



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Progress Energy Wildwood Operations Ctr
On-Site Inspection Start Date: 07/21/2009 **On-Site Inspection End Date:** 07/21/2009
ME ID#: 52257 **EPA ID#:** FLD029436631
Facility Street Address: 4306 E County Road 462, Wildwood, Florida 34785-8762
Contact Mailing Address: 4306 E County Road 462 Bldg E, Wildwood, Florida 34785-8762
County Name: Sumter **Contact Phone:** (352) 748-8711

NOTIFIED AS:

SQG (100-1000 kg/month)

INSPECTION TYPE:

Routine Inspection for Used Oil Transfer Facility
Routine Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Manager
Other Participants: Rebecca Lee, Sr. Environmental Specialist; Mason Anderson, Supervisor; James Haugabrook, Supervisor

LATITUDE / LONGITUDE: Lat 28° 53' 8.0335" / Long 82° 1' 51.4788"

SIC CODE: 4911 - Trans. & utilities - electric services

TYPE OF OWNERSHIP: Private

Introduction:

Progress Energy's Wildwood Operations Center was inspected to determine its compliance with state and federal hazardous waste management regulations. Rebecca Lee, James Haugabrook and Mason Anderson explained facility operations during the inspection. Until recently, the facility was subject to used oil transporter regulations under 40 CFR 279 as more than 55 gallons of oil was being transported at a time to the facility as part of field maintenance activities. Progress Energy has made arrangements with its contractors to pick up oil directly from its field locations in most cases. According to Ms. Lee, Progress stopped transporting oil in quantities of 55 gallons or more except for on site transport around November 2008. The facility has been a conditionally exempt small quantity generator since at least 2004, but maintains compliance with most small quantity generator requirements.

Process Description:

The Operations Center includes a Central Maintenance Warehouse, a Central Transformer Repair building and a Fleet Services building. The Heavy Hauling department transports large equipment and hazardous materials. Substation and Transmission Line Maintenance mainly occurs in the field, but equipment and tools are stored at this location. The exterior storage yard was clean and well organized. Grass and weeds were under control in the portions of the yard that were not paved. Most electrical equipment was stored on the paved areas, and articles like power poles were stored in grassy areas.

The Operations Center is not responsible for maintaining street lighting, and therefore does not collect universal waste lamps from off site. Overhead HID lighting is maintained by a contractor, who removes the lamps. The only universal waste lamps on site were about a dozen boxes of fluorescent lamps stored in the Central Warehouse. One of these was open, and one was not labeled, and this was corrected during the inspection. No hazardous waste is generated in the

Inspection Date: 07/21/2009

Warehouse.

Transformer repair begins with inspecting incoming transformers, including determining the PCB content. PCB equipment is managed in accordance with TSCA regulations, and the facility maintains a separate building for PCB storage. The PCB building includes a small tank farm. If Non PCB transformers can be repaired, the oil is drained and the unit is repaired, painted (if needed) and re-filled. If Non PCB equipment is not repairable, it is drained and loaded on a flatbed trailer for transfer to the Progress Rail recycling facility adjacent to this site. Progress Rail was formerly a Progress Energy subsidiary, but the business unit was sold to Caterpillar, Inc. several years ago.

Transformer oil from repairable transformers is held in separate tanks, and processed for re-use in repaired transformers. Oil from unrepairable transformers is held for disposal. There are two separate tank farms for non-PCB oils, one adjacent to the Central Repair facility and the second along the east property boundary for storage of oils transported to and from field equipment. There are nine horizontal tanks in the latter tank farm, three for new oil and six for used oil. According to the facility, the used oil tanks in this farm are now empty as the facility is no longer transporting oil from the field.

