



**Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report**

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**FACILITY INFORMATION:**

**Facility Name:** Florida Transformer Inc DBA Emerald Transformer  
**On-Site Inspection Start Date:** 10/26/2017      **On-Site Inspection End Date:** 10/26/2017  
**ME ID#:** 74617      **EPA ID#:** FLR000168203  
**Facility Street Address:** 4509 State Highway 83 N, Defuniak Springs, FL 32433-3960  
**Contact Mailing Address:** 4509 ST HWY 83 North, Defuniak Springs, FL 32435  
**County Name:** Walton

**NOTIFIED AS:**

LQG (>1000 kg/month)

Transporter

Used Oil

**INSPECTION TYPE:**

Follow-Up Inspection for LQG (>1000 kg/month) facility  
Follow-Up Inspection for Used Oil Processor facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Paige L Plier, Inspector

Other Participants: Nicole Hetzel, Inspector; Jessica Pennington, Environmental Manager

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

**SIC CODE:** 3612 - Manufacturing - transformers, except electronic

**TYPE OF OWNERSHIP:** Private

**Introduction:**

This follow-up report addresses minor out-of-compliance issues noted in Florida Transformer's initial inspection report dated September 15, 2017. The facility was in violation of Title 40 Code of Federal Regulations (CFR) Parts 265.52(d), 265.52(e), 265.53(b) and of Chapter 62-710.401(6) and 62-737.400(5)(a). Specifically, the sites' Contingency Plan was missing items specific to the Resource Conservation and Recovery Act (RCRA), at least two used oil containers were open, and universal waste lamps were not being managed in a way to prevent releases of mercury.

The facility sufficiently responded to the Department's Compliance Assistance Offer letter that was sent on September 25, 2017. Their official response was received on October 4, 2017, via electronic communication.

A follow-up site visit and inspection was conducted on October 26, 2017. During the inspection, an updated copy of the Contingency Plan was reviewed and the universal waste and used oil storage areas were visually inspected. Upon review of these items, all deficiencies noted in the initial report were corrected and the facility appears to be in compliance.

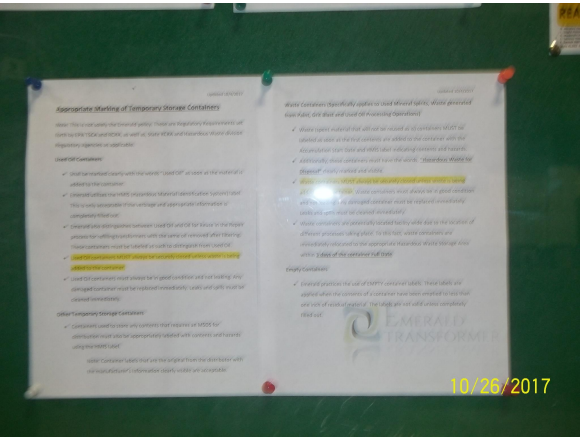
**PHOTO ATTACHMENTS:**

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Photo 1 - Universal Waste Lamp Management



Photo 2 - Used Oil Updated SOP



Conclusion:

Florida Transformer appeared to be in compliance with State and Federal hazardous waste regulations.

