

Check Sheet

Company Name: Transformer Consultants
Permit Number: AC 37-65849, AO 37-099472
PSD Number: _____
Permit Engineer: _____

Application:

- | | |
|--|--------------------------|
| <input checked="" type="checkbox"/> Initial Application | Cross References: |
| <input checked="" type="checkbox"/> Incompleteness Letters | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Responses | <input type="checkbox"/> |
| <input type="checkbox"/> Waiver of Department Action | <input type="checkbox"/> |
| <input type="checkbox"/> Department Response | |
| <input type="checkbox"/> Other | |

Intent:

- Intent to Issue
 - Notice of Intent to Issue
 - Technical Evaluation
 - BACT or LAER Determination
 - Unsigned Permit
- Correspondence with:
- EPA
 - Park Services
 - Other
- Proof of Publication
 - Petitions - (Related to extensions, hearings, etc.)
 - Waiver of Department Action
 - Other

Final

Determination:

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.
 2. Restricted Delivery.

3. Article Addressed to:
 Mr. John P. Wunderle, Jr.
 Transformer Consultants
 P. O. Box 3575
 Akron, Ohio 44310

4. Type of Service:	Article Number:
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	0155539

Always obtain signature of addressee or agent and DATE DELIVERED:

5. Signature - Addressee
 X

6. Signature - Agent
 X *J. Wunderle*

7. Date of Delivery
 APR - 9 1985

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

No. 0155539
 RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

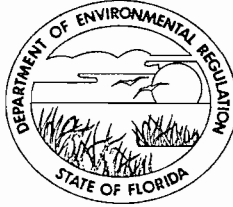
SENT TO		Mr. John P. Wunderle
STREET AND NO.		
P.O., STATE AND ZIP CODE		
POSTAGE		\$
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	\$
	SPECIAL DELIVERY	\$
	RESTRICTED DELIVERY	\$
	OPTIONAL SERVICES	
	RETURN RECEIPT SERVICE	
	SHOW TO WHOM AND DATE DELIVERED	\$
	SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	\$
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	\$
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	\$
TOTAL POSTAGE AND FEES		\$
POSTMARK OR DATE		4/3/85

PS Form 3800, Apr. 1976

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. John P. Wunderle, Jr., Manager
Environmental Services
Transformer Consultants
Post Office Box 3575
Akron, Ohio 44310

April 2, 1985

Enclosed is Permit Number AO 37-099472 to Transformer Consultants, to operate a relocatable unit to dechlorinate transformer oils, issued pursuant to Section 403, Florida Statutes.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5, FAC, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes. This permit is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraph. Upon the timely filing of a petition, this permit will not be effective until further Order of the Department.

When the Order is final any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301; and

by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the clerk of the Department.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Enclosure

cc: S. Myers, Transformer Consultants
R. Rasor, Transformer Consultants
S. Fox, DER
C. Forthman, DER
R. McVety, DER
R. Kriegel, DER Northwest District
J. Brown, DER Northeast District
R. Garrity, DER Southwest District
A. Alexander, DER St. Johns River District
P. Edwards, DER South Florida District
R. Duke, DER Southeast Florida District
D. Bayly, Duval County
R. Stewart, Hillsborough County
J. Gibbs, Pinellas County
F. Gargiulo, Palm Beach County
V. Howard, Broward County
R. Rodon, Dade County

CERTIFICATION

This is to certify that the foregoing Notice of Permit and all copies requested were mailed before the close of business on Apr 3, 1985.

for *C. H. Fancy*
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

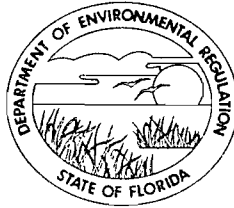
FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Patricia A. Adams
Clerk

April 3, 1985
Date

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:

Mr. John P. Wunderle, Jr., Manager
Environmental Services
Transformer Consultants
Post Office Box 3575
Akron, Ohio 44310

PERMIT/CERTIFICATION

Permit No.: AO37-099472
County: Statewide
Expiration Date: March 29, 1990
Project: A relocatable unit
to dechlorinate
transformer oils

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of a 0.6 million BTU per hour heater which is an integral part of a portable processor to dechlorinate transformer oils contaminated with polychlorinated biphenyls. The mobile unit will be operated at different facilities located within the State of Florida. The public notification of location and hours of operation will be a condition of the operating permit when the relocatable unit is moved from one facility to another.

Replaces Permit No.: AC37-65849

DER Form 17-1.201(7) Page 1 of 8.

PERMITTEE: Permit/Certification No.: AO37-099472
Transformer Consultants Project: A relocatable unit to
dechlorinate transformer oils

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate the enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.712(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by any order from the department.

PERMITTEE: Permit/Certification Number: A037-099472
Transformer Consultants Project: A relocatable unit to
dechlorinate transformer oils

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as maybe required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purposes of;

a. Having access to and copying any records that must be kept under the conditions of the permit:

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

(a) a description of and cause of non-compliance; and

(b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

PERMITTEE: Permit/Certification No: A037-099472
Transformer Consultants Project: A relocatable unit to
dechlorinate transformer oils

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards (Section 401. PL 92-500)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE: Permit/Certification No.: A037-099472
Transformer Consultants Project: A relocatable unit to
dechlorinate transformer oils

14. (con't)

b. The permittee shall retain at the facility or other location designated by this permit records of, all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. (Section 17-4.07(1), F.A.C.)

2. Test the emissions for the following pollutant(s) at intervals of 12 months from the date March 14, 1984, and submit a copy of test data to the Department of Environmental Regulation, Bureau of Air Quality Management, Central Air Permitting, 2600 Blair Stone Road, Tallahassee, Florida 32301, within forty five days of such testing (Section 17-2.700 (2), Florida Administrative Code (F.A.C.)).

- | | |
|------------------|--------------------------|
| () Particulates | () Sulfur Oxides |
| () Fluorides | () Nitrogen Oxides |
| (X) Opacity | () Hydrocarbons |
| | () Total Reduced Sulfur |

PERMITTEE:
Transformer Consultants

Permit/Certification No.: AO37-099472
Project: A relocatable unit to
dechlorinate transformer oils

SPECIFIC CONDITIONS (con't):

3. Testing of emissions must be accomplished at approximately 0.6 million BTU per hour. Failure to submit the input rates or operation at conditions which do not reflect actual operating conditions may invalidate the data (Section 403.161(1)(c), Florida Statutes).
4. Visible emissions to the outside air from the heater stack shall not exceed 20 percent opacity (six minute average) as determined by DER Method 9 pursuant to Section 17-2.610(2)(a), F.A.C.
5. Fuel oil fired in the burner shall be uncontaminated ASTM grade No. 2 having a sulfur content of less than 0.7 percent by weight.
6. The applicant shall notify the District Office of the Department and the appropriate local program in which the unit is operating at least 15 working days prior to conducting the required annual compliance test.
7. There shall be no detectable PCBs in exhaust or vented gases from the disposal portion of the PCB-GONE process. If gases escape and contain PCBs, the applicant must immediately cease operation and must inform the Department of Environmental Regulation's District Office and the appropriate local program having jurisdiction by close of business on the next regular business day. No PCBs may be processed until the emission problem has been corrected to the satisfaction of the Department.
8. Transformer dielectric fluid must be sampled after it exits the PCB destruction portion of the PCB-GONE process but before it is returned to the transformer or other container. This sample must be tested for PCB concentration within 15 days. If the PCB concentration of the sample is 2 ppm or greater, that fluid must be treated again with the PCB-GONE process within 45 days of the test. If the transformer dielectric fluid is returned to the transformer after the PCB-GONE process has been used, that transformer cannot be reclassified as a non-PCB transformer unless the fluid is tested again after at least three months of in service use and shown to contain less than 50 ppm PCBs. Any transformer dielectric fluid treated with the PCB-GONE process must be disposed of as if it contained between 50 and 500 ppm PCBs or the original concentration of PCBs until such time that the required testing shows that PCB concentration has been reduced below 2 ppm.
9. Any solid wastes or by-products generated by the PCB-GONE system must be stored in accordance with Annex III, 40 CFR 761.42(b), and must be disposed of in a chemical waste landfill approved by EPA under Annex III of the PCB Regulation (40 CFR 761.41). Solid waste disposal must comply with all applicable federal regulations. Cleaning of the filters must be handled according to the requirements of applicable sections of 40 CFR, Part 761.

