Environmental Compliance Plan

For

Florida Transformer, Inc.

DeFuniak Springs, Fl

December 2009

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Introduction

The Environmental Compliance Plan (ECP) provides additional information demonstrating the facility's commitment to operate the facility in compliance with its Air Operating Permit Requirements and sound environmental principles in general. The plan outlines procedures the responsible facility personnel incorporate during the normal operation of the facility. The Department may expect that the facility is following all procedures outlined in the most recent updated and approved ECP.

The detail of this Plan is consistent with the complexity of the system. It is developed in accordance with the unique requirements of this facility and provides the operator with adequate information and description regarding the design, operation and maintenance features of the facility. It also contains information concerning process control and performance evaluation for the facility, as well as equipment and procedural descriptions (including any notification/report requirements of appropriate agencies) in case of abnormal events such as breakdown of equipment, destruction by hazard of fire, wind or other causes. Regular maintenance and repair instructions for plant equipment and monitoring procedures are also included.

Management Commitment

Florida Transformer, Inc. adheres to a strong, facility-wide environmental program which was developed to ensure the highest commitment and quality from the business operation as well as from employees, to protect and enhance the environment.

Operator Training

This Plan represents continuing education program for all plant operators concerning facility operation, permit and other regulatory requirements. A copy of this approved Plan is available to the operators and maintenance personnel.

Personnel are trained to operate the facility in accordance with standard operating procedures and this Plan. Consequently, new employees will be trained within 90 days after commencement of employment and prior to unsupervised equipment operation.

Training sessions are intended to teach personnel how to operate and monitor process equipment and emissions control associated with such equipment. Such sessions include waste management, spill prevention, air permits and other environmental topics.

Plant operators involved with the operation of air emissions control devices (paint booths filters, burnout ovens, scrap metal recovery oven, media blasting baghouse and PCB-1000 exhaust filters) are trained on how to recognize excessive opacity (smoke, dust or mist) coming from exhaust stacks and/or vents of such devices. They do not need to be certified opacity readers but through experience gained by operating and observing such systems they are capable to recognize when emissions are excessive. No smoke and/or dust particulate matter should be observed (seen by a naked eye) from painting booth or blasting media baghouse exhaust vents. Burnout ovens and scrap metal recovery oven stacks can sometimes emit smoke during start-up (warm-up) or when the primary chamber doors are open for loading or similar reason. Such emissions should be for a short time (less than 3 minutes/hour) and under 20% opacity. During normal operation no emissions (other than heat waves) from scrap metal recovery ovens should be detected. The PCB-1000 oil processing equipment may or may not emit mist from a single portion of the equipment. This should be expected and is described in further detail in this plan.

FTI does employ a trained and certified visible emissions evaluator who, on a daily basis, conducts general observations of emissions units to ensure the general facility standard and standards specific to those units are not violated.

Historical data retrieved (Manometer differential pressure gauge readings 09/2001-03/2004) by FTI indicates that monthly paint booth filter changes sustain pressure levels below the maximum 1.5". Therefore, operators of paint booths are trained to observe pressure drops within paint booths by visually observing flow indicators placed across filtering media of paint booths and record monthly filter changes in order to remain compliant.

A magnehelic gauge is used to observe differential pressure of the media blasting baghouse. Associates observe gauges daily and record readings weekly. The pressure for the emissions control equipment is to remain between 1-6" WG. Dates of filter changes are also logged for the media blast baghouse.

Operators are also trained to observe pressure drop gauge(s) placed across filtering media of paint booths and media blasting baghouse. They are familiar with normal ranges for each one; observe gauge(s) daily and record readings as specified for each department. If readings are not within specified ranges or associates observe an indication of pressure drop/increase or inadequate flow, operators are trained to trouble shoot these gauge(s) as explained in the Operation and Maintenance part of this Plan. The Operation and Maintenance part of this plan describes how to determine if gauge(s) are reading correctly. If gauge(s) are not at fault and readings are still out of determined ranges, then emissions control device(s) are at fault. Processes controlled by these emissions control devices are stopped and problems corrected. Operators are trained to be able to interpret changes in gauge readings and visual observations to the extent of recognizing that increase in pressure drop indicates that filters are "loading up" and shall need replacement soon. Low readings indicate that filters are either installed incorrectly or integrity of filter has been compromised.