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**4.0 - Large Quantity Generator Checklist****Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	40 CFR 262 Subpart A - General Standards	Yes	No	N/A
4.1	Has the facility properly identified all hazardous waste streams? 262.11	✓		
4.2	Did the facility obtain an EPA ID Number prior to treating, storing, disposing, or transporting hazardous waste? 262.12(a)	✓		
4.4	If YES, did the facility meet an exclusion or exemption from hazardous waste permit requirements? 268.7(a)(5), 62-730.240(1)	✓		
Item No.	40 CFR Part 268 -- Land Disposal Restrictions	Yes	No	N/A
4.5	Does the facility ensure restricted waste streams are not diluted as a substitute for treatment? 268.3(a)	✓		
4.7	Has the generator developed a waste analysis plan (WAP) describing procedures they will carry out to comply with the treatment standards? 268.7(a)(5)			✓
4.8	If the generator has a WAP, is it based on a detailed chemical and physical analysis of the prohibited waste(s) being treated? 268.7(a)(5)(i)			✓
4.9	If the generator has a WAP, does it include all the information necessary to treat the waste(s), including selected testing frequency? 268.7(a)(5)(i)			✓
4.10	Is the waste analysis plan in the facility's on-site files and available to inspectors? 268.7(a)(5)(ii)			✓
4.11	Did the generator comply with the notification requirements of 268.7(a)(3) for treated wastes shipped off-site? 268.7(a)(5)(iii)			✓
4.12	Has the generator determined all applicable hazardous waste codes associated with hazardous waste generated? 268.9(a)			✓
4.13	If the waste is characteristic hazardous waste (and not D001 nonwastewater treated by CMBST, RORGS, or POLYM of 268.42 Table 1) did the generator identify reasonably expected underlying hazardous constituents? 268.9(a)			✓
4.14	If the hazardous waste is land disposed, did it meet the treatment standard requirements of 268.40? 268.40(a)	✓		
4.15	If the waste or contaminated soil does not meet the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
4.16	If the generator chooses not to determine if the waste meets the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(2)			✓
4.17	If the waste or contaminated soil met the treatment standards did the generator send a one-time written notice to the TSD containing all required information? 268.7(a)(3)			✓
4.18	Did the generator retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced for at least 3 years from the date the waste was last shipped? 268.7(a)(8)			✓
4.20	Did the generator meet the requirements identified in 268.7(a)(9) for use of the alternative treatment standards for lab packs? 268.7(a)(9)			✓
Item No.	40 CFR 262 Subpart B -- The Manifest	Yes	No	N/A

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Item No.	40 CFR 262 Subpart B -- The Manifest	Yes	No	N/A
4.21	<p>Did the facility use a properly completed manifest for all its hazardous waste shipments? (Check items below that are not in compliance) 262.20(a)(1)</p> <p><input type="checkbox"/> Item 1. Generator's U.S. EPA Identification Number</p> <p><input type="checkbox"/> Item 2. Page 1 of "X" (total number of pages used to complete the manifest)</p> <p><input type="checkbox"/> Item 3. Emergency Response Phone Number</p> <p><input type="checkbox"/> Item 4. Manifest Tracking Number</p> <p><input type="checkbox"/> Item 5. Generator's Mailing Address, Phone Number and Site Address</p> <p><input type="checkbox"/> Item 6. Transporter 1 Company Name &amp; U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 7. Transporter 2 Company Name &amp; U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 8. Designated Facility Name, Site Address, Phone Number, and U.S. EPA ID Number</p> <p><input type="checkbox"/> Item 9. U.S. DOT Description (Including Proper Shipping Name, Hazard Class or Division, Identification Number and Packing Group)</p> <p><input type="checkbox"/> Item 10. Containers (Number and Type)</p> <p><input type="checkbox"/> Item 11. Total Quantity (Round to nearest whole unit; container capacities are not acceptable as estimates)</p> <p><input type="checkbox"/> Item 12. Units of Measure (Weight/Volume)</p> <p><input type="checkbox"/> Item 13. Waste Codes. Enter up to 6 of the most representative waste codes.</p> <p><input type="checkbox"/> Item 14. Special Handling Instructions and Additional Information</p> <p><input type="checkbox"/> Item 15. Generator's / Offeror's Certifications</p> <p><input type="checkbox"/> Item 16. International Shipments (Import or Export must be noted)</p> <p><input type="checkbox"/> Item 17. Transporter's Acknowledgment of Receipt (printed name, signature, date of receipt)</p> <p><input type="checkbox"/> Item 18. Discrepancy (Discrepancies between waste described on manifest and waste received by facility)</p> <p><input type="checkbox"/> Item 19. Hazardous Waste Report Management Codes (On returned copies only)</p> <p><input type="checkbox"/> Item 20. Designated Facility Owner or Operator Certification of Receipt (printed name, signature, date of receipt)</p>	✓		
4.22	Did the facility designate on the manifest one facility which is permitted to handle the waste described on the manifest? 262.20(b)	✓		
4.23	Did the generator sign the manifest certification by hand? 262.23(a)(1)	✓		
4.24	Did the generator obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 262.23(a)(2)	✓		
4.25	Did the generator retain one copy of the manifest for 3 years or until a copy of the signed manifest was received from the Designated Facility (TSD)? 262.23(a)(3)	✓		
4.26	For any bulk shipments within the U.S. solely by water did the generator provide 3 copies of the signed and dated manifest to the Designated Facility? 262.23.(c)			✓
4.27	<p>For rail shipments originating at the site of generation did the generator provide at least 3 signed and dated manifests to one of the entities below: (Check items below that are not in compliance) 262.23(d)</p> <p><input type="checkbox"/> The next non-rail transporter?</p> <p><input type="checkbox"/> The Designated Facility if transported solely by rail?</p> <p><input type="checkbox"/> The last rail transporter to handle the waste in the U.S. if exported by rail?</p>			✓
4.28	If the generator did not receive a signed return copy of the manifest from the designated facility within 35 days of shipment, did the generator contact the transporter and/or designated facility? 262.42(a)(1)			✓
4.29	If the generator did not receive a signed return copy of the manifest from the designated facility within 45 days of shipment, did the generator file an exception report? 262.42(a)(2)			✓
4.30	If an exception report was submitted did it include a legible copy of manifest? 262.42(a)(2)(i)			✓
4.31	If an exception report was submitted did it include a cover letter signed by the generator explaining efforts taken to locate the waste and the results of those efforts? 262.42(a)(2)(ii)			✓
4.32	Did the generator maintain manifests for 3 years? 262.40(a)	✓		
4.34	If YES, did the generator meet the requirements of 40 CFR 262.23(f)? 262.23(f)			✓
Item No.	40 CFR 262 Subpart C -- Pre Transport Requirements	Yes	No	N/A
4.35	Before transporting or offering hazardous waste for transport off-site, did the generator package the waste in accordance with 49 CFR parts 173, 178, and 179? 262.30			✓
4.36	Before transporting or offering hazardous waste for transport off-site, did the generator label each package in accordance with 49 CFR part 172? 262.31			✓