PERMITTEE: Permit/Certification No.: A037-099472
Transformer Consultants Project: A relocatable unit to dechlorinate
transformer oils

SPECIFIC CONDITIONS (con't):

10. The Permittee must request a department approval to be attached to this Operating Permit each time the PCB-GONE processing system is relocated to another site. The request must be submitted prior to publication of the public notice and must include the information requested below in letter form and be submitted to the District Office with a copy to the appropriate local program where the unit will be operated with a copy to the Department of Environmental Regulation, Bureau of Air Quality Management, Central Air Permitting, 2600 Blair Stone Road, Tallahassee, Florida, 32301:

- a. The name and address of the company whose transformer dielectric fluid is to be processed by the PCB-GONE process.
- b. A plot plan showing the proposed location of the PCB-GONE unit.
- c. The dates and times the unit will be operated at this location.
- d. The total number of gallons of transformer dielectric fluid to be processed at this location.
- e. Provide a draft Public Notice for the new location. The format for the notice is attached as Exhibit I.

11. After the Department receives the request for relocation, the Permittee shall, at his own expense, publish the public notice one time only in the Legal Ad Section of a newspaper of general circulation in the area the unit is to be located. Proof of publication shall be submitted to both Department Offices within 7 days of publication. The unit cannot relocate until written approval is received from the district office.

12. Detailed monthly reports, including the number of gallons, dates, times, name, address, location, any unusual incidents, and any other pertinent information, must be submitted to Department of Environmental Regulation, Bureau of Air Quality Management Central Air Permitting, 2600 Blair Stone Road, Tallahassee, Florida, 32301, and to the district office(s) and the appropriate local program office that the unit has operated in during the month. These reports are due on the tenth day of the following month. If no fluids are treated during the month a report to that effect shall be submitted to the the Tallahassee office at the above address.

PERMITTEE: Permit/Certification No.: A037-099472
Transformer Consultants Project: A relocatable unit to dechlorinate
transformer oils

SPECIFIC CONDITIONS (con't):

13. An application to renew this operating permit shall be submitted to the Department of Environmental Regulation, Bureau of Air Quality Management Central Air Permitting, 2600 Blair Stone Road, Tallahassee, Florida, 32301 sixty (60) days prior to the expiration date of this permit.

Issued this 30 day of March
1985.

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

Victoria J. Schinkel
Victoria J. Schinkel, Secretary

Exhibit I

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action on Permit Application

The department gives notice of its intent to amend an operating permit to allow Transformer Consultants to temporarily operate a .6 million BTU per hour heater which is an integral part of a relocatable system to dechlorinate PCB contaminated transformer oils. All conditions required to insure compliance with Chapter 17-2, Florida Administrative Code, will remain unchanged.

The unit will be permitted to treat _____ gallons of PCB oil located at _____ (Name of Facility and location) from _____ (date) to _____ date .

Any comments received by the _____ (Name) District office, _____ (complete address) within 14 days after publication of this notice will be considered before the operation will be authorized in accordance with their permits.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at Department of Environmental Regulation, _____ (Name and address of District Office)

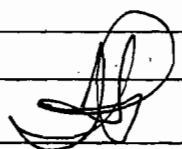
To Cindy
Date 8/22 Time 3:53

WHILE YOU WERE OUT

M. Loane Belder
of OHIO S.D. MYERS
Phone 216-633-2604
Area Code Number Extension
#239

<input type="checkbox"/>	TELEPHONED	<input type="checkbox"/>	PLEASE CALL
<input type="checkbox"/>	CALLED TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN
<input type="checkbox"/>	WANTS TO SEE YOU	<input type="checkbox"/>	URGENT
<input type="checkbox"/>	RETURNED YOUR CALL		

Message called 5:15 not in


Operator



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

August 14, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joseph J. Kelly
Environmental Affairs Manager
S. D. Myers, Inc.
180 South Avenue
Tallmadge, Ohio 44278

Dear Mr. Kelly:

Re: Operating Permit Renewal Application No. A037-181530
Relocatable Transformer Oil Dechlorination Unit

Our letter dated June 25, 1990, notified you the above referenced application is incomplete (see attached copy).

When a permit application is incomplete, all processing of the application is suspended. Pursuant to Section 120.60, Florida Statutes, the Department may deny a permit application if the applicant, after receiving timely notice, fails to correct errors or omissions, or supply additional information within a reasonable period of time.

It has been 48 days since you were notified of the need for additional information and an additional fee. Therefore, within 15 days of receipt of this letter please advise us if:

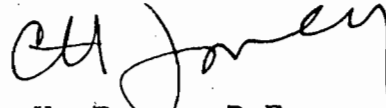
- A. You wish to withdraw your application.
- B. You need additional time to obtain the required information and inform us of the approximate date we will be receiving the information.
- C. You have questions about our request and wish to discuss your application with us.

If we do not receive one of the responses listed above or the necessary information to complete the application within the required time requested, the Department will initiate action to deny the application.

Mr. Joseph J. Kelly
August 14, 1990
Page 2 of 2

Your cooperation regarding this matter will be appreciated.

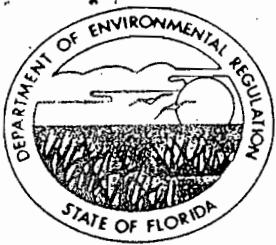
Sincerely,

A handwritten signature in black ink, appearing to read "C. H. Fancy". The signature is written in a cursive style with a large, sweeping initial "C".

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Attachment

cc: Cindy Phillips



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 25, 1990

Mr. Joseph J. Kelly
Environmental Affairs Manager
S.D. Myers, Inc.
180 South Avenue
Tallmadge, Ohio 44278

Dear Mr. Kelly:

RE: Operating Permit Renewal Application No. A037-181530,
Relocatable Transformer Oil Dechlorination Unit

On May 29, 1990, the Department received your \$250 check for the application processing fee to renew operating permit No. A037-099472. However, per subsection 17-4.050(4)(a)2.b., of the Florida Administrative Code (FAC), the fee necessary for an operating permit for a source requiring visible emissions observations is \$750. Please submit a check for the additional \$500 required to process this application.

In addition, the application is deemed incomplete. Additional information is required for further processing of this application. Within 30 days of receipt of this letter, please respond to the following items of incompleteness:

1. In the construction permit application, the maximum heat input of #2 fuel oil was stated to be 0.6 MMBTU/hr. In this renewal application, the maximum heat input of #2 fuel oil is stated to be 0.75 MMBTU/hr. Please explain this discrepancy.
2. Specific Condition No. 2 of Permit No. A037-099472 requires annual testing of emissions for opacity. The last visible emissions observation report we have on file is dated May 1, 1985. The renewal application states that the PCB-GONE unit was operated in 1985, 1986, and 1987. Please submit the visible emissions observation reports for 1986 and 1987.
3. Specific Condition No. 10 requires a written request to be submitted to the appropriate District Office, and a copy to the Department, for each relocation. However, there are no requests on file at this office to operate at any of the eight sites listed in the renewal application. Please explain why written requests to relocate were not submitted.

S.D. Myers A037-181530
June 25, 1990

Page Two

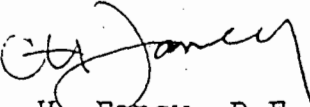
4. Please provide proof that a public notice was published and written approval was given by the District Offices prior to operating at each of these eight sites, as required by Specific Condition No. 11.

5. Specific Condition No. 12 requires that monthly operating reports be submitted to the Department and to the appropriate District Office. If no fluids were treated during the month, this was to be reported to the Department. There are no monthly reports on file at this office. Please explain why these were not submitted.

6. Please submit a report showing the location, dates, hours of operation, gallons of transformer fluid processed, and amount of fuel burned for each usage of the PCB-GONE in Florida since April 2, 1985.

If you have any questions concerning this request for information, please contact Cindy Phillips of my staff at (904)488-1344.

Sincerely,


C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

cc: District Offices



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 25, 1990

Mr. Joseph J. Kelly
Environmental Affairs Manager
S.D. Myers, Inc.
180 South Avenue
Tallmadge, Ohio 44278

Dear Mr. Kelly:

RE: Operating Permit Renewal Application No. A037-181530,
Relocatable Transformer Oil Dechlorination Unit

On May 29, 1990, the Department received your \$250 check for the application processing fee to renew operating permit No. A037-099472. However, per subsection 17-4.050(4)(a)2.b., of the Florida Administrative Code (FAC), the fee necessary for an operating permit for a source requiring visible emissions observations is \$750. Please submit a check for the additional \$500 required to process this application.

In addition, the application is deemed incomplete. Additional information is required for further processing of this application. Within 30 days of receipt of this letter, please respond to the following items of incompleteness:

1. In the construction permit application, the maximum heat input of #2 fuel oil was stated to be 0.6 MMBTU/hr. In this renewal application, the maximum heat input of #2 fuel oil is stated to be 0.75 MMBTU/hr. Please explain this discrepancy.
2. Specific Condition No. 2 of Permit No. A037-099472 requires annual testing of emissions for opacity. The last visible emissions observation report we have on file is dated May 1, 1985. The renewal application states that the PCB-GONE unit was operated in 1985, 1986, and 1987. Please submit the visible emissions observation reports for 1986 and 1987.
3. Specific Condition No. 10 requires a written request to be submitted to the appropriate District Office, and a copy to the Department, for each relocation. However, there are no requests on file at this office to operate at any of the eight sites listed in the renewal application. Please explain why written requests to relocate were not submitted.