Plant Monitoring

This section establishes the use of parameters to monitor plant operation such as pressure differentials, visual indicators and visible emissions. Monitoring also includes recording of materials used on monthly basis and calculation of resulting air emissions. The monitoring will be carried out in the manner described:

Paint Booths "#1, #2 & #3

The performance parameters include such physical, chemical or electrical characteristics as are applicable to the particular paint booth. Such parameters generally include the following indicators:

Condition of filtering media
Presence of mist (opacity) from paint booth exhaust stack(s)
Flow indicators placed on open faces of spray booths which can be gauges developed for that purpose or simple plastic strips hanging

The pressure drop across filters as observed by flow indicators is a useful parameter to monitor paint booth performance. A given paint booth will operate within a certain pressure drop range.

A pressure drop lower than the lower end of the operating range could indicate:

Exhaust fan not running
Filter media failure; holes in filter, or filter misalignment
Ductwork structural failure

A pressure drop higher than the upper end of the operating range could indicate:

Plugged filters

Additionally DEP Operation Permit requires annual visible emissions testing according to EPA Method 9, to determine compliance with DEP rules. Each such annual testing event provides an opportunity to evaluate a possible correlation between filtering media pressure drop and exhaust air opacity.

Material Monitoring

Recording of materials used in painting operation and calculation of resultant air emissions will be conducted as follows:

At the beginning of each month, no later than the 10th, calculation of air emissions for previous month are performed assuming that all VOC and HAPs contents in such materials become airborne during painting and are released into atmosphere through exhaust stack(s). Filtering media in paint booths eliminate only liquid mists and/or paint solids in (overspray), but do not capture any of the gases such as VOCs or HAPs. Therefore all contents of VOCs and HAPS, as published in manufacturer's MSDS (Material Safety Data Sheet), must be accounted for when calculating air emissions. All HAPS are identified by CAS numbers and up to date list is listed on Florida web site www.dep.state.fl.us/airfules/fac/62-210.pdf under definitions, hazardous air pollutant.

Summary of calculated VOCs and HAPs are shown on monthly summary form together with calculation of rolling 12-month totals for each pollutant.

Calculated rolling 12-month totals cannot exceed the following (as specified in DEP Operation Permit):

47.5 tons for VOCs
19.4 tons for Total HAPs
9.4 tons for any individual HAP (xylene, H-186 in particular)

Media Blasting Baghouse

Material Monitoring

Readings on media blasting baghouse shall remain between 1 - 6" WG

The performance parameters include such physical, chemical or electrical characteristics as are applicable to the media blasting baghouse. Such parameters generally include the following indicators:

Condition of filtering media (cartridges)
Differential pressure gauge reading
Presence of mist (opacity) from exhaust blower

The pressure drop across the baghouse is a useful parameter to monitor baghouse performance. A given baghouse will operate within a pressure drop range.

A pressure drop much lower than the lower end of the operating range could indicate:

New cartridges which have not developed filter cake
Cartridge failure
Baghouse structure failure
Ductwork structural failure

A pressure drop much higher than the upper end of the operating range could indicate:

Plugged cartridge(s)
Blocked stack
Blower malfunction
Plugged ductwork

The DEP Air Operation Permit does not require annual visual emissions testing according to EPA Method 9, to determine compliance with DEP rules. However, the emissions unit is subject to the General Facility Wide Visible Emission Standard.

Burnout Ovens 1 & 2

Controlling air emissions from both ovens is achieved by forcing exhaust air and products of combustion created in primary chamber to pass through secondary chamber(s) before exiting to atmosphere through exhaust stack(s). Temperatures in secondary chamber(s) are maintained high (1,200 F in Oven #1 and 1,400 F in Oven #2) by burners located in secondary chamber(s). The heat and flame from these burners enhance destruction of products of combustion and gaseous emissions by completing the combustion process.

Operators are trained to operate both ovens as described in "Procedure for Startup and Shutdown". They are also trained to observe oven stacks and recognize abnormal conditions as described in "Operator Training" section of this Plan.

