CDG
Engineering. Environmental. Answers.

December 11, 2017

CDG Engineers & Associates, Inc.
1830 Hartford Highway
Dothan, AL 36301
Tel (334) 677-9431
Fax (334) 677-9450

www.cdge.com

Ms. Dawn Cinquino
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399

SUBMITTED ELECTRONICALLY VIA HWPP@dep.state.fl.us

RE: First Request for Additional Information
Florida Transformer, Inc.
EPA I.D. No.: FLR 000 168 203
Operating Permit Number 0311571-002-HO

This letter and supporting documentation is being provided to address the specific items noted in the September 27, 2017 Request for Additional Information (RAI) letter from the Department. Each of the noted action items identified are listed below followed by the response to address the item.

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 even in this section.

Response
*A revised "**Attachment 5, Preparedness & Prevention Plan**" has been enclosed as an Attachment to this letter to address including this description as requested.*

b. Fire Extinguisher Map: The fold-out figure located at the end of this section should be numbered/labeled.

Response
A referenced figure has been identified as Figure 1 and is included in revised Preparedness & Prevention Plan referend in the response to Item 1.a.

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?

Response
The facility IP3 was prepared by CDG Engineers. A copy of the signed certification page from this document is provided as an attachment.

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.

Response
The home addresses have been included in the facility Contingency Plan. The facility Contingency Plan (SAF MAN SOP 17.1 GC) was originally submitted in the renewal application as ***Attachment 6.*** *The updated plan with accurate information is provided as an attachment.*

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.

Response
The table in ***Attachment 5*** *has been reviewed and its accuracy verified. This table only includes those storage tanks that are applicable to the used oil processing permit approval. The table within the IP3 covers all aboveground storage tanks and temporary storage tanks facility wide.*

2. Attachment 6, Page 1, Emergency Plan Coordinator: Please see the previous comment about the home address for emergency contacts.

Response
The facility Contingency Plan (SAF MAN SOP 17.1 GC) was originally submitted in the renewal application as ***Attachment 6.*** *The updated plan with accurate information is enclosed as an attachment.*

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.

Response
A Revised ***Attachment 8*** *has been enclosed for your review. Please note, the final approval issued to the facility on April 22, 2015 by the EPA lists as Condition 1.b. that PCB dechlorination is approved for mineral oil dielectric fluid with PCB levels up to 2,000 ppm PCB.*

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.

Response
See response to item number 3 above.

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.

Response
The Closure Plan has been updated to include soil sampling and analysis protocol based on the results of a Closure Integrity Evaluation and is included as an attachment.

The referenced 2015 PCB impacts to the soil at the facility were not associated with or the result of current facility operations. Standard operating procedures have been developed and implemented that are designed to prevent recurrence of the conditions that lead to the 2015 soil impacts.

d. Page 6, Closure Cost Estimate: Please provide Attachment D for our review.

Response
The most recent Closure Cost Estimate associated with the Used Oil Processing Facility Closure Plan is enclosed for your review.

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

Response
*A revise **Attachment 9** has been enclosed to indicate the frequency of training.*

Thank you for your attention to these details. Please do not hesitate to contact me for further information if needed.

Regards,

Rex Allen Thompson, P.E.
Senior Project Manager

Enclosures

cc: dawn.cinquino@dep.state.fl.us

Signature: _____

Date: 12/11/2017

Rex Allen Thompson, P.E.
Florida License No. 48377
Florida COA No. 4099

EMERALD TRANSFORMER

Used Oil Processing Permit
Renewal Application
August 2017
Attachment 5

FLORIDA TRANSFORMER, INC.
USED OIL PROCESSING
PREPAREDNESS & PREVENTION PLAN

This Preparedness & Prevention Plan shall serve as the prevention plan for the used oil processing equipment to process used oil to complete processing of used mineral oil dielectric fluid to remove Polychlorinated Biphenyl (PCB) concentrations to Non-Detect levels.

The oil processing equipment may be used onsite at Florida Transformer, Inc. (FTI) or on customer property away from FTI. This prevention plan will apply to both circumstances and should be adhered to accordingly.

This document shall serve as the prevention plan specific to FTI for the used oil processing, all ancillary equipment and all subjected areas. The FTI Facility Integrated Pollution Prevention Plan is a separate document attached at the end of this section and shall serve as FTI's overall facility plan.

EMERALD TRANSFORMER

Facility Owner and Operator Information

Florida Transformer, Inc.
4509 State Highway 83
DeFuniak Springs, FL 32433
(850) 892-2711

Facility Contacts:

Name	Title	Work Telephone	Home Telephone
Jessica Pennington	~~Environmental Mgr~~ Director of Safety and Environmental Compliance	(850) 892-2711	(850) 333-8772
~~Danny Shaw~~ Ronald Edwards	Processing/Maintenance Supervisor	(850) 892-2711	(850) 265-2845
~~Ron Shaw~~ Andy Hall	Plant Manager	(850) 892-2711	(850) 635-2006
~~Steve Holland~~ Mike Burns	EVP Operations	(850) 892-2711	(850) 830-2415

Facility Description

Operations Overview

Florida Transformer, Inc. (FTI) is a power distribution equipment repair and decommission facility. The facility handles many different types of equipment including transformers, regulators and reclosers which all contain mineral oil. In support of the facility's processing operations, used mineral oil is stored onsite in aboveground tanks. Each of the tanks employed for bulk storage of used oil have been listed in the table below. The table also lists containers of significant volume which are working/temporary holding tanks or equipment. Mineral oil to be processed is received at the facility via common carrier tank trucks or within equipment received for repair and test/evaluation purposes. These storage tanks are named and accounted for in this plan.

The standard hours of operation for this facility are 7:00 A.M. to 3:30 P.M. Monday through Friday. In order to meet customer requirements, the facility often operates outside of these standard hours to include late afternoons and weekends. Processing also occurs offsite at customer-owned facilities and locations. A section of this plan will be dedicated to Spill Prevention in the field.

Used oil processing is completed by the use of a Mobile Dechlorination Unit (PCB-1000). Treatment includes a chemical reaction between oil and sodium. The process begins with degasification followed by sodium dispersion, mixing, condesate removal and centrifuge. The PCB-1000 is a batch process. Maximum batch size is 265 gallons.

The PCB-1000 unit is completely automated and requires limited supervision. FTI designates at least one (1) employee to supervise the process while at the facility and at least two (2) employees for process operations while offsite on customer property. FTI employs approximately ~~130~~115 people. All oil pumping and material transfer operations are manually initiated and monitored by onsite personnel.

Facility Storage

In support of operations at FTI, several aboveground storage tanks are used for material storage. A description of these may be found in the Facility SPCC plan. The list below contains the storage containers used in direct conjunction with the PCB-1000 and the used oil processing.

TANK ID	TANK USE/LOCATION	CONTENTS	GALLON CAPACITY
TK-3/4	MIXING TANK/PCB-1000 MOBILE PLANT	MINERAL OIL	265
	BULK STORAGE TANKS		
TANK C	USED OIL / TANK FARM	MINERAL OIL	8400
TANK T	USED OIL / TANK FARM	MINERAL OIL	8400
TANK G	USED OIL / TANK FARM	MINERAL OIL	8400
TANK PO-1	PROCESSED OIL FOR REPAIR / TANK FARM	MINERAL OIL	8225
TANK PO-2	PROCESSED OIL FOR VENDOR TRANSFER / TANK FRM	MINERAL OIL	15000
PCB-1*	PCB OIL STORAGE/PCB ROOM INPROCESS	MINERAL OIL	1295
PCB-2*	PCB OIL STORAGE/PCB ROOM INPROCESS	MINERAL OIL	1295
PCB-3*	PCB OIL STORAGE/PCB ROOM INPROCESS	MINERAL OIL	1295
PCB-4*	PCB OIL STORAGE/PCB ROOM INPROCESS	MINERAL OIL	1295
PCB-5*	PCB OIL STORAGE/PCB ROOM INPROCESS	MINERAL OIL	1295
TANK Q*	VERTICAL SKID HOLDING TNK SLUDGE / INPROCESS	OIL/SLUDGE	560

*** Are not involved with Used Oil Processing for non-PCb oil (<50ppm PCB)**

Drainage Pathway and Distance to Navigable Waters

Water leaving the FTI facility travels eastward into the ditching along State Highway 83. Once the water enters the ditch, it travels southward along the roadway to a cross culvert approximately 0.1 miles south of the facility. Here the water crosses under State Highway 83 and continues a general south-south easterly path where it eventually enters the headwaters of West Sandy Creek.

