



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

OCT 25 2018

John Carroll, LEP  
Senior Project Manager  
Fuss & O'Neill, Inc.  
146 Hartford Road  
Manchester, CT 06040

RE: Approval Notification/Application for Clean-Up of Polychlorinated Biphenyl Remediation Waste Under 40 CFR § 761.61(a) and (c)  
Non-PCB Decommissioning Area for the Florida Transformer Inc. Facility,  
DeFuniak Springs, Florida.

Dear Mr. Carroll:

The U.S. Environmental Protection Agency has completed its review of the Notification/Application for Clean-Up of Polychlorinated Biphenyl Remediation Waste Under 40 CFR § 761.61(a) and (c) Non-PCB Decommissioning Area which applies to the Florida Transformer Inc. (FTI) facility located at 4509 State Highway 83 North in DeFuniak Springs, Florida, and the Polychlorinated Biphenyl (PCB)-impacted soil at the adjacent Gulf gas station/convenience store, located at 4483 State Highway 83 North in DeFuniak Springs, Florida. The FTI facility and the adjacent Gulf gas station/convenience store are collectively referred to as the Site in this Approval.

The Notification/Application for Clean-Up of Polychlorinated Biphenyl Remediation Waste Under 40 CFR § 761.61(a) and (c) (Remedial Action Plan) applies to the remediation of PCB-impacted building materials, concrete and soil associated with historical operations in the Non-PCB Decommissioning Area building and other areas of the facility, as well as the adjacent Gulf gas station/convenience store. The Remedial Action Plan, dated November 2017 was prepared and submitted by Fuss & O'Neill, Inc., a consultant, on behalf of FTI.

The Remedial Action Plan proposes the following work at the Site:

- Demolish and dispose of the Non-PCB Decommissioning building, including removal of the interior concrete floor and underlying soil contaminated with PCBs.
- Remove the exterior concrete and soil contaminated with PCBs at the FTI facility and the adjacent Gulf gas station/convenience store.
- Dispose of impacted building materials, concrete, and soil with PCB concentrations greater than 1 mg/kg at a Toxic Substances and Control Act (TSCA) permitted disposal facility.

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## Site History and Site Characterization

FTI has owned and operated the facility since 1979. The facility's PCB commercial storage permit was renewed on September 26, 2017. The FTI facility receives electrical equipment for service, repair or decommissioning, primarily electrical regulators and transformers. The facility processes items classified as non-PCB, i.e., items with PCB concentrations less than 50 parts per million (ppm) and items classified as PCB-contaminated equipment, which contains PCBs at concentrations greater than 50 and less than 500 ppm.

FTI submitted to the EPA two self-disclosure reports in October and November 2015. In the October 2015 report, FTI disclosed the discovery of a processing error. A transformer classified as PCB-contaminated equipment had been processed as a non-PCB item. In other words, a transformer with a PCB concentration greater than 50 ppm had been processed according to procedures used for a transformer with a PCB concentration less than 50 ppm. In the November 2015 report, FTI reported that a potential release to building materials was found during the investigation of the transformer processing error. Releases of PCBs to the concrete floor and underlying soil in the Non-PCB Decommissioning Area were identified during the investigation. Historic information indicated the building currently known as the Non-PCB Decommissioning Area was previously used for decommissioning transformers by the previous owner prior to FTI's purchase of the facility in 1979. In December 2015, FTI submitted a PCB Characterization Work Plan to follow-up the disclosure reports submitted to the EPA.

The results of characterization activities at the Site were described in a Final PCB Characterization Summary submitted to the EPA in November 2017. The report documents the results of sampling events at the Site. Characterization activities are described in the Remedial Action Plan:

- Characterization of PCB contamination at the Site began in February 2016 with collection of concrete samples from the interior of the Non-PCB Decommissioning Area and exterior concrete and soil samples.
- Based on the results of the initial sampling event, supplemental sampling was conducted in areas where the PCB concentrations in concrete and/or soil samples were greater than 1 ppm. Additional soil and concrete samples were collected during several supplemental sampling events in March 2016 through July 2017.

## Summary of Proposed Work

FTI plans to remove from the Site, concrete and soil with PCB concentrations greater than 1 ppm. FTI will demolish and dispose of the Non-PCB Decommissioning building, including removal of the concrete floor and underlying soil contaminated with PCBs.

During remedial activities at the site, confirmation sampling will be completed in several areas which require additional characterization, for example areas which were inaccessible during characterization or areas where the vertical extent of PCB contamination requires additional data. Additional concrete and/or soil will be removed from these areas and confirmation samples will be collected across a 1.5 meter grid to confirm removal of PCB concentrations at concentrations above 1 ppm.