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Item No.	40 CFR 262 Subpart C -- Pre Transport Requirements	Yes	No	N/A
4.37	Before transporting or offering hazardous waste for transport off-site, did the generator mark each package in accordance with 49 CFR part 172? 262.32(a)			✓
4.38	Before transporting or offering hazardous waste for transport off-site, did the generator mark each container of 119 gallons or less with the following? (Check items below that are not in compliance) 262.32(b) <input type="checkbox"/> Generator's Name and Address? <input type="checkbox"/> Generator's EPA ID Number? <input type="checkbox"/> Manifest Tracking Number?			✓
4.39	Before transporting or offering hazardous waste for transport off-site, did the generator offer the initial Transporter the appropriate DOT Placards? 262.33			✓
Item No.	40 CFR 262 Subpart C -- Accumulation Requirements	Yes	No	N/A
4.42	Did the generator comply with the 90 day accumulation time limit or was granted an extension of up to 30 days? 262.34(b)	✓		
4.43	If a 90-day accumulation area was closed, did the generator meet the closure performance standards of 40 CFR 265.111? 265.111			✓
4.44	If a 90-day accumulation area was closed, did the generator meet the disposal and decontamination standards of 40 CFR 265.114? 265.114			✓
4.45	Has the generator clearly marked the accumulation start date on each hazardous waste container? 262.34(a)(2)	✓		
4.46	Has the generator ensured the accumulation start date is visible for inspection on each hazardous waste container? 262.34(a)(2)	✓		
4.47	Has the generator ensured each hazardous waste container and tank is labeled or marked clearly with the words "Hazardous Waste"? 262.34(a)(3)	✓		
4.49	Are satellite containers at, or near, the point of generation where wastes initially accumulate? 262.34(c)(1)	✓		
4.50	Are satellite containers under the control of the operator of the process generating the waste? 262.34(c)(1)	✓		
4.51	Are satellite containers in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 262.34(c)(1)(i), 265.171	✓		
4.52	Are satellite containers in use made of, or lined with, materials that are compatible with the hazardous waste to be stored? 262.34(c)(1)(i), 265.172	✓		
4.53	Does the generator keep satellite containers closed during storage, except when adding or removing waste? 262.34(c)(1)(i), 265.173(a)	✓		
4.54	Has the generator marked satellite containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers? 262.34(c)(1)(ii)	✓		
4.56	If YES, within 3 days did the generator mark an accumulation start date on the excess waste container? 262.34(a)(2)	✓		
4.57	If YES, within 3 days did the generator label the excess waste container with the words "Hazardous Waste"? 262.34(a)(3)	✓		
Item No.	40 CFR 265 Subpart I -- Use and Management of Containers	Yes	No	N/A
4.58	Does the generator use hazardous waste containers that are in good condition? (Check for leaks, corrosion, dents, bulges, etc.) 265.171	✓		
4.59	Does the generator use hazardous waste containers that are made of, or lined with, materials compatible with the hazardous waste to be stored? 265.172	✓		
4.60	Has the generator keep hazardous waste containers closed during storage, except when adding or removing waste? 265.173(a)	✓		
4.61	Does the generator ensure hazardous waste containers are not opened, handled, or stored in a manner that may rupture the container or cause it to leak? 265.173(b)	✓		
4.62	Does the generator conduct weekly inspections of areas where hazardous waste containers are stored? (Sometime during calendar week) 265.174	✓		
4.63	Does the generator properly document the weekly inspections? 62-730.160(5)	✓		
4.65	Does the generator ensure ignitable and/or reactive wastes are not stored closer than 50 feet to the facility's property line? 265.176	✓		
4.66	If the facility places incompatible wastes, or incompatible waste and materials in the same container, is it done in compliance with 40 CFR 265.17(b)? 265.177(a), 265.17(b)			✓
4.67	If the facility places hazardous waste in an unwashed container that previously held incompatible wastes or materials, is it done in compliance with 40 CFR 265.17(b)? 265.177(b), 265.17(b)			✓
4.68	Are containers holding a hazardous waste that are stored near incompatible waste or other materials protected from that waste or material (kept apart)? 265.177(c)	✓		
Item No.	40 CFR 265.16 -- Personnel Training	Yes	No	N/A
4.69	Does the generator ensure facility personnel complete hazardous waste training, either on-the-job or classroom instruction? 265.16(a)(1)	✓		
4.70	Is the trainer adequately trained in hazardous waste management procedures? 265.16(a)(2)	✓		
4.71	Does the generator include instruction on hazardous waste management procedures, including contingency plan implementation, relevant to employee position? 265.16(a)(2)	✓		