Spill History

There have been no spill events at this facility. Any spills that occur during operations will be recorded as a Chemical Release Incident detailing the date of release; amount and type of material released, reason for release and preventive measures to minimize recurrence.

A letter dated May 3, 2017 was submitted from Florida Transformer, Inc. to the State of Florida Department of Environmental Protection which included the Initial Notice of Contamination Beyond Property Boundaries on DEP Form 62-780.900(1) that included details of a self disclosure notification made to the EPA as a result of self implemented sampling by the company to determine PCB impacts, if any, due to an error in procedure that was discovered in 2015. The sampling indicated evidence of a release of unknown origin, except that PCBs were discovered to have impacted one operations area of the facility. The PCB Characterization efforts have been ongoing since 2015. An interim summary report of the characterization analysis was provided to the FL DEP via shared link from the Environmental engineers retained to conduct the sampling. At the time of the submittal of this application for renewal, the PCB Characterization efforts have been completed under the guise of EPA Region 4. A PCB Characterization summary report will be submitted to the EPA, followed by a Remedial Action plan for the EPA's review prior to remediation of the PCB impacted area at the facility.

Prevention Measures

Engineering Controls and Containment

Two (2) major drainage paths exist at FTI. The South Retention Pond collects all runoff from the southern portion of the facility. This includes any runoff from the tanker loading and unloading area or connection points to and from the PCB-1000 mobile plant. The holding capacity of the retention pond is large enough to contain the contents of an entire tanker truck in the event of an accident. There is an additional stormwater retention pond northeast of the facility to capture additional runoff from the grounds and the parking lot.

The main bulk storage area, which houses Tanks C, T, G and PO-1 in addition to other tanks not involved with used oil processing, has poured concreted walls. Tanks C and T are under roof and within secondary containment. Tank PO-1 and G are within secondary containment although not under roof. Tank Q is a portable tank staged within secondary containment. Tank PO-2 is a double-walled horizontal tank equipped with means for interstitial monitoring. Tanks PCB-1, 2, 3, 4, and 5 are housed in the PCB room within secondary containment as required by the facility approval to commercially store PCB waste. Secondary containment calculations for these areas are provided in Appendix F the facility SPCC plan.

All bulk storage tanks have visual liquid level gauges that allow a quick assessment of the tank contents. Storage tank inventory is monitored for available capacity. In addition, tanks C and T and G have high level alarms installed to protect against overfilling. If the high level alarms are activated, an audible alarms sounds in the oil handling area.

Additionally, the oil processing equipment used at the facility is housed within a 40 foot container trailer with steel frame construction and Kemlite paneling. A temporary/removable containment berm is used under the container to prevent any release of drips or leaks that may occur at piping connections while in the field at customer locations.

Along with secondary containment, drainage control, observation, inspections, training and spill response materials are included in facility prevention measures. These items are discussed in detail below and in the SPCC.

Bulk Storage Area Drainage Control

If water is collected in the bulk storage secondary containment, it is visually inspected for oil contamination. Non-contaminated water is drained by sump pump within the containment to the South Retention Pond. If the water appears to have oily sheen, it will be transferred to a temporary storage container (i.e. 55 gallon drum) and processed for disposal. Each time the containment area is inspected for condition and amount of water collection, an entry will be made onto the Record of Water Removal from Bulk Storage Area form noting the date, time, amount of water removed and if oil was present.

A temporary/removable containment berm will be used under the container at connection points while the system is used off site at customer locations.

Underground Storage Tanks

There are no buried or partially buried storage tanks at this facility and the PCB-1000 will not be used in conjunction with any buried or partially buried underground storage tanks.

Aboveground Storage Tank Inspection

The bulk storage tanks used in conjunction with the PCB-1000 are observed throughout working hours. A more formal, thorough inspection for leaks, deterioration and maintenance is completed monthly and recorded. This monthly inspection also includes all transfer piping. Any defects found are noted and promptly reported so that appropriate action can be taken. A record of these inspections is kept onsite and is available for review. Informal inspections occur each workday by our employees in conjunction with their regular duties.

FTI also receives a tri-annual (if no violations have occurred) Storage Tank Facility Inspection from the Florida Department of Environmental Protection (DEP). The results of these inspections are kept onsite and available for review. Proper aisle space for the tanks, various containers and associated equipment is also verified at this time. The most recent Storage Tank Facility Inspection was conducted on August 2, 2017. The report is attached.

Additionally, tanks, pipes and fittings are inspected daily before each use as part of a pre-operation inspection of the PCB-1000.

Corrective Actions for Spills/Leaks

Any identification of leaks, corrosion, wear or other damage to tanks, piping or containment is recorded during monthly inspections and the actions taken are further detailed within the FTI SPCC and within Attachment 9 – Unit Management Plan.

Personnel Training/Safety Measures

FTI's Director of Safety and Environmental Compliance, Jessica Pennington, is responsible for oil spill prevention personnel training and overall implementation of the SPCC plan.

The facility SPCC is made available to all personnel. This document and all guidelines and procedures for spill prevention are annually presented as a facility-wide employee safety meeting topic.

Each employee at the facility is provided the Employee Spill Prevention and Response Procedural Overview. This document is signed by the employee and placed in employee records with Human Resources.

Associates directly responsible for oil handling during processing and operation of the oil processing equipment either at the facility or on customer property will participate in onsite manufacturing training to include procedures specific to the PCB-1000. This will include product transfer from tank to truck/tanker. This training documentation will be kept with employee file.

Key employees utilize individual handheld radio communication devices to allow for constant contact between employees and continued communication from the various facility areas. Telephones are located in several locations throughout the facility and are capable of contacting 911 and any emergency response team. Each employee in direct contact with the used oil processing in required to have a working cellular phone on them at all times in case of an emergency and also has use of an individual handheld radio in the event cell service is not available.

Spill/Fire Response Materials

Spill response material is located in every department in the event of a release. A mobile spill response cart mounted on wheels is kept onsite that contains granular absorbent material, oil absorption pads and socks, five-gallon buckets, shovels and brooms for easy access and timely retrieval should a spill occur. Where used oil processing occurs, a spill response kit is housed and stocked with response material in the event of a release. Figure 3 within the facility Integrated Pollution Prevention plan provides a map with the locations of the Spill response Stations and the Mobile Spill Recovery Units. A Fire Extinguisher Map can also be found at the end of this section providing locations of each fire extinguisher onsite.

Site Security

All areas of the FTI are protected against vehicular entry. All entrance gates are securely locked when the facility is unattended. In addition, all tank valves which would provide a direct outtlow of oil are locked in the closed position when the facility is not attended. Adequate lighting is provided around the facility to deter potential vandals and to allow the detection of an oil spill. FTI also employs 24-hour weekend security and 12-hour night time security throughout the week.

Emergency Response Contacts

In the event of a spill that threatens to enter any water source or waterway, the following are a list of Emergency Contacts to be used. This Preparedness & Prevention Plan, the FTI Integrated Pollution Prevention Plan and the Contingency & Emergency Action Plan will be supplied to all local emergency response authorities. The transmittal letter from FTI to these agencies can be found at the end of this Attachment.

