FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803-3767

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

September 25, 2015

Jerry Devlin, Environmental Coordinator
Wildwood Service Complex
4306 E County Road 462
Wildwood, FL 34785
Jerry.Devlin@duke-energy.com

Re: Wildwood Service Complex
HW Facility ID #FLD029436631
Sumter County

Dear Mr. Devlin:

Department personnel conducted a compliance inspection of the above-referenced facility on September 4, 2015. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records, and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Edward Rysak at 407-897-2906 or via e-mail at Edward.Rysak@dep.state.fl.us.

Sincerely,

Wanda Parker-Garvin

Wanda Parker-Garvin, Environmental Manager
Central District
Florida Department of Environmental Protection

WPG/er

Enclosures: Inspection Report (with attachments)

cc: Brandon.barr@duke-energy.com

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Wildwood Service Complex

On-Site Inspection Start Date: 09/04/2015 **On-Site Inspection End Date:** 09/04/2015

ME ID#: 52257 **EPA ID#:** FLD029436631

Facility Street Address: 4306 E County Road 462, Wildwood, Florida 34785-8762

Contact Mailing Address: 10011 E Hwy 98, Port St Joe, Florida 32456

County Name: Sumter **Contact Phone:** (850) 229-5504

NOTIFIED AS:

CESQG (<100 kg/month)
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector:	Edward Rysak, Environmental Specialist
Other Participants:	Jerry Devlin, Environmental Coordinator; John White, Environmental Consultant; James Haugabrook, Warehouse Supervisor

LATITUDE / LONGITUDE: Lat 28° 53' 8.0335" / Long 82° 1' 51.4788"

SIC CODE: 4911 - Trans. & utilities - electric services

TYPE OF OWNERSHIP: Private

Introduction:

On September 4, 2015, Edward Rysak and John White, Florida Department of Environmental Protection (FDEP, Department), accompanied by James Haugabrook, Warehouse Supervisor, inspected Wildwood Service Complex for compliance with state and federal used oil transporter regulations. The inspection was strictly a file review of the facility's records from the year 2015 to verify compliance with state and federal laws applicable to self-transporters of used oil.

On the date of the inspection, the facility's Environmental Coordinator, Jerry Devlin, was not available onsite for file review. Instead, Mr. Haugabrook called Mr. Devlin on his cell phone for a phone interview with the inspectors. Mr. Devlin followed up with the inspector, Edward Rysak, via email on 9/9/2015. **NOTE: the facility's Environmental Coordinator works four days per week, Monday through Thursday.

The facility most recently submitted its Used Oil Handler Certification and Annual Report by Used Oil and Used Oil Filter Handlers [Form 62-710.901(3)] on 1/9/2015 and its Letter of Self Insurance [Form 62-710.901 (4)] on 2/4/2015. The facility has carried on its original EPA ID number, FLD029436631, issued on 8/12/1987, through the date of this report. The facility is currently owned and operated by Duke Energy, Florida. In the past, the facility operated under the ownership of Florida Power Corporation and Progress Energy.

Process Description:

The Wildwood Service Complex serves as a hub for the collection of all Duke Energy of Florida's electrical power station equipment prior to determining the equipment's final destination for reclamation or disposal. Equipment handled includes but is not necessarily limited to: transformers, capacitors, capacitor bushing rods, circuit breakers, electrical caps & switches, and shunt capacitor bank racks.

Used oil from electrical equipment is tested via samples collected onsite. Samples are taken from each unit brought into the complex prior to shipment offsite and combined into a batch sample. Once enough samples are accumulated, the sample batch is primarily sent to Florida Transformer Inc. for testing of Polychlorinated Biphenyls (PCB's), however occasionally Flowers Chemical Labs Inc. and Clean Harbors Inc. may be used for the analysis if the situation warrants it. According to Mr. Devlin, these samples are usually sent out once a month, sometimes twice a month if a large number of units come in.

If used oil sampling results come back with non-regulated levels of PCB contamination, the corresponding units from which the samples were taken have their oil removed and the used oil is stored onsite in tanks as "Non-PCB oil" prior to being shipped offsite for reclamation. Units whose oil samples contain regulated levels of PCB contamination do not have their oil removed prior to being shipped offsite to a registered used oil processor.