4. Please provide proof that a public notice was published and written approval was given by the District Offices prior to operating at each of these eight sites, as required by Specific Condition No. 11.

5. Specific Condition No. 12 requires that monthly operating reports be submitted to the Department and to the appropriate District Office. If no fluids were treated during the month, this was to be reported to the Department. There are no monthly reports on file at this office. Please explain why these were not submitted.

6. Please submit a report showing the location, dates, hours of operation, gallons of transformer fluid processed, and amount of fuel burned for each usage of the PCB-GONE in Florida since April 2, 1985.

If you have any questions concerning this request for information, please contact Cindy Phillips of my staff at (904)488-1344.

Sincerely,



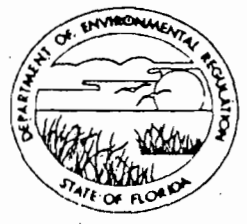
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

cc: District Offices

#250 pd.
5-29-90

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

AO 37-181530

APPLICATION FOR RENEWAL OF
PERMIT TO OPERATE AIR POLLUTION SOURCE(S)

If major alterations have occurred, the applicant should complete the Standard Air Permit Application Form.

Source Type: _____ Renewal of DER Permit No. AO-099472

Company Name: S.D. MYERS, INC. County: (STATE OF OHIO)

Identify the specific emission point source(s) addressed in this application (i.e., Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired):

VACUUM PUMP EMISSION OF "PCB-GONE" PROCESS

Source Location: Street: VARIABLE City: _____

UTM: East _____ North _____

Latitude: _____° _____' _____" N. Longitude: _____° _____' _____" W.

1. Attach a check made payable to the Department of Environmental Regulation in accordance with operation permit fee schedule set forth in Florida Administrative Code Rule 17-4.05.
2. Have there been any alterations to the plant since last permitted? [] Yes [X] No
If minor alterations have occurred, describe on a separate sheet and attach.
3. Attach the last compliance test report required per permit conditions if not submitted previously. N/A
4. Have previous permit conditions been adhered to? [X] Yes [] No If no, explain on a separate sheet and attach.
5. Has there been any malfunction of the pollution control equipment during tenure of current permit? [] Yes [X] No If yes, and not previously reported, give brief details and what action was taken on a separate sheet and attach.
6. Has the pollution control equipment been maintained to preserve the collection efficiency last permitted by the Department? [X] Yes [] No
7. Has the annual operating report for the last calendar year been submitted? [] Yes [] No If no, please attach. N/A

Please provide the following information if applicable:

A. Raw Materials and Chemical Used in Your Process:

Description	Contaminant		Utilization	
	Type	%wt	Rate	lbs/hr
Proprietary -	See confidential Commercial Application Demonstration			
	Plan submitted with last application			

B. Product Weight (lbs/hr): _____

C. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	Avg/hr*	Max/hr**	
Fuel Oil #2	3 gallons/hour		750,000 BTU/hour

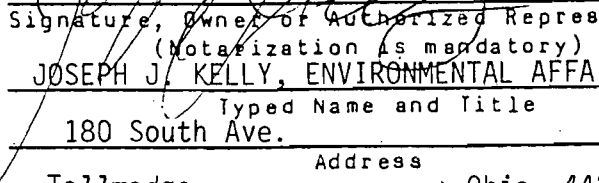
D. Normal Equipment Operating Time: hrs/day 24 ; days/wk 6 ; wks/yr 52 ;
 hrs/yr (power plants only) _____ ; if seasonal, describe Note: above applies
only when in area

The undersigned owner or authorized representative*** of S.D. Myers, Inc. is fully aware that the statements made in this application for a renewal of a permit to operate an air pollution source are true, correct and complete to the best of his knowledge and belief. Further, the undersigned agrees to maintain and operate the pollution source and pollution control facilities in such a manner as to comply with the provisions of Chapter 403, Florida Statutes, and all the rules and regulations of the Department. He also understands that a permit, if granted by the Department, will be non-transferable and he will promptly notify the Department upon sale or legal transfer of the permitted facility.

*During actual time of operation.

**Units: Natural Gas-MMCF/hr;
 Fuel Oils-barrels/hr; Coal-lbs/hr.

***Attach letter of authorization if not previously submitted


 Signature, Owner or Authorized Representative
 (Notarization is mandatory)
JOSEPH J. KELLY, ENVIRONMENTAL AFFAIRS MANAGER
 Typed Name and Title
180 South Ave.
 Address
Tallmadge Ohio 44278
4-27-90 216-633-2666
 Date Telephone No.

Earl E. Williamson April 27, 1990

EARL E. WILLIAMSON
 Notary Public - State of Ohio
 My Commission Expires June 14, 1993



RECEIVED

MAY 01 1990

4-27-90

DER-BAQM

Mr. C.H. Fancy, PE, Bureau Chief
Bureau of Air Quality Management
Dept. of Environmental Regulation
2600 Blair Stone Rd.
Tallahassee, Florida 32301-8241

RE: Permit Number AO 37-099472

Dear Mr. Fancy,

Enclosed is our renewal application for the above referenced permit. However, we were unable to determine the cost of our renewal so would you please let us know how much this will be so we can forward a check to your Dept.

Thank you for your cooperation and if you have any questions regarding this renewal, don't hesitate to call this office.

Sincerely,

A handwritten signature in cursive script that reads "David L. Belden".

David L. Belden
Environmental Coordinator

cc: Joe Kelly

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

AO 37-181530

APPLICATION FOR RENEWAL OF
PERMIT TO OPERATE AIR POLLUTION SOURCE(S)

If major alterations have occurred, the applicant should complete the Standard Air Permit Application Form.

Source Type: _____ Renewal of DER Permit No. AO-099472³⁷

Company Name: S.D. MYERS, INC. County: (STATE OF OHIO)

Identify the specific emission point source(s) addressed in this application (i.e., Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired):

VACUUM PUMP EMISSION OF "PCB-GONE" PROCESS

Source Location: Street: VARIABLE City: _____

UTM: East _____ North _____

Latitude: _____° _____' _____"N. Longitude: _____° _____' _____"W.

1. Attach a check made payable to the Department of Environmental Regulation in accordance with operation permit fee schedule set forth in Florida Administrative Code Rule 17-4.05.
2. Have there been any alterations to the plant since last permitted? Yes No
If minor alterations have occurred, describe on a separate sheet and attach.
3. Attach the last compliance test report required per permit conditions if not submitted previously. N/A
4. Have previous permit conditions been adhered to? Yes No If no, explain on a separate sheet and attach.
5. Has there been any malfunction of the pollution control equipment during tenure of current permit? Yes No If yes, and not previously reported, give brief details and what action was taken on a separate sheet and attach.
6. Has the pollution control equipment been maintained to preserve the collection efficiency last permitted by the Department? Yes No
7. Has the annual operating report for the last calendar year been submitted? Yes No If no, please attach. N/A

DER Form 17-1.202(4)
Effective November 30, 1982

Page 1 of 2

Please provide the following information if applicable:

A. Raw Materials and Chemical Used in Your Process:

Description	Contaminant		Utilization	
	Type	%Wt	Rate	lbs/hr
Proprietary -	See confidential Commercial Application Demonstration			
	Plan submitted with last application			

B. Product Weight (lbs/hr): _____

C. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	Avg/hr*	Max/hr**	
Fuel Oil #2	3 gallons/hour		750,000 BTU/hour

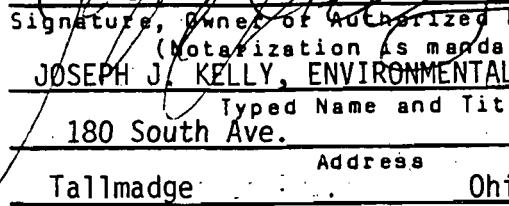
D. Normal Equipment Operating Time: hrs/day 24; days/wk 6; wks/yr 52;
 hrs/yr (power plants only) _____; if seasonal, describe Note: above applies
only when in area

The undersigned owner or authorized representative*** of S.D. Myers, Inc.
 is fully aware that the statements made in this application for a renewal of a permit to
 operate an air pollution source are true, correct and complete to the best of his knowledge
 and belief. Further, the undersigned agrees to maintain and operate the pollution source
 and pollution control facilities in such a manner as to comply with the provisions of Chap-
 ter 403, Florida Statutes, and all the rules and regulations of the Department. He also
 understands that a permit, if granted by the Department, will be non-transferable and he
 will promptly notify the Department upon sale or legal transfer of the permitted facility.