National Response Center **1-800-424-8802**

Local Regulatory Contacts:
Florida Division of Emergency Management 1-800-226-4329
Florida Department of Environmental Protection 1-800-245-2118

Region 4 / Southeast **(MS, TN, AL, GA, FL, KY, SC, NC)**: 1-800-241-1754 or 1-404-562-9900

DeFuniak Springs Fire Department 911 or 850-892-8503

Walton County Sheriff's Department 911 or 850-892-8111

Walton County Emergency Management 850-892-8065

Regional Regulatory Contacts:

Region 1 / New England **(ME, NH, VT, MA, RI, CT)**: 1-888-372-7341

Region 2 **NY and NJ** 1-212-637-4050

Region 3 / Mid-Atlantic **(DE, MD, PA, VA, WV, DC)**: 1-800-438-2474

Region 5 / Upper Midwest **(IL, IN, MI, MN, OH, WI)**: 1-312-353-2000

Region 6 / South Central **(AR, LA, NM, OK, TX)**: 1-214-665-2210

Region 7 / Midwest **(IA, KS, MO, NE)**: 1-800-223-0425

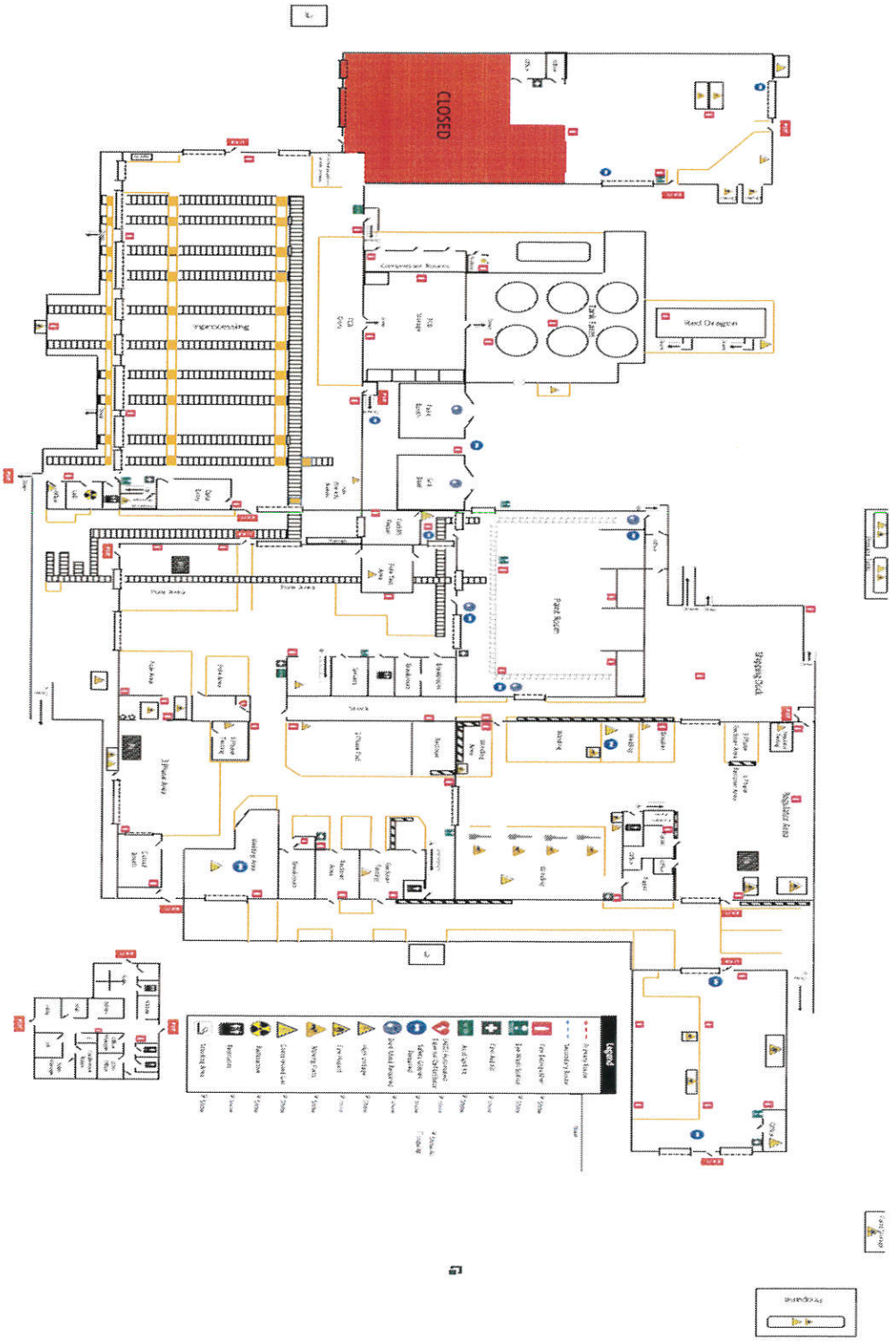
Region 8 / Mountains and Plains **(CO, MT, ND, SD, UT, WY)**: 1-303-312-6312

Region 9 / Pacific Southwest **(AZ, CA, HI, NV, Guam, American Samoa)**: 1-415-947-8713

Region 10 / Pacific Northwest **(AK, ID, OR, WA)**: 1-800-424-4372 or 1-206-553-4973

Florida Transformer, Inc. Emergency Spill Response Contractor
SWS First Response 1-800-852-8878

FIGURE 1



Revision 11/6/2017

EMERALD TRANSFORMER

Used Oil Processing Permit
Renewal Application
August 2017

IP3 Certification Signed

Date of Previous Plan Version: February 2012

Date of Last Plan Amendment/P.E. Certification: February 2012

Date of Last Plan Review: October 2016

Designated person accountable for spill prevention:
Director Environmental Compliance

CERTIFICATION

By means of this certification, I attest that I am familiar with the requirements of provisions of 40 CFR Part 112, that I or my designated agent have visited and examined the facility, that this SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of this Part, that procedures for required inspections and testing have been established, and that the Plan is adequate for the facility. This certification does in no way relieve the owner and operator of the facility of his or her duty to fully implement this SPCC Plan in accordance with the requirements of 40 CFR 112.

Engineer: Rex Allen Thompson

Signature:

Registration Number: 48377
State: Florida

Date: 10/13/16

10/13/16

EMERALD TRANSFORMER

Used Oil Processing Permit
Renewal Application
August 2017

Attachment 6

SAF MAN SOP: 17.1 GC	**Title: Emergency Action Plan** **Gulf Coast Location**
Effective Date:	**Supersedes: 17.0 GC**
Department: Safety	
APPROVALS	J. Pennington Director of Safety and Environmental Compliance Date: 9/21/2017

1. SCOPE and APPLICATION

1.1 This Emergency Action Plan (EAP) specifically covers all Emerald Transformer - Gulf Coast associates which explains practices and procedures for their safety in the event of catastrophic or "Acts of God" occurring while otherwise on Emerald Transformer premises.

1.2 All safety and environmental regulations as established by Emerald Transformer, federal, state, or local agencies are to remain in compliance, in addition to the specific procedures described by this Standard Operating Procedure (SOP).

1.3 This policy **SHALL APPLY** to all parties mentioned in this SOP, **as well as**, to non-Emerald Transformer persons while on any properties owned, or otherwise, under the responsibility of Emerald Transformer. This is to include contractors, vendors, suppliers, and all other visitors.

1.4 This policy will be maintained by the Director of Safety and Environmental Compliance and shall be made available to Regulatory Agencies and associates for their review.

