4)
- Additionally, the area adjacent to the Redragon is checked during the inspection. This is an effort to ensure there are no drums improperly labeled, stored, etc.

#13, Page 9

FTI's Contingency Plan did not include information addressing the control of hazardous waste or hazardous waste constituents into the environment during an emergency. In addition, the plan did not have an emergency coordinator or an alternate. On January 10, 2014, Ms. Pennington forwarded to FDEP a revised Contingency Plan with the required information specific to the RCRA program.

- Please see Section I. of FTI's Emergency Action Plan 2011, 2012, 2013, 2014 (Attachment 5)
- First notice the coordinators and alternates are listed every year and change as applicable throughout the editions.
- Second, notice section II has repeatedly included "Chemical Spill/Leak" as a potential event respective to the facility Emergency Action Plan.
- Thirdly, notice on 01/10/2014 FTI submitted a revised EAP to the Department that expounded on oil and/or Hazardous Materials/waste release and response. (Section IX of the 2014 edition, Attachment 6)

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The training program provided during the inspection addressed the PCB program requirements. Nevertheless, it did not address hazardous waste management procedures.

- See attached Safety Meeting Presentation slides (Attachment 7).
- The facility provides mandatory Safety Training on a monthly basis to all facility personnel. Each month a different safety topic is addressed (i.e. fire safety, back safety, hazard communication, etc.) In particular, the Emergency Action Plan is reviewed annually.
- Additionally, all personnel who are involved in preparing for shipment, handling or transporting any hazardous waste attend the DOT HazMat Training that is provided by an outsourced consultant. In this training those associates are trained on the function specific portions of their jobs. A training certificate is placed in each attending associates employee file.
- As a result of this inspection, a formal Hazardous Waste Management Training SOP has been developed. Please see attachment 8.

#15, Page 9

- a. From September 2012 to April 2013, it appears that FTI generated between 100 to 1,000 kilograms of hazardous waste per month. FTI stored Redragon residues (D002/D018) for 281 days (9/19/12 - 6/28/13).
- FTI's oil processing equipment was commissioned the spring and summer of 2012. The facility was only approved to process oil at the approval of the state as trial batches to prepare for the EPA demonstration. The trial batches began on August 30, 2012.
 - This is indicative of the time the first byproduct waste was generated from the Redragon and the result was the increase in the facility hazardous waste generation.
 - The extended amount of time the waste was kept on site is due to the profiling process with the appropriate disposal company, retrieving appropriate analytical, receiving quotations for disposal rates, etc.

#16, Page 10

- b. Sometime in April 2013 and thereafter, FTI increased its hazardous waste generation rate to more than 1,000 kilograms per month. Therefore, the facility has been a fully regulated large quantity hazardous waste generator since April 2013. After becoming large quantity hazardous waste generator, it appears that FTI stored its hazardous waste for greater than ninety days, as follows:

Paint operations waste (D001/D005/F005/F003) for 128 days (6/6/13 – 10/12/13).

Spent grid blasting media (D007) for 118 days (6/6/2013 – 10/02/13).

Paint operations waste (D001/D005/F005/F003) for 93 days (7/11/13 - 10/12/13).

Paint operations waste (D002/D018) for 121 days (10/15/2013 - 2/13/14)

- FTI actively obtained its own hazardous waste transport permit in AL to better and more cost efficiently comply with the 90 day storage rule. The permit app was submitted February 10, 2014. Approval was issued from the Department April 25, 2014.
- At this time, FTI transports its own waste to the appropriate disposal facility to meet the 90 day storage restriction.
- Additionally, personnel have been designated the direct responsibility and accountability for advising when the 90 day storage limit is approaching.

Summary

In summary, based on the immediate response and actions taken and submitted to the FL DEP and Region 4 Agency, following the inspection, it should be ultimately clear to the Agency and the Department this is a facility that is motivated and determined to comply. Changes of the facility regulatory status may have played a large role in the majority of the suspected violations in the Notice of Opportunity to Show Cause received by the facility. With the appropriate management and personnel training in place, the facility will continue to maintain compliance.

Attachment 1



FLORIDA TRANSFORMER, INC.

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

108271

January 18, 2014

Jerome Rogers
City of Opp
P.O. Box 610
Opp, AL 36467

Reference: PCB-Contaminated Carcass Disposal
CD #: 0049-13
FTI Load #: 112713

Dear Mr. Rogers,

Please find enclosed a copy of your Certificate of Disposal stating that the PCB-Contaminated electrical equipment received by Florida Transformer, Inc. has been properly disposed of in accordance with 40 CFR 761.72. All PCB-Contaminated electrical equipment has been decommissioned and disposed of by Florida Transformer, Inc.

This completes all required documentation pertaining to the proper disposal of this material. If you have any questions, please do not hesitate in contacting us.

Sincerely,

Jessica Pennington
Environmental Compliance



EPA ID Number – FLR000168203

CERTIFICATE OF DISPOSAL

Florida Transformer, Inc (FTI) does hereby certify that as of December 11, 2013 it has disposed of the material referenced below in compliance with 40 CFR 761.72, Scrap Metal Recovery Oven, as it pertains to the disposal of PCB-Contaminated articles regulated under 40 CFR 761. All electrical distribution equipment has been dismantled at the FTI disposal facility. Resultant electrical components, including the carcass, have been processed through the Scrap Metal Recovery Oven for thermal destruction of combustible material and any residual PCB-contaminated oils. Raw materials recovered from this process are recycled with the exception of the porcelain, which is landfilled.

Identification of Waste

Identity:	Items per Continuation Page
CD #:	0049-13
FTI Load #:	112713

Under civil and criminal penalties of laws for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Responsible Official: Jessica Pennington Title: Environmental Manager

Signature: _____

Date: _____

Florida Transformer, Inc.
4509 State Hwy 83 North
DeFuniak Springs, FL 32433
(850) 892-2711
www.floridatransformer.com

PCB CONTAMINATED CARCASS LOAD # 112713

Seq	Job	P/U Date	CUSTOMER	KVA	DESCRIPTION	SER_NO	ASD	CERT#	PPM	GAL	WT	CUSTPO
22106	A25846	11/08/13	CITY OF OPP 000025	25	FT1 1 PHASE POLE XFMR	8252106	11/12/13	0	116	D	302	

CITY OF OPP

1 Carcasses **Drained: 1** **NOT Drained: 0**

302 lb.



FLORIDA TRANSFORMER, INC.

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

no charge

January 31, 2014

Jerome Rogers
City of Opp
P.O. Box 610
Opp, AL 36467

Reference: PCB Oil Disposal
Manifest #: 007352445JJK
Ship Date: 12/09/13

Dear Mr. Rogers,

The material shown on the attached list has been shipped per the above referenced Manifest. Please find enclosed a copy of the Manifest stating that the PCB Mineral Oil Dielectric Fluid (MODEF) recovered from electrical equipment received by Florida Transformer, Inc. has been shipped to Clean Harbors for de-chlorination per 40 CFR 761.60(e).

Also enclosed, please find a copy of the Certificate of Disposal from Clean Harbors indicating that all required documentation pertaining to the proper disposal of this material has been completed.

If you have any questions, please do not hesitate to contact us.

Sincerely,

Jessica Pennington
Environmental Compliance

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FLR000168203	2. Page 1 of 1	3. Emergency Response Phone 850-830-3202	4. Manifest Tracking Number 007352445 JJK			
5. Generator's Name and Mailing Address FLORIDA TRANSFORMER PO BOX 507 DEFUNIAK SPRINGS, FL 32435			Generator's Site Address (if different than mailing address) 4509 St Hwy 83 North DeFuniak Springs, FL 32433					
Generator's Phone: 850-892-2711								
6. Transporter 1 Company Name CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.			U.S. EPA ID Number MAD039322250					
7. Transporter 2 Company Name			U.S. EPA ID Number					
8. Designated Facility Name and Site Address CLEAN HARBORS PPM, LLC. 1875 FORGE STREET TUCKER, GA 30084			U.S. EPA ID Number GAD880839187					
Facility's Phone: 770-834-0802								
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) 1. NON DOT REGULATED, POLYCHLORINATED BIPHENYLS		10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
			No.	Type				
			1	TT	14817	K		
14. Special Handling Instructions and Additional Information QB1. PPMDH18TU, EST VOLUME 4505.00 GALLONS, EARLIEST RFS DATE 08/08/13 JOB # GA8840750								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Officer's Printed/Typed Name Jessica Pennington			Signature <i>Jessica Pennington</i>		Month Day Year 11/29/13			
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____							
	17. Transporter Acknowledgment of Receipt of Materials							
TRANSPORTER	Transporter 1 Printed/Typed Name Charles R. Pennington			Signature <i>Charles R. Pennington</i>		Month Day Year 11/29/13		
	Transporter 2 Printed/Typed Name			Signature		Month Day Year		
DESIGNATED FACILITY	18. Discrepancy							
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection 4455.15 15.185 Kgs							
	18b. Alternate Facility (or Generator)			Manifest Reference Number: _____				
	Facility's Phone: _____			U.S. EPA ID Number				
	18c. Signature of Alternate Facility (or Generator)			Month Day Year				
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a								
Printed/Typed Name Michael P. Campbell			Signature <i>Michael P. Campbell</i>		Month Day Year 11/29/13			



Clean Harbors PPM LLC
1875 Forge Street
Tucker, GA 30084
GAD980839187
(770) 934-0902

CERTIFICATE OF DISPOSAL

Generator Contact Name: Mrs. Aida Martin
Generator Facility Name: Florida Transformer Inc
Generator Address: P.O. Box 507
Defuniak Springs, FL 32435

Sales Order#: GA8649756
Date Received: 12/9/2013

Load #:
Manifest #: 007352445JJK

CH ID Number	Date Removed From Service	Unit Type	Unique ID/ Serial Number	Material Description	Disposal Date	Method of Disposal	Disposal Facility
35247876	8/8/2013	TT	007352445FLE	PCB Liquids For Dechlorination (<500PPM)	12/18/2013	Dechlorination	PPM - Tucker, GA

Under civil and criminal penalties of law for making or submission of false or fraudulent statements or representatives (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Michael Holden

Authorized Agent

Thursday, January 02, 2014
Date

4455 g/s 15,188 Kgs

Final CD For This Manifest

Drum	Job	P/U Date	CUSTOMER	KVA	DESCRIPTION	SER_NO	ASD	CERT#	PPM	GAL	POD
T3	A25846	11/08/13	CITY OF OPP 000025	25	FTI 1 PHASE POLE XFMR	8252106	11/12/13	A25846	116	10.91	11/25/13
CITY OF OPP					1 Units	10.91 gal					

Attachment 2



FLORIDA TRANSFORMER, INC.