*During actual time of operation.

**Units: Natural Gas-MMCF/hr;
 Fuel Oils-barrels/hr; Coal-
 lbs/hr.

***Attach letter of authorization
 if not previously submitted


 Signature, Owner or Authorized Representative
 (Notarization is mandatory)
JOSEPH J. KELLY, ENVIRONMENTAL AFFAIRS MANAGER
 Typed Name and Title
180 South Ave. Address
Tallmadge Ohio 44278
4-27-90 City State Zip
216-633-2666 Telephone No.
 Date

ER Form 17-1.202(4)
 Effective November 30, 1982

Page 2 of 2

Earl E. Williamson April 27, 1990

EARL E. WILLIAMSON

Notary Public - State of Ohio

My Commission Expires June 14, 1993

FIRST NATIONAL BANK OF ASHLAND
AN AFFILIATE OF
NATIONAL CITY BANK, AKRON
AKRON, OHIO
ACTS 412

SPMYERS

THE TRANSFORMER CONSULTANTS
P.O. BOX 4724 AKRON, OHIO 44310-0575

56-389
412

CHECK DATE	CHECK NUMBER
05-22-90	10055

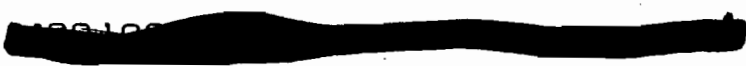
CHECK AMOUNT

\$ *****250.00*****

TO THE
ORDER OF:

Florida Dept. of
Environmental Regulation

Donna J. Farrell
Phyllis J. Sullivan
AUTHORIZED SIGNATURE



ACTS 412
SPMYERS
THE TRANSFORMER CONSULTANTS

180 South Avenue
Tallmadge, OH 44278

RECEIVED
DER - MAIL ROOM
1990 MAY 29 AM 11:00

Patty, 5/22
Here is our check
for renewing our permit
AD 37-D99472. If
there are any questions give
me a call.
Sincerely,
Dave Belden

MS. PATTY ADAMS
BUREAU OF AIR QUALITY
DEPT. OF ENVIRONMENT
2600 BLAIR STONE W
TALLAHASSEE, FL

1990



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

February 14, 1990

Mr. David L. Belden
Environmental Coordinator
S. D. Myers
180 South Avenue
Tallmadge, Ohio 44278

Dear Mr. Belden:

In response to your February 5, 1990, letter concerning the renewal of permit AO 37-099472, please find enclosed an operation permit renewal application form and current copies of Chapter 17-2 and 17-4, F.A.C. Please complete the application form and return it to this office with the appropriate processing fee. The procedures for obtaining DER permits and the schedule of fees are found in 17-4.050.

If you have any questions or need any assistance, please call me at (904)488-1344.

Sincerely,


E. H. Fancy, P.E.

Chief
Bureau of Air Regulation

CHF/pa

Enclosures



RECEIVED

FEB 8 1990

DER-BAQM

Feb. 5, 1990

Mr. C.H. Fancy, P.E., Bureau Chief
Bureau of Air Quality Management
Dept. of Environmental Regulation
2600 Blair Stone Rd.
Tallahassee, Florida 32301-8241

RE: Permit Number A0 37-099472

Mr. Fancy,

Per our conversation regarding the above permit to operate a relocatable unit to dechlorinate transformer oils, I am writing this letter to express our desire to extend the permit. The current expiration date is March 29, 1990. I am also attaching a list of the dates/places we have performed this service since 1985.

Your cooperation in outlining the steps necessary to renew this permit would be greatly appreciated. If you have any questions, please call me at ext. 239, otherwise I await your response.

Sincerely,

A handwritten signature in cursive script that reads "David L. Belden".

David L. Belden
Environmental Coordinator

cc. Joe Kelly

PCB-GONE in Florida since 1985

Monsanto/Pensacola, FL	May 2, 1985	VE S/1/85
Air Products/Pace, FL	May 13-20, 1985	
Florida Keys Electric/Tavernier, FL	Feb. 26-March 4, 1986	
Reedy Creek Utilities/Lake Buena Vista	June 25-27, 1986	
Olin/St. Marks, FL	July 31, 1986	
Air Products/Pace, FL	Aug. 1-7, 1986	
Olin/St. Marks, FL	July 10, 1987	
Air Products/Pace, FL	July 11, 1987	

17-2.210(2)(c) 2.
 IF SHUTDOWN MORE THAN
 6 months, renewed no
 more than 5 yrs from
 date of shutdown.

Prostate fee
 17-4.050(4)(2)

Requested

5/30/85	ALCOA	FT. MEADE
4/10/85	Reedy Creek Utilities,	Lake Buena Vista
2/85	Air Products and Chemicals,	Pensacola
2-3/85	Monsanto,	Pensacola

Southern Environmental Sciences, Inc.

DER
MAY 15 1985
PAQM

VISIBLE EMISSIONS EVALUATION FORM

Company Name S.D. Myers (Transformer Consul) Type Facility PCB-Gene heater
 Permit No. A037-099472 Control Device None
 Address Mobile facility, Tested on site Operating Mode 5gal/hr diesel fuel
at Monsanto plant, Pensacola, FL. Production Rate NA
 County Escambia Process Input Rate 5gal/min. incoming
 Test Date 5/1/85 Permitted Rate NA

Stack: Distance from 40' Height ~12'
 Direction from West of stack

Sky Conditions: Overcast

Background description: Gray sky

Emissions: Color None

Continuous NA Intermittent NA

Water vapor present? No

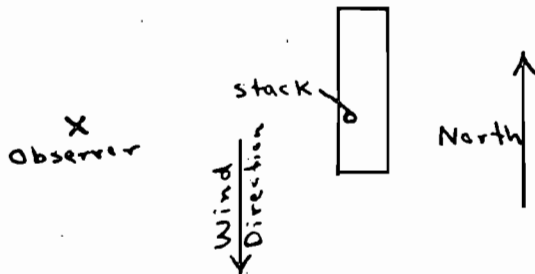
If yes, is plume Detached NA

Attached NA

Ambient Temperature: 75°F

Comments: Wind from south at 8 to 10 mph. Sun was not visible during test.

Map:



Start Time: 10:50 AM Stop Time: 12:20 PM

	0	15	30	45	0	15	30	45
0	0	0	0	0	30	0	0	0
1	0	0	0	0	31	0	0	0
2	0	0	0	0	32	0	0	0
3	0	0	0	0	33	0	0	0
4	0	0	0	0	34	0	0	0
5	0	0	0	0	35	0	0	0
6	0	0	0	0	36	0	0	0
7	0	0	0	0	37	0	0	0
8	0	0	0	0	38	0	0	0
9	0	0	0	0	39	0	0	0
10	0	0	0	0	40	0	0	0
11	0	0	0	0	41	0	0	0
12	0	0	0	0	42	0	0	0
13	0	0	0	0	43	0	0	0
14	0	0	0	0	44	0	0	0
15	0	0	0	0	45	0	0	0
16	0	0	0	0	46	0	0	0
17	0	0	0	0	47	0	0	0
18	0	0	0	0	48	0	0	0
19	0	0	0	0	49	0	0	0
20	0	0	0	0	50	0	0	0
21	0	0	0	0	51	0	0	0
22	0	0	0	0	52	0	0	0
23	0	0	0	0	53	0	0	0
24	0	0	0	0	54	0	0	0
25	0	0	0	0	55	0	0	0
26	0	0	0	0	56	0	0	0
27	0	0	0	0	57	0	0	0
28	0	0	0	0	58	0	0	0
29	0	0	0	0	59	0	0	0

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

THIS IS TO CERTIFY THAT

Byron E. Nelson, has completed the STATE OF FLORIDA visible emissions evaluation training and is a qualified observer of visible emissions as specified by EPA reference method 9.
 This certificate expires on Sept. 15, 1985

Judi Sears Byron E. Nelson
 Certification Officer Bearer's Signature
 DER Form PERM 5-9 (Jun 79)

SUMMARY OF AVG. OPAC.

Set	Sum	Avg.
1	0	0
2	0	0
3	0	0
4	0	0
5	0	0
6	0	0
7	0	0
8	0	0
9	0	0
10	0	0

Emission Limit $\leq 20\%$
(6 min. avg)

Averaging Period 6 min

Average Opacity 0%

Compliance: Yes No

TRANSFORMER CONSULTANTS
DIVISION S.D.MYERS, INC
18100 UPPER BAY ROAD #208
HOUSTON, TEXAS 77058

713/333-5684

DATE 4-22-85

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GA. 30365

RECEIVED

APR 26 1985

Dept. of Environmental Regulation
Office of General Counsel

ATTENTION: MR. CHARLES R. JETER
REGIONAL ADMINISTRATOR

DEAR MR. JETER,

THIS IS TO NOTIFY YOU THAT S.D. MYERS, INC. HAS BEEN CONTRACTED TO DECHLORINATE PCB'S IN TRANSFORMER MINERAL OIL, USING OUR APPROVED PCB-GONE PROCESS.