2. EMERGENCY PLAN COORDINATOR

NAME:	**Jessica Pennington**
ADDRESS:	973 PRICE RD, DEFUNIAK SPRINGS, FL 32433
TITLE:	**Director of Safety and Environmental Compliance**
CELL NO:	**(850) 333-8772**
OFFICE NO:	**Ext. 3200**

3. PREFERRED MEANS OF REPORTING FIRES AND OTHER EMERGENCIES

3.1 Emergencies that could be encountered in the workplace include:

a.	Fire	e.	Chemical Spill/Leak
b.	Explosion	f.	Violence
c.	Severe weather/Tornado	g.	Medical
d.	Bomb Threat	h.	Hostile Intrusion

3.2 All company emergencies shall be reported by the appropriate manager or designee by notifying the Emergency Coordinator of the nature of the specific emergency. If necessary, upon evaluation of the specific event, the Emergency Coordinator, or their designee will then contact the appropriate emergency service.

3.3 Emerald Transformer - **Gulf Coast** - Emergency Coordinators are:

Jessica Pennington
Director of Safety & Environmental Compliance
973 PRICE RD, DEFUNIAK SPRINGS, FL 32433
Ext. 3200
Cell: 850-333-8772

Andy Hall
Plant Manager
180 OLD AIRPORT ROAD, DEFUNIAK SPRINGS, FL 32433
Ext. 3170
Cell: 850-635-2006
Home: 850-892-5984

Billy Burgess
Production Manager
950 ALMA ROAD, DEFUNIAK SPRINGS, FL 32433
Ext. 3174
Cell: 850-333-0149

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

Depending on the magnitude of the emergency, use of the Company Public Address (PA) System may be inappropriate.

Contact emergency services (dial 911) based upon the merits of the emergency.

3.4 Emergency contacts, and other facility representatives capable of facilitating emergency response are to be posted with contact information in close proximity to telephones.

4. FIRST AID

The Company will ensure an adequate number of associates trained in first aid. (See Appendix C)

5. PROCEDURE

5.1 Emergency Escape Procedures and Routes

5.1.1 Emergency escape procedures and route assignments shall be posted in each work area, and all associates are to have been trained by supervision in the proper emergency procedures.

5.1.2 New associates are trained in new hire orientation and when initially assigned to a work area. An example of an escape route that is to be posted in each work area is provided in this SOP. (See Appendix A.)

5.2 Associates Assigned to Perform Critical Operations Prior to Evacuation

5.2.1 Critical Operations are procedures required to safely secure specific areas prior to the assigned associate's evacuation. (See Table 2 and Appendix B)

5.3 Associate Accountability Procedures after Evacuation

5.3.1 Each supervisor is responsible for accounting of all assigned associates, personally or through a designee, by having all such associates report to a predetermined rally point and conducting a head count.

5.3.2 Entities may be able to conduct a roll call using time cards or a similar system.

5.3.3 All supervisors are required to report their head count to the Emergency Plan Coordinator.

6. ALARM SYSTEM

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

a. Company Public Address System
b. Alternate: Walkie-Talkie System
c. Person-to-person (See TABLE 1 – AREA MONITORS)

6.2 In some cases, electronic modes of communication may not be permitted. When this happens, associates will be given verbal instructions by management or other authorized persons.

6.3 Emerald Transformer will comply with OSHA Standard 1910.165, Employee Alarm Systems.

7. TRAINING

The following Area Monitors have been trained to assist in the safe and orderly evacuation of other associates during emergencies.

TABLE 1 – AREA MONITORS

NAME	TITLE	WORK AREA	SPECIAL ASSIGNMENT
Billy Godwin	Supervisor	Pad Mount, LT, Welding,	
Brandon Radney	Lead	Pad Mount, LT, Welding,	Alternate
Daniel Williams	Winder	Fabrication	
Mark Hall	Winder	Fabrication	Alternate
Ronald Edwards	Manager	Regulator, 3Ø Recloser, Panel	
Todd Anderson	Panel Repair	Regulator, 3Ø Recloser, Panel	Alternate
Nancy Cook	Stock Clerk	Stock Room	
Janet Hewett	Stock Clerk	Stock Room	Alternate
Billy Burgess	Production Mgr	Pole, Test	
Carson Anderson	Lead	Pole, Test	Alternate
Eddie Ling	Pole Test	Pole, Test	Alternate
Mary Suttles	Lead	Paint	
Kenneth Evans	Lead	Inprocessing	
Lessia Hardy	Inprocessing	Inprocessing	Alternate
Teresa McKinney	Lab Tech	Lab	
Andre Miley	Lab Manager	Lab	Alternate
Ronald Edwards	Maintenance Manager	Maintenance, Housekeeping	
Carl Holloway	Maintenance Lead	Maintenance, Housekeeping	Alternate
Darryal Senn	Shipping Coordinator	Transportation	
Brandon Hunt	Shipping	Transportation	Alternate
Chuck Middleton	Decommission Tech	Decommission	
Josh Gillman	Decommission Tech	Decommission	Alternate
Guy Ward	Recloser Repair	1Ø Recloser	
Shawn Carter	Recloser Repair	1Ø Recloser	Alternate
Brandon Garrett	Engineer	Upstairs Offices	
Billy Godwin	Supervisor	Upstairs Offices	Alternate
AK Green	Office Manager	Office/Admin	
Linda Anderson	Office	Sales Assistant	Alternate
Calvin VanVoorst	PCB Decommission	SMRO	
Kimber Armstrong	PCB Decommission, Lead	SMRO	Alternate
Rick Drake	Operator	Red Dragon	
Mike Allen	Operator	Red Dragon	Alternate
Chet Lawniczak	Field Decom	Field Decom	
Anthony Mitchem	Field Decom	Field Decom	Alternate
James Cook	Field Service	Field Service	
Billy Godwin	Field Service	Field Service	Alternate

Training is to be provided for the above associates when:

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

8. EMERGENCY SHUTDOWN PROCEDURES

During some emergency situations, it will be necessary for specifically assigned and properly trained associates to remain in their work areas during evacuation efforts until specific, critical operations have been performed. Associates who are trained as potential Hazardous Waste Management personnel and their job description are identified as such in the chart below.

The following assignments are necessary to ensure proper emergency control.

TABLE 2 – EMERGENCY SHUTDOWN/HAZ WASTE MGMT PERSONNEL & TASKS

WORK AREA	NAME	TITLE	DESCRIPTION OF ASSIGNMENT	JOB DESCRIPTION
Decommission	Chuck Middleton	Decom Tech	Turn Off Propane Supply at Tank	
Decommission	Josh Gillman (Alternate)	Decom Tech	Turn Off Propane Supply at Tank	
Oil Supply	Bobby Jones	Inprocessing/Tank Farm	Turn Off Oil Pumps	HazWst Mgmt/Tank Farm Maintenance
Oil Supply	Kimber Armstrong (Alternate)	Inprocessing/Tank Farm	Turn Off Oil Pumps	HazWst Mgmt/Regulated Services Supervisor
Shop	Carl Holloway	Maintenance Tech.	Shop Power Supply	
Shop	Ronald Edwards (Alternate)	Maintenance Tech.	Shop Power Supply	
PCB Decommission	Tim Shiver	PCB Decommission	Oven Power Supply (South Wall) Propane Emergency Shut-Off (East Wall)	HazWst Mgmt/ SMRO/PCB Decommission Technician
PCB Decommission	Calvin VanVoorst (Alternate)	PCB Decommission	Oven Power Supply (South Wall) Propane Emergency Shut-Off (East Wall)	HazWst Mgmt/SMRO/PCB Decommission Technician
PCB1000	Rick Drake	Operator	Safely end all processes; Close IN/OUT oil valves; Turn off nitrogen at supply.	HazWst Mgmt/ Oil Processing Technician
PCB1000	Mike Allen (Alternate)	Operator	Safely end all processes; Close IN/OUT oil valves; Turn off nitrogen at supply.	HazWst Mgmt/Oil Processing Technician

HAZ WASTE Management Job Descriptions Defined:

Tank Farm Maintenance – may manage/handle TSCA or RCRA regulated waste for the purposes of preparation for shipment or disposal

Regulated Services Supervisor – oversees the receipt, storage, handling, shipping and preparation for disposal of all TSCA or RCRA regulated waste.

