

From: [Gross, Kelli](#)
To: [Bayly, Karen](#)
Subject: FW: FMO -FDEP Inspection @ 2425 Thompson St, Ft Myers
Date: Thursday, February 3, 2022 9:22:39 AM
Attachments: [image003.png](#)
[30 Day Tracker File.xlsx](#)
[Transporters Used Oil Acceptance Log.pdf](#)

EXTERNAL MESSAGE

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Karen,

Below in blue is the plan of corrective action to prevent recurrence of the noncompliance item. Please let me know if this will be acceptable.

Thanks,

Kelli Gross

Sr. Environmental Specialist
Power Delivery Environmental
(941) 316-6231 Office
(941) 531-0483 Mobile
Kelli.Gross@fpl.com



From: Bayly, Karen <Karen.Bayly@FloridaDEP.gov>
Sent: Thursday, January 27, 2022 3:02 PM
To: Gross, Kelli <Kelli.Gross@fpl.com>
Subject: FW: FMO -Thompson St Service Center 2425 Thompson St, Ft Myers

Good Afternoon Kelli – My supervisor, Gary Maier, reviewed my draft inspection report along with your response; and provided the comments below.

Please provide an acceptable plan of corrective action to prevent recurrence of the noncompliance item by February 7, 2022.

Please feel free to contact me if you have any questions.

Thanks. Karen



Karen Bayly
Environmental Consultant
South District Office
Florida Department of Environmental Protection
Karen.Bayly@FloridaDEP.gov
Office: 239-344-5616



From: Maier, Gary <Gary.Maier@FloridaDEP.gov>
Sent: Thursday, January 27, 2022 2:49 PM
To: Bayly, Karen <Karen.Bayly@FloridaDEP.gov>
Subject: RE: FMO -Thompson St Service Center 2425 Thompson St, Ft Myers

Thank you Karen.

In my humble opinion:

The proposed corrective action plan from FPL to prevent recurrence of the violation of missing the 35 day window should contain more substance, especially since DEP discovered a similar situation at another FPL facility in the Orlando area.

An acceptable plan of corrective action to prevent recurrence of the noncompliance should include:

- A description of the old procedure, and explanation of why it didn't work. The date that used mineral oil goes into the tank is entered on the Transporters Used Oil Acceptance Log (attached) as the Start Date. Pickup would be scheduled before the 35th day after the Start Date. The occurrence in October 2021 that exceeded 35 days was due to an incorrect date being communicated to the transporter as the start date. He calculated his pick-up from that date. The correct start date was entered on the log. This was just a failure in communication.
- A description of the procedural changes implemented, and how these changes will prevent recurrence, including recurrence at other FPL facilities. Will continue to use the Transporters Log. The change will be with the pick-up date communicated to the transporter. That date will be 35 days or less after the last pick-up date no matter when the oil goes into the tank. This due date for oil pick-up has also been added to the 30 Day Tracker File. That will eliminate a recurrence.
- A description of the new compliance procedure. On the 30 Day Tracker File the date oil is removed from tank is entered as the Start Date. Due date is entered 35 days from Start Date. This is the date communicated to Transporter to have oil picked up by.
- A description of a procedure to periodically review internal records to detect possible noncompliance, and to notify DEP if noncompliance is detected. Tracker File is reviewed and updated daily.
- Copies or examples of any modified forms or reports that are part of the new compliance procedure. Attached is the 30 Day Tracker File and Transporter Used Oil Acceptance Log

Thank you,

Gary

From: Bayly, Karen <Karen.Bayly@FloridaDEP.gov>

Sent: Thursday, January 27, 2022 2:19 PM

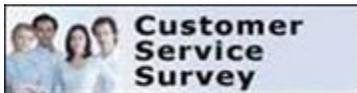
To: Maier, Gary <Gary.Maier@FloridaDEP.gov>

Subject: FW: FMO -Thompson St Service Center 2425 Thompson St, Ft Myers

Gary – below is the response received from FPL following the inspection. Thanks. Karen



Karen Bayly
Environmental Consultant
South District Office
Florida Department of Environmental Protection
Karen.Bayly@FloridaDEP.gov
Office: 239-344-5616



From: Gross, Kelli <Kelli.Gross@fpl.com>

Sent: Wednesday, December 15, 2021 9:12 AM

To: Bayly, Karen <Karen.Bayly@FloridaDEP.gov>

Subject: FMO -Thompson St Service Center 2425 Thompson St, Ft Myers

EXTERNAL MESSAGE

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Karen,

Following up with you regarding the inspection at Ft Myers Service Center on 12/8. Below are the items that were brought to my attention and the actions being taken to correct:

- 35 day window missed for used mineral oil pickup in October 2021 – Going forward the 35 day time clock will start the following day after oil is removed. The Vendor (TA America) driver has been notified of this change.
- Non-Hazardous Manifest had incorrect EPA ID numbers – Template has been made to cover the three areas (AOW, TBO and FMO) that have rolloffs with correct Generator's US EPA ID numbers for each area. The US EPA ID number for Okeechobee Landfill has also been corrected on template.
- ZEP Parts Cleaner – what solvent is being used – Attached is the Safety Data Sheet
- Universal Waste drum for aerosol cans label has been updated – see below picture



Please let me know if there are any other items that you require that I may have missed.