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

Field Quom Par # 344106

November 21, 2013

Patrick Chubb
Mississippi Power Company
P.O. Box 4079
Gulfport, MS 39502-4079

Reference: Carcass Disposal
Manifest # FLR000168203/007352432JJK
Shipped: 10/14/13

Dear Mr. Chubb,

The material shown on the attached continuation sheet was shipped for disposal on the above referenced manifest. Also attached is a copy of the manifest denoting that the material shipped has been delivered to, and accepted by, Trans-Cycle Industries, Inc. for disposal in compliance with 40 CFR 761 as applicable to disposal of PCB material.

A copy of the Certificate of Disposal will be mailed to you as soon as it is received by Florida Transformer, Inc. If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

Jessica Pennington
Environmental Compliance

NOV 08 2013

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number FLR 000 168 203	2. Page 1 of	3. Emergency Response Phone 850-892-2711	4. Manifest Tracking Number 007352432 JJK		
5. Generator's Name and Mailing Address FLORIDA TRANSFORMER INC PO BOX 507 DEFUNIAK SPRINGS, FL 32435							
Generator's Site Address (if different than mailing address) 4509 ST HWY 83 N DEFUNIAK SPRINGS, FL 32433							
6. Transporter 1 Company Name TRANSFORMER DECOMMISSIONING INC							
U.S. EPA ID Number TNW 100000 066							
7. Transporter 2 Company Name							
U.S. EPA ID Number							
8. Designated Facility Name and Site Address TCI OF ALABAMA LLC 101 Parkway East Pell City, AL 35125-2749							
U.S. EPA ID Number ALD 983 167 891							
Facility's Phone: 205-338-9997							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type	11. Total Quantity	12. Unit WL/Vol.	
x	1. RQ, POLYCHLORINATED BIPHENYLS, SOLID, 9, UN2315 PG III			18 CM	2467	kg	
x	2. RQ, POLYCHLORINATED BIPHENYLS, SOLID, 9, UN2315 PG II			2 CM	185	kg	
x	3. RQ, POLYCHLORINATED BIPHENYLS, SOLID, 9, UN2315 PG II			3 CM	1621	kg	
x	4. RQ, POLYCHLORINATED BIPHENYLS, SOLID, 9, UN2315 PG II			1 CM	243	kg	
14. Special Handling Instructions and Additional Information 9b1. Drained PCB Electrical Equip. (18 Polemnt) 9b2. Drained PCB Elec Equip. (Oil Switch) 9b3. Drained PCB Elec Equip. (Pad Mount) 9b4. Drained PCB Elec Equip (Metering Outfit) Earliest RFS Date - 07/03/2013							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Jessica Pennington							
Signature <i>Jessica Pennington</i>							
Month Day Year 10 14 13							
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name DAVE SICASPER Signature <i>Dave A Casper</i> Month Day Year 10 14 13							
Transporter 2 Printed/Typed Name Signature Month Day Year							
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number							
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H010 2. H010 3. H010 4. H010							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name MICHAEL SPRAGGINS Signature <i>Michael Spraggins</i> Month Day Year 10 15 13							

DESIGNATED FACILITY TO GENERATOR

Disposal Facility:
Trans-Cycle Industries

PCB BUSHING DISPOSAL

Manifest # 007352432JIK
Ship Date: 10/14/13

Job #	P/U Date	Customer	KV	Description	Serial #	ASD Date	Cert #	PPM	Weight
A19839	10/1/2013	Mississippi Power 352	15	PCB Oil Filled Bushing	A19839/No Tag	10/11/2013	A19839	>500	22 lbs.
A20432	10/7/2013	Mississippi Power 352	23	PCB Oil Filled Bushing	A20432/No Tag	10/11/2013	A20432	503	73 lbs.

Total Weight: 95 lbs.



FLORIDA TRANSFORMER, INC.

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

October 2, 2014

Patrick Chubb
Mississippi Power Company
P.O. Box 4079
Gulfport, MS 39502-4079

Reference: Carcass Disposal
Manifest # 007352432JJK
Shipped: 10/14/13

Dear Mr. Chubb,

Please find enclosed a copy of the Certificate of Disposal stating that the PCB material shipped on the above referenced manifest was properly disposed of by Trans-Cycle Industries, Inc. in compliance with 40 CFR 761 as applicable to disposal of PCB material.

This completes correspondence pertaining to disposal of this material. If you have any questions, please do not hesitate to contact us.

Sincerely,

Alda Martin
Administrative Assistant

**TCI of Alabama, LLC**

101 Parkway East
Pell City, AL 35125
Phone: (205) 338-9997
Fax: (205) 338-9979
EPA ID #: ALD983167891

Certificate of Disposal**Certificate Number:** 133994**Date Issued:** 12/5/2013**Manifest Id Number:** 007352432JJK**Pickup Date:** 10/14/2013**Generator:** FLORIDA TRANSFORMER, INC.

POST OFFICE BOX 507

4509 STATE HIGHWAY 83

DEFUNIAK SPRINGS, FL 32433

We hereby certify that the following PCB items were disposed of by TCI of Alabama, LLC metals cleaning and recycling process as of the date(s) shown below:

Barcode	Description	Serial #	Date
AA541665	PADMOUNT TRANSFORMER	76K30064	12/4/2013
AA541666	PADMOUNT TRANSFORMER	65M3988	12/4/2013
AA541667	METER	A16244	12/4/2013
AA541668	POLE MOUNT TRANSFORMER	C668452	12/4/2013
AA541669	POLE MOUNT TRANSFORMER	6607677	12/4/2013
AA541670	POLE MOUNT TRANSFORMER	F847818-64Y	12/4/2013
AA541671	BUSHING	A19839	12/4/2013
AA541672	BUSHING	A20432	12/4/2013

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Tracy Helms
Quality Director

12/5/2013

Date



ALABAMA

TCL of Alabama, LLC

101 Parkway East

Pell City, AL 35125

Phone: (205) 338-9997

Fax: (205) 338-9979

EPA ID #: ALD983167891

Certificate Number: 133994

Date Issued: 12/5/2013

Manifest Id Number: 007352432JJK

Total Items: 27

Pickup Date: 10/14/2013

Generator: FLORIDA TRANSFORMER, INC.

POST OFFICE BOX 507

4509 STATE HIGHWAY 83

DEFUNIAK SPRIN , FL 32433

Disposal Summary

In accordance with our agreement to provide disposal services, we hereby certify the completion of all items picked up on the above listed manifest. A summary of the disposition is as follows:

<u>TCL Barcode</u>	<u>Serial #</u>	<u>Gen Ref #</u>	<u>Size / KVA</u>	<u>Description</u>	<u>PCB (ppm)</u>	<u>Disposed</u>	<u>Method</u>	<u>Item(s)</u>	<u>Outbound</u>	<u>Disposed</u>	<u>Method</u>	<u>Liquid(s)</u>	<u>Outbound</u>
AA541671	A19839		0	BUSHING	419,990	12/4/2013	MCR			11/24/2013	INC		138531
AA541672	A20432		0	BUSHING	503	12/4/2013	MCR			11/24/2013	INC		138531
Quantity: 2													
AA541667	A16244		0	METER	530	12/4/2013	MCR						
Quantity: 1													
AA541659	1788-22		21793	OIL SWITCH	592	12/4/2013	MCR						
AA541660	A10068		21794	OIL SWITCH	661	12/4/2013	MCR						
Quantity: 2													
AA541664	76K30063		21845	PADMOUNT TRANSFORMER	1,741	12/4/2013	MCR						
AA541665	76K30064		21846	PADMOUNT TRANSFORMER	1,892	12/4/2013	MCR						
AA541666	65M3988		21847	PADMOUNT TRANSFORMER	664	12/4/2013	MCR						

Disposal Method Key:

CWL: PCB Chemical Waste Landfill - Waste Management, Emelle, AL
 DRN: Complete Draining - TCL of Alabama, LLC, Pell City, AL
 IHB: TCL Thermal Destruction - TCL of Alabama, LLC, Pell City, AL
 INC: PCB Incineration - Vedolia, Ft. Arthur, TX
 MCR: Metals Cleaning and Recycling - TCL of Alabama, LLC, Pell City, AL
 RCY: Recycling - TCL of Alabama, LLC, Pell City, AL
 THM: Thermal Destruction - See Attached Outbound
 DTX: Dechlorination - See Attached Outbound
 IHX: Dechlorination - TCL of Alabama, LLC Pell City, AL

