



Department of Environmental Protection

Lawton Chiles
Governor

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

FEB 9 - 1995

Mr. Alan Benedict
FPL
P.O. Box 088801
North Palm Beach, FL 33408-8801

RE: Used Oil Permit

Dear Mr. Benedict:

The Hazardous Waste Permitting Section has reviewed your letter of January 11, 1995, regarding the proposed change in operations. Based on your description of FPL's revised method of operation, (specifically not filtering any used oil sent to non-FPL facilities), FPL would not require a permit as a processor under Section 62-710.530 F.A.C.

FPL does need to comply with registration requirements as a marketer and transporter per 62-710, F.A.C.

If you have any questions, please feel free to contact me at (407) 433-2650 ext. 252.

Sincerely,

John M. Jones, P.E.
Hazardous Waste Section

APPLICATION TRACKING SYSTEM

02/07/96

PPL NO:280435

APPL RECVD:11/14/95 TYPE CODE:50 SUBCODE:16 LAST UPDATE:02/07/96

DER OFFICE RECVD:WPB DER OFFICE TRANSFER TO:___ APPLICATION COMPLETE:___/___/___

DER PROCESSOR:JONES, JOHN

APPL STATUS:WI DATE:01/11/96 (ACTIVE/DENIED/WITHDRAWN/EXEMPT/ISSUED/GENERAL)

RELIEF:___ (ISSAC/EXEMPTIONS/VARIANCE)

(Y/N) N MANUAL TRACKING

DISTRICT:50 COUNTY:50

(Y/N) N OGC HEARING REQUESTED

LAT/LONG:26.46.15/80.05.52

(Y/N) N PUBLIC NOTICE REQD?

BASIN-SEGMENT:___-___

(Y/N) N GOV BODY LOCAL APPROVAL REQD?

CODE #:

(Y/N) Y LETTER OF INTENT REQD? ___ (I/ISSUE D/DENY)

ALT#:___

PROJECT SOURCE NAME:FLORIDA POWER & LIGHT COMPANY

STREET:2455 PORT WEST BLVD.

CITY:WEST PALM BEACH

STATE:FL

ZIP:33407

PHONE:___-___-___

APPLICATION NAME:FLORIDA POWER & LIGHT COMPANY

STREET:9250 WEST FLAGLER STREET

CITY:MIAMI

STATE:FL

ZIP:33174

PHONE:407-625-7612

AGENT NAME:___

STREET:___

CITY:___

STATE:___

ZIP:___

PHONE:___-___-___

FEE #1 DATE PAID:11/14/95

AMOUNT PAID:00100

RECEIPT NUMBER:00054781

DATE APPLICANT INFORMED OF NEED FOR PUBLIC NOTICE - - - - -

DATE DER SENT DNR APPLICATION/SENT DNR INTENT - - - - -

DATE DER REQ. COMMENTS FROM GOV. BODY FOR LOCAL APP. - - - - -

DATE #1 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - -

DATE #2 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - -

DATE #3 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - -

DATE #4 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - -

DATE #5 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - -

DATE #6 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - -

DATE LAST 45 DAY LETTER WAS SENT - - - - -

DATE FIELD REPORT WAS REQ--REC - - - - -

DATE DNR REVIEW WAS COMPLETED - - - - -

DATE APPLICATION WAS COMPLETE - - - - -

DATE GOVERNING BODY PROVIDED COMMENTS OR OBJECTIONS - - - - -

DATE NOTICE OF INTENT WAS SENT--REC TO APPLICANT - - - - -

DATE PUBLIC NOTICE WAS SENT TO APPLICANT - - - - -

DATE PROOF OF PUBLICATION OF PUBLIC NOTICE RECEIVED - - - - -

WAIVER DATE BEGIN--END (DAY 90) - - - - - 12/08/95--03/08/96

COMMENTS:1ST WAIVER TO END 03/08/96

WITHDRAWN 1/11/96
John Jones

1	APPLICATION TRACKING SYSTEM		11/15/95
2	APPL NO:280435		
3	APPL RECVD:11/14/95	TYPE CODE:50 SUBCODE:16	LAST UPDATE:11/15/95
4	DER OFFICE RECVD:WPB	DER OFFICE TRANSFER TO:___	APPLICATION COMPLETE:___/___/___
5	DER PROCESSOR:KAMATH, VIK		
6	APPL STATUS:AC DATE:11/14/95 (ACTIVE/DENIED/WITHDRAWN/EXEMPT/ISSUED/GENERAL)		
7	RELIEF:___ (SSAC/EXEMPTIONS/VARIANCE)		
8	(Y/N) N MANUAL TRACKING	DISTRICT:50 COUNTY:50	
9	(Y/N) N OGC HEARING REQUESTED	LAT/LONG:26.46.15/80.03.52	
10	(Y/N) N PUBLIC NOTICE REQD?	BASIN-SEGMENT:___	
11	(Y/N) N GOV BODY LOCAL APPROVAL REQD?	COE #:___	
12	(Y/N) Y LETTER OF INTENT REQD? ___ (1/ISSUE 0/DENY)	ALT#:___	
13	PROJECT SOURCE NAME:FLORIDA POWER & LIGHT COMPANY		
14	STREET:2455 PORT WEST BLVD. CITY:WEST PALM BEACH		
15	STATE:FL	ZIP:33407	PHONE:___
16	APPLICATION NAME:FLORIDA POWER & LIGHT COMPANY		
17	STREET:9250 WEST FLAGLER STREET CITY:MIAMI		
18	STATE:FL	ZIP:33174	PHONE:407-625-7612
19	AGENT NAME:___		
20	STREET:___ CITY:___		
21	STATE:___	ZIP:___	PHONE:___
22	FEE #1 DATE PAID:11/14/95 AMOUNT PAID:00100 RECEIPT NUMBER:00054781		
23	DATE APPLICANT INFORMED OF NEED FOR PUBLIC NOTICE ___/___/___		
24	DATE DER SENT DNR APPLICATION/SENT DNR INTENT ___/___/___		
25	DATE DER REQ. COMMENTS FROM GOV. BODY FOR LOCAL APP. ___/___/___		
26	DATE #1 ADDITIONAL INFO REQ--REC FROM APPLICANT ___/___/___		
27	DATE #2 ADDITIONAL INFO REQ--REC FROM APPLICANT ___/___/___		
28	DATE #3 ADDITIONAL INFO REQ--REC FROM APPLICANT ___/___/___		
29	DATE #4 ADDITIONAL INFO REQ--REC FROM APPLICANT ___/___/___		
30	DATE #5 ADDITIONAL INFO REQ--REC FROM APPLICANT ___/___/___		
31	DATE #6 ADDITIONAL INFO REQ--REC FROM APPLICANT ___/___/___		
32	DATE LAST 45 DAY LETTER WAS SENT ___/___/___		
33	DATE FIELD REPORT WAS REQ--REC ___/___/___		
34	DATE DNR REVIEW WAS COMPLETED ___/___/___		
35	DATE APPLICATION WAS COMPLETE ___/___/___		
36	DATE GOVERNING BODY PROVIDED COMMENTS OR OBJECTIONS ___/___/___		
37	DATE NOTICE OF INTENT WAS SENT--REC TO APPLICANT ___/___/___		
38	DATE PUBLIC NOTICE WAS SENT TO APPLICANT ___/___/___		
39	DATE PROOF OF PUBLICATION OF PUBLIC NOTICE RECEIVED ___/___/___		
40	WAIVER DATE BEGIN--END (DAY 90) ___/___/___		
41	COMMENTS:		
42			
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PATS02 280435 APPLICATION TRACKING SYSTEM STANDARD INFORMATION1 12/11/95
APPL RECVD:11/14/95 TYPE CODE:SO SUBCODE:16 280435 LAST UPDATE:11/15/95
DER OFFICE RECVD:WPB DER OFFICE TRANSFER TO:___ APPLICATION COMPLETE:00/00/00
DER PROCESSOR:KAMATH, VIK
APPL STATUS:AC DATE:11/14/95 (ACTIVE/DENIED/WITHDRAWN/EXEMPT/ISSUE/GENERAL=GP)
RELIEF:___ (SSAC=SS/EXEMPTIONS=EX/VARIANCE=VA)
(Y/N) N MANUAL TRACKING DISTRICT:50 COUNTY:50
(Y/N) N OGC HEARING REQUESTED LAT/LONG:26.46.15/80.05.52
(Y/N) N PUBLIC NOTICE REQD? BASIN-SEGMENT:___
(Y/N) N GOV BODY LOCAL APPROVAL REQD? COE #:_____
(Y/N) Y LETTER OF INTENT REQD? _ (I/ISSUE D/DENY) ALT#:_____

PROJECT SOURCE NAME:FLORIDA POWER & LIGHT COMPANY
STREET:2455 PORT WEST BLVD. CITY:WEST PALM BEACH
STATE:FL ZIP:33407 PHONE:_____
APPLICATION NAME:FLORIDA POWER & LIGHT COMPANY
STREET:9250 WEST FLAGLER STREET CITY:MIAMI
STATE:FL ZIP:33174 PHONE:407-625-7612
AGENT NAME:_____
STREET:_____ CITY:_____
STATE:_____ ZIP:_____ PHONE:_____
FEE #1 DATE PAID:11/14/95 AMOUNT PAID:00100 RECEIPT NUMBER:00054781

TAB TO HERE:___

PATS03 280435 APPLICATION TRACKING SYSTEM CLOCK INFORMATION 12/11/95
APPLICATION NUMBER:280435 APPLICATION TYPE:SO
A DATE APPLICATION WAS RECEIVED - - - - - 11/14/95

C DATE DER SENT DNR APPLICATION/SENT DNR INTENT - - - - - __/__/__--__/__/__

E DATE #1 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - __/__/__--__/__/__

E DATE #2 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - __/__/__--__/__/__

E DATE #3 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - __/__/__--__/__/__

E DATE #4 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - __/__/__--__/__/__

E DATE #5 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - __/__/__--__/__/__

E DATE #6 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - __/__/__--__/__/__

F DATE LAST 45 DAY LETTER WAS SENT - - - - - __/__/__--__/__/__

G DATE FIELD REPORT WAS REQ--REC - - - - - __/__/__--__/__/__

H DATE DNR REVIEW WAS COMPLETED - - - - - __/__/__--__/__/__

I DATE APPLICATION WAS COMPLETE - - - - - __/__/__--__/__/__

K DATE NOTICE OF INTENT WAS SENT--REC TO APPLICANT - - - - - __/__/__--__/__/__

N WAIVER BEGIN DATE--END DATE (DAY 90) - - - - - 12/08/95--03/08/96

PATS06 280435 001 0280435001 TAB TO HERE:___
12/11/95 8.19.21
APPLICATION COMMENTS

PROJECT NAME: FLORIDA POWER & LIGHT COMPANY LAST UPDATED: 12/11/95

NARRATIVE SEQ.
1ST WAIVER TO END 03/08/96 (001)

**WAIVER OF 30 DAY TIME LIMIT - GENERAL PERMITS
UNDER SECTIONS 62-4.530, F.A.C., AND 403.814, FLORIDA STATUTES**

License (Permit, Certification) Application No. 5050-280435

Applicant's Name: Florida Power & Light Company
Port West Properties CoOp

The undersigned has read Section 403.814, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced notification, the applicant hereby with full knowledge and understanding of the applicant's rights under Sections 403.814, Florida Statutes, and Rule 62-4.530, Florida Administrative Code, waives the right to the use of the general permit 30 days after notification to the State of Florida Department of Environmental Protection as prescribed by law. The applicant agrees and understands that the undertaking of any activities covered by this general permit notification prior to the expiration date below, without written agreement from the Department will be considered a violation of Rule 62-4.530, F.A.C. Said waiver is made freely and voluntarily by the applicant, with full knowledge, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Protection.

This waiver shall expire on the 8th day of March 1996.

The undersigned is authorized to make this waiver on behalf of the applicant.

Signature

Lamp L. Leskayan
NAME (PLEASE TYPE OR PRINT)
Manager
Environmental Affairs

Post-it™ brand fax transmittal memo 7871		# of pages: <u>1</u>
To: <u>Alan Benedict</u>	From: <u>V. Kamaiah</u>	
Co: <u>EPL</u>	Co: <u>FDEP</u>	
Dept:	Phone: <u>433-2650 x246</u>	
Fax: <u>625-7665</u>	Fax: <u>433-2666</u>	



Lawton Chiles
Governor

Florida Department of Environmental Protection

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

PERMIT DATA FORM

PROJECT SOURCE NAME Florida Power & Light Company

Type Code 50 Subcode 15 Check If: ☒ GP ☐ Exempt
16

Correct Fee _____
Amount Received \$ 100.00
Amount Refund _____

Permit Processor's Initial _____ Data Entry Operator's Initial MCH

Comments 5050-280435



Florida Power & Light Company
EZ Procurement Account

54781

Void if not presented for payment
within six months from date of check

6260000782

FPL

P.O. Box 088801
North Palm Beach, FL 33408-8801

NationsBank of Florida, N.A.
Lake City, Florida

OCT 27 19 95

Pay THE SUN 100 DOLLARS 00 CTS \$ 100.00

To The Order Of

DEPT. OF ENVIRONMENTAL PROTECTION

REFERENCE ADB- USED OIL
PROCESSING FACILITY-
GEN. PERMIT NOTIFICATION

Environmental Affairs PORTWEST
(407) 625-7619 PROPERTIES

By [Signature]

AREA: SED _____

Cash Receiving Application
Collection Point Log Remittance

CRAF006A

Tot: _____ \$100.00

SY\$REMT: 74318 Type: CP Recvd Date: 14-NOV-1995 Status: RECEIVED
SY\$RCPT: 54781 PNR: Check #: 6260000782 Amount: 100.00
SSN/FEI#: Name: FPL
First: Middle: Title: Suf:
Address1: Short Comments:
Address2: P.O.BOX 088801 FLORIDA POWER & LIGHT COM
City: NORTH PALM BEACH ST: FL Zip: 33408-8801 Country:

P A Y M E N T (S)

SYS\$PAYT	Distr	CL	Object	Payment	Reference#	Applic/	S
	Area..		Code/Description.....	Amount.....		Fund	T
76367	SED		002245 SOLID WASTE-OPE	\$100.00	SO50280435	PFTF	CO

COMMIT FREQUENTLY \$100.00 Payment total

Press <TAB> to accept Collection Point or enter F&A.