Material Monitoring

Oven #1 is allowed to burn 180 lbs of combustibles per 4 hr burn cycle. Hours of operation are unlimited.

Oven #2 is allowed to burn 52 lbs of combustibles per hour. Hours of operation are unlimited.

Records of quantity of combustibles processed through each oven will be kept on lbs/hr basis.

Scrap Metal Recovery Oven

Material Monitoring

Controlling air emissions from this oven is achieved by forcing exhaust air and products of combustion created in primary chamber to pass through secondary chamber(s) before exiting to atmosphere through exhaust stack(s). Temperatures in secondary chamber(s) are maintained high (1,200 C) by burner located in secondary chamber. The heat and flame from the burner enhance destruction of products of combustion and gaseous emissions by completing the combustion process.

Operators are trained to operate this oven as described in "Startup, Operation, Shutdown and Recordkeeping Standard Operating Procedure". They are also trained to observe oven stack and recognize abnormal conditions as described in "Operator Training" section of this Plan.

Operation of this oven must adhere strictly with 40 CFR 761.72 a (1) through (9) and FL DEP Operation Permit. Records must be kept daily for each batch burned.

Maximum operating hours are 3,744 hr/yr.

Maximum burn capacity per batch is 250 pounds of combustibles as stated in EU004 PTE Parameters section D.1 of the DEP Air Operation Permit.

Minimum burn cycle is 2.5 hours per batch.

PCB-1000

The PCB-1000 is equipped with five (5) filter housings and three (3) opportunities or locations for exhaust.

The PCB-1000 mobile oil processing equipment utilizes a vacuum chamber to aid in moisture removal of incoming material to be processed. An exhaust is located at the degasifier (vacuum) chamber. This exhaust is equipped with two (2) in line activated carbon (i.e. charcoal) filters and one (1) activated alumina filter. The charcoal filters specifically aid in capturing any chlorine, odor and color from the exhaust. The activated alumina aids in additional moisture removal from the exhaust.

The PCB-1000 utilizes nitrogen for valve operation and to blanket mixing tanks as a safety feature due to the use of sodium as the process reagent chemical. In the event there is excessive nitrogen flow or build up, a safety relief exhaust is located after the nitrogen line into the mixing tanks. This exhaust is equipped with two (2) charcoal filters.

The centrifuge portion of the processing equipment may emit steam/mist during separation of solids formed from reaction between oil and reagent. This should be expected and minimal. The centrifuge uses water as a service liquid and the sludge or byproduct tank must be vented to allow escape of steam due to the

product's temperature when exiting the mixing tank.

Material Monitoring

The PCB-1000 is intended for use to process both Non PCB (2-49ppm PCB) oil and PCB contaminated oil ≥50ppm by dechlorination for the removal of PCBs up to, but not exceeding 2,000ppm PCB. The different PCB concentration oils will be processed separately from one another and the Non PCB oil a vast majority of the operating time. All material processed with the PCB-1000 is documented per operating requirements and analyzed for PCB concentration prior to processing activities.

Procedure for Startup, Operation and Shutdown

Burnout ovens 1 & 2

Procedures for startup and shutdown are clearly posted for each oven. Both ovens are operated as follows:

1. Load primary chamber and close loading door

2. Preheat secondary chamber to specified temperatures (1200 F for Oven No. 1 and 1400 F for Oven No. 2). Primary chamber combustion is not to be started before secondary chamber temperature is achieved.

3. Start primary chamber combustion
   Experience has shown that when material loaded in primary chamber contains high percentage of combustibles (the rest are metal cores), it is better to start ignition by using a match or a lighter. In this case primary chamber door is cracked open for a short time to achieve ignition and closed immediately after combustible material(s) begins burning. Using primary burners would create violent combustion which can damage the oven.

   In case material loaded inside primary chamber contains small amount of combustibles, combustion in primary chamber is started and maintained by igniting primary chamber burners.

4. Do not open loading door during entire burnout cycle unless absolutely necessary.

5. Minimum temperatures in secondary chamber(s) must be maintained during entire burnout cycle.

6. At the end of burnout cycle turn off primary burner(s). Allow secondary chamber burners to burn for an additional 15 minutes prior to being turned off.