THE SCOPE OF WORK MEETS THE CONDITIONS OF APPROVAL SET FORTH BY THE STATE AND REGION IV, U.S.E.P.A..

THE COMPANY WHERE PCB-GONE IS TO BE DONE:

ALCOA
FT. MEADE, FL.

PROJECTED STARTING DATE: 5-30-85

SINCERELY,



DAVE HENCEROOTH
REGIONAL SALES MANAGER

DH/dh

c/c: DEPARTMENT OF ENVIRONMENTAL REGULATIONS
BUREAU OF AIR QUALITY MANAGEMENT
CENTRAL AIR PERMITTING
2600 BLAIR STONE ROAD
TALLAHASSEE, FL. 32301
ATTN: MR. DOUGLAS H. MacLAUGHLIN
ASSISTANT GENERAL COUNSEL

c/c: MAYOR ROBERT F. BULLARD
PO BOX 856
FT. MEADE, FL. 33841

c/c: DEPT. OF ENVIRONMENTAL REGS
7601 HWY. 301 NORTH
TAMPA, FL. 33610
ATTN: DAN WILLIAMS

c/c: VERN SIR LOUIS, V.P. PRODUCTION
J.J. KELLY, ENVIRONMENTAL AFFAIRS
JOHN WUNDERLE, MGR. ENVIRONMENTAL SERVICES
MARTIN FAUSNIGHT, PRODUCTION MANAGER

DER

APR 29 1985

BAQM

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Steve Smallwood

INITIAL

DATE

2.

Cheri

INITIAL

DATE

3.

GP

INITIAL

DATE

4.

file

INITIAL

DATE

REMARKS:

INFORMATION

REVIEW & RETURN

REVIEW & FILE

INITIAL & FORWARD

DISPOSITION

REVIEW & RESPOND

PREPARE RESPONSE

FOR MY SIGNATURE

FOR YOUR SIGNATURE

LET'S DISCUSS

SET UP MEETING

INVESTIGATE & REPT

INITIAL & FORWARD

DISTRIBUTE

CONCURRENCE

FOR PROCESSING

INITIAL & RETURN

DER
APR 29 1985
BAQM

FROM:

Doug MacLaughlin

DATE

4-29

PHONE

Best Available Copy

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

RECEIVED

MAR 29

Office of the Secretary

DER

APR 1 1985

BAQM

TO: Victoria J. Tschinkel
 FROM: Clair Fancy *[Signature]*
 DATE: March 29, 1985
 SUBJ: Approval of Attached Air Operating Permit

Attached for your approval and signature is one Air Operating Permit for Transformer Consultants. This is a statewide permit for the operation of the PCB Gone process. It was decided that both the construction and operating permits would be issued in Tallahassee, with a condition of the operating permit requiring approval from the appropriate district office and public notification of the location and hours of operation each time the unit is relocated.

On March 5, 1985, copies of the draft permit were sent to all DER District offices, as well as all approved local program offices, for comments. Their responses are incorporated into the final permit. Day 90, after which the permit would be issued by default, is May 6, 1985.

The Bureau recommends your approval and signature.

CF/pa

Attachments

TO: S. Fox, DER
C. Forthman, DER
R. McVety, DER
R. Kriegel, DER Northwest District
J. Brown, DER Northeast District
R. Garrity, DER Southwest District
A. Alexander, DER St. Johns River District
P. Edwards, DER South Florida District
R. Duke, DER Southeast Florida District
D. Bayly, Duval County
R. Stewart, Hillsborough County
J. Gibbs, Pinellas County
F. Gargiulo, Palm Beach County
V. Howard, Broward, County
R. Rodon, Dade County

FROM: C.H. Fancy

DATE: March 5, 1985

SUBJ: PCB GONE unit

Attached is a draft operating permit for statewide operation of the PCB GONE process. If you do not have any adverse comments about its contents by March 15, 1985, we propose to get it signed in Tallahassee on that date. If you have a problem, please call me at SunCom 278-1344, or write me at the above address.

CHF/rw

Attachment

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP		ACTION NO.	
		ACTION DUE DATE	
1. TO: (NAME, OFFICE, LOCATION)	INITIAL		
<i>Clair Fancy</i>	DATE		
2.	INITIAL		
	DATE		
3.	INITIAL		
	DATE		
4.	INITIAL		
	DATE		
<p>REMARKS:</p> <p><i>Mr. Art Bolivar from Miami called to make comments on the PCB Gene? permit. You apparently had asked for comments by today (Fri.) He feels strongly that a specific condition should be included which says something to the effect of:</i></p> <p><i>" the appropriate local program shall be advised prior to the relocation of the unit to that programs area "</i></p>	INFORMATION		
	REVIEW & RETURN		
	REVIEW & FILE		
	INITIAL & FORWARD		
	DISPOSITION		
	REVIEW & RESPOND		
	PREPARE RESPONSE		
	FOR MY SIGNATURE		
	FOR YOUR SIGNATURE		
	LET'S DISCUSS		
	SET UP MEETING		
	INVESTIGATE & REPT		
INITIAL & FORWARD			
DISTRIBUTE			
CONCURRENCE			
FOR PROCESSING			
INITIAL & RETURN			
FROM:	DATE		
<i>Tom Rogers</i>	<i>3/15</i>		
	PHONE		



Ed P
CF
File

Suite 208, 18100 Upper Bay F.
Houston, Texas 77058
Phone: (713) 333-5684

March 18, 1985

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GA 30365

DER

APR 1 1985

BAQM

Attention: Mr. Charles R. Jeter
REGIONAL ADMINISTRATOR

Gentlemen:

This is to notify you that S. D. Myers, Inc. has been contracted to DeChlorinate PCB's in transformer mineral oil, using our approved PCB-Gone process.

The scope of work meets the conditions of approval set forth by the State and Region IV, U.S.E.P.A.

The Company where PCB-Gone is to be done:

REEDY CREEK UTILITIES
LAKE BUENA VISTA, FLA 32830

Projected starting date: 4/18/85

Sincerely,

Dave Henceroth
DAVE HENCEROTH
Regional Sales Manager

DH/dsm

cc: ST. JOHNS RIVER DISTRICT
3319 Maquire Blvd. Suite 232
Orlando, Fla 32803

Mayor Bill Sterner
P. O. BOX 40/Walt Disney World
Lake Buena Vista, FLA 32830

Mr. Alex Senkevich

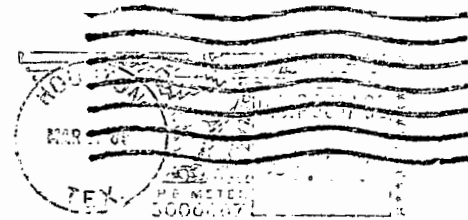
cc: V. Sir Louis, V.P. Production
J.J. Kelly, Environmental Affairs
M. Fausnight, Mgr. Production

Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting
2600 Blair Stone Road
Tallahassee, FLA 32301

Acts 4:12

DIVISION OF
ED Myers **TRANSFORMER**
CONSULTANTS

Suite 208, 18100 Upper Bay Road
Houston, Texas 77058



CERTIFIED
P 548 284 903
MAIL

**RETURN RECEIPT
REQUESTED**

DEPARTMENT OF ENVIRONMENTAL REGULATIONS
BUREAU OF AIR QUALITY MANAGEMENT
CENTRAL AIR PERMITTING
2600 Blair Stone Road
Tallahassee, FLA 32301

PUBLIC NOTICE

The Department of Environmental Regulation intends to modify the existing operating permit for Transformer Consultants to operate a .6 million Btu per hour heater which is an integral part of a relocatable system to dechlorinate PCB contaminated transformer oils. All conditions required to insure compliance with Chapter 17-2, Florida Administrative Code, will remain unchanged.

The unit will be permitted to treat 7,318 gallons of PCB oil located at Reedy Creek Utilities from April 14, 1985 to January 15, 1986.

Any comments received by the St. Johns River District Office, 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803 within 14 days after publication of this notice will be considered before the operating permit is modified.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, FAC, within 14 days of the date of this notice with:

Office of General Counsel
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

A copy of this petition must also be sent to:

District Manager/Florida Dept. of Environmental Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

Appeared in Orlando Cent. on March 22, 1985

- Encourage participation in Training Sessions
- go slow; study handouts, ask for questions
- don't work outside of mobile source field

Pensacola:

no malfunction

c20% except for startup

if leak, how would be detected

vent in sector, if into tank

Tom Sawicki called in ref PCB Gone
Condition 12 - add "and to
district in which PCB Gone
Unit is located"

JJ



P.O. Box 4724
Akron, Ohio 44310
Phone: (216) 929-2847
Toll Free: (800) 321-9580

January 29, 1985

Mr. C. H. Fancy, P.E.
Deputy Bureau Chief
State of Florida
Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Mr. Fancy:

As per our phone conversation of January 29, 1985, S. D. Myers, Inc. is applying for a state wide operating permit in Florida in order to perform our PCB-Gone Dechlorination Process.