Thanks

Kelli Gross

Sr. Environmental Specialist
Power Delivery Environmental

(941) 316-6231 Office

(941) 531-0483 Mobile

Kelli.Gross@fpl.com



[Dep Customer Survey](#)



TT#	Start Date	Due Date	Outage Date	Time	Vaccon Reqd
	1/14/2022	2/12/2022	2/1/2022	9:00	
	1/10/2022	2/8/2022	2/2/2022	9:00	N
	1/10/2022	2/8/2022	2/2/2022	12:00	Y
268	1/10/2022	2/8/2022	2/2/2022	10:00	N
890	1/12/2022	2/10/2022	2/3/2022	9:00	
1252	1/24/2022	2/22/2022	2/9/2022	9:00	
569	1/14/2022	2/12/2022	2/9/2022	9:00	
58	1/19/2022	2/17/2022	2/9/2022	12:00	
477	1/23/2022	2/21/2022	2/9/2022	10:00	

NEED OUTAGE SCHEDULED ASAP

	11/29/2021				
224	1/23/2022	2/21/2022			N
333	1/22/2022	2/20/2022			Y
97	1/21/2022	2/19/2022			
	1/21/2022	2/19/2022			
225	1/24/2022	2/22/2022			

ENV Follow-up Only - no outage required

168	1/24/2022	2/22/2022			
876	1/10/2022	2/8/2022			
327	1/27/2022	2/25/2022			

TX Painters

	12/15/21				
	01/18/22				

Used Mineral Oil Tanks

	01/03/22	02/07/22			
	01/03/22	02/07/22			

Rev: 2/1/22 07:00

WR#	TX Info	TLN	Loop #
11159940	50	5-5712-0275	348-4/5
11142203	100	5-6212-4270	3116116-6/7
11162062	25	5-5307-2037	31228-12/13
11143240	75	5-1985-9204	29203-10/11
11163108	50	5-4736-4909	AE
11184894	25	5-6101-1085	481410-4/5
11161459	75	7-6194-5574	42192-8/9
11166075	37	5-6321-5370	3142-14/15
11178890	50	5-1372-6213	AE

10956643	1500	5-5711-3141	Vault - 12 PUMP DOWN
11176632	50	5-2267-1533	679501-16/17
11174166	500	5-5508-8522	356025-8/9, 26-6/7 & 27-6/7
11175340	50	5-2150-9349	AE - After 5pm - anytime Sun
11176027	50	5-4244-7294	AE
11177883	15	5-6521-1396	AE

11175361	75	5-2163-0673	659101-12/13
11152998	10	5-6806-3501	AE
	25/25/25	5-8226-6680	AE

11058291		5-5510-1302	
11146772	500	5-1563-3876	69741/42/43-4/5

	6,000 Gal		
	6,000 Gal		

Comments	Compl
Leakerrepl'd 1/14 - stump removal w/ oil	MAX 6119
found in WMS	MAX 5877
Crew found - Resc'd from 1/27 SO issues	MAX 6175
1/10 Status 50	MAX 5823
1/19 Status 50	MAX 6177
Mastec - Favino / Spencer	MAX 6300
	MAX 6120
1/21 Status 50 - Gate Code *2127	MAX 6178
1/25 Status 50	MAX 6230
1/25/22 Andy field verified that no oil found	
1/25 Status 50	MAX 6229
Go back w/ outage	MAX 6231
1/24 Status 50	MAX 6228
1/24 Status 50 DAL found	MAX 6232
1/28 Status 50 - Outage after hrs M-F 8-5	MAX 6233
PMTX replaced 1/24 - ENV not notified	
1/20 tx was replaced	MAX 5876
Pole & txs are on the ground	
7 - 3ph pmtxs - Charge time to WR#	
Charge time to WR# - cust paid Gate Code 9742	
TA America - Allan Cochran 407-466-4675	

TRANSPORTERS USED OIL ACCEPTANCE LOG
FPL Distribution West Region - South

<p align="center">TANK LOCATION</p>	<p align="center">START DATE OIL IN TANK</p>	<p align="center">SHIP DATE</p>
<p>Ft. Myers Service Center 2425 Thompson St. Ft. Myers</p>	<p align="center">SAMPLE ID *</p>	<p align="center">SHIPMENT LOAD #</p>

* **Sample ID:** the used oil is managed as <50 ppm PCB based on process knowledge and years of historical data - routine samples are not analyzed. If a sample is sent for analyses, please enter the Sample ID.

<p align="center">DATE OIL ADDED TO TANK</p>	<p align="center">ESTIMATED GALLONS</p>	<p align="center">DRIVER'S SIGNATURE</p>
		See Daily Used Oil Pick-up Log

TRANSPORTERS USED OIL ACCEPTANCE LOG
DAILY USED OIL PICKUP LOG

<p align="center">TANK LOCATION</p> <p align="center">Ft Myers SC EPA ID # FLD000007644</p>	<p align="center">DATE OF PICKUP</p>
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PICKUP LOCATION	EPA ID#	ESTIMATED GALLONS	DRIVER'S SIGNATURE
Punta Gorda Service Center 122 E. Charlotte Ave Punta Gorda, FL 33950	FLD000807446		
Ft. Myers Plant 10650 SI Rd. 80 Ft. Myers, FL 33905	FLD000807305		
Ft. Myers Service Center 2425 Thompson St Ft. Myers, FL 33901	FLD000807644		
Gladolus Service Center 15834 Winkler Rd Ft. Myers, FL 33908	FLD000807651		
LaBelle Service Center 246 W Cowboy Way LaBelle, FL 33835	FLD000733832		
Bonita Springs Service Center 28430 Old US 41 Bonita Springs, FL 34135	FLD000733709		
Golden Gate Service Center 4105 15th Ave SW Naples, FL 34116	FLD000011650		
Naples Service Center 1220 5th Ave North Naples, FL 34102	FLD000733717		
Englewood Service Center 725 E Dearborn St Englewood, FL 34223	FLD000807388		

TRANSFER TO USED OIL TANK			
TANK #	DATE TRANSFERRED	GALLONS	DRIVER'S SIGNATURE