Count: *1

<Replace>

SOUTHEAST DISTRICT PERMIT PROCESSING WORKSHEET

LOGGING

NAME OF PROJECT FLORIDA POWER & LIGHT COMPANY
 PROJECT LOG NO. S050-280435 COUNTY PALM BEACH
 DATE APPLICATION RECEIVED 11/14/95 30-DAY (HW 60-DAY) DATE 12/13/95
 AMOUNT OF FEE PAID \$100.00 COPIES OF PLANS _____
 COPIES OF APPLICATION 1 COPIES OF SPECIFICATIONS _____
 COPIES TO: CORPS___; LOCAL PROGRAM___; TALLAHASSEE___; DNR___; OTHER___

PERMIT REVIEW

PERMIT ASSIGNED TO KAMATH, VIK AMOUNT OF FEE REQ'D \$ _____
 DISCHARGE TO OR LOCATED IN AQUATIC PRESERVE: Yes___ No___ N/A___
 PERMIT STATUS AND CHRONOLOGY

DATE	REVIEWER'S INITIALS	COMMENTS

(continue on reverse side)

FIELD INSPECTION BY: _____ DATE _____; N/A _____
 WATER MANAGEMENT COMMENTS (DATE) _____; N/A _____
 LOCAL PROGRAM APPROVAL (DATE) _____; N/A _____
 GPSI, APIS, OR PWS UPDATE DRAFTED: Yes _____; N/A _____
 PUBLIC NOTICE LETTER ISSUED/PUBLISHED (DATES) _____; N/A _____
 APPLICATION COMPLETION DATE _____ > DEFAULT DATE _____
 >> D.A.S. 90+ DAYS INACTIVITY AUTHORIZATION: _____OK _____DENY <<
 COMMENTS: _____

PERMIT, EXEMPTION, DENIAL DRAFTED BY: _____ DATE: _____
 INTENT: PROGRAM HEAD _____ PROGRAM ADM. _____
 FINAL DRAFT REVIEWED BY: _____ DATE: _____
 FINAL DRAFT APPROVED BY: _____ DATE: _____

FINAL PROCESSING

DISTRIBUTION BY: _____ DATE: _____
 PATS UPDATED BY: _____ DATE: _____
 GPSI, APIS OR PWS UPDATED BY: _____ DATE: _____
 WORD PROCESSOR: _____



SAMPLING AREA

N-CAD BATTERY
PROCESSING AREA

GLOVES
GLOVES
GLOVES
GLOVES
GLOVES
GLOVES
GLOVES
GLOVES

EMERGENCY
EYE
WASH



LEAD ACID BATTERY
PROCESSING AREA

CONTAMINANT
SPILL KIT
FIRE
EXTINGUISHER

FW EYE
WASH
KIT

3-22-99

Summary

General

Catalog	Hazardous Waste	Profile	Discovery_Compliance
Object Type	Document		

Property

Document Date	09-26-2007	County	PALM BEACH
Facility-Site ID	FLD000807792	Facility Type	HAZARDOUS WASTE GENERATOR (HWG)
Received Date	09-26-2007	Document Type	INCOMING CORRESPONDENCE
Document Subject	CESQG consolidation		

Folder

Insert into folder	None
--------------------	------

Workflow

Entity will not be added to the workflow.

Select file to insert

Winston, Kathy

From: Winston, Kathy
Sent: Wednesday, September 26, 2007 11:49 AM
To: 'Frank_J_Nesbihal@fpl.com'
Subject: RE: CESQG Waste Consolidation Program

Thanks for your quick response. If you feel you are meeting all these requirements then it seems we can put this issue to bed

Kathy Winston
 Environmental Manager
 Hazardous Waste Compliance/Enforcement
 (561)681-6670
 SunCom 226-6670
 Fax (561)681-6770

From: Frank_J_Nesbihal@fpl.com [mailto:Frank_J_Nesbihal@fpl.com]
Sent: Wednesday, September 26, 2007 11:20 AM
To: Winston, Kathy
Cc: D_M_Rawson@fpl.com
Subject: Re: CESQG Waste Consolidation Program

Hi Kathy,

Thanks so much for sending this to me. After reviewing the letter from the FDEP to the Sarasota County Chemical Collection Center which outline the requirements for the new rule, I believe our West Palm Beach consolidation facility is already complying with all of the requirements. I have forward this email to Dan Rawson, the Supervisor of our consolidation facility, to confirm.

Thanks,
 Frank

▼ "Winston, Kathy" <Kathy.Winston@dep.state.fl.us>

<p>"Winston, Kathy" <Kathy.Winston@dep.state.fl.us> 09/26/2007 10:50 AM</p>	<p>To: Frank_J_Nesbihal@fpl.com cc: Subject: CESQG Waste Consolidation Program</p>
---	--

Per our phone discussion today, here is Agusta's opinion on who this rule applies to. Also, the letter attached gives you an idea of what the Dept. expects from you concerning the site. After rereading your originally submittal, it seems that you may have covered all your bases. But check for compliance with the 5 points in the letter and get back to me with further explanation

9/26/2007

if you feel that some part of your program is not meeting these requirements.

Kathy Winston
Environmental Manager
Hazardous Waste Compliance/Enforcement
(561)681-6670
SunCom 226-6670
Fax (561)681-6770

(See attached file: DOC092607.pdf)

Summary

General

Catalog	Hazardous Waste	Profile	Discovery_Compliance
Object Type	Document		

Property

Document Date	09-24-2007	County	PALM BEACH
Facility-Site ID	FLD000807792	Facility Type	HAZARDOUS WASTE GENERATOR (HWG)
Received Date	09-24-2007	Document Type	OUTGOING CORRESPONDENCE
Document Subject	CESQG consolidation		

Folder

Insert into folder	None
--------------------	------

Workflow

Entity will not be added to the workflow.

Select file to insert

Browse...

Cancel

Back

Insert

Winston, Kathy

To: Frank_J_Nesbihal@fpl.com
Subject: CESQG Waste Consolidation Program
Attachments: DOC092607.pdf

Per our phone discussion today, here is Agusta's opinion on who this rule applies to. Also, the letter attached gives you an idea of what the Dept. expects from you concerning the site. After rereading your originally submittal, it seems that you may have covered all your bases. But check for compliance with the 5 points in the letter and get back to me with further explanation if you feel that some part of your program is not meeting these requirements.

Kathy Winston
Environmental Manager
Hazardous Waste Compliance/Enforcement
(561)681-6670
SunCom 226-6670
Fax (561)681-6770

9/26/2007

From: Clarke, Raoul
Sent: Monday, September 24, 2007 2:17 PM
To: Gleason, Irene
Subject: FW: CESQG authorization

Attachments: Co HHW Req Auth Ltr.doc

From: Posner, Augusta
Sent: Friday, April 14, 2006 2:16 PM
To: Erickson, John; Winston, Kathy; Barbaccia, Phil; Burson, Lu; Emery, Charles; Fitzsimmons, Michael; Goddard, Charles; Kutash, William; Lubozynski, Tom; Patel, Ashwin; Dregne, James; Valade, Vicky; White, John; Outlaw, Douglas; Baker, Bryan; Bahr, Tim; Holmes, Georgiana; Gaynor, Kathy; White, Kirk; Erickson, John; Byer, James; Bradner, James; Kothur, Bheem; Moncrief, Aiki; Ray, Steve; Chisolm, Jack; Minhaj, Ghousuddin; Price, John L.; Neves, Richard; Clarke, Raoul; Perrigan, Glen; Tenace, Laurie; Knauss, Elizabeth; London, Lisa; Kantor, Karen E.; Abcarian, Julie; Brown, Stephen E.; Farrell, Jennifer A.; Kelley, Lisa; Bayly, Karen; Kraemer, Janine
Subject: CESQG authorization

Hello all!

This language is now in Chapter 62-730, FAC, effective as of January 29, 2006:

62-730.220 Applications for Permits and Other Authorizations.
(5) 40 CFR 261.5(f)(3)(iii) and 40 CFR 261.5(g)(3)(iii) [as adopted in subsection 62-730.030(1), F.A.C.] provide that waste generated by conditionally exempt small quantity generators ("CESQG waste") must be delivered to certain specified facilities, including a facility "authorized to manage hazardous waste by a State with a hazardous waste management program approved under Part 271 of this chapter." Florida is such a state. The Department's authorization to manage CESQG waste shall include facility-specific operating conditions, including location, generator responsibilities, amount and type of wastes, time limits, and recordkeeping, as appropriate to the request and generator status of the authorized person.

The language was added to give notice to organizations such as school districts and utility companies with many conditionally exempt generating locations that they can be authorized to collect and manage that waste at a central location. It could also apply, for example, to painting contractors that transport CESQG amounts of hazardous waste from the job site to a central location.

A question has come up as to how to apply the new language to municipal Household Hazardous Waste (HHW) collection programs that also accept CESQG waste.

County HHW programs were started with DEP grants that required CESQG waste collection at the HHW facility for the first five years. The initial grant requirement provides CESQGs with affordable and convenient options for proper hazardous waste disposal. After the grant expires, the county can decide whether or not to continue to accept the waste. DEP's HHW program strongly encourages county HHW facilities to accept CESQG waste through other HHW grants, annual workshops, and training.

To ensure that the new language does not discourage HHW programs from voluntarily accepting CESQG waste, the interpretation of 62-730.220 (5) as it applies to municipally operated HHW collection facilities is as follows.

If an HHW program wishes to continue accepting CESQG waste they can submit a letter (see attached template) to the district showing that they have met these three criteria.

- 1) Has received or is receiving a DEP HHW grant
- 2) Has obtained an EPA ID #
- 3) Has CESQG waste acceptance procedures

The new language does not apply to county HHW programs that allow CESQGs to bring waste when a hazardous waste management contractor is on-site because the waste is being delivered directly to a registered hazardous waste transporter.

Should you have any questions regarding this interpretation, please contact me.

Thank you!



Co HHW
th Ltr.doc (2

CONFIDENTIAL ATTORNEY WORK PRODUCT
EXEMPT FROM PUBLIC DISCLOSURE PURSUANT TO §119.07(3)(I), F.S.
Agusta P. Posner
State of Florida Department
of Environmental Protection
3900 Commonwealth Blvd. MS 35
Tallahassee, FL 32399-2000
ph (850) 245-2282
FAX (850) 245-2302
augusta.posner@dep.state.fl.us



Florida Department of Environmental Protection

Southeast District Office
400 North Congress Avenue, Suite 200
West Palm Beach, Florida 33401-2913

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

September 25, 2007

Oland L. Stokes, Jr.
Sarasota County Chemical Collection Center
8750 Bee Ridge Road
Sarasota, Florida 34241, Florida

Dear Mr. Stokes:

Re: Authorization to Consolidate Hazardous Waste from
Conditionally Exempt Small Quantity Generators

On June 12, 2006 the Department received your letter dated May 9, 2006 requesting formal authorization to manage hazardous waste from conditionally exempt small quantity generators (CESQGs) pursuant to Florida Administrative Code Rule 62-730.220(5). The District Hazardous Waste Program has inspected the Chemical Collection Center in the past, and is familiar with its construction and waste management practices. The Department hereby approves your request with the understanding that current management practices will continue. In particular, the Department expects that your facility will:

1. Provide CESQGs with written disposal records that document the type and amount of hazardous waste delivered, the date of delivery, the name and address of both the generator and the Chemical Collection Center. The Collection Center must maintain copies of these records.
2. Label all waste that arrives at the facility in unlabeled containers with the identity of the material and/or appropriate hazard class information. If the visual inspection of incoming waste finds that the container label does not match the waste, the container must either be rejected or re-labeled. Re-labeling is allowed only if the identity of the waste can be confirmed.
3. Continue its current management practices and ensure that the waste is:
 - a) Separated from incompatible materials.
 - b) Stored in closed containers that are in good condition and appropriate to the nature of the waste.
 - c) Provided with adequate aisle space to allow for periodic inspections and access for emergency fire control and spill control equipment.
 - d) Managed only by persons with appropriate HAZWOPER and HAZMAT training.
4. Comply with all USDOT shipping requirements when preparing waste for shipment off site.
5. Dispose of hazardous wastes to facilities authorized to manage hazardous waste by the USEPA in accordance with FAC Rule 62-730.030(2). Copies of disposal records must be maintained.

We appreciate Sarasota County's efforts to ensure hazardous waste generated within the County is managed appropriately. Sarasota's efforts will help protect the County's ground water resources as well as human health. If we can provide the County with any additional assistance, or if you have any questions, please call James Dregne at 813/632-7600 ext. 410.

Sincerely yours,

J.M. Farley
Interim District Director
Southwest District

cc: Tim Bahr, Hazardous Waste Regulation Section
Agusta Posner, OGC.

Index

General

Catalog	Hazardous Waste	Creator	winston_k
Profile	Discovery_Compliance	Create Date	10-24-2007 (MM-DD-YYYY)
Object Type	Document		

Properties

County	PALM BEACH
Facility-Site ID	FLD000807792
Document Date	08-31-2007
Received Date	08-31-2007
Document Type	INCOMING CORRESPONDENCE
Contractor ID	
Facility Type	HAZARDOUS WASTE GENERATOR (HWG)
Document Subject	CESQG CONSOLIDATION

[Edit](#)[Back](#)

Winston, Kathy

From: Frank_J_Nesbihal@fpl.com
Sent: Friday, August 31, 2007 1:51 PM
To: Winston, Kathy
Cc: D_M_Rawson@fpl.com; Roger_Messer@fpl.com
Subject: CESQG Waste Consolidation Program
Attachments: 20070829094046404.pdf

Hello Ms. Winston:

This email will briefly explain FPL's CESQG waste consolidation program for the management of our waste aerosol cans. Unpunctured waste aerosol cans that are generated at FPL facilities are managed under the satellite accumulation regulation at 40 CFR 262.34(c) regardless of their generator status. Most of FPL's facilities operate as a conditionally exempt small quantity generator ("CESQG"). However, it is company policy that only facilities that are CESQG's pursuant to 40 CFR 261.5 can send their unpunctured waste aerosol cans, via a contract carrier, to FPL's Port West Properties ("PWP") facility for consolidation, puncturing, and off site disposal/recycling. As known, CESQG's are not subject to most RCRA regulations, including using a hazardous waste permitted transporter and a hazardous waste manifest, in accordance with 40 CFR 261.5(b). Any FPL facility that is deemed a large quantity generator ("LQG") or a small quantity generator ("SQG") must send their unpunctured waste aerosol cans directly from the facility to a FPL-approved off site hazardous waste disposal facility. Recall, FPL has received approval from the FDEP via letter dated July 13, 1992 that allows the consolidation of CESQG wastes from company locations at the PWP facility. The letter is attached below. The FDEP letter also allows the consolidation of small quantity generator ("SQG") wastes at the PWP facility as well. However, the contract carrier FPL has engaged currently does not hold a hazardous waste transporter's permit to transport SQG wastes. Therefore, as previously mentioned, FPL has established a company policy that the PWP facility only accepts CESQG wastes from company facilities.

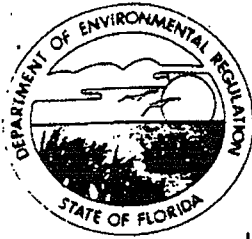
Each CESQG facility collects unpunctured waste aerosol cans in a covered 55-gallon open top DOT-approved drum that is placed in a designated area. A monthly hazardous waste generation log is maintained at each facility to demonstrate their generator status. When a drum becomes full, a new drum replaces it, and the full drum is shipped to the PWP facility as a DOT hazardous material using a FPL preprinted shipping paper. The shipping paper is retained at the CESQG facility for 3 years, and used to document delivery. Upon arrival at the PWP facility, the unpunctured waste aerosol cans are evaluated for incompatibility prior to puncturing and evacuation. Approximately 99% of the waste aerosol cans are punctured and crushed, then recycled as scrap steel. After puncturing, the liquid residuals are captured in a 55-gallon drum and disposed of off site as a hazardous waste via Viola Environmental Services (formerly Onyx Environmental Services). The annual generation of aerosol residuals is typically less than 2 drums. The remaining 1% of the waste aerosol cans that are not punctured are directly shipped to the TSD facility located in Creedmore, North Carolina for incineration.

(See attached file: 20070829094046404.pdf)

If you have any questions, please do not hesitate to email or call me at 561-691-7013.

9/4/2007

Thank you,
Frank Nesbihal, CHMM
Principal Environmental Specialist



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406

Lawton Chiles, Governor

Telephone: 407/433-2650

Carol M. Browner, Secretary

Fax: 407/433-2666

JUL 13 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RECEIVED

JUL 15 1992

Mr. Keith Drescher
Florida Power & Light
P.O. Box 078768
West Palm Beach, Florida 33407

ENVIRONMENTAL AFFAIRS

RE: Proposed recycling and hazardous waste collection program.

Dear Mr. Drescher:

The Department has reviewed Florida Power & Light's (FPL) May 22, 1992 letter proposing a state wide collection and recycling program for FPL's hazardous wastes generated at its 87 service centers. FPL's proposal to collect both recyclable materials and hazardous wastes encompasses the management of wastes from both Conditionally Exempt Small Quantity Generators (CESQG) and Small Quantity Generators (SQG) as defined in Title 40 Code of Federal Regulations (CFR) 261.5 and 40 CFR 262.34, respectively. The wastes generated from CESQG and SQG are regulated under two separate sets of management requirements. In terms of the wastes generated at CESQG locations, the following requirements will apply to the management of those wastes.