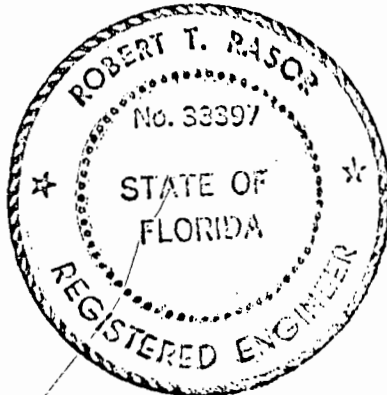
I have enclosed a copy of a past operating permit request along with a copy of our original construction permit and results from our Florida emissions test.

If you have any questions regarding the enclosed, please do not hesitate to call me.

Sincerely,

John P. Wunderle, Jr.
Manager, Environmental Services

Robert T. Rasor
Manager, Field Service & Engineering



JPW/RR/1h
Enclosures

DER
FEB 5 1985
BAQM

Mr. Farcy,

I mailed you the attached
letter January 29, 1985 but
I neglected to send the check.
I hope this hasn't caused any
inconvenience.

Thank you

John P. Wenderle / ⁴²⁸278

DER

FEB 5 1985

BAQM

31184

DIVISION OF S.D. MYERS **TRANSFORMER CONSULTANTS**

P. O. BOX 4724 AKRON, OHIO 44310-0575

THE SUM **100 DOLLARS 00 CTS**

DOLLARS

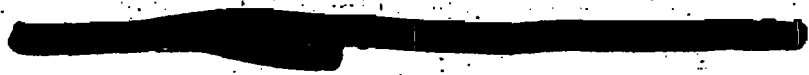
PAY

DATE	TO THE ORDER OF	GROSS AMOUNT		DISCOUNT	CHECK AMOUNT
		OTHER	ACCTS PAYABLE		
1-30-85	FLORIDA DEPT. OF ENVIRONMENTAL REGULATION	100.00			100.00

TRANSFORMER CONSULTANTS
DIV. S. D. MYERS, INC.
VOID IF NOT CASHED WITHIN 60 DAYS

S. D. Myers

NATIONAL CITY BANK
AKRON, OHIO 44305



2/15
Bill, Patty -
I need to be involved in
this as it proceeds. This will
basically turn into a
CAPS operating permit.
Quite possibly, Ed should
be review engineer on this.
Clair

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No. 76061

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Transformer Consultants Date February 5, 1985

Address P.O. Box 4724 Akron Ohio 44310-0575 Dollars \$ 100.00

Applicant Name & Address same as above

Source of Revenue _____

Revenue Code 001032 Application Number AO 37-099472

By Patricia G. Adams



Acts 4:12

DIVISION OF
S. D. Myers

TRANSFORMER
CONSULTANTS

DER
FEB 5 1985
BAQM

P.O. Box 4724
Akron, Ohio 44310
Phone: (216) 929-2847
Toll Free: (800) 321-9580

January 29, 1985

Mr. C. H. Fancy, P.E.
Deputy Bureau Chief
State of Florida
Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Mr. Fancy:

As per our phone conversation of January 29, 1985, S. D. Myers, Inc. is applying for a state wide operating permit in Florida in order to perform our PCB-Gone Dechlorination Process.

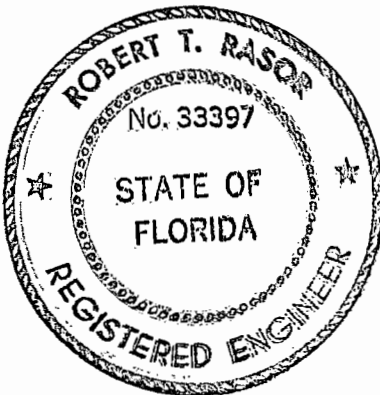
I have enclosed a copy of a past operating permit request along with a copy of our original construction permit and results from our Florida emissions test.

If you have any questions regarding the enclosed, please do not hesitate to call me.

Sincerely,

John P. Wunderle, Jr.
Manager, Environmental Services

Robert T. Rasor
Manager, Field Service & Engineering



JPW/RR/1h

Enclosures

DER
FEB 5 1985
BAQM

Southern Environmental Sciences, Inc.

D.W.
PCB June 47

VISIBLE EMISSIONS EVALUATION FORM

Company Name Transformer Consultants Type Facility PCB re-refiner heater
 Permit No. A037-65849 Control Device None
 Address Mobile facility - tested on site Operating Mode 5 gal/hr diesel fuel
at Alcoa plant, Ft. Meade, Fla. Production Rate NA
 County Polk Process Input Rate 5 gal/min Inorganic oil
 Test Date March 14, 1984 Permitted Rate NA

Stack: Distance from 30' Height ~12'
 Direction from WNW

Start Time: 2:40 PM Stop Time: 3:40 PM

Sky Conditions: Clear

Background description: Industrial Bldg.

Emissions: Color None

Continuous NA Intermittent NA

Water vapor present? No

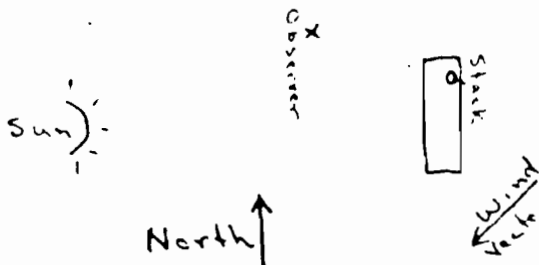
If yes, is plume Detached NA

Attached NA

Ambient Temperature: 80°F

Comments: wind from ENE at approx. 5 mph

Map:



	0	15	30	45	0	15	30	45
0	0	0	0	0	0	0	0	0
1	0	0	0	0	0	0	0	0
2	0	0	0	0	0	0	0	0
3	0	0	0	0	0	0	0	0
4	0	0	0	0	0	0	0	0
5	0	0	0	0	0	0	0	0
6	0	0	0	0	0	0	0	0
7	0	0	0	0	0	0	0	0
8	0	0	0	0	0	0	0	0
9	0	0	0	0	0	0	0	0
10	0	0	0	0	0	0	0	0
11	0	0	0	0	0	0	0	0
12	0	0	0	0	0	0	0	0
13	0	0	0	0	0	0	0	0
14	0	0	0	0	0	0	0	0
15	0	0	0	0	0	0	0	0
16	0	0	0	0	0	0	0	0
17	0	0	0	0	0	0	0	0
18	0	0	0	0	0	0	0	0
19	0	0	0	0	0	0	0	0
20	0	0	0	0	0	0	0	0
21	0	0	0	0	0	0	0	0
22	0	0	0	0	0	0	0	0
23	0	0	0	0	0	0	0	0
24	0	0	0	0	0	0	0	0
25	0	0	0	0	0	0	0	0
26	0	0	0	0	0	0	0	0
27	0	0	0	0	0	0	0	0
28	0	0	0	0	0	0	0	0
29	0	0	0	0	0	0	0	0

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

THIS IS TO CERTIFY THAT

Byron E. Nelson has completed the STATE OF FLORIDA visible emissions evaluation training and is a qualified observer of visible emissions as specified by EPA reference method 9.
 This certificate expires on June 15, 1984
Judi Kard Certification Officer
Byron E. Nelson Bearer's Signature
 DER Form PERM 5-9 (Jun 79)

SUMMARY OF AVG. OPAC.		
Set	Sum	Avg.
1	0	0
2	0	0
3	0	0
4	0	0
5	0	0
6	0	0
7	0	0
8	0	0
9	0	0
10	0	0

Emission Limit 20%
 Averaging Period 6 min
 Average Opacity 0%
 Highest Avg. Opacity 0%
 % of Readings above Permitted 0
 Compliance: Yes No

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221

Permit Number: AC 37-65849
Expiration Date: January 1, 1984
County: relocatable
Latitude/Longitude:

Project: A relocatable unit to
dechlorinate transformer oils.

This permit is issued under the provisions of Chapter(s) 403
17-2 and 17-4, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or **operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:**

Construction of a 0.6 million Btu per hour heater which is an integral part of a portable processor to dechlorinate transformer oils contaminated with polychlorinated biphenyls. The mobile unit will be operated at different facilities located within the State of Florida. The location and hours of operation will be a condition of the operating permit which must be modified when the relocatable unit is moved from one facility to another.