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Item No.	40 CFR 265.16 -- Personnel Training	Yes	No	N/A
4.72	Is the training program designed to ensure facility personnel respond effectively to emergencies and did not fail to cover emergency procedures and equipment? 265.16(a)(3)	✓		
4.73	Does the generator conduct training within 6 months of hire or within 6 months of an employee moving to a new position that requires training? 265.16(b)	✓		
4.74	Does the facility ensure employees do not work unsupervised prior to receiving training? 265.16(b)	✓		
4.75	Does the generator review training annually, at least once each calendar year? 265.16(c)	✓		
4.76	Does the generator maintain documentation of job titles and name of person filling the job for positions related to hazardous waste management? 265.16(d)(1)	✓		
4.77	Does the generator maintain written job descriptions for personnel in positions involving hazardous waste management? 265.16(d)(2)	✓		
4.78	Does the generator maintain a written description of the type and amount of both introductory and continuing training provided to each employee? 265.16(d)(3)	✓		
4.79	Does the generator maintain documentation that the training or job experience required has been given to, and completed by, facility personnel? 265.16(d)(4)	✓		
4.80	Does the generator maintain personnel training records for current employees until closure of facility? 265.16(e)	✓		
4.81	Does the generator maintain personnel training records for former employees for 3 years after their resignation or reassignment? 265.16(e)	✓		
Item No.	40 CFR 265 Subpart C -- Preparedness and Prevention	Yes	No	N/A
4.82	Is the facility maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden, or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? 265.31	✓		
4.83	Does the facility provide or maintain an internal communications or alarm system capable of providing immediate emergency instruction to personnel? 265.32(a)	✓		
4.84	Does the facility provide a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? 265.32(b)	✓		
4.85	Does the facility provide and maintain portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? 265.32(c)	✓		
4.86	Does the facility provide and maintain water at adequate volume and pressure available to supply waterhose streams, foam producing equipment, automatic sprinklers, or water spray systems? 265.32(d)	✓		
4.87	Does the facility test and maintain, as necessary, communications, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment? 265.33	✓		
4.88	When hazardous waste is being handled, does the facility ensure all personnel involved have immediate access to an internal alarm or communication device? 265.34(a)	✓		
4.89	If only one employee is on premises while the facility is operating, does the facility ensure the employee has immediate access to a telephone or 2-way radio to summon external assistance? 265.34(b)	✓		
4.90	Does the facility maintain adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility in an emergency? 265.35	✓		
4.91	Has the facility attempted to make arrangements to familiarize police, fire departments, and emergency response teams with the facility's operations? 265.37(a)(1)	✓		
4.92	Where more than one police or fire department may respond, has the facility designated a primary emergency police and/or fire authority? 265.37(a)(2)	✓		
4.93	Has the facility attempted to make arrangements with State emergency response teams, emergency response contractors, and equipment suppliers? 265.37(a)(3)	✓		
4.94	Has the facility attempted to familiarize local hospitals with the properties of hazardous waste handled and the types of injuries that could result? 265.37(a)(4)	✓		
4.95	If State or local authorities have declined to enter into arrangements, has the facility document this refusal in the operation record? 265.37(b)			✓
Item No.	40 CFR 265 Subpart D -- Contingency Plan and Emergency Procedures	Yes	No	N/A
4.96	Does the facility have a contingency plan? 265.51(a)	✓		
4.97	In the event of a fire, explosion, or release of hazardous waste or hazardous waste constituents did the facility implement the contingency plan implemented immediately? 265.51(b)	✓		
4.99	Fires? 265.52(a)	✓		
4.100	Explosions? 265.52(a)	✓		
4.101	Unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? 265.52(a)	✓		
4.102	Is the contingency plan part of a modified Spill Prevention, Control, and Countermeasure (SPCC) Plan? 265.52(b)	✓		
4.103	Does the plan describe arrangements agreed to by local police, fire departments, hospitals, contractors, and emergency response teams? 265.52(c)	✓		
4.104	Does the plan list names, addresses (office & home), and phone numbers (office & home) of emergency coordinator(s)? 265.52(d)	✓		
4.105	Does the plan identify the primary emergency coordinator and list alternates in order the they will assume responsibility? 265.52(d)	✓		