7. Turn off secondary burners and allow oven(s) to cool prior to unloading

Scrap Metal Recovery Oven (SMRO)

Startup, Operation, Shutdown and Recordkeeping Standard Operating Procedures

1. Before starting oven, check for the following items:
    - Ensure that the continuous emissions monitor (CEM) performed a valid automatic calibration. **If the CEMs are not operating properly DO NOT operate the SMRO – immediately notify the supervisor**
    - Ensure there is no material inside the primary chamber
    - The damper is in the open position or perpendicular to the stack. Photohelic gauge located on the oven control panel shall read 0"
    - All draft doors are closed (including back draft door)
    - The primary chamber slide gate is open
    - Observe pressure reading on gas gauge located on gas line at rear of oven to ensure gas flow to the oven. Pressure should read at least 25 psi

2. Start combustion blowers

3. Start secondary chamber by turning the selector switch to the "on" position

4. After the two minute purge, observe that the burner did ignite by checking the flame signal inside the control panel, as well as, looking through the sight glass located on the secondary chamber

5. When preheating the oven, **but not while processing a load**, allow the secondary chamber temperature to rise to at least 677 C before igniting primary chamber burner. The primary and secondary burners may be started together only for initial warm-up of the SMRO **without a load in the primary chamber**.

6. Once secondary chamber temperature reaches 677 C, open primary door approximately 6"and turn primary burner switch to the "on" position

7. Physically observe the ignition by sight before closing the primary door.

8. Close the primary door and ensure that the flame signal inside the control panel indicates flame

9. Select material to be processed and prepare burn pallets. **Weigh material prior to burn cycle and record material and pre-burn gross weight on SMRO Operation Log**

10. Amount of Combustibles:
    - Calculate weight of combustibles by multiplying the gross weight of the material to be burned by the appropriate percentage of combustibles for the type of material to be burned. See table

Material	% Combustibles
C-Cores	5 %
Casings (windings)	15 %
Metal Frames	5 %
Porcelain bushings & Miscellaneous Non-Porous Material	5 %

- **The minimum burn cycle time per batch may not be less than 2.5 hours**
- **Maximum load is 250 lbs of combustible per batch**
- **If amount of combustibles is more than 250 lbs, adjust load until it contains no more than 250 lbs of combustibles**

11. When the secondary chamber is at a minimum temperature of 1,200 C (+/- 100 C) and the primary chamber is at a minimum temperature of 593 C the primary chamber loading sequence may be started. **Record secondary chamber temperature and time on the SMRO Operation Log prior to loading the primary chamber**

12. Turn primary burner selector switch to the "off" position and close primary slide gate

13. Before loading the material and re-igniting the primary burner, retention chamber draft door shall be open to ensure oxygen levels are above 3%

14. Raise the primary door and load material into the chamber. **Record primary chamber temperature and time on the SMRO Operation Log once primary chamber is loaded**

15. Open primary slide gate and open left and right draft doors approximately 1"

16. In the event secondary chamber temperature drops below 1,200 C (+/- 100 C) during loading, operator will ensure secondary chamber temperature reaches 1,200 C (+/- 100 C) before primary burner is ignited. **Record secondary chamber temperature and time on the SMRO Oven Operation Log once the primary chamber is loaded and when the secondary chamber reaches 1,200 C (+/- 100 C)**

17. Turn primary burner selector switch to the "on" position

18. Physically observe the ignition by sight before closing the primary door

19. Close the primary door and ensure that the flame signal inside the control panel indicates flame

20. Burn cycle start time can not commence until loaded primary chamber reaches a minimum operating temperature of 537 C. **Record the temperature and start time of primary chamber burner on the SMRO Operation Log once loaded primary chamber reaches 537 C**

21. Observe control panel temperatures for primary chamber and secondary chamber to ensure minimum required operating temperatures are maintained
    - Primary Chamber – minimum of 537 C for the entire burn cycle and must reach 650 C at least once during heating cycle or batch treatment. **Record primary chamber temperature and time when the primary chamber reaches 650 C on the SMRO Operation Log**
    - Secondary Chamber – minimum temperature of 1,200 C (+/- 100 C) for the entire burn cycle