Quality Director

12/5/2013

Date

TL 5295 TIAL 7445 1 comp. 13531 706238 138531

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number ALD683167891	2. Page 1 of 1 1	3. Emergency Response Phone 800 424-8300	4. Manifest Tracking Number 011752547 JJK	
5. Generator's Name and Mailing Address TCI OF ALABAMA, LLC 101 PARKWAY EAST PELL CITY, AL 35125-2748 Generator's Phone: (205) 338-8897 Ed						
Generator's Site Address (if different than mailing address) CRZ. GREG MASSARO						
6. Transporter 1 Company Name ROBBIE D. WOOD, INC.					U.S. EPA ID Number ALD087138891	
7. Transporter 2 Company Name					U.S. EPA ID Number	
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS HIGHWAY 73 PORT ARTHUR, TX 77640 Facility's Phone: (409) 738-2821						
3.5 MILES W. OF TAYLOR'S BAYOU TXD000338890						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity
				No.	Type	12. Unit Wt/Vol
	1. RG, UN2315, POLYCHLORINATED BIPHENYLS, LIQUID, 9, PGH1			1	TT	1945
						KG
13. Waste Codes OUT3288						
14. Special Handling Instructions and Additional Information PCB FLUID >400 PPM PCBSS TRAILER: 7443 DRFS: 9/09/13 POUNDS: 42120 PROFILE: RV2871 WORK ORDER: N/A GALLONS: 5763 EMERGENCY RESPONSE GUIDE: #171 24 HR EMERGENCY CONTACT: CHEMTREC						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Certifier's Printed/Typed Name Laur Holms			Signature <i>[Signature]</i>		Month Day Year 11 7 13	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name D. H. Roberts			Signature <i>[Signature]</i>		Month Day Year 11 7 13	
Transporter 2 Printed/Typed Name			Signature		Month Day Year	
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number:						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. 1640 2. 3. 4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a						
Printed/Typed Name Josette Y. McElhane			Signature <i>[Signature]</i>		Month Day Year 11 8 13	



13531

Veolia ES Technical Solutions, L.L.C.
Federal EPA ID: TXD000838896
State EPA ID: 50212-001
Highway 73, 3.5 miles W. of Taylor's Bayou Bridge
Port Arthur, TX 77643
(409) 736-2821

TCI OF ALABAMA, LLC
101 PARKWAY EAST
PELL CITY, AL 35125-2749

RECEIVED DEC 04 2013

ATTN: GREG MASSARO

CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from TCI OF ALABAMA, LLC (Fed EPA ID - ALD983167891) on 11/8/2013 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 011752547JJK.

Sequence 1

Profile Number: PTABV2871

Veolia Tracking ID: 706238

<u>Veolia Unit ID</u>	<u>Treatment Date</u>	<u>Inter-Company #</u>	<u>Date CD Was Issued</u>
1	11/24/2013		12/4/2013

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits, and licenses on the date listed above. Management of wastes includes pre-treatment blending and subsequent incineration per standardized handling code H040, "Incineration - thermal destruction other than use as fuel", reference 40 CFR Part 262, Appendix Item 19, (TCEQ 30 TAC § 335.10).

A handwritten signature in black ink, appearing to read "Paul V. Conrad", written over a horizontal line.

Paul V. Conrad
Material Services Manager

Disposal Facility:

PCB BUSHING DISPOSAL

Manifest # 007352432JJK

Trans-Cycle Industries

Ship Date: 10/14/13

Job #	P/U Date	Customer	KV	Description	Serial #	ASD Date	Cert #	PPM	Weight
A19839	10/1/2013	Mississippi Power 352	15	PCB Oil Filled Bushing	A19839/No Tag	10/11/2013	A19839	>500	22 lbs.
A20432	10/7/2013	Mississippi Power 352	23	PCB Oil Filled Bushing	A20432/No Tag	10/11/2013	A20432	503	73 lbs.

Total Weight: 95 lbs.

Attachment 3



FLORIDA TRANSFORMER, INC.

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

December 16, 2013

DEP Waste Management Division
HWRS, MS4560
2600 Blair Stone Rd
Tallahassee, FL
32399-2400

Re: 8700-12FL Florida Notification of Regulated Waste Activity

To Whom It May Concern:

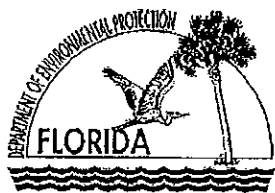
Please find enclosed the required 8700-12FL Notification of Regulated Waste Activity form for the Florida Transformer, Inc. facility located at 4509 State Hwy 83 North, DeFuniak Springs, FL. The purpose of the submittal is to update facility information regarding two (2) items. The items are as follows:

- 1) To update the facility status to Large Quantity Generator of Hazardous Waste
- 2) To add the EPA Hazardous Waste Code D018 to the list of generated waste codes at the facility.

Please feel free to contact me with questions, concerns or if additional information is needed.

Thank you,

Jessica Pennington
Florida Transformer, Inc.
Environmental Compliance



8700-12FL - FLORIDA NOTIFICATION OF REGULATED WASTE ACTIVITY

DEP Waste Management Division-HWRS, MS4560
2600 Blair Stone Rd. Tallahassee, FL 32399-2400
(850) 245-8707

Date Received
(for FDEP Official Use Only)

EPA ID: F L R 0 0 0 1 6 8 2 0 3

Please use the instructions document to complete this form

1. Reason for Submittal

(all submitters must
complete pages 1 and 2
and sign page 5.
Pages 3 and 4, - com-
plete as applicable)

Mark 'X' in
the correct box:
(must choose one
if a notification)

- ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, used oil activities, or PCW activities).
- ☒ To provide subsequent notification (to update status and facility identification information).
- ☐ To provide the final notification (closing) for the facility. (see instructions—must complete pages 1,2,5)
- FL Registration(s) ☐ UW Mercury (see page 3) ☒ HW Transporter (see page 4) ☒ Used Oil (see page 4)

2. Facility or Business Name

FLORIDA TRANSFORMER INC

3. Facility Operator

(List additional opera-
tors in the comments
section).

Name of Operator: Versatile Processing Group
Date became Operator: 08 / 18 / 2006
☐ New Operator mm dd yy
Street or P.O. Box: 9820 Westpoint Drive Suite 300
Phone Number: 317-577-9300
City or Town: Indianapolis State: IN Zip Code: 46256 Country (if not USA):
Operator Type: ☒ Private ☐ Federal ☐ Municipal ☐ State ☐ County ☒ Other Corporation

4. Facility Physical Location Information (No P.O. Boxes)

☐ Same address as
#3 above or:

Physical Street Address: 4509 St Hwy 83 North ☐ Vessel
City or Town: DeFuniak Springs State: FL Zip Code: 32433
County: Walton Country (if not USA):

5. Facility North American Industry Classification System (NAICS) Code(s) (at least 5 digits)

A. 3 3 5 3 1 1 (required) B.
C.
D.

6. Facility or Business Mailing Address

☒ Same address as # above or: Street or P.O. Box: PO Box 507
City or Town: DeFuniak Springs State: FL Zip/Postal Code: 32433 Country (if not USA):

7. Facility or Business RCRA Contact Person

First Name: Jessica Last Name: Pennington Title: Environmental Manager
Phone Number: 850-892-2711 Extension: 12 E-Mail: jessica@floridatransformer.com Fax: 850-892-6428
Street or P.O. Box: 4509 St Hwy 83 North PO Box 507

☐ Same address as
above or:

City or Town: DeFuniak Springs State: FL Zip Code: 32433 Country (if not USA):

8. Real Property (FL Land) Owner of the Facility's Physical Location (List additional owners in the com- ments section.)

☐ Same address as
above or:

Name of Owner: Versatile Processing Group Inc. Date became Owner: 08 / 18 / 2006
☐ New Owner mm dd yy
Street or P.O. Box: 9820 Westpoint Drive Suite 300 Phone Number: 317-577-9300
City or Town: Indianapolis State: IN Zip Code: 46256 Country (if not USA):
Owner Type: ☒ Private ☐ Federal ☐ Municipal ☐ State ☐ County ☒ Other Corporation

9. RCRA Hazardous Waste Activities at this Facility: (Mark 'X' in all that apply):**(A) (1) Generator of Hazardous Waste**

For Items 2 through 7, mark 'X' in all that apply.

☒ Yes ☐ No (Do not include Universal Waste or Used Oil)**(2) Treater, Storer, or Disposer of Hazardous Waste**

If YES, Choose only one of the following three categories.

(at your facility) Note: A hazardous waste permit may be required for this activity.

- ☒ a. **Large Quantity Generator (LQG):**
Generates in any calendar month 1,000 kilograms or greater per month (kg/mo) (2,200 lbs.) of non-acute hazardous waste; or Greater than 1 kg (2.2 lbs) of acute hazardous waste (at least once a year)

- ☐ a. Operating Commercial TSD
☐ b. Operating Non-Commercial TSD
☐ c. Non-Operating: Postclosure or Corrective Action Permit or Order (HSWA, etc.)

- ☐ b. **Small Quantity Generator (SQG):**
Generates in any calendar month greater than 100kg/mo but less than 1,000 kg/mo (>220 to <2,200 lbs.) of non-acute hazardous waste and/or 1 kg (2.2 lbs) or less of acute hazardous waste (at least once a year)

- (3) ☐ **Recycler of Hazardous Waste** (at your facility)
Specify: ☐ Commercial ☐ Non-Commercial.
Note: A permit is required for storage prior to recycling.

- (4) ☐ **Exempt Boiler and/or Industrial Furnace**
☐ a. Small Quantity On-site Burner Exemption
☐ b. Smelting, Melting, and Refining Furnace Exemption

- ☐ c. **Conditionally Exempt SQG (CESQG):**
Generates in any calendar month 100 kg/mo or less (220 lbs.) of non-acute hazardous waste and 1 kg (2.2 lbs) or less of acute hazardous waste

- (5) ☐ **Person Authorized to Manage Conditionally Exempt Waste Generated at Other Facilities**
Choose this management activity ONLY if you attach EITHER a copy of your application for such authorization OR the authorization you received from FDEP.

In addition, indicate other generator activities that apply.