- 1) Service Centers designated as CESQG must meet the requirements set forth in 40 CFR 261.5 (i.e. generate <100kg of hazardous waste per month and never accumulate >1000kg on-site at any one time).
- 2) Pursuant to 40 CFR 261.5(g)(3)(v)(A), hazardous wastes generated from CESQG that are beneficially used or reused, or legitimately recycled or reclaimed are not subject to the regulation under 40 CFR, Parts 262 through 266 and 268 and the notification requirement of Section 3010 of RCRA. This exemption would appear to apply to the waste spray paint cans and the fluorescent light tubes if managed in accordance with FPL's recycling proposal.
- 3) The non-acute hazardous wastes that are generated at CESQG locations and are not going to be beneficially reused, recycled or reclaimed are subject to the requirements of 40 CFR 261.5(g). The Central Reclamation Salvage (CRS) facility in West Palm Beach will be considered a staging

area prior to delivery of the wastes to a facility that meets the requirement of 40 CFR 261.5(g)(3). All hazardous waste accepted by the CRS facility from the CESQG facilities, regardless of volume, will have a maximum of 180 days from the time that they accept the waste to have it removed to a properly permitted TSD facility. If the CRS facility accumulatively accepts and/or generates >100kg of hazardous waste in any one month period or accumulates >1000kg of hazardous waste on-site at any time, it will become a SQG and shall meet the requirements set forth in 40 CFR 262.34. If the CRS facility accumulatively accepts and/or generates >1000kg of hazardous waste in any one month period or accumulates >6000kg of hazardous waste on-site at any time, the facility will be considered a Large Quantity Generator (LQG) and shall meet the full requirements set forth in 40 CFR 262.

- 4) Although this proposed management plan for CESQG wastes does not require the use of a hazardous waste manifest, the generator of the waste is required to ensure delivery to proper facility. In order for FPL to verify this requirement, the generating facility shall maintain a tracking system that will verify the volume of waste generated, waste type and the date which the wastes are taken off-site. The designated facility shall maintain records that indicate the locations from which the wastes are received, volumes received and the date they are received. All records shall be kept up to date, readily available for review and shall be maintained on-site for at least three years.
- 5) The hazardous waste generated at CESQG facilities shall not be mixed or combined with any hazardous waste generated at SQG facilities. If the hazardous wastes streams are combined at any time, the resultant mixture shall be managed in accordance with the requirements of SQG wastes as referenced in 40 CFR 262.

The hazardous wastes generated by SQG facilities are subject to the regulations as set forth in 40 CFR 262.34. The following requirements will apply to the management of those wastes.

- 1) Pursuant to 40 CFR 262.34, all hazardous wastes generated by SQGs that are transported, or offered for transportation, to an off-site treatment, storage or disposal (TSD) facility must utilize a hazardous waste manifest, unless the waste is reclaimed pursuant to a contractual agreement as set forth in 40 CFR 262.20(e). Furthermore, all hazardous wastes that are taken off-site to be recycled are subject to 40 CFR 261.6 requirements. As set forth in 40 CFR 261.6(c),

facilities that recycle recyclable materials without storing the materials before they are recycled are subject to only notification and manifesting requirements. The Department has determined that "storage" of hazardous wastes that are destined for recycling will occur if the wastes are not manifested off-site to a proper TSD or entered into the recycling operation within 24 hours upon arrival at the facility. If the wastes are "stored" on-site for greater than the allowed 24 hour period, all applicable provisions of Parts 264 and 265, and Parts 124, 266, 268 and 270 and the notification requirements of 3010 RCRA will apply to the facility.

- 2) The CRS will be the designated facility on the hazardous waste manifest for the recyclable materials. If the CRS facility accumulatively accepts and/or generates >100kg of hazardous waste in any on month period or accumulates >1000kg of hazardous waste on-site at any time, it will become a SQG and shall meet the requirements set forth in 40 CFR 262.34. If the CRS facility accumulatively accepts and/or generates >1000kg of hazardous waste in any one month period or accumulates >6000kg of hazardous waste on-site at any time, the facility will be considered a LQG and shall meet the full requirements set forth in 40 CFR 262. The CRS facility must also notify the State via EPA Form 8700-12 with its generator status and as an exempt treater.
- 3) Any hazardous wastes that are not intended to be reused, recycled or reclaimed at the CRS facility can not be transported from any SQG facility to the CRS facility unless the CRS facility obtains a RCRA storage permit.

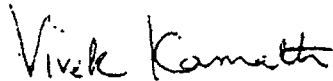
The following general conditions shall also apply to the proposal.

- 1) All staff involved in handling and transferring hazardous waste must be properly trained in site specific emergency and waste handling procedures.
- 2) The CRS location that accepts the hazardous wastes from the CESQG and SQG shall assume all responsibilities for that waste.
- 3) This proposal applies only to those wastes streams that are generated at FPL's own facilities. The conditions of this letter do not apply to wastes generated by generators other than FPL's own facilities.

Florida Power & Light
Page 4 of 4

If you have any questions concerning this matter please
contact Mr. Jeffrey Smith at 407/433-2650.

Sincerely,



Vivek Kamath, P.E.
Waste Programs Administrator

cc: Satish Kastury, Environmental Administrator, Tallahassee
Thomas Moody, Program Administrator, Pensacola
Michael Fitzsimmons, Program Administrator, Jacksonville
William Bostwick Jr., Program Administrator, Orlando
William Kutash, Program Administrator, Tampa
Vivek Kamath, Program Administrator, West Palm Beach
Philip Barbaccia, Program Administrator, Ft. Myers

NOTICE OF POTENTIAL HAZARDOUS WASTE NON-COMPLIANCE – Page 1 of 2

FACILITY NAME FPL		TYPE OF INSPECTION: CAV: <input type="checkbox"/> CEI: <input checked="" type="checkbox"/> CI: <input type="checkbox"/> OTHER: <input type="checkbox"/>	
ADDRESS 2455 Port West Blvd	CITY West Palm Beach	STATE FL	ZIP CODE 33407
EPA ID NUMBER F4D000807792	DATE OF INSPECTION 5/19/05	PAGE 1	OF 2
FOLLOW UP CAV INSPECTION WITHIN 120 DAYS: <input type="checkbox"/> YES <input type="checkbox"/> NO			

A hazardous waste/used oil compliance inspection was made this date, under the authority of Section 403.091, Florida Statutes (F.S.), to determine your facility's compliance with Chapter 403, F.S. and Chapters 62-730 and 62-710, Florida Administrative Code (F.A.C.). Provisions of Title 40 Code of Federal Regulations (C.F.R.) Parts 260 through 268 and 279, which are cited on this form, have been adopted by reference as the state hazardous waste and used oil rules in Chapter 62-730 and 62-710, F.A.C. The following 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 which exist at the time of this inspection.**

GENERAL REQUIREMENTS:

- ☐ Failure to ensure delivery of HW to proper HW facility § 261.5
- ☐ Failure to provide hazardous waste determination § 262.11
- ☐ Failure to notify as generator § 262.12
- ☐ Failure to use a manifest or reclamation agreement § 262.20
- ☐ Failure to provide personnel training § 265.16, 262.34
- ☐ Evidence of release(s) of waste § 265.31
- ☐ Facility exceeds 90/180 day time limit § 262.34

CONTAINER MANAGEMENT:

- ☐ Unlabeled containers § 262.34
- ☐ Undated containers § 262.34
- ☐ Leaking or bulging containers § 262.34
- ☐ Open containers § 265.173
- ☐ Inadequate aisle space § 62-730.160

RECORDKEEPING REQUIREMENTS:

- ☐ Manifests § 262.40, § 262.44
- ☐ Training records § 262.34
- ☐ Contingency Plan § 262.34
- ☐ Weekly Inspection records § 62-730.160
- ☐ Information not posted by phone § 262.34
- ☐ Authorities not notified § 262.37

USED OIL VIOLATIONS:

- ☐ Failure to label containers § 279.22
- ☐ Failure to respond to releases § 279.22
- ☐ Failure to document used oil disposal § 279.10

MATERIALS PROVIDED to assist in accomplishing corrective actions

- | | | |
|--|---|---|
| <input type="checkbox"/> DEP Small Quantity Generator Handbook | <input type="checkbox"/> EPA <i>Managing Used Oil</i> | <input type="checkbox"/> Mercury Lamp Recyclers |
| <input type="checkbox"/> EPA <i>Understanding the Hazardous Waste Rules</i> | <input type="checkbox"/> Environmental Yellow Pages | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> EPA <i>Notification of Regulated Waste Activity</i> | <input type="checkbox"/> List of HW/Used Oil Transporters | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Florida Automotive Recyclers Handbook | <input type="checkbox"/> Antifreeze Recycling Vendors | <input type="checkbox"/> Other _____ |

Florida Fact Sheets

- | | |
|--|---------------------------------------|
| <input type="checkbox"/> Antifreeze for Recycling / Waste Antifreeze | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Summary of Hazardous Waste Regulations | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Summary of Used Oil/Used Oil Filter Regulations | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Other: _____ | <input type="checkbox"/> Other: _____ |

HAZARDOUS WASTE INSPECTION EXIT INTERVIEW SUMMARY, NOTICE OF POTENTIAL VIOLATIONS
Page 2 of 2

ITEMS REQUESTED OR RECOMMENDATIONS BY THE "INSPECTOR":

No Items Requested

OWNER/OPERATOR COMMENTS:

The owner/operator is hereby requested to submit in writing, within days of this inspection, 1) a description of all corrective actions taken, 2) a schedule for completion of corrective actions to be taken and 3) a description of efforts to prevent recurrence of the above items to the person signing as **"INSPECTOR"**, Florida Department of Environmental Protection, 400 North Congress Avenue, Suite 200, West Palm Beach, FL 33401. The actions taken within days of this notice will be considered in determining whether enforcement, including the assessment of penalties, should be initiated.

IF YOU HAVE QUESTIONS, contact: Jeff Curtis at (561) 681-~~8880~~ ⁶⁷⁵⁶.

"INSPECTOR" (signature): [Signature] Date: 5/19/05

The undersigned person hereby acknowledges that he/she received a copy of this notice and has read and understands the same.

SIGNATURE:

[Signature]

PRINTED NAME:

Dan Rawson

TITLE:

AREA ENVIRONMENT COORDINATOR

DATE:

5-19-2005



Central Laboratory, 6001A Village Blvd. West Palm Bch. Fl. 33407

RECEIVED

FEB 20 2002

DEPT OF ENV PROTECTION
WEST PALM BEACH

February 12, 2002

Mr. Stephen E. Brown
Department of Environmental Protection
400 N. Congress Avenue
West Palm Beach, Fl. 33416

Re: Missing Generator 2 Manifest CWMA 864602

Dear Mr. Brown,

Enclosed please find a copy of the original generator 2 manifest 864602 which was missing from the packet you inspected today at the Central Laboratory. The copy we faxed to you was from Waste Management, however after searching the file cabinet the original was found in the drawer below where the packets are kept.

If you have any questions or comments, please do not hesitate to call me at (561) 640-2070.

Thank you for your visit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Howard F. Cosgrove".

Howard F. Cosgrove
Waste Management Team Leader



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 211000018017792	Manifest Document No. 07009	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address FLORIDA POWER & LIGHT CO 6001 A VILLAGE BOULEVARD WEST PALM BEACH, FL 33407		Location: 6001 A VILLAGE BOULEVARD 2455 Port West Blvd WEST PALM BEACH, FL 33407		A. State Manifest Document Number CWMA 864602	
4. Generator's Phone (561) 646-2090		6. US EPA ID Number NJ0000031009		B. State Generator's ID	
5. Transporter 1 Company Name ONYX ENVIRONMENTAL SVCS L.L.C.		7. Transporter 2 Company Name 2988-001 FL State Motor Transit Co.		C. State Transporter's ID NJ0000031009	
7. Transporter 2 Company Name FL State Motor Transit Co.		8. US EPA ID Number MD1509150581998		D. Transporter's Phone 973 347-7111	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number AL00000622464		E. State Transporter's ID	
				F. Transporter's Phone 800/572-8768	
				G. State Facility's ID	
				H. Facility's Phone 205/652-9721	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) SA.050		12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol
a. RG WASTE FLAMMABLE LIQUIDS, CORROSIVE, n.e.s. (HEXANE; SULFURIC ACID; PCB) 3, UN2924, III (24:0002, 0001)		001 DM 00480		240	P
Disposal Approval # _____ CWM Profile # OAKA19084					
b.					
Disposal Approval # _____ CWM Profile # _____					
c.					
Disposal Approval # _____ CWM Profile # _____					
d.					
Disposal Approval # _____ CWM Profile # _____					
J. Additional Descriptions for Materials Listed Above 2419084, 1000 TOSH 001, 000715/00, RSG 109		K. Handling Codes for Wastes Listed Above a. M141 (50) c.			
State of Generation FLORIDA		b. d.			
15. Special Handling Instructions and Additional Information BILL PC019 ONYX - ELDONAWE FL. Purchase Order # _____ Work Order # DW A 250234 Primary Emergency Contact is: IFOTRAC 1-800-535-5053 Secondary Emergency Contact is: _____ EMERGENCY CONTACT: _____					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name HOWARD F. CASCROVE		Signature [Signature]		Month Day Year 10 7 12 15 16 16	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name GERARD E. LAMPA		Signature [Signature]		Month Day Year 10 7 12 15 16 16	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name [Signature]		Signature [Signature]		Month Day Year 10 8 10 10 10	
19. Discrepancy Indication Space Location added per. Regulatory Committee 8/1/00					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name [Signature]					
Signature [Signature] Month Day Year 10 8 10 10 10					

HAZARDOUS WASTE INSPECTION EXIT INTERVIEW SUMMARY – Page 1 of 2

FACILITY NAME FPL Port West Properties		TYPE OF INSPECTION: CAV: <input type="checkbox"/> CEI: <input type="checkbox"/> CI: <input checked="" type="checkbox"/> OTHER: <input type="checkbox"/>	
ADDRESS 2455 Port West Blvd.		CITY West Palm Beach	STATE FL
EPA ID NUMBER		DATE OF INSPECTION	PAGE 1 OF 2
FOLLOW UP CAV INSPECTION WITHIN 120 DAYS: <input type="checkbox"/> YES <input type="checkbox"/> NO			

A hazardous waste/used oil compliance inspection was made this date, under the authority of Section 403.091, Florida Statutes (F.S.), to determine your facility's compliance with Chapter 403, F.S. and Chapters 62-710, 62-730, 62-737, and 62-740, Florida Administrative Code (F.A.C.). Provisions of Title 40 Code of Federal Regulations (C.F.R.) Parts 260 through 268 and 279, which are cited on this form, have been adopted by reference as the state hazardous waste and used oil rules in Chapter 62-710, 62-730, 62-737 and 62-740, F.A.C. The following 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 which exist at the time of this inspection. You are advised to immediately begin correcting these potential violations noted below:**

GENERAL REQUIREMENTS:

- ☐ Failure to ensure delivery of HW to proper HW facility § 261.5
- ☐ Failure to provide hazardous waste determination § 262.11
- ☐ Failure to notify as generator § 262.12
- ☐ Failure to use a manifest or reclamation agreement § 262.20
- ☐ Failure to provide personnel training § 265.16, 262.34
- ☐ Evidence of release(s) of waste § 265.31
- ☐ Facility exceeds 90/180 day time limit § 262.34

USED OIL VIOLATIONS:

- ☐ Failure to label containers § 279.22
- ☐ Failure to respond to releases § 279.22
- ☐ Failure to document used oil disposal § 279.10

CONTAINER MANAGEMENT:

- ☐ Unlabeled containers § 262.34
- ☐ Undated containers § 262.34
- ☐ Leaking or bulging containers § 262.34
- ☐ Open containers § 265.173
- ☐ Inadequate aisle space § 62-730.160

RECORDKEEPING REQUIREMENTS:

- ☐ Manifests § 262.40, § 262.44
- ☐ Training records § 262.34
- ☐ Contingency Plan § 262.34
- ☐ Weekly Inspection records § 62-730.160
- ☐ Information not posted by phone § 262.34
- ☐ Authorities not notified § 262.37

MATERIALS PROVIDED to assist in accomplishing corrective actions

- | | | |
|---|---|---|
| <input type="checkbox"/> DEP Small Quantity Generator Handbook
<input type="checkbox"/> EPA Understanding the Hazardous Waste Rules
<input type="checkbox"/> EPA Notification of Regulated Waste Activity
<input type="checkbox"/> Florida Automotive Recyclers Handbook | <input type="checkbox"/> EPA Managing Used Oil
<input type="checkbox"/> Environmental Yellow Pages
<input type="checkbox"/> List of HW/Used Oil Transporters
<input type="checkbox"/> Antifreeze Recycling Vendors | <input type="checkbox"/> Mercury Lamp Recyclers
<input type="checkbox"/> Other _____
<input type="checkbox"/> Other _____
<input type="checkbox"/> Other _____ |
|---|---|---|

Florida Fact Sheets

- | | |
|--|--|
| <input type="checkbox"/> Antifreeze for Recycling / Waste Antifreeze
<input type="checkbox"/> Summary of Hazardous Waste Regulations
<input type="checkbox"/> Summary of Used Oil/Used Oil Filter Regulations
<input type="checkbox"/> Other: _____ | <input type="checkbox"/> Other: _____
<input type="checkbox"/> Other: _____
<input type="checkbox"/> Other: _____
<input type="checkbox"/> Other: _____ |
|--|--|

HAZARDOUS WASTE INSPECTION EXIT INTERVIEW SUMMARY – Page 2 of 2

OTHER: _____

ITEMS REQUESTED BY INSPECTOR:

- Signed copy of Manifest missing return copy from Laboratory
- Employee Training records
- Arrangements with local Authorities

OWNER/OPERATOR COMMENTS:

The owner/operator is hereby requested to submit in writing, within 14 days of this inspection, 1) a description of all corrective actions taken, 2) a schedule for completion of corrective actions to be taken and 3) a description of efforts to prevent recurrence of the above items to the person signing as "INSPECTOR", Florida Department of Environmental Protection, P.O. Box 15425, West Palm Beach, FL 33416. The actions taken within 14 days of this notice will be considered in determining whether enforcement, including the assessment of penalties, should be initiated.

IF YOU HAVE QUESTIONS, contact: Stephen Brown at (561) 681-6600.

INSPECTOR (signature): [Signature] Date: 2/12/02

The undersigned person hereby acknowledges that he/she received a copy of this notice and has read and understands same.

SIGNATURE: <u>Daniel M. Rawson</u>	PRINTED NAME: <u>DAN RAWSON</u>
TITLE: <u>AREA ENVIRONMENTAL COORDINATOR</u>	DATE: <u>02-12-2002</u>



Jeb Bush
Governor

Department of Environmental Protection

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

David B. Struhs
Secretary

JUN 25 1999

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT Complaint X Routine Follow-up Permitting

FACILITY NAME FLORIDA POWER & LIGHT - PORT WEST PROPERTIES

DEP/EPA ID# FLD000807792

ADDRESS 2455 PORT WEST BOULEVARD, WEST PALM BEACH, FL 33407

COUNTY PALM BEACH PHONE (561) 588-1401 DATE 3/22/99 TIME 9:15 AM

TYPE OF FACILITY

GENERATOR

Con. Ex. S.Q.G.
Small Quantity
X Generator
Non-Handler
X Used Oil

STORAGE

Container
Tank
Waste Pile
Surface Impoundment

TREATMENT

Tank
Land Treatment
Thermal
Chem/Phys/Bio
Incinerator
Surface Impoundment

TRANSPORTER

X Transporter
Transfer Station

DISPOSAL

Landfill
Surface Impoundment
Waste Pile

2. APPLICABLE REGULATIONS:

40 CFR 261.5 X 40 CFR 262 40 CFR 263 40 CFR 264

40 CFR 265 40 CFR 266 X 40 CFR 268 X 40 CFR 279

3. RESPONSIBLE OFFICIAL: (Name and Title)

Keith Drescher - Sr. Environmental Specialist

4. SURVEY PARTICIPANTS & PRINCIPAL INSPECTOR:

FDEP: John Harris, Mark McLean

FLORIDA POWER AND LIGHT: Keith Drescher, Dan Rawson

Report Prepared By: John Harris

5. FACILITY LATITUDE: 26° 46' 8" LONGITUDE: 80° 6' 5"

6. TYPE OF OWNERSHIP: FEDERAL STATE COUNTY MUNICIPAL X PRIVATE

7. PRE-ARRANGED INSPECTION: YES X NO

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

W-RB, File

GENERATOR CHECKLIST

Facility Name: FPC Port West Properties Date: 3-22-99
 Facility Representative: Keith Drescher, Dan Rawson Facility ID #: FLD00087792
 SIC Codes: 4931 Inspector: J. Harris, M. McLean

40 CFR 262 Subpart A -- General Standards

1. Describe the facility's hazardous waste streams:

WASTE DESCRIPTION	EPA Waste Codes	Generation Rate	Disposal Facility and EPA ID	Correct ID?	Testing or Process Knowledge
Paint related	D001 F003/F005		AETS	✓	Process
			ALD000622464		
Parts washer	D001		Safety Klean	✓	Process
			GAD980839187		
Shop rags			G+K	✓	Process
aerosol cans	D001/D003 F003/F005		AETS	✓	Process
			ALD000622464		
bead blaster			AETS	✓	test and Process
			ALD000622464		
PCB cont. transformer oil			Safety Klean (Tucker, GA)	✓	test
			GAD980839187		

(describe discrepancies in waste identification in narrative)

2. Has the facility obtained an EPA ID number? (40 CFR 262.12) Y ✓ N
3. Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? Y ✓ N
4. Are any hazardous wastes treated or disposed of on site?
Describe in narrative. Y N ✓
5. Is the facility exempt from hazardous waste permit requirements?
Describe in narrative. Y N ✓

Facility: _____
Date: _____

40 CFR 262 Subpart B -- The Manifest

1. Does the facility use a manifest for all its hazardous wastes? (262.20) Y ☒ N _____
2. Is the facility using the correct form (EPA 8700-22; OMB #2050-0039)? Y ☒ N _____
3. Does the facility ship by rail or water? (If so, check 262.23(c)) Y _____ N ☒ _____
4. Is the manifest filled out properly? Y ☒ N _____

Item No.:

1. -Generator EPA ID # Y ☒ N _____
-5 digit manifest document # Y ☒ N _____
3. -Generator name and mailing address Y ☒ N _____
4. -Generator phone # Y ☒ N _____
- 5-8. -Transporter names and ID #s Y ☒ N _____
- D-F. -Transporter phone # (state requirement) Y ☒ N _____
9. -TSD name and mailing address Y ☒ N _____
10. -TSD # EPA ID # Y ☒ N _____
- H. -TSD Phone # (state requirement) Y ☒ N _____
11. -DOT description of the waste, including hazard class, ID #
and packaging group Y ☒ N _____
12. -Container # and type Y ☒ N _____
- 13-14. -Quantity of waste and units Y ☒ N _____
- I. -EPA waste code (state requirement) Y ☒ N _____
- K. -Handling codes (state requirement) Y ☒ N _____
16. -Name, handwritten signature of generator and date Y ☒ N _____
- 17-18. -Name, handwritten signature of transporter and date Y ☒ N _____
19. -Are any manifest discrepancies noted? Y _____ N ☒ _____
20. -Name, handwritten signature of TSD and date Y ☒ N _____

Number of manifests examined 250
Number of errors —

Note manifest document numbers and dates of manifests with errors below:

Manifest #	Date	Destination	Error(s)

5. Have any exception reports been filed? (262.42) Y _____ N ☒ _____
If so, did exception reports include legible copy of manifest and cover letter? Y N/A N _____
6. Are manifests retained for 3 years? Y ☒ N _____

Facility: _____
Date: _____

40 CFR 262 Subpart C -- Pre Transport Requirements

1. Does the facility accumulate the waste on-site prior to treatment or disposal? Y ☒ N _____
Circle applicable accumulation units:
Containers Tanks Drip Pads Containment Buildings
2. Are containers used to ship the waste off-site? Y ☒ N _____
3. Are any containers on-site prepared for shipment? Y ☒ N _____
a. If so, are the containers appropriate for the waste? (262.30) Y ☒ N _____
b. Are the correct diamond-shaped DOT hazard class container labels used? (262.31) Y ☒ N _____
c. Are containers of 110 g or less marked with the correct DOT shipping name and number? Y ☒ N _____
Is a label with the language required under 262.32(b) used? Y ☒ N _____
Is the generator's name, address and manifest document number on the label? Y ☒ N _____
d. Are placards available to be provided to the transporter? (262.33) Y ☒ N _____
e. Are bulk packagings used (over 400 kg solid or 118 g liquid)? Y _____ N ☒ _____
f. Are they marked and placarded properly? Y _____ N _____

40 CFR 262 Subpart C -- Accumulation Requirements

1. Does the facility comply with the 90-day accumulation time limit? (262.34(a)) (Complete tank, container and/or drip pad checklists for units accumulating waste.) Y ☒ N _____
2. If not, has the facility been issued an extension by the Department? (262.34(b)) Y N/A N _____
3. Is each container marked with the beginning date of accumulation? (262.34(a)(2)) Y ☒ N _____
4. Is each container and tank marked with the words "Hazardous Waste"? (262.34(a)(3)) Y ☒ N _____
5. Are satellite accumulation points used? Describe in narrative. Y ☒ N _____
6. Are satellite containers closed ((262.34(c)) and marked with the words "hazardous waste" or other words that describe the contents? Y ☒ N _____
7. Do satellite accumulation points hold 55 gallons of waste or less? Y ☒ N _____
8. If not, is the excess marked with the date the excess waste began accumulating? (The date must be within 3 days of the date of inspection (262.34(c)(2)) Y N/A N _____

Facility: _____
Date: _____

40 CFR 262 Subpart C -- Personnel Training -- (265.16)

1. Do facility personnel complete hazardous waste training?
Comments: Y ☒ N ☐
2. Is the trainer adequately trained in hazardous waste management procedures? Y ☒ N ☐
3. Does the training cover safety? Y ☒ N ☐
4. Does the training cover emergency response procedures, including equipment handling and inspection? Y ☒ N ☐
5. Does the training cover hazardous waste identification and handling procedures? Y ☒ N ☐
6. Does the facility maintain personnel training records? Y ☒ N ☐
7. Does the facility maintain job titles and position descriptions for employees managing hazardous waste? Y ☒ N ☐
8. Do the job descriptions include the requisite skills, education and experience? Y ☒ N ☐
9. Do the job descriptions include a list of the positions' duties? Y ☒ N ☐
10. Are people trained within 6 months of hiring? Y ☒ N ☐
11. Do they work unsupervised prior to training? Y ☐ N ☒
12. Is training reviewed annually? Date of last training 4/98 Y ☒ N ☐
13. Are records maintained for three years? Y ☒ N ☐

265 Subpart C -- Preparedness and Prevention

1. Is there evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment? (265.31) Y ☐ N ☒
2. Does the facility have an internal communication or alarm system? (265.32(a)) Y ☒ N ☐
3. Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? (265.32(b)) Y ☒ N ☐
4. Describe fire control equipment. Is it adequate? (265.32(c)) Y ☒ N ☐
5. Is spill control and decontamination equipment present? (265.32(c)) Y ☒ N ☐

Facility: _____
Date: _____

6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? (265.32(d)) Y ☒ N _____
7. Is the emergency equipment inspected and tested periodically? Y ☒ N _____
Frequency? once / year
8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (265.35) Y ☒ N _____
9. Has the facility made emergency response arrangements with the following: (265.37)
- Fire Department: _____ Y ☒ N _____
Police: _____ Y ☒ N _____
Hospital: _____ Y ☒ N _____
Emergency Response Contractor: _____ Y ☒ N _____
10. If not, has the facility attempted to do so and is the refusal documented? Y _____ N _____

265 Subpart C -- Contingency Plans and Emergency Response

1. Does the facility have a contingency plan? 265.51) Y ☒ N _____
2. Is it at the facility and easily available? (265.53) Y ☒ N _____
3. Does the plan include:
- Fire Response Procedure: N/A _____ Y ☒ N _____
 - Spill Response Procedures: N/A _____ Y ☒ N _____
 - Explosion Response Procedures: N/A ☒ Y _____ N _____
 - A description of arrangements with local authorities: KATIE KEITH DAN N/A _____ Y ☒ N _____
 - Emergency Coordinators: (Name) Dan Peterson Y ☒ N _____
 - Addresses and telephone numbers of Emergency Coordinators: Y ☒ N _____
 - Emergency equipment list: Y ☒ N _____
 - Specifications and capabilities of emergency equipment: Y ☒ N _____
 - Locations of emergency equipment: Y ☒ N _____
 - An evacuation plan and routes: Y ☒ N _____
 - Evacuation/alarm signals: Y ☒ N _____
4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? Y ☒ N _____
5. Has the plan been distributed to the local police, fire department, ERT and hospital? Circle omitted authorities. (265.53) Y ☒ N _____
6. Is the emergency coordinator authorized to commit funds for incident response? Y ☒ N _____

Facility: _____
Date: _____

40 CFR 262 Subpart D -- Record keeping and Reporting

1. Is the generator keeping the following records:

Biennial Reports (262.41)
Exception reports (262.42)
Test Results:

N/A _____ Y ☒ N _____
N/A ☒ Y _____ N _____
N/A _____ Y ☒ N _____

2. Where are records kept? office & facility
3. Who is in charge of keeping records? Name Dan Rawson
Title _____
4. Any additional reporting, such as contingency plan implementation reports? (262.43) NA ☒ Y _____ N _____
5. Are records kept for a minimum of 3 years? Y ☒ N _____

40 CFR 262 Subpart E -- Exports N/A ☒

1. Has the facility exported any hazardous waste? Y _____ N _____
2. Has the exporter notified EPA 60 days prior to the initial shipment? Y _____ N _____
3. Has the receiving country consented to receive the waste? Y _____ N _____
4. Has a copy of the EPA Acknowledgment of Consent accompanied the shipment? Y _____ N _____
5. Did the shipment conform, and was the manifest completed as required by 40 CFR 262.54? Y _____ N _____
6. Has the exporter received confirmation of delivered shipment? Y _____ N _____
7. Has the exporter submitted an annual report to EPA? Y _____ N _____
8. Are all records kept a minimum of three years? (262.57) Y _____ N _____

40 CFR 262 Subpart F -- Imports N/A ☒

1. Has the facility imported any hazardous waste? Y _____ N _____
2. Has the manifest been completed per 262.60(b)? Y _____ N _____

Facility Name: _____
Inspector: _____
Date: _____

40 CFR Part 265 Subpart I - Use and Management of Containers

1. Are the containers in good condition (265.171)?
(Check for leaks, corrosion, bulges, etc.) Yes ☒ No ☐
2. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? Yes ☒ No ☐
3. Is the waste compatible with the containers and/or its liner (265.172)? Yes ☒ No ☐
4. Are the containers kept closed except when adding or removing wastes (265.173(a))? Yes ☒ No ☐
5. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak (265.173(b))? If yes, explain using narrative. Yes ☐ No ☒
6. Are each of the containers inspected at least weekly? (265.174) Yes ☒ No ☐
Are records kept including: (62-730.160 (6) F.A.C.)
Date? Yes ☒ No ☐
Time? Yes ☒ No ☐
Legibly written name of the inspector? Yes ☒ No ☐
Number of Containers? Yes ☒ No ☐
Condition of containers? Yes ☒ No ☐
Notes of observations made? Yes ☒ No ☐
Date and nature of repairs or corrective actions? Yes ☒ No ☐
7. Are ignitable and reactive wastes stored at least 50 feet from the property boundary? (265.176) Yes ☒ No ☐
8. Are incompatible wastes stored in the same containers? Yes ☐ No ☒
9. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? (265.35) Yes ☒ No ☐
10. Is there sufficient aisle space allow to allow full inspection of the containers and labels? (62-730.160(7) F.A.C.) Yes ☒ No ☐

Facility: _____
Date: _____

LAND DISPOSAL RESTRICTIONS CHECKLIST

40 CFR Part 268

LDR Waste Determination (268.7)

1. Describe the generator's restricted hazardous waste streams (use the LDR Treatment Standards list) and the destination of each.