22. Oven is equipped with audio/visual alarm which goes off when secondary chamber temperature drops below 1177 C or rises above 1316 C

Oven is also equipped with Continuous Emissions Monitor System (CEMs) that measures and records the following:

- CO - <35 ppmv
- O2 - >3%
- CEff – 99.9%

Operator must periodically check the CEMS for CO, CO2, O2, CEff, primary chamber temperature and secondary chamber temperature on analyzer screen inside control room.
These parameters are sampled on a minute-by minute bases and readings are fed into the analyzer, which are visually displayed on a monitor. Data is saved to the computer, which is equipped with CD and hard drive download capabilities. The computer also contains a 24-hr back-up power source to prevent data loss in case of power disruption

The analyzer is automatically recalibrated daily with certified span gases contained in cylinders

All data collected will be downloaded and printed to hard copy on a monthly basis and will be made available for inspection

23. In the event the CO rises above 35 ppmv, O2 drops below 3%, or CEff drops below 99.9% the operator shall immediately adjust the retention chamber draft door for correction and make note of the time. **If condition persist longer than 30 minutes, operator shall record the occurrence on the comments section of the SMRO Operation Log and immediately notify the supervisor**

***Note – If comment section on front of SMRO Operation Log is full, operator shall make comments on back of log

In the event there is a primary chamber burner failure, the load will remain in the primary chamber and the secondary chamber burner will continue to operate until the load ceases to emit visible emissions. **The operator shall record the occurrence on the comments section of the SMRO Operation Log and immediately notify the supervisor. Once repairs have been made, the burn cycle shall start over with all parameters being recorded on a new line on the SMRO Oven Operation Log**

***Note – If comment section on front of SMRO Operation Log is full, operator shall make comments on back of log

In the event electrical power to the SMRO is lost, the load will remain in the primary chamber until power is restored. **The operator shall record the occurrence on the comments section of the SMRO Oven Operation Log and immediately notify the supervisor. Once electrical service has been restored, the burn cycle shall start over with all parameters being recorded on a new line on the SMRO Oven Operation Log**

***Note – If comment section on front of SMRO Operation Log is full, operator shall make comments on back of log

In the event any of the above conditions occur, or any of the CEMs are found to not be operating properly at any time during the process, Florida Transformer will provide written notification of noncompliance activity to the Department per "Abnormal Events" found in Environmental Compliance Plan

24. If load contains a sufficient amount of combustible material and maintain a minimum temperature of 537 C can be maintained in primary chamber, burner can be turned off to conserve fuel. However, this does not indicate burn cycle end time

- **WARNING – Primary chamber temperature must be allowed to reach 650 C at least once during each burn cycle**
- **WARNING – Primary chamber temperature cannot be allowed to drop below 537 C at any time during each burn cycle**

25. In the event primary chamber temperature drops below minimum operating temperature of 537 C, the primary chamber burner will be reignited automatically via the burners high/low fire to maintain minimum temperature during the burn cycle

26. When secondary chamber temperature reaches approximately 1,202 C, the photohelic gauge is adjusted to 0.08" – 0.10"

27. **Once burn cycle time is completed, record the primary chamber temperature and end time on the SMRO Operation Log. The minimum burn cycle time per batch may not be less than 2.5 hours**

28. Open primary chamber door and remove load once temperature drops to 371 C

29. **Weigh material and record post-burn weight on the SMRO Operation Log**

30. **Compute and record the total combustible weight and burn cycle time on the SMRO Operation Log by subtracting pre-burn weight from post-burn weight and the start cycle time from the end cycle time**

31. **Compute and record combustibles lbs/hr burned on the SMRO Operation Log**

32. Initial the log line corresponding to the batch just processed. For subsequent loads repeat operating steps 9 – 31. Start a new line on the operating log for each load processed