- ☐ d. Short-Term Generator (one-time, not on-going)
☐ e. Episodic: Not more than one-time per year: __ SQG __ LQG
☐ f. United States Importer of hazardous waste
☐ g. Mixed Waste (hazardous and radioactive) Generator

- (6) ☐ **Receives Hazardous Waste from Off-Site**
(7) ☐ **Underground Injection Control**

10. Waste Codes for Federally Regulated Hazardous Wastes: List the waste codes of the Federal hazardous wastes handled at your facility. List them in the order they are presented in the regulations (e.g., D001, D003, F007, K019, P012, U112).

Hazardous waste transporters list codes routinely or usually transported. Use comments or an additional page if more spaces are needed.

1 D001	2 D005	3 D007	4 D018	5 F003	6 F005	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21

11. Other Status Changes (If no longer handling waste or closed, sections 9 and 10 should be blank and skip Section 12-16):**(A) Non-Handler of Regulated Waste at This Facility** (Sections 9, 10 and 12-16 should be blank.)

- ☐ (1) Business no longer generates, transports, treats, stores, disposes of, or otherwise handles any regulated waste.

(B) Facility Closed (Complete this section only if all business activities at this facility have ceased.)

- ☐ (1) Closed at this location and moved or moving to another - Submit a new Form 8700-12FL for the new location if you will
☐ (2) Out of Business - Business closed on _____ (date)

☐ (C) Property Tax Default☐ (D) Petition for Bankruptcy Protection**12-14 — Registration Activities Contact Information** (only if this submission is a registration or registration information update):
☒ Same as Facility RCRA
 Contact on page 1 or enter:

First Name:

Last Name:

Title:

Phone Number:

Extension:

E-Mail:

Contact for:

- ☒ HW Transporter
☐ Used Oil Handler
☐ Universal Waste

Street or P.O. Box:

City or Town:

State:(Country):

Zip Code:

Universal Waste Notification and Mercury Transporter/Handler Registration		EPA ID No. FLR 000 168 203
12. Universal Waste (UW) Activities (Mark 'X' and complete all that apply) :		
A. Federal Notification	<input type="checkbox"/> Federally Defined Large Quantity Handler (LQH) = Generate/Accumulate: <u>5,000 kg (11,000 lb) or more</u> of any combination of UW accumulated (at any one time) <div style="display: flex; justify-content: space-between;"> Accumulates: <input checked="" type="checkbox"/> a. UW Batteries <input type="checkbox"/> b. Pesticides <input type="checkbox"/> c. Pharmaceuticals </div> <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> d. Mercury Containing Devices <input type="checkbox"/> e. Mercury Containing Lamps </div> <input type="checkbox"/> Destination Facility for UW Note: For this activity, a facility must treat, dispose or recycle a UW. A permit is required for storage prior to recycling.	
B. Florida Universal Pharmaceutical Waste (UPW): one-time registration		
<input type="checkbox"/> Pharmaceuticals LQH = 5,000 kg or more of Universal Pharmaceutical Waste (UPW) accumulated (at any one time) <input type="checkbox"/> Pharmaceuticals Acute LQH = more than 1 kg (2.2 lb) of acutely hazardous ("P-listed") pharmaceutical waste (UPW) accumulated <input type="checkbox"/> Reverse Distributor of Universal Pharmaceutical Waste (UPW) (must be registered with the Florida Department of Health [DOH]) <input type="checkbox"/> Florida Universal Pharmaceutical Waste (UPW) Transporter		
C. Florida Annual Mercury Handler Registration:		
For-hire transporters, transfer facilities, handlers, reclamation and recovery facilities of Mercury-Containing Lamps and Devices operating in the State of Florida are required to register annually with the Department using this section of the form [Chapter 62-737, F.A.C.]. A one-time fee of \$1,000 is required for first time registration as a Large Quantity for-hire Handler of Mercury-Containing Lamps and Devices as detailed in 62-737.400(3)(a)3. (please contact FDEP first). If you <u>only</u> generate lamps and/or devices or manage pharmaceuticals, do not register or complete the information below.		
(1) This form is being submitted as a Florida Registration of Universal Waste Transporter/Handler <u>for-hire</u> Activities <input type="checkbox"/> First time registering <input type="checkbox"/> Renewal <input type="checkbox"/> One-time \$1,000 fee for Mercury for-hire first time LQH registration is attached		
<input type="checkbox"/> For-hire Transporter of Universal Waste Mercury-Containing Lamps or Devices <input type="checkbox"/> For-hire Transfer Facility of Universal Waste Mercury-Containing Lamps or Devices <input type="checkbox"/> Mercury-Containing Devices (thermostats, etc) SQH = less than 100 kg accumulated by for-hire handler <input type="checkbox"/> Mercury-Containing Lamps SQH = less than 2,000 kg (8,000 lamps) accumulated by for-hire handler		Annual Registration Required
<input type="checkbox"/> Mercury-Containing Devices LQH = 100 kg (220 lb) or more accumulated at any one time by for-hire handler <input type="checkbox"/> Mercury-Containing Lamps LQH = 2,000 kg (4400 lbs/8,000 lamps) or more accumulated by for-hire handler		Annual Registration + one-time \$1,000 fee + More Requirements (contact FDEP)
(2) Mercury Recovery and/or Reclamation Facility (A <u>hazardous waste permit</u> is required for this activity) <input type="checkbox"/> First time registering <input type="checkbox"/> Renewal		Annual Registration Required
Briefly Describe your Universal Waste Activities: <input type="checkbox"/> We use Drum Top Bulb Crusher(s).		
13. Other State Regulated Waste Activities: Petroleum Contact Water (PCW) <input type="checkbox"/> Recovery <input type="checkbox"/> Transport [62-740 F.A.C.] Note: A water facility permit may be required for this activity. An annual report is required for a recovery facility pursuant to Rule (62-740.300(5))		

14. HW Transporter Activities: (Mark 'X' and complete all that apply if you need to register your HW Transporter activities)

Transporters of and Transfer Facilities for Hazardous Waste in the State of Florida are required to register and annually renew their registration. Evidence of casualty/liability insurance pursuant to 62-730.170(2)(a) is required in addition to this registration. Transfer facilities must submit several additional documents as detailed on page 5 the first time they register and when the information changes. Registered transporters and transfer facilities may only begin operations after receiving approval from the Department. Generators of hazardous waste who transport waste only within the boundaries of their facility should not register.

A. HW Transporter Registration Information (must be completed annually and when this information changes)

This facility is a registered transporter of hazardous waste.

This form is: ☐ Initial Registration ☐ Renewal ☐ Notification of changes ☐ Cancel Registration

☒ 1. For own waste only ☐ 2. For commercial purposes ☐ 3. Both commercial and own waste

4. Transportation Mode ☐ Air ☐ Rail ☒ Highway ☐ Water ☐ Other - specify _____

B. HW Transfer Facility Registration Information (must be completed annually and when this information changes)

☐ This facility is a Hazardous Waste Transfer Facility: (at this location) Storage Volume _____

This form is: ☐ Initial Registration ☐ Renewal ☐ Notification of changes ☐ Cancel Registration

Note: Hazardous Waste transfer facilities must comply with the requirements of Rule 62-730.171, F.A.C., and Rule 62-730.182, F.A.C.

The Transfer Facility records required under the provisions of Rule 62-730.171(6), F.A.C., are kept at (check one):

☐ Our mailing (business) address ☐ The site (facility) address

Please enter the EPA ID Number of the HW Transporter who carries the insurance for this Transfer Facility:

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Please see the top of page 5 for additional items that must be submitted in addition to the above registration for Hazardous Waste Transfer Facilities [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)]:

15. Used Oil and Oil Filter Activities: (Mark 'X' and complete all that apply if you need to register your used oil activities),

Transporters (exemptions in 40 CFR 279.40(a)(1-4), transfer facilities, processors, off-specification burners, and/or marketers must annually register with the Department using this form. All except Florida used oil (UO) Processors and collection centers must pay an annual \$100 registration fee.

This form is: ☐ Initial Registration ☐ Renewal ☐ Notification of changes ☐ Cancel Registration

☐ If applicable, a check or money order, in the amount of \$100, payable to Florida Department of Environmental Protection is enclosed.

(1) Used Oil Transporter - mark activities: (occurring in Florida)

☒ a. Transporter (off-site) and noncontiguous locations

☒ b. Transfer Facility

(2) ☐ Collection Center (From businesses, no more than 55 gal per shipment)

(3) ☒ Used Oil Processor (A permit is required.)

(4) ☐ Off-Specification Used Oil Burner

(5) Used Oil Fuel Marketer ☒ On-Spec ☐ Off-Spec

(6) Used Oil Filter Management (must annually register)

☒ a. Transporter

☐ b. Transfer Facility

☐ c. Processor (Annual Report Required)

☐ d. End User

(7) The records required under the provisions of Rule 62-710.510, FAC, are kept at (check one):

☐ Our mailing (business) address ☒ The site (facility) address

Please see the top of page 5 for additional items that must be submitted in addition to the above registration and fees required for non-exempt Used Oil Transporters.

(14 cont.) **Hazardous Waste Transfer Facilities:** In addition to the registration required for Transfer Facilities on Page 4, Section 14, the following items are required to be submitted with the initial notification for a transfer facility and any changed items must be submitted with any subsequent submission [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)]:

- ☐ Certification by a responsible corporate officer of the transporter that the proposed location satisfies the criteria of Section 403.7211(2), Florida Statutes (F.S.) [Rule 62-730.171(3)(a)1., F.A.C.]
- ☐ Evidence of the transporter's financial responsibility [Rule 62-730.171(3)(a)3., F.A.C.]
- ☐ A brief general description of the transfer facility operations [Rule 62-730.171(3)(a)4., F.A.C.]
- ☐ A copy of the facility closure plan [Rule 62-730.171(3)(a)5., F.A.C.]
- ☐ A copy of the contingency and emergency plan [Rule 62-730.171(3)(a)6., F.A.C.]
- ☐ A map or maps of the transfer facility [Rule 62-730.171(3)(a)7., F.A.C.]