WASTE DESCRIPTION	EPA Waste Codes	Generation Rate	Disposal Facility and EPA ID	Correct ID?	Testing or Process Knowledge
Paint Related	D001 F003/F005		AETS	✓	process
			ALD000622464		
Parts Washer	D001		Safety Klean	✓	process
Aerosol Cans	D001/D003 F003/F005		AETS	✓	process
			ALD000622464		
Bead Blast Media			AETS	✓	test and process
			ALD000622464		

2. Are the wastes correctly identified? (You may need to review TOC, TSS, HOC, TCLP, PFLT, 3rd Thirds WW, NWW, Technology Acronyms, Tables 268.41, 268.42 & 268.43.) [268.7 Notices for 3rd Third includes variance until 8-8-90: Minimum Technology]

Y ✓ N

Comments: _____

3. Is the generator storing restricted waste on site?

Y ✓ N

Facility: _____
Date: _____

Comments: _____

a. Is the generator complying with 268.50? Y ☒ N ☐

Comments: _____

b. Is the generator complying with 262.34 as required by 268.50(a)(1)? Y ☒ N ☐

Comments: _____

c. Are the wastes identified correctly? Y ☒ N ☐

Comments: _____

d. Have LDR wastes been stored over 90 days (generator)? Y ☐ N ☒

Comments: _____

e. If the facility is a TSD and has been storing LDR wastes for over a year, can the TSD prove (if challenged) that the reason for such storage is solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal? Y ☐ N ☐

Comments: N/A

4. Does the generator have a case-by-case extension or a variance? Y ☐ N ☐

Specify:

N/A

Facility: _____
Date: _____

Waste with Treatment Standards

1. Do the Notifications required by 268.7 include:

a. EPA Hazardous Waste #?

Y ☒ N ☐

b. Applicable Treatment Standards or proper reference for wastes other than F001-F005, F020-F023, F026-F028, and California List (3rd Third Rule)?

Y ☐ N ☐

c. Manifest Document #'s?

Y ☒ N ☐

d. Waste Analysis Data, where available?

N/A Y ☐ N ☐

e. Certification Statement if Generator is claiming to meet Treatment standards?

N/A Y ☐ N ☐

f. Date Waste is Subject to Prohibitions if Subject to a Case-By Case Extension or Variance

N/A

Comments: _____

2. Does the generator maintain the above records on-site for five (5) years? Y ☒ N ☐

Comments: _____

3. Additional Notes and Comments:

Check for soft hammer compliance prior to May 8, 1990.

USED OIL GENERATOR CHECKLIST

Facility Name: FPL - Port West Properties Date: 3-22-99
 Facility Representative: K. Tescher, D. Rawson Facility ID #: FLD000807792
 SIC Codes: 4931 Inspector: S. Harris, M. McLean

40 CFR 279 Subpart C – Generator Standards

1. Describe the facility's used oil streams:

WASTE DESCRIPTION	ON/Off Specification	Testing or Process Knowledge	Generation Rate	Disposal Facility and EPA ID
Used oil	—	—		

2. Does the generator mix hazardous waste with the used oil?(279.10) Y N ✓

3. If so, is the facility a CESQG? Y N/A N

4. If not, Is the oil mixed with a characteristic hazardous waste?
(describe waste) Y N ✓

If so, does the facility document that the resultant mixture does not exhibit any
characteristic of hazardous waste? Y N/A N

Or, if the hazardous waste is only D001, that the resultant mixture is not
ignitable? Y N/A N

If the facility is not a CESQG, and oil is mixed with a listed hazardous waste,
it must be managed as a hazardous waste.

5. Does the facility generate other materials contaminated with used oil? Y N ✓

If so, are the materials burned for energy recovery as used oil? Y N/A N

or, Does the facility have records documenting the residuals are not
hazardous waste? Y N/A N

6. Does the generator claim that the used oil meets the specification in 279.11? Y ✓ N

If so, and the oil is to be burned for energy recovery, the generator is a marketer
subject to 40 CFR 279 Subpart H

Subpart C

1. Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? Y ☒ N _____
Are containers/tanks in good condition? (279.22(b)(1)) Y ☒ N _____
Are containers/tanks leaking? (279.22(b)(2)) Y _____ N ☒ _____
Are containers/tanks storing used oil marked with the words "Used Oil", including fill pipes used to fill underground tanks? (279.22(c)) Y ☒ N _____
2. Are used oil filters stored in above ground containers which are: (62-710.850(6))
In good condition? Y ☒ N _____
Closed or otherwise protected from weather? Y ☒ N _____
Labeled "Used Oil Filters"? Y ☒ N _____
Stored on an oil impervious surface? Y ☒ N _____
3. Have any releases to the environment occurred, other than a leak from a UST? Y _____ N ☒ _____
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? (279.22(d)) Y N/A N _____
4. Does the generator burn on site in a space heater? (279.23) Y _____ N ☒ _____
If so, does he burn only DIY oil or oil generated on site? Y N/A N _____
Does the heater have a capacity of no more than 0.5 million BTU/hr? Y N/A N _____
Are combustion gasses vented to the atmosphere? Y N/A N _____
5. Does the generator only use transporters who have received EPA Identification numbers?
Name and number Self Transport
6. If not, does the generator self-transport only used oil generated on site or DIY oil to used oil collection centers or aggregation point owned by the generator? Y ☒ N _____
Name and location of center: Port West Properties
Location of generator aggregation point _____
If so, is this only in vehicles owned by the facility or facility employees? Y _____ N _____
Is no more than 55 gallons transported at one time? Y _____ N _____
7. Alternatively, does the generator have a tolling arrangement with a used oil reclaimer? Y ☒ N _____
Is a copy of the contract kept on site specifying
type and frequency of shipments? Y _____ N _____
that the transport vehicle is owned by the processor? Y _____ N _____
that the reclaimed oil will be returned to the generator? Y _____ N _____

USED OIL TRANSPORTER CHECKLIST

Facility Name: FPL-Port West Properties Date: 3-22-99
Facility Representative: K. Drescher, D. Rawson Facility ID #: FLD000807792
Inspector: S. Harris, M. McLean Registration # _____

40 CFR 279 Subpart E -- Transporter Standards

1. Is the facility exempt under any of the following? (279.40(a)) Y _____ N ✓

On site transport?

Generator transporting < 55 g /time to a collection center?

Transporter of < 55 g /time from generator to aggregation point owned by same generator ?

2. If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 261.7 after HW shipments? (If not, the used oil must be managed as hazardous)

Y _____ N _____ NA ✓

3. Does the transporter process used oil incidental to transport? (279.41)

Y _____ N ✓

Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock?

N/A _____ Y _____ N ✓

If not, has the transporter conducted a hazardous waste determination? (279.10(e))

N/A _____ Y ✓ N _____

4. Has the facility notified of used oil activities? Check EPA form 8700-12

Y ✓ N _____

5. Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? (279.43(a))

Transport to own Aggregation point (PX) for vendor pickup.

Y _____ N _____

6. Does the transporter comply with DOT requirements? (279.43(b))

Y ✓ N _____

7. If any oil is discharged during transport, does the transporter: (279.43(c))

Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable?

Y ✓ N _____

Report to DOT in writing per 49 CFR 171.16?

Y ✓ N _____

Clean up any discharges until the discharge poses no threat?

Y ✓ N _____

8. Does the facility also transport used oil filters?

Y _____ N ✓

If so, are the filters stored in above ground containers which are: (62-710.850(6))

In good condition?

Y _____ N _____

Closed or otherwise protected from weather?

Y _____ N _____

Labeled "Used Oil Filters"?

Y _____ N _____

Stored on an oil impervious surface?

Y _____ N _____

Facility Name: _____

Date: _____

Transporter Recordkeeping - 279.46

1. Do used oil acceptance records include: (279.46(a))

Name & Address of facility providing the oil for transport?

Y ☒ N ☐

EPA ID # of oil provider (if applicable)?

Y ☒ N ☐

Quantity of oil shipped?

Y ☒ N ☐

Date of shipment?

Y ☒ N ☐

Signature of oil provider, dated upon receipt?

Y ☒ N ☐

2. Do used oil delivery records include: (279.46(b))

Name & Address of receiving facility or transporter?

Y ☒ N ☐

EPA ID # of receiving facility or transporter?

Y ☒ N ☐

Quantity of oil delivered?

Y ☒ N ☐

Date of delivery?

Y ☒ N ☐

Signature of oil receiver, dated upon receipt?

Y ☒ N ☐

3. Do the above records also include state required information on the type of oil and destination or end use? (62-710.510(1)(c & e))

Y ☒ N ☐

4. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))

Y ☒ N ☐

5. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)

Y ☒ N ☐

☒ If not, is the facility an electric utility transporting only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?

Y ☒ N ☐

7. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))

Y ☒ N ☐

Transporter Certification (62-710 F.A.C.)

1. Is the transporter certified? (local governments, and < 55g/time transporters are exempt) (62-710.600)

Y ☒ N ☐

2. Does the facility maintain training records? (62-710.600(2)(c))

Y ☒ N ☐

3. Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? (62-710.600(2)(d))

Y ☒ N ☐

☒ 4. Is the facility registration form and ID number displayed? (62-710.500)

Y ☐ N ☐

Facility Name: _____
Date: _____

Transfer Facility Standards - 279.45

- 1 Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F
- N/A ☒ Y ☐ N ☐

Is the transfer facility registered per 62-710.500(1)(a) F. A. C.? Y ☐ N ☐

- 2 Does the transporter determine whether used oil stored at a transfer facility has a total halogen content above or below 1,000 ppm? Y ☒ N ☐

Is this done by testing? Y ☒ N ☐

Is this done by process knowledge? Describe basis in narrative. Y ☐ N ☒

Are test records or copies of records providing basis for determination kept for 3 years? Y ☒ N ☐

- 3 Have any analyses showed exceedances of the 1,000 ppm level? Y ☐ N ☒

If so, was the oil managed as hazardous waste? Y ☐ N ☐

If not, was the oil exempt? Describe in narrative. N/A ☒ Y ☐ N ☐

- 4 Is used oil stored only in tanks or containers? (Circle applicable units) Y ☒ N ☐

- 5 If the facility has tanks, do they comply with 62-761 and 62.762 F. A. C rules? (Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.) Y ☐ N ☐
See site SPCC Plan

Is secondary containment provided and adequate? Y ☒ N ☐

- 6 Are containers, and tank trailers in good condition and not leaking? Y ☒ N ☐

- 7 Are containers provided with secondary containment consisting of walls and floor at a minimum? Y ☐ N ☐ *N/A* ☒

Is the containment system impervious to oil so as to prevent migration? Y ☐ N ☐

- 8 Are ASTs, UST tank fill lines and containers labeled "used oil"? Y ☒ N ☐

- 9 Are used oil filters stored more than 10 days?
If so, is the facility a registered used oil filter transfer facility? (62-710.850) N/A ☒ Y ☐ N ☐

- 10 Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? Y ☒ N ☐

FLORIDA POWER & LIGHT COMPANY
2455 PORT WEST BLVD
REGULATED MATERIALS FACILITY
BUILDING C-1
WEST PALM BEACH FLORIDA 33407

FACSIMILE TRANSMITTAL SHEET

TO:

Mark Jones

COMPANY:

DEP

FAX NUMBER:

561-681-6770

PHONE NUMBER:

RE:

EPA ID #

FROM:

DAN RAWSON

DATE:

06-22-99

TOTAL NO. OF PAGES INCLUDING COVER:

1

SENDER'S FAX NUMBER:

FAX # 561-845-3341

SENDER'S PHONE NUMBER:

PH # 561-845-3344

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Mark, here is the requested info.

Hazardous Waste

AETS (Waste Management)

New Jersey EPA ID # NJD080631369

Alabama EPA ID # ALD000622464

PCB OIL

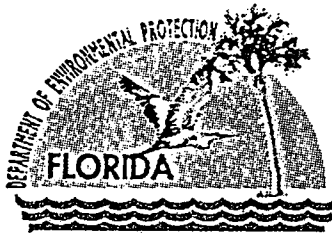
Safety Kleen

Georgia EPA ID # GAD980839187

Respectfully,

Dan Rawson





Jeb Bush
Governor

Department of Environmental Protection

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION EXIT INTERVIEW

FACILITY: FPL PORT WEST PROPERTIES DATE: 3-22-99 TIME: _____

INTERVIEW PARTICIPANTS: KEITH DRESCHER, DAN RAWSON, JOHN HARRIS, MARK MCLEAN

This exit interview is the Department's attempt to advise you early in the process of possible violations of Florida Administrative Code Chapter 17-730, which adopts 40 CFR Parts 260-266 by reference. It is possible that the list of violations noted (checked) is incomplete. After a complete internal file review by the Department an inspection report will be finalized. In most cases, the violations noted by the inspector will not change in the final report, therefore, you are advised to immediately begin correcting these deficiencies noted below.

Please also be aware that the Department has signed an enforcement agreement with the U.S. Environmental Protection Agency which calls for the assessment and collection of monetary penalties when violations, such as these, are noted. While your quick response in correcting the violations may not reduce the calculated penalties, continued non-compliance may result in greater penalty liability.

