

Thursby, Kim

From: Cinquino, Dawn
Sent: Wednesday, October 04, 2017 11:05 AM
To: Thursby, Kim
Subject: FW: Florida Transformer; FLR 000 168 203;First Request for Additional Information (RAI)

From: Jessica Pennington [mailto:jpennington@emeraldtransformer.com]
Sent: Wednesday, October 4, 2017 11:02 AM
To: Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us>
Subject: Re: Florida Transformer; FLR 000 168 203;First Request for Additional Information (RAI)

Received

Sent from my iPhone

On Oct 4, 2017, at 9:33 AM, Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us> wrote:

Jessica,

The attached document was inadvertently sent to an incorrect (old?) email address. Please confirm receipt of the document by responding to this email.

Thank you,

Dawn Cinquino

<image001.png>

Dawn M. Cinquino, Esq., P.E., P.G.
Professional Engineer II
Hazardous Waste Program & Permitting
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 4560
Tallahassee, FL 32399
Dawn.Cinquino@dep.state.fl.us
Office: 850-245-8766

Please note: Florida has a broad public records law. Most written communications to or from state employees are public records and may be made available to the public or media upon request. This email communication, and future emails to my attention may therefore be subject to public disclosure.

From: Thursby, Kim **On Behalf Of** Epost HWRS
Sent: Wednesday, September 27, 2017 10:27 AM
To: 'jessica@floridatransformer.com' <jessica@floridatransformer.com>
Cc: Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Walker, Kim (Waste) <Kim.Walker@dep.state.fl.us>; McBride, Ashanti <Ashanti.McBride@dep.state.fl.us>; Kothur, Bheem <Bheem.Kothur@dep.state.fl.us>; Eldredge, Susan F. <Susan.F.Eldredge@dep.state.fl.us>; Buselli, Bradley

<Bradley.Buselli@dep.state.fl.us>; Hartshorn, Brad <Brad.Hartshorn@dep.state.fl.us>; Cinquino, Dawn <Dawn.Cinquino@dep.state.fl.us>

Subject: Florida Transformer; FLR 000 168 203;First Request for Additional Information (RAI)

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Bryan Baker, P.G.
Environmental Administrator
Hazardous Waste Program & Permitting



<9-27-17 FLTransformer_RAI.pdf.Receipt.pdf>



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

REQUEST FOR ADDITIONAL INFORMATION

September 27, 2017

Ms. Jessica Pennington,
Environmental Compliance Manager
Florida Transformer, Inc.
Post Office Box 507
Defuniak Springs, Florida 32435
jessica@floridatransformer.com

RE: **First Request for Additional Information (RAI)**
Walton County – Hazardous Waste
Facility Name: Florida Transformer – Defuniak Springs
EPA I.D. No.: FLR 000 168 203
Operating Permit Number: 0311571-002-HO

Dear Ms. Pennington:

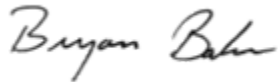
Thank you for your application for renewal of the Used Oil and Solid Waste Operating Permit for the above referenced Facility. The Department has assigned DEP Application No. 0311571-002-HO to the application. A Department staff review of the application and supporting documentation submitted on August 28, 2017 indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, October 27, 2017, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to Dawn.Cinquino@dep.state.fl.us. If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to Dawn.Cinquino@dep.state.fl.us, alerting us that it has been posted.

If you have any questions, please contact Dawn Cinquino by telephone at 850-245-8766 or by e-mail at Dawn.Cinquino@dep.state.fl.us.

Sincerely,



Bryan Baker, P.G.
Environmental Administrator
Florida Department of Environmental Protection

BB/dc

Attached: List of Requested Information

cc:

Ashanti McBride, OGC Tallahassee, ashanti.mcbride@dep.state.fl.us
Bheem Kothur, DEP Headquarters, bheem.kothur@dep.state.fl.us
Susan Eldredge, DEP Headquarters, susan.f.eldredge@dep.state.fl.us
Bradley Buselli, DEP Headquarters, bradley.buselli@dep.state.fl.us
Brad Hartshorn, DEP Northwest, brad.hartshorn@dep.state.fl.us

Attachment: List of Requested Information

Facility Name: Florida Transformer – Defuniak Springs
EPA I.D. No.: FLR 000 168 203
Operating Permit Number: 0311571-002-HO

1. Attachment 5, Preparedness & Prevention Plan:
 - a. Page 1, Spill History: This section states that there have been no spill events at this facility. However, in 2015, the facility provided EPA notice of PCB impacts to concrete and soil at the facility that extend onto neighboring properties. Please include information on this event in this section.
 - b. Fire Extinguisher Map: The fold-out figure located at the end of this section should be numbered/labeled.
 - c. Integrated Pollution Prevention Plan (IP3):
 - i. Page i, Certification: The IP3 was last updated October 2016, but the certification section is unsigned. Who prepared the updated IP3?
 - ii. Page iv., Emergency Contact Information: Home addresses for the emergency coordinators must be provided in the Contingency Plan for the facility per 40 CFR 279.52(b)(2)(iv). Please provide that information in this attachment, and submit a revised page electronically for our records.
 - d. Page 4, Table 1, Bulk Storage Tank Information: Please review this table, including product stored in each tank, to ensure that it is updated and accurate, as it appears to conflict with the table on page 2 of the Preparedness & Prevention Plan in Attachment 5. Please verify that the table is correct as is, or submit a revised table electronically for our records.
2. Attachment 6, Page 1, Emergency Plan Coordinator: Please see the previous comment about the home address for emergency contacts.
3. Attachment 8, Closure Plan:
 - a. Page 1, Introduction: In paragraph 1, PCB removal in mineral oil up to 1,500 ppm is mentioned. This amount was revised in other sections of the permit application to read “up to 1,999 ppm”. Please ensure that the closure plan is consistent throughout and consistent with the remainder of the application.
 - b. Page 2, Facility Description: In paragraph 2, PCB removal in mineral oil up to 1,900 ppm is mentioned. This amount was revised in other sections of the permit application to read “up to 1,999 ppm”. Please ensure that the closure plan is consistent throughout and consistent with the remainder of the application.
 - c. Page 5: Soil sampling and analysis is not addressed in the Closure Plan. Please explain why you do not anticipate that soil may be impacted upon closure, especially in light of the 2015 PCB impacts to soil.
 - d. Page 6, Closure Cost Estimate: Please provide Attachment D for our review.

4. Attachment 9, Employee Training Program: Please indicate how often training occurs.