(15 cont.) **Used Oil Transporters:** (Exemptions in 40 CFR 279.40(a)(1-4))

In addition to the requirements on Page 4 Section 15:

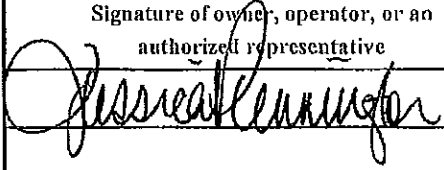
- ALL registered UO Handlers must submit an annual report except generators transporting UO from noncontiguous operations within their own company.
- UO transporters transporting off-site over public highways only within their own company must submit proof of insurance.
- UO transporters transporting more than 500 gallons/year must submit proof of insurance annually, and must sign and certify this submission as a certified used oil transporter in section 17 (except those exempted by Rule 62-710.600(1), F.A.C.).

☐ The used oil annual report is attached ☐ Evidence of Liability Insurance pursuant to 62-710.600(2)(e), F.A.C. is attached.

16. **Comments** (attach a page if more space is needed):

17. **Certification:** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

☒ I certify as a Used Oil Transporter that I am familiar with the applicable Florida and Federal laws and rules governing used oil transportation and have an annual and new employee training program in place covering the applicable used oil rules. Evidence of financial responsibility is demonstrated by the Used Oil Transporter Certificate of Liability Insurance, DEP form 62-730.900(5)(a), F.A.C..

Signature of owner, operator, or an authorized representative	Print Name and Title	Used Oil	Date Signed (mm-dd-yyyy)
	Jessica Pennington Environmental Mgr	<input checked="" type="checkbox"/>	12/16/2013
		<input type="checkbox"/>	
		<input type="checkbox"/>	

If the person that filled in this form is not the Facility Contact or Operator, please complete the information below:

(Name of person completing this form)

(Phone Number)

(E-mail Address)

Attachment 4

Notes:

Form Updated 12/16/2013

Attachment 5

I. EMERGENCY PLAN COORDINATOR

NAME: **Scott Seay**
TITLE: **HR / Safety Manager**
TELEPHONE NO: **(850) 892 -2711 x 39**

II. PREFERRED MEANS OF REPORTING FIRES AND OTHER EMERGENCIES

Emergencies that could be encountered in the workplace include:

- Fire
- Explosion
- Tornado/Weather
- Bomb Threat
- Chemical Spill/Leak
- Violence
- Medical

All company emergencies will be reported by the appropriate manager or designee by dialing ext. 32, 11, or 39 and reporting to the Emergency Coordinator that there is a specific emergency. If necessary, as each specific event dictates, the Emergency Coordinator, or their designee will then contact the appropriate emergency service.

Florida Transformer Emergency Coordinators are:

David Smith	Plant Manager	-ext. 32
	Cell # 334-791-9408	
Ron Shaw	General Manager	-ext. 11
	Cell # 850-830-8071	
Scott Seay	Human Resources Manager	-ext. 39
	Home # 334-684-6444	

These associates can be contacted for further information or explanation of duties.

Depending on the magnitude of the emergency, use of the Company Intercom (press *Intercom* *70) may be appropriate. Contact emergency services (dial 911) as needed.

2011 EAP

I. EMERGENCY PLAN COORDINATOR

NAME: **Steve Holland**
TITLE: **HR / Safety Manager**
TELEPHONE NO: **(850) 892 -2711 x 39**

II. PREFERRED MEANS OF REPORTING FIRES AND OTHER EMERGENCIES

Emergencies that could be encountered in the workplace include:

- Fire
- Explosion
- Tornado/Weather
- Bomb Threat
- Chemical Spill/Leak
- Violence
- Medical

All company emergencies will be reported by the appropriate manager or designee by dialing ext. 32, 11, or 39 and reporting to the Emergency Coordinator that there is a specific emergency. If necessary, as each specific event dictates, the Emergency Coordinator, or their designee will then contact the appropriate emergency service.

Florida Transformer Emergency Coordinators are:

David Smith	Plant Manager	-ext. 32
	Cell # 334-791-9408	
Ron Shaw	General Manager	-ext. 11
	Cell # 850-830-8071	
Steve Holland	Human Resources Manager	-ext. 39
	Home # 334-449-0982	

These associates can be contacted for further information or explanation of duties.

Depending on the magnitude of the emergency, use of the Company Intercom (press *Intercom* *70) may be appropriate. Contact emergency services (dial 911) as needed.

2012 EAP

I. EMERGENCY PLAN COORDINATOR

NAME: **Meredith Allred**
TITLE: **HR / Safety Manager**
TELEPHONE NO: **(850) 892 -2711 x 39**

II. PREFERRED MEANS OF REPORTING FIRES AND OTHER EMERGENCIES

Emergencies that could be encountered in the workplace include:

- Fire
- Explosion
- Tornado/Weather
- Bomb Threat
- Chemical Spill/Leak
- Violence
- Medical

All company emergencies will be reported by the appropriate manager or designee by dialing ext. 32, 11, or 39 and reporting to the Emergency Coordinator that there is a specific emergency. If necessary, as each specific event dictates, the Emergency Coordinator, or their designee will then contact the appropriate emergency service.

Florida Transformer Emergency Coordinators are:

Ron Shaw General Manager -ext. 11
4604 State Hwy 2 West
Defuniak Springs, FL, 32433
Cell # 850-830-8071

Meredith Allred Human Resources Manager -ext. 39
460 Dr. Roberts Drive
Defuniak Springs, FL, 32433
Home # 850-797-0626

These associates can be contacted for further information or explanation of duties.

Depending on the magnitude of the emergency, use of the Company Intercom (press *Intercom* *70) may be appropriate. Contact emergency services (dial 911) as needed.

2013
EAP

I. EMERGENCY PLAN COORDINATOR

NAME: **Meredith Allred**
TITLE: **HR / Safety Manager**
TELEPHONE NO: **(850) 892 -2711 x 39**

II. PREFERRED MEANS OF REPORTING FIRES AND OTHER EMERGENCIES

Emergencies that could be encountered in the workplace include:

- Fire
- Explosion
- Tornado/Weather
- Bomb Threat
- Chemical Spill/Leak
- Violence
- Medical

All company emergencies will be reported by the appropriate manager or designee by dialing ext. 32, 11, or 39 and reporting to the Emergency Coordinator that there is a specific emergency. If necessary, as each specific event dictates, the Emergency Coordinator, or their designee will then contact the appropriate emergency service.

Florida Transformer Emergency Coordinators are:

Ron Shaw President -ext. 11
4604 State Hwy 2 West
Defuniak Springs, FL, 32433
Cell # 850-830-8071

Meredith Allred Human Resources Manager -ext. 39
460 Dr. Roberts Drive
Defuniak Springs, FL, 32433
Home # 850-797-0626

These associates can be contacted for further information or explanation of duties.

Depending on the magnitude of the emergency, use of the Company Intercom (press *Intercom* *70) may be appropriate. Contact emergency services (dial 911) as needed.

2014
EAP

Attachment 6



FLORIDA TRANSFORMER, INC.

OCCUPATIONAL SAFETY AND HEALTH

EMERGENCY ACTION PLAN
Effective 1/1/2014

2014
EAP

I. EMERGENCY PLAN COORDINATOR

NAME: Meredith Allred
TITLE: HR / Safety Manager
TELEPHONE NO: (850) 892 –2711 x 39

II. PREFERRED MEANS OF REPORTING FIRES AND OTHER EMERGENCIES

Emergencies that could be encountered in the workplace include:

- Fire
- Explosion
- Tornado/Weather
- Bomb Threat
- Chemical Spill/Leak
- Violence
- Medical

All company emergencies will be reported by the appropriate manager or designee by dialing ext. 32, 11, or 39 and reporting to the Emergency Coordinator that there is a specific emergency. If necessary, as each specific event dictates, the Emergency Coordinator, or their designee will then contact the appropriate emergency service.

Florida Transformer Emergency Coordinators are:

Ron Shaw General Manager -ext. 11
4604 State Hwy 2 West
Defuniak Springs, FL, 32433
Cell # 850-830-8071

Meredith Allred Human Resources Manager -ext. 39
460 Dr. Roberts Drive
Defuniak Springs, FL, 32433
Home # 850-797-0626

These associates can be contacted for further information or explanation of duties.

Depending on the magnitude of the emergency, use of the Company Intercom (press *Intercom* *70) may be appropriate. Contact emergency services (dial 911) as needed.

III. ELEMENTS

A. Emergency Escape Procedures and Routes

Emergency escape procedures and route assignments have been posted in each work area, and all associates have been trained by supervision in the correct procedures to follow. New associates are trained when assigned to a work area. A sample escape procedure and escape route sheet of the type posted in work areas is given in Appendix A.

B. Procedure for Associates Who Remain to Operate Critical Operations Before They Evacuate

The attached sheet (Appendix B) describes operations, procedures, and personnel required in order for critical operations to be performed before the assigned personnel evacuate during emergencies. A description of the special training provided is also included.

C. Associate Accountability Procedures After Evacuations

Each supervisor is responsible for accounting for all assigned associates, personally or through a designee, by having all such associates report to a predetermined designated rally point and conducting a head count. Each assigned associate must be accounted for by name. All supervisors are required to report their head count (by name) to the Emergency Evacuation Coordinator. A summary of the evacuation rally points, together with the identities of supervisors and assigned associates who must report to each, is listed in section F (Training).

D. First Aid

The Company will ensure that there is an adequate number of first aid trained associates. See Appendix C for review.

E. Alarm System

Alarm systems for notifying all associates in case of an emergency is:

- **Company Intercom (press *Intercom* *70)**

In some cases, Company Intercom use may not be permitted. When this happens, associates will be given verbal instructions by management or other authorized persons.

When so required by specific OSHA Standards, the organization will comply with OSHA Standard 1910.165, Associate Alarm Systems.

F. Training

The following personnel have been trained to assist in the safe and orderly emergency evacuation of other associate.