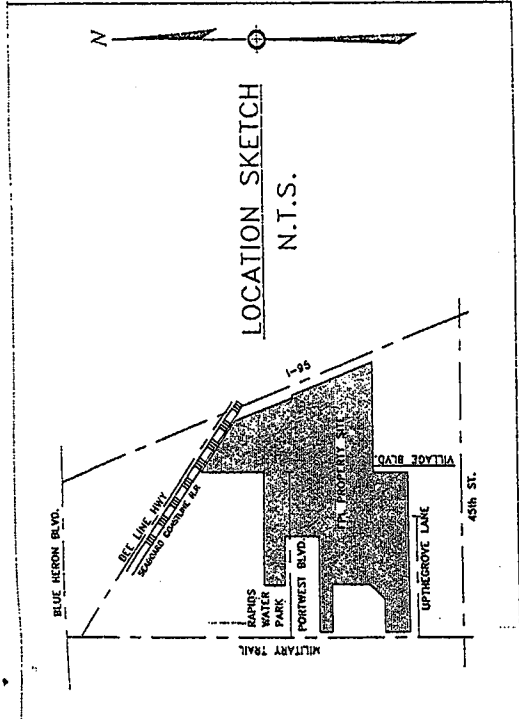
The following violations have been tentatively identified:

- ___ 1. Hazardous Waste Determination [262.11].
- ___ 2. Notification as a generator [262.12].
- ___ 3. Manifest Deficiencies [262 Subpart B].
- ___ 4. Recordkeeping [test results, manifest, biennial report].
- ___ 5. Personnel Training [265.16; 262.34(d)].
- ___ 6. Contingency Plan [265 Subpart D; 262.34(d)(5)].
- ___ 7. Preparedness and prevention [265 Subpart C; 262.34(d)(4)].
- ___ 8. Container Requirements [265 Subpart I; 262.34(d)(2)].
- ___ 9. Tank requirements [265 Subpart J].
- ___ 10. Exceeding accumulation storage time [262.34(a); 262.34(d)].
- ___ 11. Accumulation start date & labels on containers [262.34(a)(2)&(3)].
- ___ 12. Accumulating >1000 kg without meeting SQG standards [261.5].
- ___ 13. Not ensuring delivery of HW to a proper TSD facility [261.5].
- ___ 14. Notification as a TSD facility [264.11].
- ___ 15. Treatment, storage or disposal without a permit [F.A.C. 17-730].
- ___ 16. Ground water monitoring [265 Subpart F].
- ___ 17. Security Requirements [265.14].
- ___ 18. Storing HW less than 50 feet from the property line [265.176].
- ___ 19. "No Smoking" signs, ignitable/reactive requirements [265.17].
- ___ 20. Closure/Post-closure [265 Subpart G].
- ___ 21. Financial Responsibility [264 Subpart H].
- ___ 22. Failure to comply with the provisions of a Department Issued Permit or with the provisions of the Consent Order.
- ___ 23. Other _____

COMMENTS: NO OBSERVED VIOLATIONS

Keith D. Drescher
RECEIPT ACKNOWLEDGED BY

Mark McLean
INVESTIGATOR



FACILITY LEGEND
FUEL STORAGE / GENERATORS

- 500 GAL. STORAGE TANK (MINERAL OIL)
- 500 GAL. STORAGE TANK (DIESEL)
- 400 KW DIESEL GENERATOR
- 1000 GAL. STORAGE TANK (DIESEL)
- 150 KW DIESEL GENERATOR
- 5000 GAL. STORAGE TANK (UNLEADED GAS)
- 5000 GAL. STORAGE TANK (DIESEL)
- 1000 GAL. STORAGE TANK (DIESEL)
- 200 KW DIESEL GENERATOR
- 500 GAL. STORAGE TANK (MINERAL OIL)
- 6000 GAL. MOBILE TANKER (STORAGE AREA)
- TANKER TRANSFER AREA
- BLDG. DIM = 51' X 54' X 19'H.
- 6000 GAL. U.G. STORAGE TANK (DIESEL)
- 1372 KW DIESEL GENERATOR
- PROPAANE TANK (250 GAL.)
- 19 KW GENERATOR
- PROPAANE TANK
- 20 KW GENERATOR
- 75 GAL. STORAGE DAY TANK (DIESEL)
- 100 KW GENERATOR (EMERG.)
- "PROPOSED" PROPAANE STORAGE AREA FOR PROPOSED GENERATOR (500 GAL.)

FACILITY LEGEND
BUILDINGS / FOOTAGE

BLDG.	TITLE / FOOTAGE
"A"	AREA = 300' X 130' X 28'6"H INVENTORY RESOURCES ADMINISTRATION PALM BCH. HABILITATION "PROPOSED" ALUMINUM RECOVERY SYSTEM TRANSFORMER DECOMMISSIONING AREA a. WIRE RECLAIMER FURNACE b. SWEAT FURNACE c. QUENCHER
"A-1"	POWER DELIVERY WAREHOUSE 80' X 150' X 20'H.
"B"	PHYSICAL DISTRIBUTION WAREHOUSE AREA = 300' X 200' X 31'H.
"B-1"	PHYSICAL DISTRIBUTION WAREHOUSE AREA = 300' X 200' X 31'H.
"B-2"	PHYSICAL DISTRIBUTION ADMINISTRATION AREA = 85' X 72' X 28'H.
"C"	CENTRAL RECLAMATION & SALVAGE AREA = 100' X 75' X 20'H.
"C-1"	REGULATED MATERIALS AREA = 120' X 60' X 20'H.
"CSE"	CUSTOMER SERVICE EAST AREA = 364' X 216' X 34'H.
"D"	CORPORATE RECORDS CENTER 145' X 180' X 23'H.
"E"	RESEARCH AND EVALUATION FACILITY 150' X 180' X 75'H.
"F"	EXAMINATION METALLURGICAL FACILITY (NON-DESTRUCTIVE) 150' X 50' X 16'H.
"G"	AUTOMOTIVE CENTER 180' X 60' X 28'H.
"H"	WELDING SHOP 115' X 60' X 18'H.
"J"	SHORES AUTO PARTS SITE (VACANT) 90' X 60' X 21'H.
"J"	CENTRAL LAB 102' X 85' X 17'H.
"K"	CRS SHOP a. PAINT BOOTH 150' X 100' X 20'H.

PHYSICAL DISTRIBUTION CENTER

(PDC)

FACILITY PLOT PLAN
TITLE V ATTACHMENT FS-2



Florida Power & Light Company, P.O. Box 088801, North Palm Beach, FL 33408-8801

February 15, 1996

RECEIVED

FEB 22 1996

DEPT OF ENV PROTECTION
WEST PALM BEACH

Mr. John Jones
Florida Department of Environment Protection
Hazardous Waste Section-Southeast District
P. O. Box 15425
West Palm Beach, Florida 33416

Re: Withdrawal of Used Oil Processing Permit Application

Dear Mr. Jones:

Florida Power and Light Company (FPL), by this correspondence, is withdrawing its application for a General Permit for used oil processing. The permit application was dated November 8, 1995 and was sent with a cover letter to Mr. Knox McKee on November 13, 1995.

We assume that since the permit application was not processed and a permit not issued, the \$100.00 permit fee will be reimbursed to FPL. NO!

We appreciate the FDEP working with FPL on this matter and reaching a mutually satisfying agreement. If there are any questions or further information is required, please do not hesitate to telephone me at 407-625-7612.

Sincerely,

Alan Benedict CEP
Principal Specialist



January 11, 1996

Mr. John Jones
Florida Department of Environmental Protection
P.O. Box 15425
West Palm Beach, Florida 33416

Re: **Used Oil Management**

Dear Mr. Jones:

RECEIVED
JAN 16 1996
DEPT OF ENV PROTECTION
WEST PALM BEACH

Following our meeting with you on December 19, 1995 we have looked into various operational modifications at FPL's Port West Properties facility which would allow used oil management processes which meet FPL's needs and operating requirements but, which would preclude the facility from being a used oil processor and negate any requirement to obtain a used oil General Permit (Processor). As we discussed in the meeting, our goal is to operate the facility in an environmentally sound manner, but avoid unnecessary permitting and its attendant paperwork requirements which do not serve any significant purpose.

We would like to implement the following process which we believe will allow operation of the facility, in compliance with Chapter 62-710 FAC and 40 CFR 279, but will relieve us from the need to obtain a General Permit to process used oil. We propose to conduct no filtration (or other processing) of used oil which is to be sent to non-FPL recycling or disposal facilities. Under this operating scenario, the only used oil which would be filtered would be recycled (burned for energy recovery) or reclaimed for its original intended use solely in FPL internal operations. Since filtration would only be performed on oil to be managed in this manner, the facility would be exempted from permitting as a processor pursuant to Section 62-710.530 FAC.

Since FPL would continue to transport some used oil which potentially could go to non-FPL facilities, the Certified Transporter status would be maintained as would registration as a marketer. The facility would also register as a transfer facility for used oil which would be sent to non-FPL facilities. Tracking records would be kept to ensure that used oil sent to non-FPL facilities would not be kept for more than 35 days (the transfer facility upper limit).

We believe that this operating scenario would streamline recordkeeping for the facility and relieve the FDEP from having to issue and track an unnecessary permit. Your concurrence with this operational strategy is requested as soon as possible. Following your concurrence, we will withdraw our General Permit application. We will then promptly submit our 1996 used oil registration application to Tallahassee FDEP to ensure that all FDEP records of our operational status are consistent.

If there are any questions, please do not hesitate to telephone me at 407-625-7612.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alan Benedict". The signature is fluid and written in dark ink.

Alan Benedict, CEP
Principal Specialist



January 11, 1996

Mr. John Jones
Florida Department of Environmental Protection
P.O. Box 15425
West Palm Beach, Florida 33416

Re: Used Oil Management

Dear Mr. Jones:

RECEIVED

JAN 16 1996

DEPT OF ENV PROTECTION
WEST PALM BEACH

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If there are any questions, please do not hesitate to telephone me at 407-625-7612.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Benedict". The signature is fluid and cursive, with a large initial "A" and a stylized "B".

Alan Benedict, CEP
Principal Specialist

I N T E R O F F I C E M E M O R A N D U M

Date: 20-Dec-1995 08:03am EST
From: John M. Jones WPB
JONES JM
Dept: Southeast District Office
Tel No: 407-433-2650
SUNCOM: 232-2650

TO: See Below

Subject: Used oil processor definition

Florida Power and Light has submitted a used oil processing permit application for oil removed from transformers (all non-PCB). The process is as follows:

1. An FP&L truck makes a "milk-run" to pick up oil from as many as 60 individual locations. This truck, a 6000 gallon tanker, then takes the oil to an FP&L transfer station.
2. The oil is off-loaded through a 50 micron filter into either (a) another truck, or (b) a 450 gallon container. The filtration is used to remove small amounts of particulates which may have accumulated during the repair or maintenance of a transformer (carbon, insulation, etc.). No other activities to upgrade the quality of the oil, such as blending or water removal, are performed.
3. The oil is then bulked and sent to a burner. Usually, the burner is an internal FP&L facility. In some cases, however, the oil may be sent to Rinker (concrete producer).

FP&L stated that they originally submitted the application as a conservative measure, and that they are not sure they need a processor permit. In light of the used oil regulation being assigned to Hazardous waste for permit review, FP&L has asked DEP to make a determination as to whether a processor permit is required for this activity. I would like your thoughts on this. Specifically, (1) Does the simple filtration activity require a processing permit?, and (2) Could the filtration be considered an incidental part of the transfer or transportation activities which are already permitted?

Thanks for your help.

Distribution:

TO: Ashwin Patel JAX	(PATEL A @ A1 @ JAX1)
TO: Bob Snyder ORL	(SNYDER B @ A1 @ ORL1)
TO: Charles Emery FTM	(EMERY C @ A1 @ FTM1)
TO: William Crawford TPA	(CRAWFORD W @ A1 @ TPA1)
TO: Bill Kellenberger PEN	(KELLENBERG_B @ A1 @ PNS1)
CC: Jeff Smith WPB	(SMITH J)
CC: Vivek Kamath WPB	(KAMATH_V)



FPL

RECEIVED

Alan Benedict

DEC 13 1995

DEPT OF ENV PROTECTION
WEST PALM BEACH

12/8/95

Vic

Enclosed is the
original 30 Day Time
Limit Waiver. Thanks
for your help.

Alan Benedict



FPL

Florida Power & Light Company
P. O. Box 088801
11770 U.S. Highway 1
North Palm Beach, FL 33408
407 625-7612 Fax 407 625-7665

Alan Benedict, M.S., R.E.M., C.E.P.
Principal Specialist
Environmental Affairs

an FPL Group company

RECEIVED

DEC 13 1995

**WAIVER OF 30 DAY TIME LIMIT - GENERAL PERMITS
UNDER SECTIONS 62-4.530, F.A.C., and 403.814, FLORIDA STATUTES**

DEPT OF ENV PROTECTION
WEST PALM BEACHLicense (Permit, Certification) Application No. S050-280435Applicant's Name: Florida Power & Light Company
Port West Properties CoOp

The undersigned has read Section 403.814, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced notification, the applicant hereby with full knowledge and understanding of the applicant's rights under Sections 403.814, Florida Statutes, and Rule 62-4.530, Florida Administrative Code, waives the right to the use of the general permit 30 days after notification to the State of Florida Department of Environmental Protection as prescribed by law. The applicant agrees and understands that the undertaking of any activities covered by this general permit notification prior to the expiration date below, without written agreement from the Department will be considered a violation of Rule 62-4.510, F.A.C. Said waiver is made freely and voluntarily by the applicant, with full knowledge, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Protection.

This waiver shall expire on the 8th day of March 1996.

The undersigned is authorized to make this waiver on behalf of the applicant.

Signature

Lump L. Leskayan
NAME (PLEASE TYPE OR PRINT)
Manager
Environmental Affairs

Post-It™ brand fax transmittal memo 7871		# of pages	1
To	Alan Benedict		
From	V. Kamath		
Co.	FPL		
Co.	FDEP		
Dept.			
Phone #	433-2650 x242		
Fax #	433-2666		
Fax #	625-7665		



Florida Power & Light Company, P.O. Box 088801, North Palm Beach, FL 33408-8801

RECEIVED

NOV 14 1995

DEPT OF ENV PROTECTION
WEST PALM BEACH

November 13, 1995

CERTIFIED #P076699389

Mr. Knox McKee
Florida Department of Environmental Protection
Southeast District Office
P.O. Box 15425
West Palm Beach, Florida 33416

**Re: General Permit Application
Used Oil Processing**

Dear Mr. McKee:

Enclosed is a copy of the subject permit application for Florida Power & Light Company's (FPL) Port West Properties facility. Also enclosed is FPL's check #6260000782 in the amount of \$100.00 to cover the required permit fee.

If there are any questions, please telephone me at 407-625-7612.

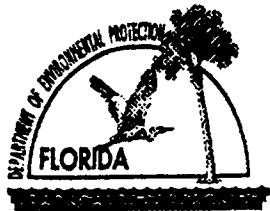
Sincerely,

Alan Benedict, CEP
Principal Specialist

ADB:ku

Enclosure

3050-280435



Florida Department of Environmental Protection

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form # 62-710.800(5)
Form Title Used Oil Processing Facility
General Permit Notification
Effective Date _____

Used Oil Processing Facility General Permit Notification

Pursuant to Rule 62-710.800, Florida Administrative Code, the owners or operators of a used oil processing facility shall submit the following information to the Waste Program Administrator of the appropriate District Office of the Department. A fee of \$100.00 shall also be submitted.

1. Status of the operation: X Existing Proposed
2. Type of notification: X Operation X Closure Modification
3. Date of beginning operation: NA
4. a. Facility name: Port West Properties
- b. Facility EPA I.D. Number: FLD 000 807 792
- c. Facility telephone number: (407) 845 3366
- d. Facility location:
- Street address (main entrance): 2455 Port West Blvd.
- City West Palm Beach County Palm Beach Zip Code 33407
- Section 36 Township 42 S Range 42 E
- Latitude 26° 46' 15" Longitude 80° 5' 52"
- e. Name of Facility Owner or Operator: Florida Power & Light Company
- f. Address of Facility Owner or Operator: 9250 West Flagler Street
- City Miami State Florida Zip Code 33174
- g. Telephone number of Facility Owner or Operator: (407) 625 7612 (Owner Representative Alan Benedict)
5. a. Name of Property Owner (if different than facility owner or operator) SAME
- b. Address of Property Owner: SAME
- City State Zip Code
- c. Telephone number of Property Owner: ()
6. Attach a description of how the state and federal used oil management requirements of Rule 62-710, F.A.C. and 40 CFR Part 279 will be met. See Attachment
7. Attach a description and general layout of the facility and equipment. See Attachment

RECEIVED
NOV 14 1995
DEPT OF ENV PROTECTION
WEST PALM BEACH

8. Attach a description of the operation of the facility including how and where the used oil will be tested, stored and processed. *See Attachment*

9. Attached the Closure Plan for the facility. This plan must demonstrate that: *See Attachment*

1. There will be no need for further facility maintenance;
2. Used oil will not contaminate surface or ground water; and
3. All soils will be free of oil and equipment will be emptied and cleaned or dismantled.

Any modification to this plan must be submitted to the Waste Program Administrator at the appropriate District Office of the Department.

10. Certification:

To the best of my knowledge and belief, I certify the information provided in this notification is true, accurate and correct.

I agree that any duly authorized representative of the Department may at any reasonable time enter and inspect, for the purpose of ascertaining the state of compliance with the law or rules and regulations of the Department, the property, premise or place identified on this form.