Units with PCB levels over 500 parts per million (ppm) are kept in a designated storage building referred to as the "PCB building" while units with PCB levels between 49 and 500 ppm are stored next to the PCB building to keep them segregated from the higher PCB content units. Non-PCB units are shipped out together with the PCB-positive units but are accounted for separately in manifests.

Used oil either removed from the units or brought in separately from electrical power stations is stored onsite as follows:

1. Non PCB-contaminated oil is stored in two above-ground storage tanks onsite. Non-PCB oil is primarily sent to Clean Harbors Inc. (Tucker, GA) and occasionally sent to TCI of Alabama Inc. (Pell City, AL) if the situation warrants it. According to Mr. Devlin, the main source of these oils comes from pure oil vacuumed out of transformers and used oil drums brought in from power substations.

2. PCB-contaminated oil is stored in the "PCB building," which contains several tanks for storage of various percentages (ppm) of PCB-contaminated oils. According to Mr. Devlin, these tanks are small and have not been used for several years, but are there for addressing spills from leaking PCB-contaminated transformers. PCB oil is sent to Veolia ES Technical Solutions LLC (Port Arthur, TX) and Freehold Cartage Inc. is used as a transporter.

3. Oily water either brought in from electrical substations or generated onsite is stored in an oil/water tanker. Oily water is sent to Clean Harbors LLC, which according to disposal manifests also dispatches its own transporters to pick up the oily water. According to Mr. Devlin, approximately two tankers of oily water are shipped out for disposal per year.

Used electrical equipment brought onsite is segregated and managed as follows:

- Non-PCB units (damaged and undamaged)
- PCB units

Non-PCB units

This waste stream includes all electrical equipment that has been shown not to contain regulated levels of PCB contamination. Undamaged, unusable units are sent to TCI of Alabama LLC for the scrap metal to be recycled. Undamaged, reusable units are sent to Florida Transformer Inc. (Emerald Transformer) for refurbishing. Damaged units are sent to a local facility, Progress Rail Services Corp. (a Caterpillar Inc. company) once their oils are removed and the units are then recycled as scrap metal.

PCB units

This waste stream includes all electrical units with regulated levels of PCB contaminants. These units are sent to TCI of Alabama LLC for disposal. According to Mr. Devlin, the PCB unit shipments

occur as follows: two types of PCB unit shipments are done. The first type of shipment concerns PCB units of known ppm concentrations. A flatbed trailer is loaded up with PCB units of known ppm concentrations and space leftover is filled up with non-PCB units for recycling.

The other type of shipment concerns capacitor bushing rods. A 30-yard roll off container is used for accumulating the bushing rods prior to shipment offsite. According to Mr. Devlin, these units are very difficult to open and pull an oil sample from, so all bushing rods are shipped off as PCB units since the actual PCB concentrations cannot be determined at Wildwood Service Complex. All bushing rods are identified and given a unique tracking number before being placed in the roll off container. Upon arriving at TCI of Alabama, they pull the bushing rods out of the roll off container and complete sampling of all units. Once complete a copy of the results are sent back to Duke Energy and the copies are then filed.

RECORDS

Records reviewed included:

- Lab test results from the most recent oil sample batch (7/30/2015)
- Non-PCB oil manifests
- PCB oil manifests
- Oily water manifests
- PCB unit manifests
- Non-PCB unit manifests

**NOTE: Due to the high number of shipments made annually and the fact that all records were requested from the facility electronically, the facility was only asked to provide records from the time period of 3 months prior to the inspection (June 2015 through August 2015). The facility's most recent Used Oil Handler Certification, Annual Report by Used Oil and Used Oil Filter Handlers [Form 62-710.901(3)], and its Letter of Self Insurance [Form 62-710.901 (4)] were found in the Department's database and were reviewed prior to the inspection.

Conclusion:

Wildwood Service Complex was inspected as a self-transporter of used oil and was in compliance at the time of the inspection. The inspection of 9/4/2015 was conducted strictly to verify the facility's status as a self-transporter of Duke Energy of Florida's used oil from its own non-contiguous facilities. Based on the information provided during and after the inspection, the facility's status as a self-transporter of used oil was confirmed. Wildwood Service Complex was in compliance at the time of this inspection.

Signed:

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

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

Edward Rysak	Environmental Specialist
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**
	FDEP
	ORGANIZATION

Supervisor: **Wanda Parker-Garvin**

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