NAME	TITLE	WORK AREA	SPECIAL ASSIGNMENT
Billy Godwin	Lead Person	Pad Mount, LT, Welding,	
Kenneth Evans	Lead Person	Pad Mount, LT, Welding,	Alternate
Danny Shaw	Supervisor	Fabrication	
Daniel Williams	Lead Person	Fabrication	Alternate
Ronald Edwards	Supervisor	Regulator, 3Ø Recloser, Panel	
Joe Ross	Panel Repair	Regulator, 3Ø Recloser, Panel	Alternate
Teresa Cook	Purchasing	Stock Room	
Nancy Cook	Stock Clerk	Stock Room	Alternate
Billy Burgess	Supervisor	Pole, Test	
Carson Anderson	Lead Person	Pole, Test	Alternate
Larry Shepherd	Lead Person	Paint	
Bobbie Jean Shiver	Paint Room	Paint	Alternate
Derek Vaughan	Lead Person	Inprocessing	
Lessia Hardy	Inprocessing	Inprocessing	Alternate
Dean Penzo	Lab Manager	Lab	
Lisa Mathes	Lab Tech.	Lab	Alternate
Ronald Edwards	Maintenance Supervisor	Maintenance, Housekeeping	
Carl Holloway	Maintenance Tech.	Maintenance, Housekeeping	Alternate
Don Carroll	Transportation Supv.	Transportation	
Darryal Senn	Transportation	Transportation	Alternate
Jessup Nolin	Supervisor	Decommission	
Andrew Hall	Supervisor	Decommission	Alternate
Kenneth Evans	Lead Person	1Ø Recloser	
Jerry Wilson	Recloser Repair	1Ø Recloser	Alternate
Carle Collins	Supervisor	Upstairs Offices	
Marty Trant	Production	Upstairs Offices	Alternate
Alice Kaye Green	Office	Office/Admin	
Kathy Parker	Office	Office/Admin	Alternate
Tim Shiver	PCB Decommission	PCB Decommission	
Frankie Cook	PCB Decommission	PCB Decommission	Alternate
Dwane Burkett	Operator	PCB1000	
Danny Shaw	Supervisor	PCB1000	Alternate

Training is provided for associates when:

1. The plan was initiated
2. Responsibilities change
3. New associates are hired or transferred

IV. EMERGENCY SHUTDOWN PROCEDURES

During some emergency situations, it will be necessary for some specifically assigned and properly trained associates to remain in work areas that are being evacuated long enough to perform critical operations. These assignments are necessary to ensure proper emergency control.

Assignments

WORK AREA	NAME	TITLE	DESCRIPTION OF ASSIGNMENT
Decommission	Jessup Nolin	Lead Person	Turn Off Propane Supply at Tank
Decommission	Andy Hall (Alternate)	Supervisor	Turn Off Propane Supply at Tank
Oil Supply	Bobby Jones	Inprocessing	Turn Off Oil Pumps
Oil Supply	Dwane Burkett (Alternate)	Inprocessing	Turn Off Oil Pumps
Shop	Carl Holloway	Maintenance Tech.	Shop Power Supply
Shop	Charles Cordle (Alternate)	Maintenance Tech.	Shop Power Supply
PCB Decommission	Tim Shiver	PCB Decommission	Oven Power Supply (South Wall) Propane Emergency Shut-Off (East Wall)
PCB Decommission	Frankie Cook (Alternate)	PCB Decommission	Oven Power Supply (South Wall) Propane Emergency Shut-Off (East Wall)
PCB1000	Dwane Burkett	Operator	Safely end all processes; Close IN/OUT oil valves; Turn off nitrogen at supply.
PCB1000	Danny Shaw (Alternate)	Supervisor	Safely end all processes; Close IN/OUT oil valves; Turn off nitrogen at supply.

V. SPECIAL TRAINING

The preceding individuals have received special instructions and training by their immediate supervisors to ensure their safety in carrying out the designated assignments. A training record describing the instructions provided and the detailed procedures to be followed is maintained in the Emergency Plan and Fire Protection Plan Coordinator's Office.

Emergency and Fire Protection Plan Coordinator: **Meredith Allred**
Title: **HR / Safety Manager**

VI. ASSOCIATE ACCOUNTABILITY PROCEDURES FOLLOWING AN EMERGENCY EVACUATION

Each supervisor is responsible for accounting for each assigned associate following an emergency evacuation. The supervisor or designee will have a list of all associates working in the plant on that shift and will keep this in his possession in order to account for all associates by name.

VII. ASSOCIATE ACCOUNTABILITY

1. Rally points have been established for all evacuation routes and procedures. These points are designated on each posted work area escape route.
2. All work area supervisors and associates must report to their designated rally points immediately following an evacuation.
3. Each associate is responsible for reporting to his or her supervisor so that an accurate head count can be made. Supervisors will check off the names of all those reporting and will report those not checked off as missing to the Emergency Evacuation Coordinator.
4. The Emergency Evacuation Coordinator will be located at one of the following locations:
 - A. Primary Location: **Main Office**
 - B. Secondary Location: **Plant Manager Office**
5. The Emergency Coordinator will determine the method that will be utilized to locate missing associates. If there is the need to reenter the evacuated area, fire department and/or rescue squads will be used to locate missing associates.

VIII. SEVERE WEATHER

The Emergency Plan Coordinator or other authorized associate shall announce severe weather alerts (such as tornados) by plant intercom system. All associates shall immediately retreat to a **Designated Storm Area** until the threat of severe weather has passed as communicated by the Emergency Plan Coordinator or his/her designee.

The **Designated Storm Areas** are:

1. The outside grit blast booth
2. The hallway in front of the stock room
3. Interior rooms and hallways inside the main office

In the event that evacuation to a **Designated Storm Area** is not feasible, associates may need to shelter-in-place.

The following should be used as shelters of last resort:

1. Inprocessing office
2. Under a work desk or heavy table
3. The old paint room / new maintenance room
4. PCB room

IX. OIL AND/OR HAZARDOUS MATERIALS/WASTE RELEASE AND RESPONSE

This facility practices the receipt, handling, use, storage and shipment of used and new transformer oil, as well as, hazardous materials and waste. There is a designated group of associates who function as the "Spill Response Team(s)". These teams serve for six months and receive training (both outsourced and in house) on response to and remediation of both oil and hazardous materials/waste release.

The facility Environmental Manager is responsible for oversight of the Response Teams and reporting, as necessary. Additionally, in the event a release or situation is foreseen as a threat to FTI personnel and/or the environment at its physical location or any surrounding territories the following contacts are in place.

REGULATORY CONTACT

OFFICE #

NATIONAL RESPONSE CENTER	1-800-424-8802
FLORIDA DIVISION OF EMERGENCY MANAGEMENT	1-800-226-4329
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	1-850-245-2118
FLORIDA DEPARTMENT OF TRANSPORTATION	1-850-245-1500
US EPA REGION IV BRANCH CHIEF (8:00 AM-5:00 PM M-F)	1-800-564-7577
US EPA REGION IV SPILL REPORTING (24 HR NUMBER)	1-404-562-8700
US COAST GUARD (DESTIN, FL.)	1-850-244-7147
HAZARDOUS MATERIALS/WASTE INCIDENTS	1-800-843-0699

EMERGENCY SERVICES

DEFUNIAK SPRINGS FIRE DEPARTMENT	911 OR 850-892-8503
WALTON COUNTY SHERIFF'S DEPARTMENT	911 OR 850-892-8111
WALTON COUNTY EMERGENCY MANAGEMENT AGENCY	850-892-8065

EMERGENCY SPILL CLEANUP CONTRACTORS

CONTACT

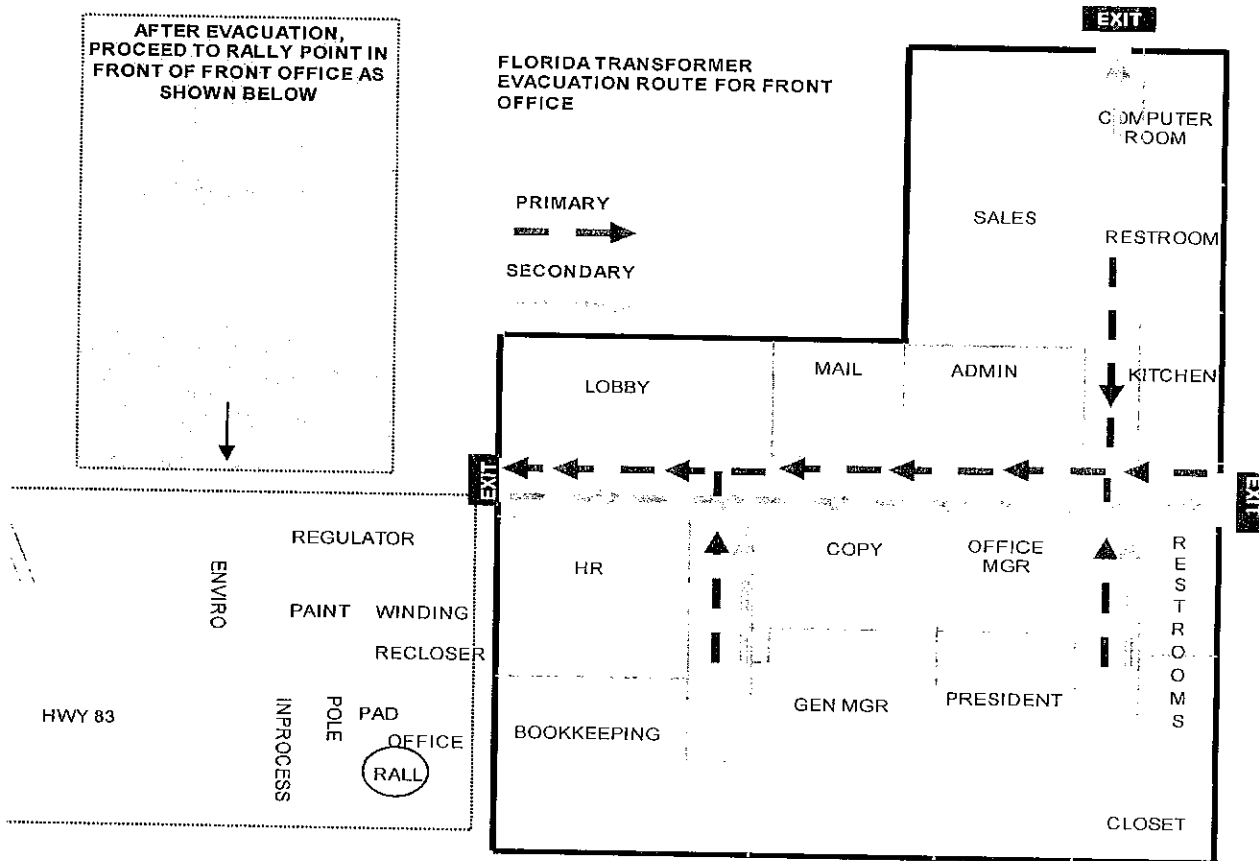
OFFICE #

SWS FIRST RESPONSE	1-800- 852-8878
--------------------	-----------------

The facility maintains a standing contract with SWS Environmental for assistance in the event a release becomes a state of emergency and/or is out of the capable control of Florida Transformer, Inc.