## Approved Work and Conditions

A finding that the proposed work will pose no unreasonable risk to health or the environment is a prerequisite for issuance of a risk-based PCB disposal approval for PCB remediation waste pursuant to 40 CFR § 761.61(c). Based on a review of the submitted Application, the Remedial Action Plan is proposing to remove soil with PCB concentrations greater than 1 ppm. Based on that review and all other data and information provided to the EPA by FTI and its consultant, the EPA has determined that the proposed work will not present an unreasonable risk of injury to health or the environment. As such, the EPA hereby approves the Remedial Action Plan and issues this Approval pursuant to 40 CFR §§ 761.61(a) and 761.61(c). FTI and its consultants may proceed with the PCB cleanup at the Site subject to the following conditions:

1. This Approval applies to PCB-impacted building materials, concrete, and soil, both interior and exterior, in the vicinity of the Non-PCB Decommissioning building at the Site. In this Approval, the Site is referred to collectively as the FTI facility and PCB-impacted soil at the adjacent Gulf gas station/convenience store located in DeFuniak Springs, Florida. Soil at the Gulf gas station/convenience store was impacted by the release of PCBs at FTI facility.
2. FTI shall notify the EPA in writing of any intended modification of the applicable provisions in the approved Remedial Action Plan and receive approval from the EPA prior to implementing any modification.
3. Laboratory analysis of soil samples shall use SW-846 Method 3540C or 3550C as the extraction method in accordance with the regulations at 40 CFR § 761.358.
4. Cleanup of Adjacent Property  
  
The cleanup proposal contained in the Remedial Action Plan as it pertains to the adjacent Gulf gas station/convenience store is acceptable to the EPA. Implementation of the approved cleanup on the adjacent property, the Gulf gas station/convenience store, is subject to agreement between FTI and the property owner.
5. These approval conditions are based on the facts, representations, and certifications made in the applicable provisions of the approved Remedial Action Plan dated November 2017. In the event these Approval conditions are inconsistent with the approved applicable provisions of the approved Remedial Action Plan, FTI must abide by the Approval conditions stated herein.
6. This Approval does not constitute a determination by the EPA that the transporters or disposal facilities selected by FTI are authorized to conduct the activities set forth in the Remedial Action Plan. FTI is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
7. This Approval does not 1) waive or compromise the EPA's enforcement and regulatory authority, 2) release FTI from compliance with any applicable requirements of federal, state or local law, or 3) release FTI from liability for, or otherwise resolve any violations of federal, state or local law.

8. All PCB waste (regardless of concentration) generated as a result of the activities described in the notification, excluding any decontaminated materials, shall be marked in accordance with 40 CFR § 761.40; stored in a manner prescribed in 40 CFR § 761.65; and, disposed of in accordance with 40 CFR §§ 761.61(a)(5) or 761.62, unless otherwise specified below:
- a. Decontamination waste and residues shall be managed in accordance with the requirements of 40 CFR § 761.79(g).
  - b. Moveable equipment, tools and sampling equipment shall be decontaminated in accordance with 40 CFR § 761.79(c)(2).
  - c. PCB-contaminated water generated during decontamination or dewatering shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.61(b).
9. FTI shall submit a final report to the EPA within 120 calendar days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a narrative of the remedial activities; characterization and confirmation sampling analytical results, if applicable; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; copies of manifests; and copies of certificates of disposal or similar certifications issued by the disposer. The report shall be submitted to the EPA in hardcopy and in an electronic format (e.g., compact disk). Analytical data included in the report shall also be submitted electronically in a specified Excel spreadsheet format (to be provided separately). The electronic spreadsheet data will be submitted in addition to data in the report.
10. All work plans and reports submitted to the EPA shall contain the certification defined in 40 CFR § 761.3.
11. FTI shall comply with the recordkeeping requirements specified at 40 CFR § 761.61(a)(9) for activities conducted in accordance with this Approval.
12. Any proposed modification(s) in the plan, specifications or information in the Remedial Action Plan must be submitted to the EPA no less than fourteen 14 calendar days prior to the proposed implementation of the changes. The review and approval procedures of 40 CFR § 761.61(a)(3)(ii) will apply.
13. Required submittals shall be mailed to:

Ken Feely, PCB Program Coordinator  
United States Environmental Protection Agency  
Atlanta Federal Center, 9T25  
61 Forsyth Street, SW  
Atlanta, Georgia 30303

If there are any questions about this Approval, please contact Jan Martin at (404) 562-8593 or martin.jan@epa.gov, or Ken Feely at (404) 562-8512 or feely.ken@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Meredith C. Anderson".

Meredith C. Anderson, Chief  
Materials and Waste Management Branch  
Resource Conservation and Restoration Division

cc: Shawn Hamilton ✓  
FDEP, Northwest District