SMRO/PCB Decommission Technician – may manage/handle TSCA or RCRA regulated waste for the purposes of preparation for shipment or disposal

Oil Processing Technician - may manage/handle TSCA or RCRA regulated waste for the purposes of preparation for shipment or disposal

9. SPECIAL TRAINING

9.1 The preceding individuals have received special instructions and training from their immediate supervisors to ensure their safety while carrying out the designated assignments.

9.2 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.

9.3 Emergency and Fire Protection Plan Coordinator:

Jessica Pennington
Director of Safety and Environmental Compliance
850-333-8772

10. ASSOCIATE ACCOUNTABILITY PROCEDURES FOLLOWING AN EMERGENCY EVACUATION

10.1 Each supervisor is responsible for accounting for each assigned associate following an emergency evacuation.

11. ASSOCIATE ACCOUNTABILITY

11.1 To evacuate the Plant in a ***Swift, Organized, and Safe*** (**S.O.S.**) manner.

11.2 **DO NOT RUN! REMAIN CALM!**

11.3 Keep talking and other noise (e.g. radios, etc.) to a minimum to avoid obscuring communications and instructions provided by emergency personnel.

11.4 Rally points have been established for all evacuation routes and procedures.

11.5 The designated rally point and escape route *SHALL* be posted in a conspicuous location in each work location and maintained in good condition.

11.6 All work area supervisors and associates must report to their designated rally point immediately following an evacuation.

11.7 Each associate is responsible for reporting to his or her supervisor so that an accurate head count can be made.

11.8 Supervisors will provide the names of all those reporting to the designated rally point and will report those not checked off as "missing" to the Emergency Plan Coordinator.

11.9 The Emergency Plan Coordinators are based at the Florida Transformer location and will notify each other of their absence. In the event both are absent, a third designated associate familiar with this plan will be appointed to be in charge.

11.10 The Emergency Plan Coordinator will determine the method that will be utilized to locate missing associates. If there is the need to reenter the evacuated area, the fire department and/or rescue squads will be used to locate missing associates.

12. SEVERE WEATHER

12.1 The Emergency Plan Coordinator or other authorized associate shall announce severe weather alerts (such as tornados) using the Public Address System.

12.2 All associates shall immediately retreat to a ***Designated Storm Area*** until the threat of severe weather has passed.

12.3 The Emergency Plan Coordinator, or his/her designee, will communicate an "ALL CLEAR" once the threat has passed.

12.4 The ***Designated Storm Areas*** are:

12.4.1 The Plant:
- a. The outside grit blast booth
- b. The hallway in front of the stock room

12.4.2 The Administration Office:
- a. The interior rooms or the hallways away from adjacent windows

12.4.3 The Human Resources and the Cooperate Offices:
- a. The central Hallway or the bathroom shower

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

12.6 The following should be used as shelters of ***last resort***:

12.6.1 The Plant:
- a. The Inprocessing Office
- b. The space under a work desk or heavy table
- c. The maintenance shop

12.6.2 The Human Resource and Corporate Offices:
- a. The space under a work desk or heavy table
- b. The bathroom shower (HR)

13. OIL and/or HAZARDOUS MATERIALS/WASTE RELEASE and RESPONSE

13.1 This facility practices the receipt, handling, use, storage and shipment of used and new transformer oil, as well as, hazardous materials and waste. In the remote possibility a release occurs, a designated group of associates have been specially trained as "Spill Response Teams."

13.2 These teams serve up to twelve months and receive training (both outsourced and in house) on response to, and the remediation of, both oil and hazardous materials/waste releases.

13.3 The facility Director of Safety and Environmental Compliance, or designated associate, is responsible for oversight of the Response Teams and reporting, as necessary.

13.4 In the event a release or situation is foreseen as a threat to Emerald Transformer associates and/or the environment at its facilities, 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 (M-F, 8 am – 5 pm)	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	**Office #**
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	**Office #**
SWS First Response	1-800-852-8878

This facility maintains a contract with SWS Environmental for assistance in the event a release becomes a state of emergency and/or is beyond the capabilities of Emerald Transformer.

14. REVIEW

14.1 This policy will be maintained by the Emerald Transformer Director of Safety and Environmental Compliance and shall be made available to Regulatory Agencies and associates for their review.

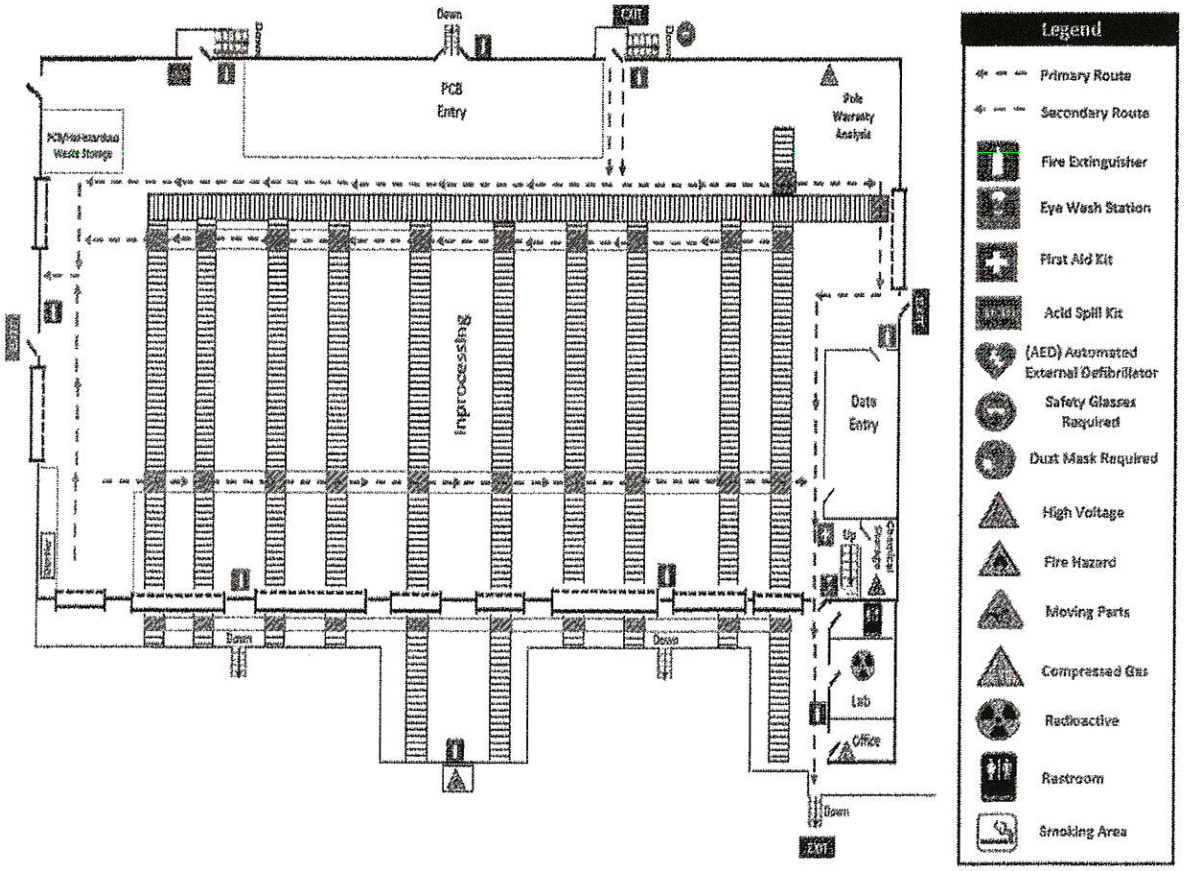
14.2 The Emerald Transformer Director of Safety and Environmental Compliance will review the plan **ANNUALLY** to reflect changes in tasks, procedures, and also technological changes that eliminate or reduce occupational exposure.