33. Secondary chamber burner is turned off at the end of the last burn of the day

34. Combustion blowers may be turned off only when afterburner and primary temperatures are 260 C or less

35. In the event of an incomplete burn, any material still containing residual material will be left on the pallet. Completely burned material may be removed from the burn pallet and replaced with additional material to be processed. The pallet shall then be re-weighed and processed. **The operator shall record the occurrence on the comments section of the SMRO Oven Operation Log and immediately notify the supervisor. The burn cycle shall start over with all parameters being recorded on the SMRO Oven Operation Log**

***Note – If comment section on front of SMRO Operation Log is full, operator shall make comments on back of log

36. In the event the operator underestimates the combustible weight, **the operator shall record the occurrence on the comments section of the SMRO Oven Operation Log and immediately notify the supervisor.**

***Note – If comment section on front of SMRO Operation Log is full, operator shall make comments on back of log

Media Blasting Baghouse

Before shot blast operation commences, dust collector must be operational and exhaust blower running.

Paint Booths #1, #2 and #3

Before painting operations commence exhaust fan(s) must be on and pressure/flow indicators across filtering media checked to ensure proper air throughput.

PCB-1000

Upon startup of oil inlet pump and vacuum chamber, the differential pressure gauge located at the first charcoal filter for the vacuum chamber, if needed, will indicate back pressure indicative that filter(s) need replacing. Otherwise, other opportunities for exhaust are safety measures and will be monitored visually for leakage or excessive mist, vapor, etc. during operation.

Inspection and Maintenance Plan

This section establishes a plant specific Inspection and Maintenance Plan. This element provides reasonable assurance that this facility can be effectively operated and maintained, through reasonable provisions for the operation and maintenance of the facility. Routine maintenance of equipment will be performed as needed to assure optimal operation. The facility shall be operated to control objectionable odors in accordance with Rule 62-296.320(2), F.A.C. fuels, solvents, lubricants and other maintenance materials shall be stored in approved areas.

This Plan includes a schedule for maintenance and inspection of all emission control devices.

The plan also contains inspection and maintenance schedules including periodic assessments of the condition of filtering media, gauges, blowers, electric motors, belts and other equipment associated with operation such emission control devices.

Media Blast Baghouse

Media blast dust collector is a cartridge type equipped with compressed air jets (pulsators) which keep cartridges clean. System is equipped with a magnehelic gauge indicating pressure drop across filter media.

Manufacturers recommendation indicates normal operating pressure between 1 – 6" WG

Daily monitoring and checks of baghouse and auxiliary equipment

Check daily to make sure pressure differential reading is within allowable limits. Record readings weekly.

If gauge reading is not within limits, troubleshoot the gauge by performing the following:

Disconnect both lines leading to gauge and see if gauge reads "O". If not, use set screw to reset gauge to "O".

While lines are still disconnected, blow both lines with compressed air (pressures no higher than 30 PSIG).

Reconnect lines and check reading.

If reading is still out of range, the problem is in the baghouse or ductwork as described in Plant Monitoring section.

If the pressure across the filter cartridges is greater than 6" WG, the cartridges shall be replaced and if the pressure drop is less than 1" WG, the dust collector unit shall immediately be shut down and inspected.

Perform visual inspection of the plume from baghouse. If at any time a constant plume of dust is observed from exhaust, check for a mechanical leak or torn cartridge. If a leak develops, the area can usually be easily spotted from the clean air side by a large deposit of dust around the leak area. Should a leak develop, clean dust from area and reseal both sides of leak with silicone sealant.

Check baghouse pulsating system and determine if it functions correctly. Record compressed air pressure weekly.

Check baghouse dust hopper and make sure it is not full.

Weekly Maintenance

Apply grease to all grease fittings.

Adjust belt tensions.

Clean compressed air filter and water trap.

Inspections

Perform regular inspections as described below:

Monthly

Check compressed air pressure

Check access door seals for leaks

Check door seals for deterioration

Check pulse duration

Quarterly

Check cartridge condition (dirty side)

Check exhaust blower

Check belt tension

Check case support for corrosion

Check all bolts and welds

Check ductwork for buildup of dust

Paint Booths #1, #2 & #3

Daily monitoring and checks of paint booths and auxiliary equipment.

Observe flow indicators for proper air throughput.