The Central Repair Tank Farm was operated in compliance with used oil regulations. However several 55 gallon containers of used oil, a portable tank and a compartmented tanker were also noted in the area that were labeled as containing used oil. These were all closed, and on pavement, but were not provided with secondary containment. This tanker is used to transfer oil from large equipment in the yard to the tank farm. The rear container mainly holds water that has been removed from transformer casings. Three additional empty tankers were noted in the yard, and these were previously used to transport used oil to the facility. The secondary containment requirements were discussed with facility representatives. In most cases, the oil pumped from the equipment is pumped into a storage tank at the end of the day. To ensure compliance, the tanker will be parked in front of the east tank farm when not in use. The pavement in this area is sloped and has curbs to provide adequate secondary containment in accordance with the facility's SPCC plan.

The Central Repair shop generates two hazardous waste streams. Solvent still bottoms (F005) are generated in a SystemOne paint gun cleaner which was purchased in 2004. According to Mr. Anderson, the satellite container for still bottom waste has been accumulating since that time. Hazardous waste bead blast waste (D006) is generated periodically from a bead blast unit. One drum of this material was generated when the unit was cleaned out in May 2009. The container was properly labeled and marked with an accumulation start date, and analytical results were on file.

New Potential Violations and Areas of Concern:

Used Oil Generator Checklist

Type: Violation

Rule: 62-710.401(6)

Question Number: 5.100

Question: Either double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment (regardless of size)? Note: Inside containers that are 55 gallons or less are assumed to meet the secondary containment requirement if they are stored on an oil-impervious surface. Inside containers/tanks that are larger than 55 gallons and are portable/wheeled are assumed to meet the secondary containment if they are stored on an oil-impervious surface and if they are typically emptied every 24 hours.

Inspection Date: 07/21/2009

Explanation: Used oil containers were located outside, without secondary containment. (Corrected)

Corrective Action: Used oil containers will be located within secondary containment when they are not being used to transport oil within the facility.

Checklist Independent Potential Violations and Areas of Concern

Type: Area Of Concern

Rule: 273.13(d)(1)

Explanation: A universal waste lamp box was not closed and another was not labeled. (Corrected)

Corrective Action: All universal waste lamp containers must be labeled and kept closed.

Summary of Potential Violations and Areas of Concern:

Potential Violations

Rule Number	Area	Date Cited	Explanation
Used Oil Generator Checklist 62-710.401(6)		07/21/2009	Used oil containers were located outside, without secondary containment. (Corrected)

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern 273.13(d)(1)		07/21/2009	A universal waste lamp box was not closed and another was not labeled. (Corrected)

Conclusion:

Progress Energy Wildwood was out of compliance with used oil secondary containment requirements. This was corrected shortly after the inspection.

Inspection Date: 07/21/2009

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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Elizabeth Knauss	Environmental Manager
PRINCIPAL INSPECTOR NAME	PRINCIPAL INSPECTOR TITLE

	FDEP	9/14/2009
PRINCIPAL INSPECTOR SIGNATURE	ORGANIZATION	DATE

Rebecca Lee	Sr. Environmental Specialist
REPRESENTATIVE NAME	REPRESENTATIVE TITLE

NO SIGNATURE	Progress Energy
REPRESENTATIVE SIGNATURE	ORGANIZATION

Mason Anderson	Supervisor
REPRESENTATIVE NAME	REPRESENTATIVE TITLE

NO SIGNATURE	Progress Energy
REPRESENTATIVE SIGNATURE	ORGANIZATION

James Haugabrook	Supervisor
REPRESENTATIVE NAME	REPRESENTATIVE TITLE

NO SIGNATURE	Progress Energy
REPRESENTATIVE SIGNATURE	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.

Inspection Date: 07/21/2009

CESQG Checklist - 40 CFR 261.5

Standards for Conditionally Exempt Small Quantity Generators		Potential Violation or AOC cited
7.1	Did the facility conduct a waste determination on all wastes generated?	
7.10	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? And less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes?	
7.20	Has the facility obtained an EPA ID #? (not required for CESQGs)	
7.30	Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste?	
7.40	Is the facility disposing of hazardous waste by mixing with used oil?	
7.50	Can the facility document proper disposal through written receipts or records?	
7.51	Does the written documentation include names and addresses of the generator and the TSD, the type and amount of hazardous waste delivered, and the date of shipment?	
7.52	Is written documentation retained for 3 years?	
7.60	Are any hazardous wastes treated or disposed of on site? If yes, describe in Narrative	
7.70	Are there any unpermitted discharges of other wastes to the environment?	