14.3 The Emerald Transformer Director of Safety and Environmental Compliance reserves the right to review and make necessary changes, at any time, to this policy to reflect new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

APPENDIX A

Below is a sample poster of escape routes to be posted in all work areas.

The evacuation rally point for Emerald Transformer – **Gulf Coast** is the grassy area directly in front of the Administration Office.



APPENDIX B

Critical Operations

The following operation at Emerald Transformer – **Gulf Coast**, is considered to be of critical nature, and where possible, special procedures for evacuation should apply.

The 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, where possible, two (2) office associates should remain in the area to assist with emergency communications.

As 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 Plan Coordinator

APPENDIX C
ASSOCIATES TRAINED IN FIRST AID / CPR / AED

Name	Department	Certification Date
Mike Allen	Red Dragon	April 2017
Meredith Allred	CHRO	April 2017
Todd Anderson	Regulator / Panels	April 2017
Kimber Armstrong	PCB	April 2017
Ashley Bartlett	Admin Office	April 2017
Billy Burgess	Manager - Production	April 2017
Beth Burns	Financial Office	April 2017
Mike Burns	EVP	April 2017
Ronald Edwards	Manager – Maint/Regulator	April 2017
Kenneth Evans	Manager - Inprocess	April 2017
David Fox	Inprocessing	April 2017
Branden Garrett	Manager - Engineering	April 2017
Billy Godwin	Manager - 3Ø Pad / Field Service	April 2017
Andy Hall	Plant Manager	April 2017
Carl Holloway	Maintenance	April 2017
Brandon Hunt	Shipping	April 2017
Hunter Lain	Decommission	April 2017
Chet Lawncizak	Field Decommission	April 2017
Jan Lipscomb	HR	April 2017
Chuck Middleton	Decommission	April 2017
Anthony Mitchem	Field Decommission	April 2017
Jessup Nolin	Decommission	April 2017
Justin Nolin	Decommission	April 2017
Russell Nolin	Field Decommission	April 2017
Jessica Pennington	Director Safety / Enviro	April 2017
Timothy Prior	Decommission	April 2017
Brandon Radney	Manager 3Ø Pad / Welding	April 2017
Dawn Stapleton	Admin Office	April 2017
Kathy Tracy	Financial Office	April 2017
Dewey Trant	HR	April 2017
Calvin VanVoorst	PCB Decommission	April 2017
Derek Vaughan	Engineering / Fabrication	April 2017

EMERALD TRANSFORMER

Used Oil Processing Permit
Renewal Application
August 2017

Attachment 8

EMERALD TRANSFORMER

FLORIDA TRANSFORMER INC.

Used Oil Processing Facility Closure Plan

FLORIDA TRANSFORMER, INC.
4509 STATE HIGHWAY 83 NORTH
DEFUNIAK SPRINGS, FLORIDA 32433

Original June 2012

Table of Contents

~~1~~1.0 Florida Transformer: Introduction

This facility closure plan applies to the Used Oil Processing activities conducted at Florida Transformer, Inc., (FTI) 4509 Highway 83 North, DeFuniak Springs, Florida 32433. There is no intent for closure of these facilities at this time. This closure plan is applicable to the Used Oil Processing equipment for the Polychlorinated Biphenyl (PCB) removal in mineral oil up to ~~1,500~~2,000 ppm PCB. This Closure Plan is applicable to the requirements listed in 40 CFR Part 279.54(h) and FAC 62-710.800(5).

This Closure Plan and the associated financial assurance for closure is prepared in accordance with the requirements of 40 CFR Part 279.54(h) – Used Oil Management; Closure, FAC 62-710.800(5) – Permits for Used Oil Processing Facilities; Closure.

The Closure Plan is applicable to testing, decontamination and disposal of the treatment process and equipment and all associated byproduct or waste. The majority of the work at the time of closure will be performed using FTI personnel under the supervision of a third-party consultant. The items associated with this Closure Plan and Closure Cost Estimate include all waste items and materials associated with the clean up and closure of the process equipment and associated tanks, piping and ancillary equipment. This Closure Plan addresses the shipment offsite for treatment/disposal of waste items and materials as well as decontamination of the process area and equipment.

2.0 Facility Contact Information/Responsible Personnel

Florida Transformer, Inc.
Physical Address: 4509 State Highway 83 North, DeFuniak Springs, FL 32433
Mailing Address: PO Box 507, DeFuniak Springs, FL 32435

EPA/RCRA Identification Number FLR 000 168 203

~~_____~~Jessica Pennington ~~_____~~	FTI ~~Environmental Compliance Manager~~Director of Safety and Environmental Compliance
Telephone	850-892-2711 850-~~951-3086~~333-8772
Address	973 Price Rd DeFuniak Springs, FL 32433
Email	~~jessica@floridatransformer.com~~jpennington@emeraldtransformer.com

~~Ron Shaw~~Andy Hall	FTI ~~General~~ Plant Manager
Telephone	850-892-2711 850-~~830-807~~635-2006
Address	4604 St Hwy 2 W, DeFuniak Springs, FL 32433
Email	~~ron@floridatransformer.com~~ahall@emeraldtransformer.com

3.0 Facility Description

FTI's core business is the service, repair and decommission of power distribution equipment. As part of the services FTI provides, paint is purchased and stored at the facility to complete the painting process following repair. Materials and metals from the decommissioning of electrical equipment are segregated and recycled or stored for disposal. The paint, repair and decommission processes involve accumulation of solid waste materials and spent solvents for disposal. All disposals are carried out via long term contracts with EPA approved disposal facilities.

Used (2-2,000ppm PCB)~~(2-2,000ppm PCB)~~ oil is processed to Non-Detect levels of PCB (<2 ppm) by means of dechlorination using the PCB-1000 processing unit. The PCB-1000 is a manufactured system using sodium dispersion to break down chlorine found in the PCB compound resulting in Non-PCB oil. The PCB-1000 is a mobile unit and may also be used offsite at FTI customer property. The PCB-1000 is placed in-line with oil transfer and processes approximately 265 gallons per batch. Associated storage may consist of byproduct storage to be disposed of. All material waiting to be processed or finished processed material is stored in bulk aboveground storage tanks.

4.0 List of Equipment to be Cleaned

This Closure Plan is for the cleaning and closure of the three (3) 8,225-8,400 gallon vertical aboveground used oil storage tanks (<50 ppm PCB), one (1) 15,000 gallon horizontal aboveground processed used oil storage tank (<2 ppm PCB), temporary storage containers, secondary containment system, the PCB-1000 oil dechlorination unit, associated areas and ancillary equipment used for or involved in the transfer and processing of used oil at the FTI facility.

The aboveground storage tanks are made of carbon steel with epoxy coating. The piping is mostly galvanized steel with some flexible hose piping systems. There may be 55-gallon metal drums used for solid waste storage for disposal. The containment system is made of concrete block and mortar.

The PCB-1000 unit is comprised of metal tanks, containers and associated piping all housed in a 41' long container trailer.

5.0 Notification of Closure

At least 60 days before initiation of closure activities, FTI will notify the Florida Department of Environmental Protection (DEP) and the United States Environmental Protection Agency (EPA), Region IV, Air, Pesticides, and Toxics, Management Division that FTI will begin closure activities on a date specified in the notice.