Routine Maintenance Includes:

Monthly

Replace paint booth filters

Blow out differential pressure lines

Burnout Ovens 1 & 2

Daily monitoring and checks of ovens and auxiliary equipment

Make sure that the Burn Out Oven Material Log is in place.

Make sure that operating instructions are clearly posted for each oven. These instructions shall include the following:

Cleanout frequency and ash disposal method

Loading instructions, including type of waste that may be burned

Capacity limits

Minimum burn times per load

Weekly Maintenance

Check condition of primary chamber loading doors and seals

Check conditions of casings for integrity

Inspections

Perform regular inspections as described below

Monthly

Check access door seals for leaks

Check door seals for deterioration

Quarterly

Check case support for corrosion

Check all bolts and welds

Check integrity of oven casings and ductwork

Scrap Metal Recovery Oven (SMRO)

Daily monitoring and checks of ovens and auxiliary equipment

Make sure that operating instructions are clearly posted for each oven. These instructions shall include the following:

Cleanout frequency and ash disposal method

Loading instructions, including type of waste that may be burned

Capacity Limits

Minimum burn times per load

Weekly Maintenance

Check condition of primary chamber loading doors and seals.

Check conditions of casings for integrity.

Inspections

Perform regular inspections as described below

Monthly

Check access door seals for leaks

Check door seals for deterioration

Quarterly

Check case support for corrosion

Check all bolts and welds

Check integrity of oven casings and ductwork

PCB-1000

The PCB-1000 Daily Inspection and Start Up Routine check off requires PCB-1000 personnel to check and drain all exhaust filters and vacuum trap (at degasifier chamber) at beginning of shift prior to operation and indicate that task is complete on inspection form.

Record Keeping

Record keeping requirements for media blasting, paint booths and burnout ovens shall include:

Records of daily media blast baghouse differential pressure gauge reading

Log of monthly paint booth filter changes

Burnout ovens quantity of combustibles processed (lb/hr) for each burn cycle

Records of emissions control units malfunctions or failures and corrective actions taken.

Results of yearly compliance tests (visible emissions) required by DEP Operation Permit.

Monthly records of all painting materials used and resulting air emissions totals (VOCs, total HAPs and xylene H-186)

Records of rolling 12-month emissions totals.

Record Keeping for Scrap Metal Recovery Oven (SMRO)

Refer to "Startup, Operation, Shutdown and Recordkeeping Standard Operating Procedures"

Record Keeping for PCB-1000

Records of monitoring the PCB-1000 equipment include and are not limited to, the date, exact place, and time of sampling or measurements; the person responsible for performing sampling or measurements; the date analyses were performed; the person responsible for performing analyses; the analytical techniques or methods used and the results of such analyses. Records are housed at the main processing facility (FTI). Operator's logs are maintained with the mobile processing equipment as well.

Periodic Plan Review

This plan will be reviewed at least annually from date of approval. This review will evaluate the effectiveness of the Plan and will make any changes necessary for the Plan to be continuously administered.

The Environmental Compliance Plan shall be updated as operations change, but no less frequently than upon renewal of permit. DEP shall be notified of changes to this Plan other than those required for routine maintenance. The Environmental Compliance Plan shall be revised when operational procedures change, to reflect any facility alterations performed or to reflect experience resulting from facility operation. Florida Transformer will periodically review and revise the operating protocol, as appropriate, to ensure satisfactory system performance.

Abnormal Events

In the event Florida Transformer is temporarily unable to comply with any of the conditions of DEP permit due to breakdown of equipment, power outages, destruction by hazard of fire, wind or other cause, Florida Transformer will notify DEP. Notification shall be made in person, by telephone, or other means within 24 hours of breakdown or malfunction. The telephone number to call to notify DEP is **850 595-0578**. For emergencies involving a significant threat to human health or the environment, **the number is 850 320-0519.**

A written report of any noncompliance referenced above shall be submitted to the Florida **Department of Environmental Protection, 160 Governmental Center, Pensacola, FL 32502-5794**, within 30 days after its occurrence. The report shall describe the nature and cause of the breakdown or malfunction, the steps being taken or planned to be taken to correct the problem and prevent its reoccurrence, emergency procedures in use pending correction of the problem and time when the facility will again be operating in accordance with permit conditions.