K. H. Simmons
(Name of Authorized Agent)

K. H. Simmons
(Signature of Authorized Agent)

11/8/95
(Date)

ATTACHMENT

6. a. Chapter 62-710 F.A.C. Compliance Demonstration

1. The Port West Properties (PWP CoOp) facility is registered as a used oil processor, marketer, transporter and transfer facility (Registration Application Attached). The facility utilizes the registration number FLD000807792.
2. The consolidated operations of Port West Properties are composed of a central collection and processing point for used oil picked up at a variety of FPL operating facilities. The majority of used oil managed at the facility is subsequently hauled to and burned for energy recovery at various FPL operating facilities, however, on occasion FPL may transport used oil to non-FPL burners. Hence, PWP CoOp is registered pursuant to Chapter 62-710 FAC and must obtain a General Permit for such used oil processing operations.

b. 40 CFR 279 Compliance Demonstration

1. The Port West Properties facility manages used oil in compliance with State regulations, in particular Chapter 62-710 FAC, which incorporates 40 CFR 279 by reference. An 8700-12 Form, Notification of Waste Activity, has been submitted to the FDEP disclosing the used oil activities conducted at FPL's PWP CoOp. (Copy Attached) Thus, the PWP CoOp is in conformance with the 40 CFR 279 notification and other substantive requirements of Chapter 62-710 FAC.

7. The Port West Properties facility is located at 2455 Port West Blvd., West Palm Beach, Florida. The used oil management activities are conducted in a portion of the facility called the Central Reclamation And Salvage and Corporate Investment Recovery Center (same address) (CRS). The PWP CoOp houses a materials storage and distribution center and FPL's central recycling center (CRS). Used oil is brought in by FPL owned and operated tankers. Tankers are parked in a fully covered building which provides full secondary containment. The facility is under full 24 hour security and has contingency plans in place and spill control equipment to handle spills in excess of the maximum storage capacity of used oil. In addition, trained personnel are available for spill response as needed. Additionally, onsite emergency response personnel have the authority to arrange for outside spill response support.
8. Used oil coming into the facility is filtered (processed) in the fully covered and secondarily contained tanker parking building to remove any sedimentaceous material which could physically interfere with the burning for energy recovery process. Resulting waste sediment is tested and disposed of appropriately. Prior to filtration the oil is tested for specifications as required at 40 CFR 279.11. If the oil is on-specification, it is transported to various FPL operating facilities for recycling (burning for energy recovery). If used oil is in excess of what can be burned for energy recovery at FPL facilities, the oil may be transported directly to non-FPL facilities for burning for energy recovery or provided to a licensed commercial used oil vendor for recycling. If used oil were to be determined to be off-specification, it would be provided to a licensed commercial used oil vendor for recycle or sent offsite to otherwise be disposed of.

9. FACILITY CLOSURE

Since the Port West Properties Facility (PWP CoOp) is a multi-use facility. It is possible that the facility could be "closed" for its used oil management operations, yet remain functional for other purposes. Presently, Florida Power and Light Company (FPL) has no plan to terminate used oil management operations for which it is registered with the FDEP and "close" such operations at the PWP CoOp. However, FPL understands its obligations regarding the potential dismantlement and/or emptying and cleaning of equipment which has been utilized in the management of used oil, as well as ensuring that the facility is closed in a manner which precludes environmental media contamination resulting from used oil management operations.

If FPL were to terminate used oil management operations at the PWP CoOp, a phased approach to closure would be followed. The first phase would address the decommissioning of equipment for used oil management such as transportation equipment, drainage systems, pumps, tanks and associated valves and piping, as well as any other hardware which had come in contact with used oil or was otherwise utilized in used oil management operations. The second phase would have multiple steps and would address site contamination assessment and remediation. These phases are addressed in detail below.

A. PHASE 1 - Decommissioning of Equipment/Hardware Utilized in Used Oil Management Operations.

All storage tanks, valving, associated piping and other equipment would be emptied of any used oil, sludge or other contaminated materials. All materials removed would be disposed of in full compliance with local, State of Florida and/or Federal requirements. In order to ensure appropriate disposal, all waste materials to be removed would be subjected to used oil specification testing pursuant to 40 CFR 279.11 and/or to appropriate hazardous waste (TCLP) testing requirements. In preparation for disposal, any wastes removed from tanks, piping, valves, transportation equipment, etc. would be stored onsite in compliance with applicable regulatory requirements and in a manner precluding their potential for release to the environment, e.g., in accordance with the labeling and pre-transport requirements found in Chapter 62-710 FAC and 40 CFR 262. Further, the PWP CoOp would comply with any applicable requirements relating to contingency and emergency response planning and notification requirements during the closure process.

After cleaning, equipment condition would be assessed for such equipment's potential re-use for either on or offsite operations, or for disassembly, scrapping or otherwise dismantling for disposal or recycling such as scrap metal. If the disposal option were to be selected or were to become necessary, all equipment would be disposed of in full compliance with applicable State and/or Federal requirements.

B. PHASE II General - Site Assessment

Following decommissioning of all transportation related tanks and hardware utilized for used oil management, a site assessment would be performed for all areas where used oil was managed and/or where the potential for oil contamination existed, including impervious surfaces such as concrete and asphalt areas and pervious areas such as grass, soil and/or gravel/crushed-rock areas. Contamination assessment phases could be done in parallel to expedite assessment/remediation.

PHASE II.A - Impervious Surface Area Assessment

Contaminated impervious surfaces might have to be dismantled to facilitate removal or might only require surface cleaning. If surface cleaning only were to be required, efforts would be made to utilize non-hazardous cleaning agents to the extent practicable. All cleaning solutions would be captured and treated/disposed of in conformance with applicable regulatory requirements. If impervious surfaces such as concrete or asphalt were determined to be contaminated, beyond surface staining, the surfacing materials would be removed and disposed of according to applicable regulatory requirements. Any asphalt or concrete with visible contamination would be subjected to appropriate chemical analyses, e.g., hazardous waste characteristic testing. In cases where hard surface materials such as concrete and/or asphalt were to be dismantled and disposed of, removed materials would be temporarily stored in a manner designed to prevent groundwater contamination or uncontrolled run-off of stormwater.

PHASE II-B - Pervious Areas Assessment

All pervious areas potentially subject to used oil contamination would be visibly assessed for evidence of discharges. Any soil, gravel, etc. with visible contamination would be subjected to appropriate chemical analyses, e.g., hazardous waste characteristic testing. Any contaminated soil, gravel, etc., would be removed, temporarily stored in a manner preventing storage area contamination and/or uncontrolled stormwater runoff, and disposed of according to applicable regulatory requirements. Ongoing surveillance of any contaminated areas would be performed during excavation to ensure that contaminated areas soils, etc. are removed in a manner which would minimize and/or prevent additional contamination of surrounding soil and/or groundwater.

PHASE II-C - Groundwater Assessment

Any evidence of groundwater contamination associated with used oil management operations equipment, would be assessed in accordance with applicable regulatory requirements. Groundwater monitoring, if necessary, would be done for parameters appropriate for the types of used oils historically managed at the facility. If oil-affected groundwater were to be identified, a contamination assessment would be conducted to evaluate the extent of groundwater/soil contamination. If necessary, an action plan would be prepared to evaluate appropriate treatment technologies necessary to remediate contamination in accordance with local, State and Federal requirements.

PHASE II-D - Final Closure

After any required remediation, previously contaminated areas would be backfilled with clean material and/or graveled, sodded or paved where required. Any required post-closure monitoring would be determined after remediation/closure on an as needed basis in accordance with State and Federal regulations.

Any modifications or amendments to this plan will be submitted to the appropriate FDEP Waste Program Administrator at the appropriate District Office of the Department. All records required for used oil management operations shall be on forms prescribed by the Department or on substantially equivalent forms approved by the Department and shall be retained by the used oil management facility for a period of three years. The records will be kept at the street address of the facility and shall be available for inspection by the Department during normal business hours.



CERTIFIED MAIL

October 30, 1995

Used Oil Coordinator
Hazardous Waste Management Section
Bureau of Solid and Hazardous Waste
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Amended Used Oil Registration Forms

Dear Sirs:

Attached are amended applications-for-registration for certain used oil management activities at Florida Power and Light (FPL) Company's Equipment Repair Center and Port West Properties facility. Attached is FPL check #6260000776 in the amount of \$100.00 in payment of the balance of registration fees for these two facilities. Also enclosed is a copy of FPL's Certificate of Liability Insurance for transporters which was previously submitted to the FDEP.

If there are any questions, please call me at 407-625-7612.

Sincerely,

Alan Benedict CEP
Principal Specialist

Florida Power & Light Company

Port West Properties

PLEASE RETURN THIS SHEET WITH YOUR REGISTRATION

☒ Amended Registration Form. Please be sure it is signed.

☒ Registration Fee. \$100 flat fee.

Training Certification:

☒ This company has previously submitted a training manual which was approved by DEP. There have been no changes to the training program. (Manual is presently being updated)

_____ This company has previously submitted a training manual which was approved by DEP. The training program has been modified and the changes are enclosed. New driver certifications are enclosed.

_____ This company is exempt from transporter certification (i.e. training manual) requirement per 62-710.600(1)(a)(b) or (c). Please circle appropriate exemption.

_____ This company transports used oil filters only and is exempt from training manual, insurance, record keeping and reporting requirements under 62-710.600, F.A.C.

Proof of Insurance:

☒ Certificate of Liability Insurance Form 62-710.900(4) signed by insurance company is enclosed.

_____ Certificate of Insurance (ACORD) signed by insurance company for renewal of existing Certificate of Liability Insurance Form.

General Permit:

_____ This company is a Used Oil Processor and holds a General Permit

Permit Number: _____ Expiration Date: _____

Permit Application Preparation Is In Process
And Will Be submitted to the FDEP Southeast
District Office When Complete - Knox McKee (FDEP)
Will Process Permit Application

Application for Registration Used Oil and Used Oil Filter Handlers*

(*Handlers are any persons subject to the registration requirements of Rule 62-710.500 and 62-710.650, F.A.C. (see Item 4b below))

For registration period July 1, 199__ through June 30, 1996

Please Print or Type Form

1. Business Name Florida Power & Light Co. FEID No. 59-0247775
DBA (Doing Business As) FPL - Port West Properties Telephone No. (407) 625-7612
Mailing Address: Alan Benedict; Environmental Affairs; P.O. Box 088201
City: North Palm Beach State: Florida Zip: 33408
Street Address: 2455 Port West Blvd.
City: West Palm Beach State: Florida Zip: 33407
Latitude/Longitude: 26° 46' 10" : 80° 06' 10" or Section: 36 Township 42S Range 42E
(This information may be found on property deeds or determined from a Florida DOT County Road Map)

2. Facility Owner Name: Florida Power & Light Co. Telephone No. (407) 625-7612
Address: 9250 West Flagler Street
City: Miami State: Florida Zip: 33174

3. Name of person operating (if different than owner)

Name: _____ Telephone No. () _____

- 4. Make \$100.00 fee check payable to Florida Department of Environmental Protection**

4a. Registration Status ☒ New ☐ Renewal EPA ID No. FLD 000 807 792

- 4b. Check boxes which apply to your used oil activity(ies). (Applicable to registration 62-710 FAC)

Used Oil : ☒ Transporter ☒ Transfer Facility ☒ Marketer ☒ Processor ☐ Burner of off-spec used oil
Amended *Amended* *Amended*

Used Oil Filter : ☐ **Transporter** ☐ **Transfer Facility** ☐ **Processor** ☐ **Waste to Energy** ☐ **End User**

- ## 5. Certification

- 5a. General Certification to be signed by all Registrants:**

To the best of my knowledge and belief I certify the information provided in this application is true, accurate and correct.

Larry Regucci
Name of Authorized Person (Print or Type)

Larry Reagin 9/18/95
Signature of Authorized Person Date

Amended
Application

ed Larry Requcci

Larry Reesman 10/26/95

- 5b. Specific Certification to be Signed by all Used Oil Transporters except those exempted by 62-710.600(1)**

I certify as a used oil transporter that the training program and financial responsibility required under Section 62-710.600, Florida Administrative Code is in place, current and being adhered to. If any modifications have been made to the originally approved training program, they are explained in the attachments to this registration form. Evidence of financial responsibility is demonstrated by the attached Used Oil Transporter Certification of Liability Insurance, DEP form 62-710.900(4).

Larry Regucci
Name of Authorized Person (Print or Type)

Larry Reagin 9/18/95
Signature of Authorized Person Date



June 2, 1995

Used Oil Coordinator
Bureau of Solid and Hazardous Waste
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Used Oil Transporter Certificate of Liability Insurance

Dear Sirs:

Attached is Florida Power and Light Company's (FPL) Certificate of Liability Insurance. This new Certificate is being submitted as a follow-up to the submittals for various used oil activities at FPL facilities transmitted to the FDEP on February 21, 1995. The existing Certificate was valid until April 30, 1995 and the new Certificate until April 30, 1996.

If there are any questions, please do not hesitate to telephone me at 407-625-7612.

Sincerely,

Alan Benedict, CEP
Principal Specialist

62-710.600 Certification of Used Oil Transporters

(d) Demonstrate, and annually verify, proof of liability insurance, or other means of financial responsibility, for any liability which may be incurred in the transport of used oil. Such financial responsibility shall cover sudden and accidental occurrences involving bodily injury and property damage in the amount of at least \$100,000 Combined Single Limit.

1. The \$100,000 Combined Single Limit is the minimum amount of financial responsibility that each used oil transporter must demonstrate. Depending on vehicle size and weight, other restrictions and financial responsibility requirements may be imposed by the Federal or State Departments of Transportation or other agencies.

2. The financial responsibility required in this paragraph may be established by any one or a combination of the following:

a. Evidence of liability insurance, either on a claim made or an occurrence basis, with or without a deductible (with the deductible, if any, to be on a per occurrence or per accident basis and not to exceed ten percent of the equity of the business), using Form 62-710.900(4). An ACORD form will only be accepted for renewal of a policy with the same carrier.

b. Other evidence of financial responsibility approved by the Department. Such proof may include surety bonds, certificates of deposit, letters of credit, trust fund agreements, or financial tests.

3. States and the federal government are exempt from the requirements of this paragraph.

EXHIBIT A

USED OIL TRANSPORTER CERTIFICATE OF LIABILITY INSURANCE

Florida Power & Light Co. purchases insurance excess of substantial self-insured retentions. The financial strength of Florida Power & Light Co. is used to fund any losses within the self-insured retention. Copy of financial statistics enclosed.

Should the policy be cancelled, assigned or changed in a manner that is materially adverse to the Insured(s) under the Policy, the undersigned will endeavor to give 35 days advance written notice thereof to the Certificate Holder, but failure to give such notice will impose no obligation or liability of any kind upon the Company, the undersigned or any agent or representative of either.

AEGIS INSURANCE SERVICES, INC.

BY:



At Jersey City, New Jersey



January 13, 1995

Florida Department of Environmental Protection
Bureau of Solid and Hazardous Waste
Hazardous Waste Regulation Section
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Notification of Used Oil Activities

Dear Sirs:

Attached are revised notifications for certain used oil activities conducted in Florida Power and Light Company (FPL) operations. These notifications for FPL's Equipment Repair Center and Port West Properties are being submitted in conformance with 40 CFR 279 and Chapter 62-710 FAC.

If there are any questions or further information is required, please telephone me at 407-625-7612.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alan Benedict', written over a horizontal line.

Alan Benedict, CEP
Principal Specialist

ADB:ku

Attachment

completing this form. The information requested here is required by law (Section 3016 of the Resource Conservation and Recovery Act).