FTI intends to complete closure within 90 days of the notification. FTI will submit a Certification of Closure within 30 days following completion of closure activities.

6.0 Decontamination Procedures

All decontamination procedures will be completed in such a fashion that all equipment, tanks and piping may be reused at a later date or offered for recycling. It will be the goal of this Closure Plan to complete sufficient decontamination in an effort to reduce waste or decommission of usable, resourceful equipment.

At the determined time that clean up and closure must be initiated, the Environmental Manager will ensure all processing activities are stopped immediately and the processing equipment is placed out of service. The Environmental Manager will begin clean-up procedures by assessing inventory of used oil at the facility to be processed. Arrangements will be made for pickup ~~of~~ and~~the used oil without processing~~ disposal of Non PCB used mineral oil dielectric fluid (processed and not yet processed) by an approved vendor.~~vendors for the transfer of the material to EPA-approved processing facilities for recyclin All processed material at the time of closure will be transferred to the appropriate vendor so that all aboveground storage tanks will be empty for commencement of closure activities.~~ All byproduct and solid waste for disposal generated from processing activities will be analyzed for proper characterization and arranged for pick up by the appropriate disposal facility. All tanks will be rendered free of pollutant vapors, if any should exist, at time of closure.

The Closure Cost Estimate found in Attachment D is based on maximum amounts for any given expenditure. For example, initial disposal and removal of material for closure will be calculated as if all four (4) used oil tanks and all temporary storage containers are completely full of material to be emptied. Other items will include the disposal of sludge byproduct removed from the equipment during processing (i.e. a maximum of the 560 gallon sludge holding tank). These items are detailed in Attachment D.

6.1 Tanks

FTI routinely has the facility's used oil storage tanks cleaned by an approved company for the transportation and treatment of non-hazardous wastewater and used oil. Cleaning is completed by a wash/rinse method using Alkaline Detergent Cleaner. If available, FTI will employ the same approved company to complete the cleaning of residual oil from all storage tanks used for processed and material to be processed. If the same company is not available, only an EPA-recognized and approved company will be sought out for tank cleaning purposes. All tank cleanup shall be performed as described in Chapters 62-762.801 and 62-770, Florida Administrative Code.

Typically, Non PCB used oil would be transferred for a profit to an appropriate vendor for processing or, at least, no charge. For the purposes of this closure plan the material will be transferred for disposal regardless of the quality of the oil to determine maximum closure cost.~~Note that only the two (2) used oil storage tanks (Tank C & T) will be cleaned initially. The processed material storage tanks, Tanks PO-1 & PO-2, will first be sampled to determine the quality of the processed oil for reuse purposes prior to closure.~~

6.2 Piping

Piping will be flushed with an aqueous-based surfactant until there is no visible resemblance of oily product flowing from the pipes. All integral piping will be removed and manways will be secured to prevent access.

6.3 PCB-1000

All tanks, containers, pumps, piping, fittings and hoses will be purged with mineral oil <2 ppm PCB to ensure the solvency of any PCB containing oil left in the lines of the system prior to the sodium introduction phase. Initial purging of the system will be completed by processing a normal batch of material (265 gallons).

6.4 Concrete Containment

All concrete containment areas will be triple washed/rinsed with an aqueous-based solution to remove any oil residue.

7.0 Justification Sampling

7.1 Tanks

A wipe test using the following procedures will be done on the interior walls of the tanks to ensure decontamination was successful. (Note: only associates with Confined Space Entry Training may enter tanks to complete sampling). A gauze pad moistened with 10 ml of N-Hexane solvent will be applied to a surface 100 cm^2. The samples will be properly packaged and sent to a contracted lab for characterization analysis to confirm there are no hazardous constituents present in the sample taken from the tanks. The diameter of the four (4) tanks requiring sampling is 10 ft. The floor of the tank will be divided into four (4) equal parts. A wipe sample will be taken from the wall, floor and ceiling of each section. There will be twelve (12) wipe samples taken from each tank to confirm decontamination for reuse at a later date.

7.2 Piping

The effluent from the cleaning of the piping after flushing will be the origin of sample for confirmation of decontamination of all piping. The aqueous-based surfactant used to flush pipes will be containerized and the proper amount of sample based on the amount retrieved will be sent to a contract lab for characterization analysis to confirm no hazardous constituents are present in the rinsate ready to be disposed or in the piping so that it may be made available for recycling.

7.3 PCB-1000

The effluent from the cleaning of the equipment after purging will be the origin of sample for confirmation of decontamination of processing equipment and ancillary piping, containers, pumps, etc. The purged oil used for solvent will be containerized and the proper amount of sample based on the amount retrieved will be sent to a contract lab for characterization analysis to confirm no hazardous constituents are present in the material ready to be disposed or in the processing equipment so that it may be offered to the manufacturer for reuse or decommissioned into recyclable parts.

7.4 Concrete Containment

The concrete containment is finished with an epoxy coating and therefore the same sampling plan and design will be used that is in place for sampling the "low-risk" areas listed in the facility's PCB Commercial Storage Permit Approval Closure Plan. The Tank & Piping Diagram located in Attachment B.3 depicts the sampling area for the process area and tank farm where all material prior to being processed and after being processed is stored. No wipe sample shall be representative of more than 300 square feet. Wipe samples will be submitted to a contracted lab for characterization analysis to ensure

no hazardous constituents remain on the surface of the containment area.

If concrete wipe samples are found to be contaminated, chip sampling will be initiated to verify the extent of contamination. Concrete chip samples will be collected by chiseling the top one (1) inch of a 10 cm x 10 cm area. The same sampling scheme will be followed for collecting concrete media as is listed for the retrieval of containment area wipe samples.

If sampling results in evident contamination, decontamination may consist of tank removal and the physical extraction of a minimum 0.25" of concrete using abrasive blasting, grinding or planing. Appropriate personal protective equipment will be utilized (respirators, safety glasses, gloves, etc.) and tarps, tents or other means of cover will be used to minimize particulate release into the air.

8.0 Decontamination Wastes

Waste generated from decontamination procedures may include rinsate (aqueous or hydrocarbon-based solvents), mineral oil, residues, concrete media, soil, rags, absorbent material, personal protective clothing and equipment. All media will be segregated by type and characterization analysis will be performed to determine if the material will be shipped offsite to an approved hazardous waste facility or non hazardous waste handler.

~~9.0 Groundwater Sampling~~

~~Should analysis results of concrete media be found to be contaminated, groundwater sampling will be initiated. A contracted group capable of retrieving groundwater samples via Geoprobe (or similar method) will be sought out to perform this work. A minimum of eight (8) samples will be taken. These consist of two (2) samples under the Inprocessing area where oil filled electrical~~

~~equipment is stored, two (2) samples under the tank farm where the bulk of used oil processing and other material processed is stored, two (2) samples under the concrete pad which drains to the South Stormwater Retention Pond and two (2) samples of the pond itself. Should groundwater samples be found to be contaminated, appropriate environmental regulatory agency personnel will be contacted for further instruction on the necessary action to be implemented. FTI is not a hazardous waste treatment, storage or disposal facility and follows procedures to ensure hazardous waste is not received or processed at the facility. Therefore, there is a limited possibility that FTI would be required to initiate post-closure activities.~~

9.0 Soil Sampling

A Closure Integrity Evaluation will be conducted on all related used oil storage tank system components that are in contact with the soil in accordance with 62-762.801(3), F.A.C. This evaluation will include a visual assessment of the specific system components, as well as, hydrostatic testing of the spill containment system to confirm the integrity of these systems. The results of the closure integrity evaluation will then be utilized to determine whether soil sampling beneath the containment system is warranted.