APPENDIX "A"

- A sample escape procedure and escape route sheet of the type posted in work areas is as follows:
- The evacuation rally point is the grassy area directly in front of the main office.



APPENDIX "B"

Critical Operations

The following operation at Florida Transformer is considered to be of critical nature, and where possible, special procedures for evacuation should apply.

1. **Front Office:** Depending upon the severity and location of each emergency, it may be possible for the office associates to remain at their stations. Should it become necessary to evacuate the office, again where possible, two office associates should remain in the area to assist with emergency communications (telephone). **Of course, when necessary, the associates will be instructed to evacuate their area immediately.** This instruction will typically come from their immediate supervisor, but in special circumstances, this instruction will come from the Emergency Coordinator.

APPENDIX “C”

Associates trained in first aid

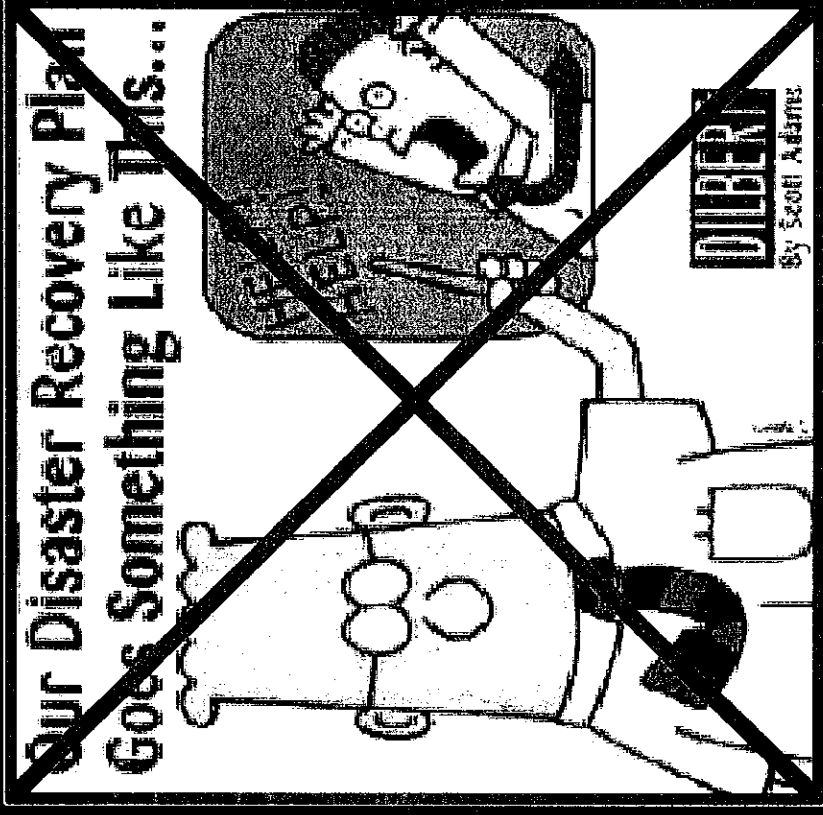
1. Danny Shaw – Winding/Upstairs office
2. Kenneth Evans – Recloser Repair
3. Ronald Edwards – Maintenance/Regulator
4. Anthony Mitchem – Field Decommission
5. Jessup Nolin – Decommission
6. Larry Shepherd – Paint
7. Dean Penzo – Lab
8. Carl Holloway – Maintenance
9. Billy Burgess – Pole/Upstairs office
10. Dwane Burkett – Inprocessing
11. Aaron Presley – Outside Paint

Associates trained in CPR & AED

1. Danny Shaw – Winding/Upstairs office
2. Kenneth Evans – Recloser Repair
3. Ronald Edwards – Maintenance/Regulator
4. Anthony Mitchem – Field Decommission
5. Jessup Nolin – Decommission
6. Larry Shepherd – Paint
7. Dean Penzo – Lab
8. Carl Holloway – Maintenance
9. Billy Burgess – Pole/Upstairs office
10. Dwane Burkett – Inprocessing
11. Aaron Presley – Outside Paint

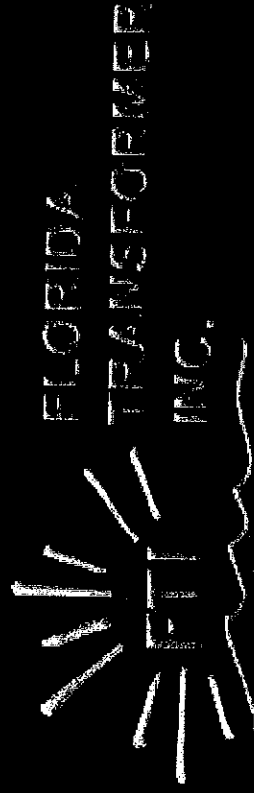
Attachment 7

Safety and Information Meeting 3/5/13



Emergency Action Plan (EAP)

EMERGENCY ACTION PLAN FLORIDA TRANSFORMER, INC.



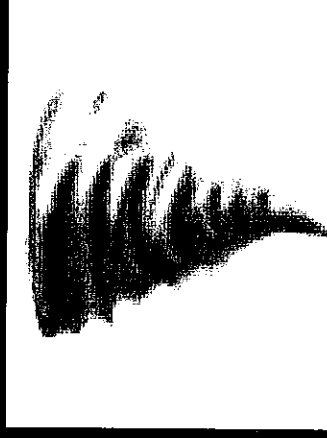
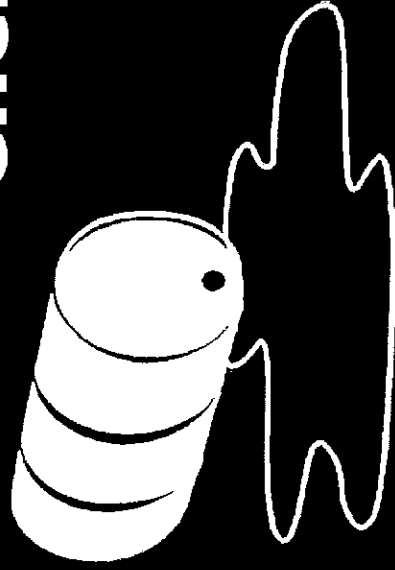
Emergency Action Plans 29

CFR 1910.38

The emergency action plan shall be in writing and shall cover those designated actions employers and associates must take to ensure associate safety from fire and other emergencies.

Emergency Action Plan

- Fire
- Explosion
- Tornado/Weather
- Chemical Spill

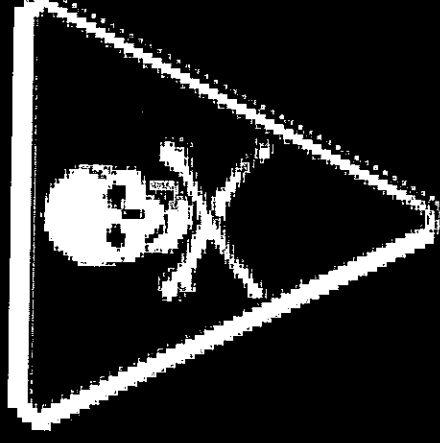


OSHA Requirements

- **Emergency escape procedures and routes.**
- **Procedures for critical plant operations before evacuating.**
- **Procedures to account for associates following emergency evacuation.**
- **Rescue and medical duties.**
- **Means of reporting emergencies.**
- **People to contact for further information.**

Identifying Hazards

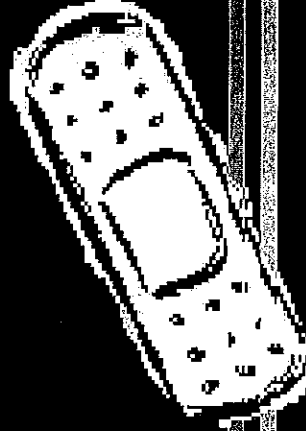
- Flammable Liquids
- Reactive Chemicals
- Explosive Agents
- Electrical Hazards
- Vapors and Dusts
- Chemical Vapors





Safety Procedures

- Know how to report a fire, spill or other incident.
- Alarm system is supervisor instructions or intercom.
- Know your responsibilities for shutting down operations or systems.
- Know where to find first-aid supplies and fire extinguishers.