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Item No.	40 CFR 265 Subpart D -- Contingency Plan and Emergency Procedures	Yes	No	N/A
4.106	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item and an outline of its capabilities? 265.52(e)	✓		
4.107	Does the plan include an evacuation plan and describe signals to begin evacuation, evacuation routes, and alternate evacuation routes? 265.52(f)	✓		
4.108	Does the facility maintain a copy of the contingency plan and any revisions at the facility? 265.53(a)	✓		
4.109	Has the facility submitted the contingency plan to local police departments, fire departments, hospitals, and State and local emergency response teams? 265.53(b)	✓		
4.110	Has the facility updated the contingency plan with changes in emergency coordinators, facility design, construction, or operations, emergency equipment, plan failure in an emergency, or applicable regulations? 265.54	✓		
4.111	Has the facility designated an emergency coordinator either on premises or on call who is able to reach the facility in a short period of time and able to commit funds for incident response? 265.55	✓		
4.112	In the event of an imminent or actual emergency situation, did the emergency coordinator follow the emergency procedures outlined in 40 CFR 265.56? 265.56			✓
Item No.	Record Keeping and Reporting	Yes	No	N/A
4.113	If the contingency plan has been implemented, did the owner or operator submit a written report to the Department within 15 days documenting the incident? 265.56(i)			✓
4.114	Does the generator keep records of any test results, waste analyses, or other determinations made in accordance with 40 CFR 262.11 for 3 years from the date the waste was last shipped off-site? 262.40(c)	✓		
4.115	Has the generator submitted a biennial report by March 1 of each even numbered year covering activities during the previous year? 262.41(a)	✓		
4.116	Does the generator maintain a copy of the biennial report for at least 3 years from the due date of the report? 262.40(b)	✓		
4.118	If YES, did the generator provide EPA with notification of the intended export 60 days before the initial shipment was intended to be shipped off-site? 262.53(a)			✓
4.120	If YES, did the generator meet all of the requirements of 40 CFR 262.60? 262.60			✓

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**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.

Paige L Plier

**Principal Inspector Name**

Inspector

**Principal Inspector Title****Principal Inspector Signature**

DEP

**Organization**

10/31/2017

**Date**

Nicole Hetzel

**Inspector Name**

Inspector

**Inspector Title**

DEP

**Organization**

Jessica Pennington

**Representative Name**

Environmental Manager

**Representative Title**

FL Transformer

**Organization**

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.

**Report Approvers:****Approver:**

Brad T Hartshorn

**Inspection Approval Date:**

10/31/2017