Surface soil samples will be collected in specific areas identified from the closure integrity evaluation as needing further investigation. Eight (8) potential soil sampling locations have been included and accounted for in the closure cost estimate. These consist of two (2) samples under the Inprocessing area where oil filled electrical equipment is stored, four (4) samples under the tank farm where the bulk of used oil processing and other material processed is stored, two (2) samples under the concrete pad which drains to the South Stormwater Retention Pond and two (2) samples of the pond itself.

Should soil samples be found to be contaminated, appropriate environmental regulatory agency personnel will be contacted for further instruction on the necessary action to be implemented. FTI is not a hazardous waste treatment, storage or disposal facility and follows procedures to ensure hazardous waste is not received or processed at the facility.

10.0 Groundwater Sampling

Should laboratory confirmation analysis of soil samples collected indicate impact to the subsurface soils from facility operations, groundwater sampling will be initiated. A contracted group capable of retrieving groundwater samples via direct push technology (DPT), or similar method, will be procured to perform this work. A minimum of eight (8) samples will be taken. These consist of two (2) samples under the Inprocessing area where oil filled electrical equipment is stored, two (2) samples under the tank farm where the bulk of used oil processing and other material processed is stored, two (2) samples under the concrete pad which drains to the South Stormwater Retention Pond and two (2) samples of the pond itself.

Should groundwater samples be found to be contaminated, appropriate environmental regulatory agency personnel will be contacted for further instruction on the necessary action to be implemented. FTI is not a hazardous waste treatment, storage or disposal facility and follows procedures to ensure hazardous waste is not received or processed at the facility. Therefore, there is a limited possibility that FTI would be required to initiate post-closure activities.

~~10.0~~11.0 Closure Cost Estimate

The FDEP Form No. 62-710.901(7) "Used Oil Processing Facility Closing Cost Estimate Form", the FTI Closure Cost Estimate Summary and the accompanying Financial Assurance Document (Letter of Credit) can be located within Attachment D.

EMERALD TRANSFORMER

February 21, 2017

Used Oil Permitting Coordinator
MS4560
FL Department of Environmental Protection
2600 Blair Stone Rd
Tallahassee, Fl 32399

To Whom It May Concern:

Please find enclosed the updated annual Closing Cost Estimate Form for the Florida Transformer, Inc. facility at 4509 State Highway 83 North, DeFuniak Springs, FL 32433.

If there are questions concerning this information or additional information is needed, please feel free to contact me.

Sincerely,

Jessica Pennington
Director of Safety and Environmental Compliance

CC: Solid.Waste.Financial.Coordinator@dep.state.fl.us

Florida Transformer, Inc.

Closure Cost Estimate ANNUAL ADJUSTMENT (JAN 1- MAR 1 2017) Inflation Factor 1.009

12/7/2017 REVISION

Closure Cost Estimates And List of Activities Based on Florida Transformer, Inc. Used Oil Processing Facility Closure Plan

Description/Activity	Quantity	Unit	Unit Cost* 2016	Unit Cost* 2017	Total
Disposal of Oily Waste / Byproduct Inventory Prior to Clean Up					
1 Sludge					
a Disposal	560	Gallons	$ 1.01	$1.02	$ 573.10
b Transportation	140	Miles	$ 1.07	$1.08	$ 150.81
2 Solid Waste (Fuller's Earth, Absorbent Material, PCB-1000 filters)					
a Disposal	0.25	Tons	$ 29.89	$30.16	$ 7.54
b Transportation	140	Miles	$ 1.07	$1.08	$ 150.81
3 Oil					
a Disposal	45,425	Gallons	$ 0.11	$0.11	$ 4,893.41
b Transportation	1900	Miles	$ 2.49	$2.51	$ 4,768.98
Clean Up Activities/Disposal					
1 Tank Cleaning (4 Tanks, 8 hrs/tank)					
a Crew and Vac Truck	32	Hours	$ 208.19	$210.06	$ 6,722.04
b Material Costs	4	Tanks	$ 512.47	$517.08	$ 2,068.32
2 Pipe Flush	110	Gallons	$ 0.53	$0.54	$ 59.25
3 Containment Wash	110	Gallons	$ 0.53	$0.54	$ 59.25
4 Decontamination Solid Waste Disposal (rags, absorbent, PPE)					
a Disposal	0.25	Tons	$ 29.89	$30.16	$ 7.54
b Transportation	140	Miles	$ 1.07	$1.08	$ 150.81
5 Residuals/Sludge from Decontamination					
a Disposal	560	Gallons	$ 1.01	$1.02	$ 573.10
b Transportation	140	Miles	$ 1.07	$1.08	$ 150.81
6 Closure Integrity Evaluation	1	Each	$2,500.00	$2,522.50	$ 2,522.50
Sampling and Analysis					
1 Tank Wipe Samples					
a PCB	48	Each	$ 37.37	$37.70	$ 1,809.78
b Halogen	48	Each	$ 102.49	$103.42	$ 4,963.97
2 Pipe Flush Samples					
a PCB	2	Each	$ 64.06	$64.63	$ 129.27
b Halogen	2	Each	$ 102.49	$103.42	$ 206.83
3 Containment Wash Samples					
a PCB	2	Each	$ 64.06	$64.63	$ 129.27
b Halogen	2	Each	$ 102.49	$103.42	$ 206.83
4 Concrete Wipe Samples					
a PCB	7	Each	$ 37.37	$37.70	$ 263.93
b Halogen	7	Each	$ 102.49	$103.42	$ 723.91
5 Soil Samples	8	Each	$ 53.00	$53.48	$ 427.82
6 Groundwater Samples	8	Each	$ 373.67	$377.04	$ 3,016.30

* - All unit costs listed are from Third Party Estimates

	2016	2017
SUBTOTAL	**31,502.34**	**$34,736.18**
Supervision and Administration (20%)	**6,300.47**	**$ 6,947.24**
SUBTOTAL with Supervision/Admin	**37,802.81**	**$41,683.41**
Contingency (10%)	**3,780.28**	**$ 4,168.34**
TOTAL CLOSING COST	**$41,583.09**	**$45,851.75**

FTI Used Oil Processing Facility Employee Training Program

Training applicable to Used Oil Processing activities at the facility and on customer property consists of:

- Facility Spill Prevention Control and Countermeasure Plan (Annual Training)
  - 40 CFR Part 112
  - Overview of SPCC plan and its purpose
  - Operation and maintenance of equipment to prevent petroleum discharge
  - Applicable pollution control laws, rules and regulations
  - Fluid level monitoring in tanks
  - Material delivery monitoring/observations
  - Inspection/recordkeeping requirements
  - Spill Response Procedures

- Hazard Communication (Annual Training)
  - Hazardous Materials Identification System
  - Scope, Purpose, Utilization

- Container Labeling (Annual Training)
  - 40 CFR Part 279 – Standards for the Management of Used Oil
  - Storage, Condition, Labeling and Response to Release of Material Stored in containers
  - FTI specific storage locations for empty, used and new storage containers

- Emergency Preparedness and Contingency Plan (Annual Training)
  - FTI Emergency Action Plan
  - Scope, Purpose, Utilization

- DOT Hazardous Materials Handling and Transportation
  - 49 CFR Part 172
  - General awareness/familiarization training.
  - Function-specific training.
  - Safety training.
  - Security awareness training

- PCB Handling (Upon Hire and Annual)
  - Training provided in conjunction with Function-Specific Hazardous Materials Training as listed above

- PCB-1000 Operating Procedures Redragon Training (Upon Hire)
  - Standard Operating Procedure and Hands On Training Initially provided by PCB-1000 Manufacturer to Managers, Supervisors, and Administrators
  - Subsequent training provided to additional associates based on initial training received from ~~manfacturer~~manufacturer

*These training presentations are documented and signed by each employee to verify attendance and participation in training.
*Documentation of training is kept in each employee file and a description of the training provided.