Waste Activity

United States Environmental Protection Agency

(For Official Use Only)

Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

B. Subsequent Notification
(Complete Item C)

C. Installation's EPA ID Number

FL0000807792

II. Name of Installation (Include company and specific site name)

FPL - PORT WEST PROPERTIES

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

2455 PORT WEST BLVD

Street (Continued)

City or Town

WEST PALM BEACH

State

Zip Code

FL

33407-1298

County Code

County Name

PALM BEACH

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

SAME

City or Town

State

Zip Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

SIMMONS

(First)

KEN

Job Title

ENV COORDINATOR

Phone Number (Area Code and Number)

407-845-3366

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing Other

☒ ☒ ☐

B. Street or P.O. Box

or Town

State

Zip Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

FLORIDA POWER + LIGHT CO

Street, P.O. Box, or Route Number

9250 WEST FLAGLER ST

City or Town

MIAMI

State

Zip Code

FL

33174-

Phone Number (Area Code and Number)

407-625-7612

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

☒

No

(Date Changed)
Month Day Year

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)

A. Hazardous Waste Activity

1. Generator (See Instructions)
- ☐ a. Greater than 1000kg/mo (2,200 lbs.)
- ☒ b. 100 to 1000 kg/mo (200-2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify

- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Boiler and/or Industrial Furnace
- ☐ 1. Smelter Deferral
- ☐ 2. Small Quantity Exemption
- Indicate Type of Combustion Device(s)
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Fuel Marketer
- ☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
- ☒ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)
- ☐ a. Utility Boiler
- ☒ b. Industrial Boiler
- ☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Activity(ies)
- ☒ a. Transporter
- ☒ b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- ☒ a. Process
- ☐ b. Re-refine

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☒ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic characteristic(s))
- ☒ ☒ ☐ ☒ 0008 0009 0006 0004

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1
F002
7

2
F003
8

3
F005
9

4
10

5
11

6
12

C. Other Wastes. (State or other wastes requiring a handler to have an LD number; See instructions.)

1

2

3

4

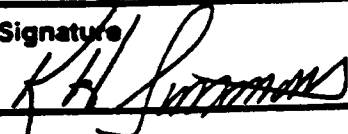
5

6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature



Name and Official Title (Type or print)

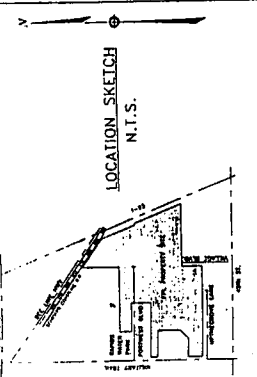
Ken Simmons, Dist. Mgr.

Date Signed

12/7/94

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



- ① 500 GAL. STORAGE TANK (GENERAL OIL)
- ② 500 GAL. STORAGE TANK (DIESEL)
- ③ 400 KW DIESEL GENERATOR
- ④ 1000 GAL. STORAGE TANK (DIESEL)
- ⑤ 150 KW DIESEL GENERATOR
- ⑥ 5000 GAL. STORAGE TANK (UNLADDED GAS)
- ⑦ 5000 GAL. STORAGE TANK (DIESEL)
- ⑧ 1000 GAL. STORAGE TANK (DIESEL)
- ⑨ 200 KW DIESEL GENERATOR
- ⑩ 500 GAL. STORAGE TANK (GENERAL OIL)
- ⑪ 6000 GAL. MOBIL TANKER (STORAGE AREA)
- ⑫ TANKER TRANSFER AREA

BLDG. DIM = 51' x 54' x 19'H.

- ⑬ 5000 GAL. H.C. STORAGE TANK (DIESEL)

RI NO.	TITLE / FOOTAGE
1	1960-1961
2	1962-1963
3	1964-1965
4	1966-1967
5	1968-1969
6	1970-1971
7	1972-1973
8	1974-1975
9	1976-1977
10	1978-1979
11	1980-1981
12	1982-1983
13	1984-1985
14	1986-1987
15	1988-1989
16	1990-1991
17	1992-1993
18	1994-1995
19	1996-1997
20	1998-1999
21	2000-2001
22	2002-2003
23	2004-2005
24	2006-2007
25	2008-2009
26	2010-2011
27	2012-2013
28	2014-2015
29	2016-2017
30	2018-2019
31	2020-2021
32	2022-2023
33	2024-2025
34	2026-2027
35	2028-2029
36	2030-2031
37	2032-2033
38	2034-2035
39	2036-2037
40	2038-2039
41	2040-2041
42	2042-2043
43	2044-2045
44	2046-2047
45	2048-2049
46	2050-2051
47	2052-2053
48	2054-2055
49	2056-2057
50	2058-2059
51	2060-2061
52	2062-2063
53	2064-2065
54	2066-2067
55	2068-2069
56	2070-2071
57	2072-2073
58	2074-2075
59	2076-2077
60	2078-2079
61	2080-2081
62	2082-2083
63	2084-2085
64	2086-2087
65	2088-2089
66	2090-2091
67	2092-2093
68	2094-2095
69	2096-2097
70	2098-2099
71	2100-2101
72	2102-2103
73	2104-2105
74	2106-2107
75	2108-2109
76	2110-2111
77	2112-2113
78	2114-2115
79	2116-2117
80	2118-2119
81	2120-2121
82	2122-2123
83	2124-2125
84	2126-2127
85	2128-2129
86	2130-2131
87	2132-2133
88	2134-2135
89	2136-2137
90	2138-2139
91	2140-2141
92	2142-2143
93	2144-2145
94	2146-2147
95	2148-2149
96	2150-2151
97	2152-2153
98	2154-2155
99	2156-2157
100	2158-2159
101	2160-2161
102	2162-2163
103	2164-2165
104	2166-2167
105	2168-2169
106	2170-2171
107	2172-2173
108	2174-2175
109	2176-2177
110	2178-2179
111	2180-2181
112	2182-2183
113	2184-2185
114	2186-2187
115	2188-2189
116	2190-2191
117	2192-2193
118	2194-2195
119	2196-2197
120	2198-2199
121	2200-2201
122	2202-2203
123	2204-2205
124	2206-2207
125	2208-2209
126	2210-2211
127	2212-2213
128	2214-2215
129	2216-2217
130	2218-2219
131	2220-2221
132	2222-2223
133	2224-2225
134	2226-2227
135</	

"A"	AREA = 100' x 150' 75' 5" H INVENTORY RECOVERY INVESTMENT RECOVERY RECOVERY RECOVERY POWER DELIVERY PROPOSED (LUNAR RECOVERY SYSTEM RECOVERY RECOVERY RECOVERY RECOVERY RECOVERY RECOVERY a. WIRE RECLAIMER b. SHREDDER
"A-1"	POWER DELIVERY RECOVERY 60' x 150' x 20" H RECOVERY RECOVERY
"B"	PHYSICAL DISTRIBUTION WAREHOUSE AREA = 500' x 200' x 11" H
"B-1"	PHYSICAL DISTRIBUTION WAREHOUSE AREA = 500' x 200' x 11" H
"B-2"	PHYSICAL DISTRIBUTION WAREHOUSE AREA = 500' x 200' x 11" H
"C"	CENTRAL RECOVERY RECOVERY AREA = 65' x 72' x 28" H
"C-1"	CENTRAL RECOVERY RECOVERY AREA = 100' x 75' x 20" H
"CSE"	REGULATED MATERIALS AREA = 120' x 60' x 20" H
"D"	CUSTOMER SERVICE EAST AREA = 344' x 216' x 14" H 145' x 180' x 23" H
"E"	CORPORATE RECORDS CENTER RESEARCH AND EVALUATION FACILITY 150' x 180' x 75" H
"F"	EXAMINATION METALLURGICAL FACILITY (NON-DESTRUCTIVE) 150' x 200' x 18" H
"G"	AUTOMOTIVE CENTER 180' x 80' x 28" H
"H"	WELDING SHOP 115' x 80' x 18" H
"I"	SHORES AUTO PARTS SITE (VACANT) 90' x 60' x 21" H
"J"	CENTRAL LAB 102' x 65' x 17" H
"K"	CSH SHOP 150' x 100' x 20" H

PHYSICAL DISTRIBUTION CENTER
(PDC)

FACILITY PLOT PLAN

ATTACHMENT WPOFS 2.BMP

	200P	300T	400T

	photos by _____ checked by C. BARNES BY B. BERTANI		
FLORIDA POWER & LIGHT DISTRIBUTION CENTER 1740 POSTOFFICE RD. T/40 MILITARY TRAIL			
DATE			ED-68-54
			4-19-69

ATTACHMENT

ANALYSIS PLAN
CONTINGENCY PLAN

6. a. Chapter 62-710 F.A.C. Compliance Demonstration

1. The Port West Properties (PWP CoOp) facility is registered as a used oil processor, marketer, transporter and transfer facility (Registration Application Attached). The facility utilizes the registration number FLD000807792.
2. The consolidated operations of Port West Properties are composed of a central collection and processing point for used oil picked up at a variety of FPL operating facilities. The majority of used oil managed at the facility is subsequently hauled to and burned for energy recovery at various FPL operating facilities, however, on occasion FPL may transport used oil to non-FPL burners. Hence, PWP CoOp is registered pursuant to Chapter 62-710 FAC and must obtain a General Permit for such used oil processing operations.

b. 40 CFR 279 Compliance Demonstration

1. The Port West Properties facility manages used oil in compliance with State regulations, in particular Chapter 62-710 FAC, which incorporates 40 CFR 279 by reference. An 8700-12 Form, Notification of Waste Activity, has been submitted to the FDEP disclosing the used oil activities conducted at FPL's PWP CoOp. (Copy Attached) Thus, the PWP CoOp is in conformance with the 40 CFR 279 notification and other substantive requirements of Chapter 62-710 FAC.

7. The Port West Properties facility is located at 2455 Port West Blvd., West Palm Beach, Florida. The used oil management activities are conducted in a portion of the facility called the Central Reclamation And Salvage and Corporate Investment Recovery Center (same address) (CRS). The PWP CoOp houses a materials storage and distribution center and FPL's central recycling center (CRS). Used oil is brought in by FPL owned and operated tankers. Tankers are parked in a fully covered building which provides full secondary containment. The facility is under full 24 hour security and has contingency plans in place ^{Volumes?} ^{Cutts?} and spill control equipment to handle spills in excess of the maximum storage capacity of used oil. In addition, trained personnel are available for spill response as needed. Additionally, onsite emergency response personnel have the authority to arrange for outside spill response support.

8. Used oil coming into the facility is filtered (processed) in the fully covered and secondarily contained tanker parking building to remove any sedimentaceous material which could physically interfere with the burning for energy recovery process. Resulting waste sediment is tested and disposed of appropriately. ^{- A RCKA Determination?} Prior to filtration the oil is tested for specifications ^{FPL? or outside contractor} as required at 40 CFR 279.11. If the oil is on-specification, it is transported to various FPL operating facilities for recycling (burning for energy recovery). If used oil is in excess of what can be burned for energy recovery at FPL facilities, the oil may be transported directly to non-FPL facilities for burning for energy recovery or provided to a licensed commercial used oil vendor for recycling. If used oil were to be determined to be off-specification, it would be provided to a licensed commercial used oil vendor for recycle or sent offsite to otherwise be disposed of.

9. FACILITY CLOSURE

Since the Port West Properties Facility (PWP CoOp) is a multi-use facility. It is possible that the facility could be "closed" for its used oil management operations, yet remain functional for other purposes. Presently, Florida Power and Light Company (FPL) has no plan to terminate used oil management operations for which it is registered with the FDEP and "close" such operations at the PWP CoOp. However, FPL understands its obligations regarding the potential dismantlement and/or emptying and cleaning of equipment which has been utilized in the management of used oil, as well as ensuring that the facility is closed in a manner which precludes environmental media contamination resulting from used oil management operations.

If FPL were to terminate used oil management operations at the PWP CoOp, a phased approach to closure would be followed. The first phase would address the decommissioning of equipment for used oil management such as transportation equipment, drainage systems, pumps, tanks and associated valves and piping, as well as any other hardware which had come in contact with used oil or was otherwise utilized in used oil management operations. The second phase would have multiple steps and would address site contamination assessment and remediation. These phases are addressed in detail below.

A. PHASE 1 - Decommissioning of Equipment/Hardware Utilized in Used Oil Management Operations.

All storage tanks, valving, associated piping and other equipment would be emptied of any used oil, sludge or other contaminated materials. All materials removed would be disposed of in full compliance with local, State of Florida and/or Federal requirements. In order to ensure appropriate disposal, all waste materials to be removed would be subjected to used oil specification testing pursuant to 40 CFR 279.11 ^{MORE DETAIL} and/or to appropriate hazardous waste (TCLP) testing requirements. In preparation for disposal, any wastes removed from tanks, piping, valves, transportation equipment, etc. would be stored onsite in compliance with applicable regulatory requirements and in a manner precluding their potential for release to the environment, e.g., in accordance with the labeling and pre-transport requirements found in Chapter 62-710 FAC and 40 CFR 262. Further, the PWP CoOp would comply with any applicable requirements relating to contingency and emergency response planning and notification requirements during the closure process.

After cleaning, equipment condition would be assessed for such equipment's potential re-use for either on or offsite operations, or for disassembly, scrapping or otherwise dismantling for disposal or recycling such as scrap metal. If the disposal option were to be selected or were to become necessary, all equipment would be disposed of in full compliance with applicable State and/or Federal requirements. ^{MORE DETAIL}

TANK AGES
MARKINGS

B. PHASE II General - Site Assessment

Following decommissioning of all transportation related tanks and hardware utilized for used oil management, a site assessment would be performed for all areas where used oil was managed and/or where the potential for oil contamination existed, including impervious surfaces such as concrete and asphalt areas and pervious areas such as grass, soil and/or gravel/crushed-rock areas. Contamination assessment phases could be done in parallel to expedite assessment/remediation.

PHASE II.A - Impervious Surface Area Assessment

*SITE PLANS
DESCRIPTION OF SURFACE MAT'L*

Contaminated impervious surfaces might have to be dismantled to facilitate removal or might only require surface cleaning. If surface cleaning only were to be required, efforts would be

made to utilize non-hazardous cleaning agents to the extent practicable. All cleaning solutions

would be captured and treated/disposed of in conformance with applicable regulatory requirements. If impervious surfaces such as concrete or asphalt were determined to be

contaminated, beyond surface staining, the surfacing materials would be removed and disposed

of according to applicable regulatory requirements. Any asphalt or concrete with visible

contamination would be subjected to appropriate chemical analyses, e.g., hazardous waste characteristic testing. In cases where hard surface materials such as concrete and/or asphalt were

to be dismantled and disposed of, removed materials would be temporarily stored in a manner designed to prevent groundwater contamination or uncontrolled run-off of stormwater.

*LOCATION?
CONTAINMENT?*

PHASE II-B - Pervious Areas Assessment

All pervious areas potentially subject to used oil contamination would be visibly assessed for evidence of discharges. Any soil, gravel, etc. with visible contamination would be subjected to appropriate chemical analyses, e.g., hazardous waste characteristic testing. Any contaminated soil, gravel, etc., would be removed, temporarily stored in a manner preventing storage area contamination and/or uncontrolled stormwater runoff, and disposed of according to applicable regulatory requirements. Ongoing surveillance of any contaminated areas would be performed during excavation to ensure that contaminated areas soils, etc. are removed in a manner which would minimize and/or prevent additional contamination of surrounding soil and/or groundwater.

PHASE II-C - Groundwater Assessment

MORE DETAIL

Any evidence of groundwater contamination associated with used oil management operations equipment, would be assessed in accordance with applicable regulatory requirements. Groundwater monitoring, if necessary, would be done for parameters appropriate for the types of used oils historically managed at the facility. If oil-affected groundwater were to be identified, a contamination assessment would be conducted to evaluate the extent of groundwater/soil contamination. If necessary, an action plan would be prepared to evaluate appropriate treatment technologies necessary to remediate contamination in accordance with local, State and Federal requirements.

PHASE II-D - Final Closure

After any required remediation, previously contaminated areas would be backfilled with clean material and/or graveled, sodded or paved where required. Any required post-closure monitoring would be determined after remediation/closure on an as needed basis in accordance with State and Federal regulations.

Any modifications or amendments to this plan will be submitted to the appropriate FDEP Waste Program Administrator at the appropriate District Office of the Department. All records required for used oil management operations shall be on forms prescribed by the Department or on substantially equivalent forms approved by the Department and shall be retained by the used oil management facility for a period of three years. The records will be kept at the street address of the facility and shall be available for inspection by the Department during normal business hours.