Memorandum

Florida Department of Environmental Protection

TO: J. Charles Harp
Program Administrator
Waste Management/Air Resources

THROUGH: Armando I. Sarasua, P.E.
Air Permitting Supervisor

FROM: Angelia Jackson
Permit Engineer

DATE: December 24, 2014

SUBJECT: Evaluation Summary for CompName, PlantName AirPermNo, CountyName County

We recommend issuing an operating permit renewal to Florida Transformer, Inc., (FTI) to operate their Walton County facility. This permit follows 1310263-005-AO, effective February 10, 2010.

Process Description.
This facility repairs electrical transformers used in residential subdivisions and industrial/commercial applications; manufactures special order transformers; and decommissions transformers not suitable for repair. Units are brought in and the oil is tested and drained. The units are disassembled and the cleaned casings and tops are transferred to the paint department for shotblasting, priming and painting. The manufacturing of special order transformers or refurbishing of old units consists of assembling the units from purchased or recycled containers (casings) and cores (copper wire windings on nonferrous metal winding bodies) and filling them with dielectric fluid (mineral oil).

Removed oil containing 50 ppmv PCB or more is segregated for disposal off-site. Casings and cores from units that contained oil with 500 ppmv PCB or more are segregated for disposal off-site.

Casings and cores from units that contained oil with less than 50 ppmv PCB are recycled by burning off combustibles in burn-out ovens. Casings and cores from units that contained oil with less than 500 ppmv PCB are recycled by burning off combustibles in the Scrap Metal Recovery Oven.

The facility also operates a Mobile PCB Dechlorination System to treat PCB contaminated dielecric fluids up to levels of 2000 ppm PCB to Non Detect (<2ppm PCB)which has undergone approval by the Environmental Protection Agency (EPA).

Pollution Control Equipment.
Emissions from the two burn-out ovens and the scrap metal recovery oven are controlled with two-stage burning. A US Filter/Wheelabrator Dust Collector is utilized to control emissions from the shot blast booth. Particulate matter from all three paint booths is controlled with two sets of filters

Applicable Rules & Regulations.
This facility is regulated in accordance with visible emissions and objectionable odor requirements of Rule 62-296.401(1), F.A.C. Emissions from the paint booths are subject to the general pollutant emissions limits in Rule 62-296.320. The applicant agreed to be bound by the requirements of 40 CFR 761.72 in order to provide reasonable assurance under Rule 62-4.070 of proper control of PCB emissions from the Scrap Metal Recovery Oven.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	62-4.070(3) *	N/A	0.17	<0.015 gr/dscf *	N/A
SO2	62-4.070(3) *	N/A	5.85	<35 ppmv *	N/A
NOx	62-4.070(3) *	N/A	0.44	<150 ppmv *	N/A
CO	62-4.070(3) *	N/A	0.11	<35 ppmv *	N/A
HCl	62-4.070(3) *	N/A	0.49	<35 ppmv *	N/A
PCB	62-4.070(3) *	N/A	0.017 lb/yr	99.9 % destruction efficiency *	
VOC	62-296.320	N/A	N/A	N/A	47.5
Total HAP	62-296.320	N/A	N/A	N/A	19.4
Xylene (HAP)	62-296.320	N/A	N/A	N/A	9.4
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	62-4.070(3) *	N/A	N/A	≤ 5% opacity except that VE ≤ 15% opacity is allowed for up to 6 minutes in any 1-hour period.	

** Agreement with permittee, application 1310263-002-AC. See applicable rules below.*

Compliance Monitoring.
The scrap metal recovery oven shall have annual tests for visible emissions and shall test once per permitting cycle for particulates, sulfur dioxide, nitrogen oxide, carbon monoxide and hydrogen chloride. The two Burn-out ovens and the three paint booths shall each be tested once during each federal fiscal year for visible emissions. A record of the combustible materials processed through each burn-out oven shall be maintained for a minimum of five years.

Compliance History. .
Compliance inspections performed in 2013, 2012 and 2010 noted the facility to be "In-Compliance".

2014 Test Resuts:

Pollutant	Units	Limits	Test Results
Particulates	grains/dscf	<0.015	0.00150
sulfur dioxide	ppmv	<35	1.50
nitrogen oxide	ppmv	<150	32.6
carbon monoxide	ppmv	<35	5.15
hydrogen chloride	ppmv	<35	16.77
Combustion Efficiency	%	≥ 99.9	>99.9

Fee Summary.
This is an:
- AO2A ($1,500 fee) minor source with a stack test.
- AO2B ($1,000 fee x 2 = $2000) minor source with no stack test.
- AO2C ($750 fee) minor source with no sample.

Total fee = $4,250.00

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