Inspection Date: 07/21/2009

Used Oil Generator Checklist

On site storage of unmixed used oil or filter shipped through certified transporters		Potential Violation or AOC cited
5.10	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units?	
5.20	Are containers/tanks in good condition?	
5.30	Are containers/tanks leaking?	
5.40	Are containers/tanks storing used oil marked with the words "Used Oil"?	
5.50	Including fill pipes used to fill underground tanks?	
5.60	Are containers/tanks (regardless of size) that are stored outside:	
5.70	Closed or otherwise protected from the environment	
5.80	Either double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment	
5.90	Are containers/tanks that are stored inside:	
5.100	Either double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment (regardless of size)? Note: Inside containers that are 55 gallons or less are assumed to meet the secondary containment requirement if they are stored on an oil-impervious surface. Inside containers/tanks that are larger than 55 gallons and are portable/wheeled are assumed to meet the secondary containment if they are stored on an oil-impervious surface and if they are typically emptied every 24 hours.	✓
5.110	Are used oil filters stored in above ground containers which are:	
5.120	In good condition?	
5.130	Are used oil filter containers closed or otherwise protected from weather?	
5.140	Are used oil filter containers labeled "Used Oil Filters"?	
5.150	Are used oil filter containers stored on an oil impervious surface?	
5.160	Have any releases to the environment occurred, other than a leak from a UST?	
5.170	If so, did the facility stop the release, contain the oil, clean up the release and manage the contaminated material properly and repair or replace the leaking units prior to returning them to service?	
5.180	Does the generator only use transporters who have received EPA Identification numbers?	
5.190	Is transporter also a Florida certified used oil transporter?	
5.200	Names and numbers of transporters:	
5.210	Does the facility generate other materials contaminated with used oil?	
5.220	If so, are the materials burned for energy recovery as used oil?	
5.230	or, Does the facility have records documenting the residuals are not hazardous waste?	
5.240	Does the generator mix hazardous waste with the used oil?	
5.250	If so, is the facility a CESQG? [CESQGs that mix HW and used oil must maintain disposal documentation per 62-730.030(3), FAC.]	
5.260	If not, Is the oil mixed with a characteristic hazardous waste? [If the facility is not a CESQG, and oil is mixed with a listed hazardous waste, it must be managed as a hazardous waste.] Describe Waste	
5.270	If so, does the facility document that the resultant mixture does not exhibit any characteristic of hazardous waste?	

Inspection Date: 07/21/2009

On site storage of unmixed used oil or filter shipped through certified transporters		Potential Violation or AOC cited
5.280	Or, if the hazardous waste is only D001, that the resultant mixture is not ignitable?	

Generator Self Transport		Potential Violation or AOC cited
5.290	Does facility transport used oil pursuant to the generator self transport exemption?	
5.300	Transports only used oil generated on site or DIY oil to used oil collection centers or aggregation point owned by the generator? Name and location of center: Location of generator aggregation point	
5.310	If so, is this only in vehicles owned by the facility or facility employees?	
5.320	Is no more than 55 gallons transported at one time?	

Processor, Marketer & Burner Applicability		Potential Violation or AOC cited
5.330	Does the generator claim that the used oil meets the specification in 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40 CFR 279 Subpart H.]	
5.340	Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]	
5.350	Does the generator burn on site in a space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]	
5.360	If so, does he burn only DIY oil or oil generated on site?	
5.370	Does the heater have a capacity of no more than 0.5 million BTU/hr?	
5.380	Are combustion gasses vented to the atmosphere?	
5.390	Alternatively, does the generator have a tolling arrangement with a used oil reclaimer?	
5.400	Is a copy of the contract kept on site specifying type and frequency of shipments?	
5.410	That the transport vehicle is owned by the processor?	
5.420	That the reclaimed oil will be returned to the generator?	