Attachments:

1. Application to Construct Air Pollution Source (DER Form 17-1.202(1)) received February 15, 1983.
2. C. H. Fancy's letter of incompleteness dated March 22, 1983
3. J. J. Kelly's letter dated May 27, 1983
4. Robert L. Guyer's letter dated August 29, 1983
5. Joyce M. Gibbs' letter dated September 1, 1983

November 15, 1983

Florida Dept. of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting
2600 Blair Stone Road
Tallahassee, FL 32301

Dear Sir:

S.D. Myer's Inc. is requesting an operating permit to utilize its PCB-Gone process within the state of Florida. In compliance with specific condition number eight (8) of your permit application we are enclosing the following information:

- a. Borden Products Division
P.O. Box 23988
Tampa, Florida 33630
- b. See Enclosure
- c. Monday, January 23, 1984
8:00 A.M. through 8:00 P.M.
- d. 840 Total Gallons
- e. See Enclosure

The same week of the Borden Products job, S.D. Myer's Inc. is scheduled to perform its PCB-Gone process in Ft. Meade, Florida, approximately 40 miles from Tampa, Florida.

The information concerning the second location is also presented in compliance with specific condition number eight (8):

- a. Aluminum Company of America
P.O. Box 896
Ft. Meade, Florida 33841
- b. See Enclosure
- c. Wednesday, January 25, 1984
8:00 A.M. through 8:00 P.M.
- d. 700 Total Gallons
- e. See Enclosure



Florida Dept. of Environmental Regulation

Page 2

In accordance with specific condition number nine (9) and relating to our Alcoa operating permit request, S.D. Myer's Inc. requests a modification to its proposed Borden Products operating permit.

If there are any questions regarding this application, please do not hesitate to contact me.

Sincerely,


John P. Wunderle, Jr.
Manager, Environmental Services

JW/1h

Enclosures

cc: State of Florida
Dept. of Environmental Regulations
Southwest District
7601 Highway 301 North
Tampa, FL 33610

Attn: Mr. Dan Williams

The Pensacola Journal

PUBLISHED DAILY EXCEPT SUNDAY

PENSACOLA, ESCAMBIA COUNTY, FLORIDA

State of Florida,
County of Escambia.

Before the undersigned authority personally appeared

J. Diane Deal

who on oath says that she is Legal Advertising Supervisor

of the Pensacola Journal, a daily (except Sunday) newspaper published at Pensacola in Escambia County, Florida; with general circulation in Escambia, Santa Rosa, Okaloosa and Walton Counties that the attached copy of advertisement, being a NOTICE in the matter of

Public Notice PO# 0431064

in the _____ Court,

was published in said newspaper in the issues of

Jan 10, 1985

PURCHASING DEPT.

Affiant further say that the said The Pensacola Journal newspaper published at Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore published in said Escambia County, Florida, each _____ and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

J. Diane Deal

Sworn to and subscribed before me this 10th

day of Jan, A.D., 1985.

Betty J. Fenton
NOTARY PUBLIC.

My Commission Expires Oct. 16, 1987

PUBLIC NOTICE

The Department of Environmental Regulation intends to modify the existing operating permit for Transformer Consultants to operate a .6 million Btu per hour heater which is an integral part of a relocatable system to dechlorinate PCB contaminated transformer oils. All conditions required to insure compliance with Chapter 17-2, Florida Administrative Code, will remain unchanged.

The unit will be permitted to treat 756 gallons of PCB oil located at Monsanto, Pensacola, Florida from February, 1985 to March, 1985, and 6,236 gallons of PCB oil located at Air Products & Chemicals, Pensacola, Florida from February, 1985.

Any comments received by the Northwest District office, Robert V. Kriegl, Dist. Manager 160 Governmental Center Pensacola, FL 32501 within 14 days after publication of this notice will be considered before the operating permit is modified.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, FAC, within 14 days of the date of this notice with:

Office of General Counsel
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

LEGAL NO. 29259 1-T JAN
10, 1985

**TRANSFORMER CONSULTANTS
D. MYERS, INC. DIV.**

TO: Clair Fancy - BAQM
FROM: Bill Thomas *WJT*
DATE: January 22, 1985
SUBJECT: Transfer Consultants -
PCB - GONE Unit

Pursuant to your request, attached is a draft operating permit for the relocatable facility. Please note, we have changed the public notice format to conform with the latest rule revisions.

We would appreciate a copy of an application for an operating permit.

We do not have any record of compliance with Specific Condition No. 10 of AC37-65849 since these required monthly reports have never been submitted to this office.

If we can be of further assistance, please give me a call.

JWE/js

Attachments

DER
JAN 30 1985
BAQM

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33610



99472

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

DR. RICHARD D. GARRITY
DISTRICT MANAGER

Mr. John P. Wunderle, Jr., Manager
Environmental Services
Transformer Consultants
Post Office Box 3575
Akron, Ohio 44310

Dear Mr. Wunderle:

Re: A relocatable unit to dechlorinate
transformer oils

Attached is Permit No. 0. Should you object to the issuance of this permit or the specific conditions of the permit, you have a right to petition for a hearing pursuant to the provisions of Section 120.57, Florida Statutes. The petition must be filed within fourteen (14) days from receipt of this letter. The petition must comply with the requirements of Section 17-103.155 and Rule 28-5.201, Florida Administrative Code, (copies attached) and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32301. Petitions which are not filed in accordance with the above provisions are subject to dismissal by the Department.

In the event a formal hearing is conducted pursuant to Section 120.57(1), all parties shall have an opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witnesses and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exceptions to any order or hearing officer's recommended order, and to be represented by counsel.

If an informal hearing is requested, the agency, in accordance with its rules of procedure, will provide affected persons or parties or their counsel an opportunity, at a convenient time and

Mr. John P. Wunderle, Jr., Manager
Akron, Ohio

Page Two

place, to present to the agency or hearing officer, written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), Florida Statutes.

Sincerely,

C. H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality
Management

CHF/js

Attachment: as stated

cc: S. Myers, Transformer Consultants
R. Basor, Transformer Consultants
~~S. Fox, DER *Portman*~~
~~C. Fourhman DER~~
R. McVety ~~G. Parker, DER~~
J. Brown ~~R. Kriegel, DER Northwest District~~
~~District Manager, DER Northeast District~~
R. Garrity, DER Southwest District
A. Alexander, DER St. Johns River District
P. Edwards, DER South Florida District
R. Duke, DER Southeast Florida District
D. Bayly, Duval County
R. Stewart, Hillsborough County
J. Gibbs ~~G. Robbins, Pinellas County~~
F. Gargiulo, Palm Beach County
V. Howard, Broward County
R. Rodon, Dade County

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33610



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

DR. RICHARD D. GARRITY
DISTRICT MANAGER

PERMITTEE:

Mr. John P. Wunderle, Jr., Manager
Environmental Services
Transformer Consultants
Post Office Box 3575
Akron, Ohio 44310

PERMIT/CERTIFICATION

Permit No.: 0
County: 0 *Statewide*
Expiration Date: 0
Project: A relocatable unit
to dechlorinate
transformer oils

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

Public Notification of

For the operation of a 0.6 million BTU per hour heater which is an integral part of a portable processor to dechlorinate transformer oils contaminated with polychlorinated biphenyls. The mobile unit will be operated at different facilities located within the State of Florida. The location and hours of operation will be a condition of the operating permit ~~which must be amended~~ when the relocatable unit is moved from one facility to another.

Replaces Permit No.: AC37-65849

PERMITTEE: Permit/Certification No.: 0
Transformer Consultants Project: A relocatable unit to
dechlorinate transformer oils

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate the enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.712(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by any order from the department.

PERMITTEE: Permit/Certification Number: 0
Transformer Consultants Project: A relocatable unit to
dechlorinate transformer oils

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as maybe required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purposes of;

a. Having access to and copying any records that must be kept under the conditions of the permit:

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

(a) a description of and cause of non-compliance; and

(b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

PERMITTEE: Permit/Certification No: 0
Transformer Consultants Project: A relocatable unit to
dechlorinate transformer oils

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards (Section 401. PL 92-500)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE: Permit/Certification No.: 0
Transformer Consultants Project: A relocatable unit to
dechlorinate transformer oils

14. (con't)

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. All applicable rules of the Department including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. (Section 17-4.07(1), F.A.C.)

2. Test the emissions for the following pollutant(s) at intervals of 12 months from the date March 14, 1984, and submit a copy of test data to the Department of Environmental Regulation, Bureau of Air Quality Management, Central Air Permitting, 2600 Blair Stone Road, Tallahassee, Florida 32301, within forty five days of such testing (Section 17-2.700 (2), Florida Administrative Code (F.A.C.)).