Safety Procedures

- **Alert others.**
- **Follow your assigned evacuation route and meet at your assigned assembly point.**
- **If you have emergency response responsibilities, follow your instructions on where to go and what to do.**

Severe Weather

When a severe weather storm alert is issued, retreat to a designated storm area:

- 1. The outside grit blast booth**
- 2. The hallway in front of the stock room**
- 3. Interior rooms and hallways inside the main office**

Severe Weather

In the event that evacuation to a Designated Storm Area is not feasible, associates may need to shelter-in-place.

The following should be used as shelters of last resort:

- Inprocessing office
- Under a work desk or heavy table
- The old paint room / new maintenance room
- PCB room

Severe Weather

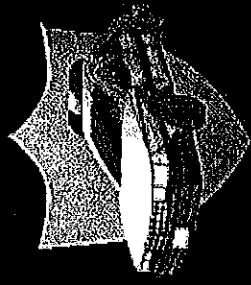
- **Stay Inside**
- **Take Cover Quickly**
- **Move Away From Exterior Walls & Windows**
- **Get Under A Piece Of Sturdy Furniture Such As A Workbench, Heavy Table Or Desk And Hold On To It.**
- **Use Arms To Protect Head & Neck**

Summary

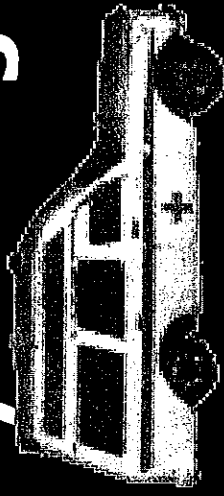


- Notify supervisor or emergency contact immediately in the event of emergency.
- Know your evacuation route and rally point. ↑
- If evacuation is ordered, leave orderly through designated exit and meet at rally point. ↑

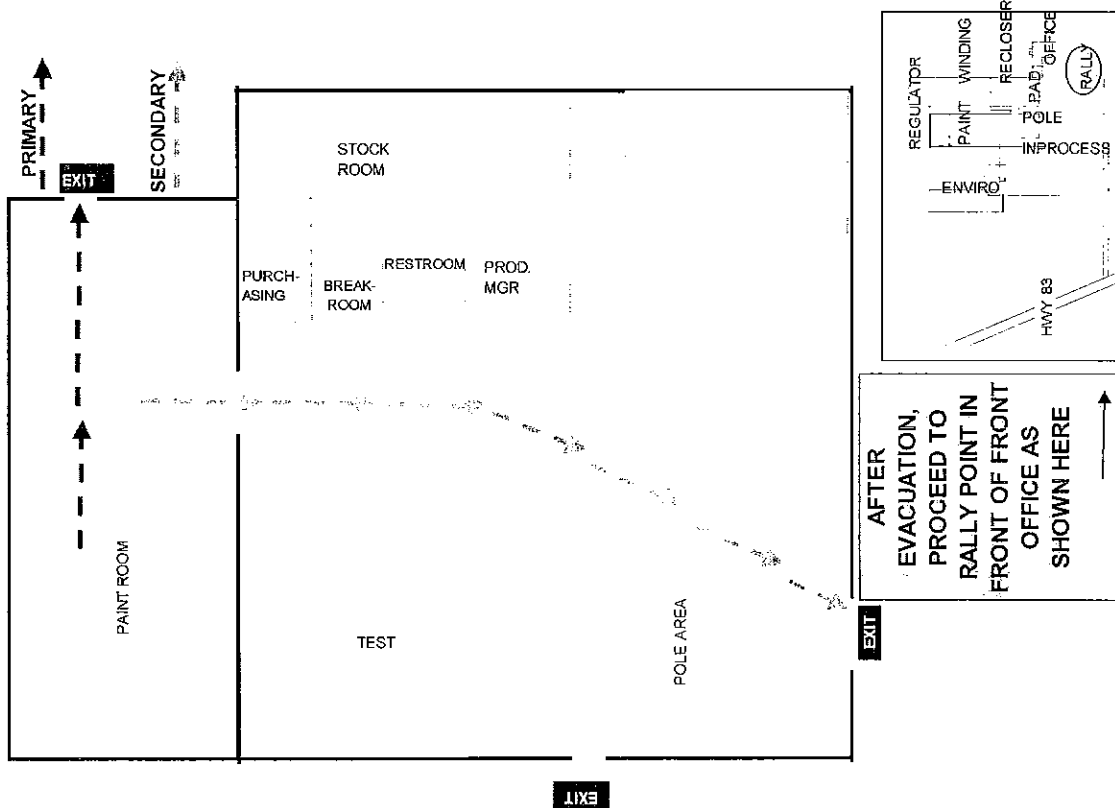
Summary



- Entry into evacuated areas should be done by trained personnel.
- Fire, Rescue and Law Enforcement can be accessed by dialing 911.



FLORIDA TRANSFORMER EVACUATION ROUTE FOR PAINT ROOM



Associates Trained in First Aid & CPR


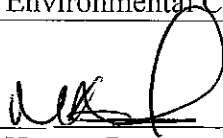

- Danny Shaw – Upstairs/Winding/Red Dragon
- Kenneth Evans – Recloser
- Ronald Edwards – Maintenance/Regulator
- Anthony Mitchem – Field Decommission
- Jessup Nolin – Decommission
- Larry Shepherd – Paint
- Dean Penzo – Lab
- Carl Holloway – Maintenance
- Billy Burgess – Pole/Upstairs
- Dwane Burkett – Red Dragon

The following personnel have been assigned to assist in the safe and orderly emergency evacuation of other associate.

Billy Godwin	Lead Person	Pad Mount, LT, Welding,	Alternate
Kenneth Evans	Lead Person	Pad Mount, LT, Welding,	Alternate
Danny Shaw	Supervisor	Fabrication	Alternate
Daniel Williams	Lead Person	Fabrication	Alternate
Ronald Edwards	Supervisor	Regulator, 3Ø Redoser, Panel	Alternate
Joe Ross	Panel Repair	Regulator, 3Ø Redoser, Panel	Alternate
Teresa Cook	Purchasing	Stock Room	Alternate
Nancy Cook	Stock Clerk	Stock Room	Alternate
Billy Burgess	Supervisor	Pole, Test	Alternate
Carson Anderson	Lead Person	Poe, Test	Alternate
Larry Shepherd	Lead Person	Paint	Alternate
Bobbie Jean Shiver	Paint Room	Paint	Alternate
Derek Vaughan	Lead Person	Inprocessing	Alternate
Lessia Hardy	Inprocessing	Inprocessing	Alternate
Dean Penzo	Lab Manager	Lab	Alternate
Lisa Mathes	Lab Tech.	Lab	Alternate

Ronald Edwards	Maintenance Supervisor	Maintenance, Housekeeping	
Carl Holloway	Maintenance Tech.	Maintenance, Housekeeping	Alternate
Don Carroll	Transportation Supv.	Transportation	
Darryal Senn	Transportation	Transportation	Alternate
Jessup Nolin	Supervisor	Decommission	
Andy Hall	Supervisor	Decommission	Alternate
Kenneth Evans	Lead Person	1Ø Recloser	
Jerry Wilson	Recloser Repair	1Ø Recloser	Alternate
Carle Collins	Supervisor	Upstairs Offices	
Marty Trant	Production	Upstairs Offices	Alternate
Alice Kaye Green	Office	Office/Admin	
Kathy Parker	Office	Office/Admin	Alternate
Tim Shiver	PCB Decommission	PCB Decommission	
Frankie Cook	PCB Decommission	PCB Decommission	Alternate

Attachment 8

ENV SOP 9.0 Page 1 of 3	Title: Florida Transformer, Inc. Hazardous Waste Management Training Program
Effective Date: 10/7/2014	Supersedes: None
Department: Environmental/Safety	
APPROVALS	J. Pennington  Date: <u>10-8-14</u> Author Director of Environmental Compliance
	M. Allred  Date: <u>10-8-14</u> Director of Human Resources and Safety
	M. Burns  Date: <u>10-8-14</u> Plant Manager

1. Scope

This purpose of this Standard Operating Procedure is to document the training requirements set forth in 40 CFR 265.16 (a)(2) as pertains to Hazardous Waste Management at the Florida Transformer, Inc. (FTI) facility.

2. Applicability

This applies to all associates responsible for generating, handling, preparing for shipment, inspecting, transporting or otherwise responsible in any way for hazardous waste at the FTI facility.

Collectively, the trainings listed in this Standard Operating Procedure are applicable to ensuring facility personnel will:

- Effectively respond in the event of an emergency
- Effectively utilize and maintain inspection and observation equipment in place at the facility
- Remain aware of appropriate shut down procedures/methods and those associates responsible for doing so
- Remain aware of communication and alarms methods
- Effectively respond to Material Release

3. Procedure

Facility personnel will participate in training provided by a hazardous waste management trained professional. It will include instruction specific to the functions that apply directly to each position.

4. Training

Training consists of:

- DOT HazMat Training as required by 40 CFR 172 Subpart H
- Facility Emergency Action Plan
- Container Labeling
- Hazard Communication
- SPCC
- Fire Safety

Occasionally, FTI personnel participate in Occupational Safety and Health Administration (OSHA) training as it becomes available. This may take place on site or off site and may be utilized in conjunction with, but not replace, the requirements of the associate training listed in this procedure.

Training will be conducted on an annual basis or within 90 days of hire by on-the-job training. Associates may not perform tasks unsupervised until the required training has been completed.

5. Recordkeeping

As required by 40 CFR 265.16, all positions held at FTI are accompanied by a written job description under the authority and approval of Human Resources. These include the name of each person filling the position. Job descriptions include the skill and education requisite, qualifications and duties.

Records of training and its contents are kept with Human Resources and/or Environmental Departments.

Training certificates are also stored with Human Resources and/or Environmental Departments for each associate that has completed training indefinitely.

6. Responsibility

FTI management is responsible for ensuring the facility Hazardous Waste Management training described in this Standard Operating Procedure is provided to applicable associates in the required time frame.

NOTES

Reference: 40 CFR 265.16