If an emergency arises or there is any condition, which prevents the continued operation or results in non-compliance with applicable regulations, the operator will:

Stop operation immediately

Notify proper official(s), as soon as practically possible, of the time, date and nature of the occurrence and the corrective action(s) taken

Ensure that emission control components are in good working order before resuming operation

Forms

Form 1..... Scrap Metal Recovery Oven Operation Log

Form 2..... Burn Out Oven Material Log

Form 3..... Paint Booth Filter Replacement Log

Form 4..... Grit Blast Log

Form 5..... PCB-1000 Daily Inspection

Florida Transformer, Inc.
Scrap Metal Recovery Oven Operation Log

Month_____, 2010

Permitted Burn Rate
Maximum Load-
250 lbs of Combustible

Date	[illegible]	[illegible]	[illegible]	[illegible] (Start)	[illegible]	[illegible] (End)	Material	Pre-Burn Gross Weight	Post-Burn Gross Weight	[illegible]	[illegible]	[illegible]

Florida Transformer, Inc
Burn-Out Oven Material Log

Month: _____

Oven No. _____

Permitted Burn Rate
No. 1 180 lb / 4 hour or 45 lb. / hour
No. 2 52 lb. / hour

Date	Time Start	Time Stop	Elaeped Time	Material	Before Burn Weight	After Burn Weight	Combustible Weight	Lbs./Hour Burned	Operator

Florida Transformer, Inc Historical Data (Manometer Draft Gauge Readings 09/2001 - 03/2004) indicates that by changing Paint Booth Filters once every month, the maximum Differential Pressure of 1.5" will not be exceeded. This log is a record of such filter changes to ensure the commitment of the FTI Painting Operation and will be overseen by Paint Room Lead Personnel and submitted as completed to be stored as "supporting documentation" of compliance with FTI Air Operation Permit.

Date of Filter Replacement	**Paint Booth Number**	**Filter Replaced By:**
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	
	1 2 3	

GRIT BLAST & DUST COLLECTOR OPERATORS LOG

MONTH_____ YEAR_____ DATE OF LAST FILTER CHANGE_____

DAY OF MONTH	MAGNEHLIOC GA	CO MONITOR	TOTAL HOURS	OPERATOR NAME
1				
2				
3				
4				
5				
6				
7				
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Each column of the sheet must be completed on every day the machine is started. **ANY MAGNEHELIC READINGS UNDER 1 OR OVER 6 MUST BE REPORTRED TO THE SUPERVISOR IMMEDIATLEY. Any significant fluctions (+/- 1.5) from day - to - day should also be reported and/or investigated.** Write "Not Used" beside the day of the month for any day that the machine is not used (including weekends)

PCB-1000 Daily Inspection and Start-up Routine

(Pre-Op) INSPECTION	Sunday		Monday		Tuesday		Wednesday		Thursday		Friday		Saturday	
	Shift 1	Shift 2	Shift 1	Shift 2	Shift 1	Shift 2	Shift 1	Shift 2	Shift 1	Shift 2	Shift 1	Shift 2	Shift 1	Shift 2
Outside area of PCB1000														
-Hose and Pipe Connections secure and not leaking														
-Sec. Containment is dry and in good order														
-Steps and railing secure and in good order														
PCB1000 Interior														
-Nitrogen cylinders in good order														
-Vacuum/degas not leaking														
-No leaks around FE and DBPC modules														
-Mixing tanks and connections secure and not leaking														
-No leaks around centrifuge and oil discharge area														
-Check and Drain all exhaust filters and vacuum trap														
START-UP														
-Received/reviewed shift briefing, verbal or written														
-Ensure proper labeling of all lines and ancillary tanks, etc.														
-Unload/Load Sodium Cylinder														
-Obtain and file previous batch test results from lab.														
-Acquire or verify test results for oil to be processed during shift.														
-Check Valve positions for incoming and outgoing product														
-Clean strainers (STR-1 & STR-2)														
-Check **ALL** tank levels, batch log & plan work accordingly (includes service liquid and sludge)														
-Verify adequate spill supplies														
-Check Sodium Disp. tank level														