- | | |
|------------------|--------------------------|
| () Particulates | () Sulfur Oxides |
| () Fluorides | () Nitrogen Oxides |
| (X) Opacity | () Hydrocarbons |
| | () Total Reduced Sulfur |

PERMITTEE: Permit/Certification No.: 8
Transformer Consultants Project: A relocatable unit to
dechlorinate transformer oils

SPECIFIC CONDITIONS (con't):

3. Testing of emissions must be accomplished at approximately 0.6 million BTU per hour. Failure to submit the input rates or operation at conditions which do not reflect actual operating conditions may invalidate the data (Section 403.161(1)(c), Florida Statutes).
4. Visible emissions to the outside air from the heater stack shall not exceed 20 percent opacity (six minute average) as determined by DER Method 9 pursuant to Section 17-2.610(2)(a), F.A.C.
5. Fuel oil fired in the burner shall be uncontaminated ASTM grade No. 2 having a sulfur content of less than 0.7 percent by weight.
6. The applicant shall notify the District Office of the Department in which the unit is operating at least 15 working days prior to conducting the required annual compliance test.
7. There shall be no detectable PCBs in exhaust or vented gases from the disposal portion of the PCB-GONE process. If gases escape and contain PCBs, the applicant must immediately cease operation and must inform the Department of Environmental Regulation's District Office having jurisdiction by close of business on the next regular business day. No PCBs may be processed until the emission problem has been corrected to the satisfaction of the Department.
8. Transformer dielectric fluid must be sampled after it exits the PCB destruction portion of the PCB-GONE process but before it is returned to the transformer or other container. This sample must be tested for PCB concentration within 15 days. If the PCB concentration of the sample is 2 ppm or greater, that fluid must be treated again with the PCB-GONE process within 45 days of the test. If the transformer dielectric fluid is returned to the transformer after the PCB-GONE process has been used, that transformer cannot be reclassified as a non-PCB transformer unless the fluid is tested again after at least three months of in service use and shown to contain less than 50 ppm PCBs. Any transformer dielectric fluid treated with the PCB-GONE process must be disposed of as if it contained between 50 and 500 ppm PCBs or the original concentration of PCBs until such time that the required testing shows that PCB concentration has been reduced below 2 ppm.
9. Any solid wastes or by-products generated by the PCB-GONE system must be stored in accordance with Annex III, 40 CFR 761.42(b), and must be disposed of in a chemical waste landfill approved by EPA under Annex III of the PCB Regulation (40 CFR 761.41). Solid waste disposal must comply with all applicable federal regulations. Cleaning of the filters must be handled according to the requirements of applicable sections of 40 CFR, Part 761.

PERMITTEE: Transformer Consultants Permit/Certification No.: 8
Project: A relocatable unit to dechlorinate transformer oils

SPECIFIC CONDITIONS (con't):

10. The Permittee must request ~~an amendment to~~ *a department approval for* this Operating Permit each time the PCB-GONE processing system is relocated to another site. The request ~~to amend the permit~~ must be submitted prior to publication of the public notice and must include the information requested below in letter form and be submitted to the District Office where the unit will be operated with a copy to the Department of Environmental Regulation, Bureau of Air Quality Management, Central Air Permitting, 2600 Blair Stone Road, Tallahassee, Florida, 32301:

- a. The name and address of the company whose transformer dielectric fluid is to be processed by the PCB-GONE process.
- b. A plot plan showing the proposed location of the PCB-GONE unit.
- c. The dates and times the unit will be operated at this location.
- d. The total number of gallons of transformer dielectric fluid to be processed at this location.
- e. Provide a draft Public Notice for the new location. The format for the notice is attached as Exhibit I.

11. After the Department receives the request for ~~amendment~~ *relocation*, the Permittee shall, at his own expense, publish the public notice one time only in the Legal Ad Section of a newspaper of general circulation in the area the unit is to be located. Proof of publication shall be submitted to both Department Offices within 7 days of publication. The unit cannot relocate until ~~the operating permit is amended~~ *with notification*

approval is received ~~by the district office~~ *from*

12. Detailed monthly reports, including the number of gallons, dates, times, name, address, location, any unusual incidents, and any other pertinent information, must be submitted to Department of Environmental Regulation, Bureau of Air Quality Management Central Air Permitting, 2600 Blair Stone Road, Tallahassee, Florida, 32301, and to the district office(s) that the unit has operated in during the month. These reports are due on the tenth day of the following month. If no fluids are treated during the month a report to that effect shall be submitted to the the Tallahassee office at the above address.

PERMITTEE: Permit/Certification No.: 0
Transformer Consultants Project: A relocatable unit to dechlorinate transformer oils

SPECIFIC CONDITIONS (con't):

13. An application to renew this operating permit shall be submitted to the Department of Environmental Regulation, Bureau of Air Quality Management Central Air Permitting, 2600 Blair Stone Road, Tallahassee, Florida, 32301 sixty (60) days prior to the expiration date of this permit.

Issued this ___ day of _____
19__.

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

Victoria J. Tschinkel, Secretary

Exhibit I

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action on Permit Application

The department gives notice of its intent to amend an operating permit to allow Transformer Consultants to temporarily operate a .6 million BTU per hour heater which is an integral part of a relocatable system to dechlorinate PCB contaminated transformer oils. All conditions required to insure compliance with Chapter 17-2, Florida Administrative Code, will remain unchanged.

The unit will be permitted to treat _____ gallons of PCB oil located at _____ (Name of Facility and location) from _____ (date) to _____ date .

Any comments received by the _____ (Name) District office, _____ (complete address) within 14 days after publication of this notice will be considered before the operation will be authorized in accordance with their permits.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at Department of Environmental Regulation, _____ (Name and address of District Office)

Attached is ^a draft operating permit for start-up
operation of the PCB Gore process. If you do
not have any adverse comments about its contents by
March 15, 1985, we propose to get it signed
in Tallahassee on that day. If you have a
problem, please call or write to me at
me at 2781344
SC

Heretore address.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

December 1, 1983

Transformer Consultants
Division of S. D. Myers
P. O. Box 3575
Akron, Ohio 44310

ATTN: Mr. John T. Wunderle, Jr.
Manager of Environmental Services

Dear Mr. Wunderle:

This is in response to your letter dated November 15, 1983, regarding the proposed operation of your firms PCB-GONE process at the Borden Products Division facility in Tampa and the Aluminum Company of America facility in Ft. Meade.

Prior to starting operation at these locations, a public notice must be published in a newspaper of general circulation in the area in the form enclosed in my letter dated to you October 5, 1983 (copy attached). Your letter of November 15, enclosed a public notice for the construction permit, and not the operating permit as was requested. Consequently this will have to be republished.


Once the public notice period has lapsed, assuming there are no adverse public concerns, please contact Mr William Thomas of our Tampa office so that a thorough inspection of the facility while at the Borden Products Division can be made. Upon completion of this inspection, if all appropriate permit conditions appear to be totally complied with, then he will send an inspection report to this office. At that point we will issue an operating permit for a five year period with a provision that the installation cannot operate at a given location until the appropriate public notice period has run and that the appropriate district has written you a brief letter of authorization allowing the unit to operate at that particular location.

All of the district air engineers agreed that this would be a much simpler process than your having to apply for a totally new operating permit each time the unit will be moved. This does not change the public notice requirement and you will need a formal written approval prior to operating at each location.

Transformer Consultants
Page Two
December 1, 1983

If you have any questions or comments regarding this,
please feel free to contact me at (904)488-1344.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/ks
cc: District Air Engineers
Marshall Mott-Smith

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

October 5, 1983

Mr. J. J. Kelly, Manager
Environmental Affairs
Transformer Consultants
Post Office Box 3575
Akron, Ohio 44310

Dear Mr. Kelly:

As we discussed in our recent telephone conversation, I am enclosing a copy of the sample public notice for an operating permit and a copy of a map of DER district and branch offices. If you need any further assistance, please feel free to call.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. H. Fancy".

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Enclosures

PUBLIC NOTICE

The Department of Environmental Regulation intends to ~~modify~~ *allow* ~~the existing operating permit for~~ Transformer Consultants to operate a .6 million Btu per hour heater which is an integral part of a relocatable system to dechlorinate PCB contaminated transformer oils. All conditions required to insure compliance with Chapter 17-2, Florida Administrative Code, will remain unchanged.

The unit will be permitted to treat _____ gallons of PCB oil located at (Name of Facility and location) from _____ (date) to _____ (date) .

Any comments received by the _____ (Name) District office, _____ (complete address) within 14 days after publication of this notice will be considered before the ~~operating permit is~~ *operation modified.* ~~will be authorized in accordance with their permits.~~

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, FAC, within 14 days of the date of this notice with:

Office of General Counsel
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

A copy of this petition must also be sent to:

District Manager

(Name) District
Florida Department of Environmental
Regulation

(address)

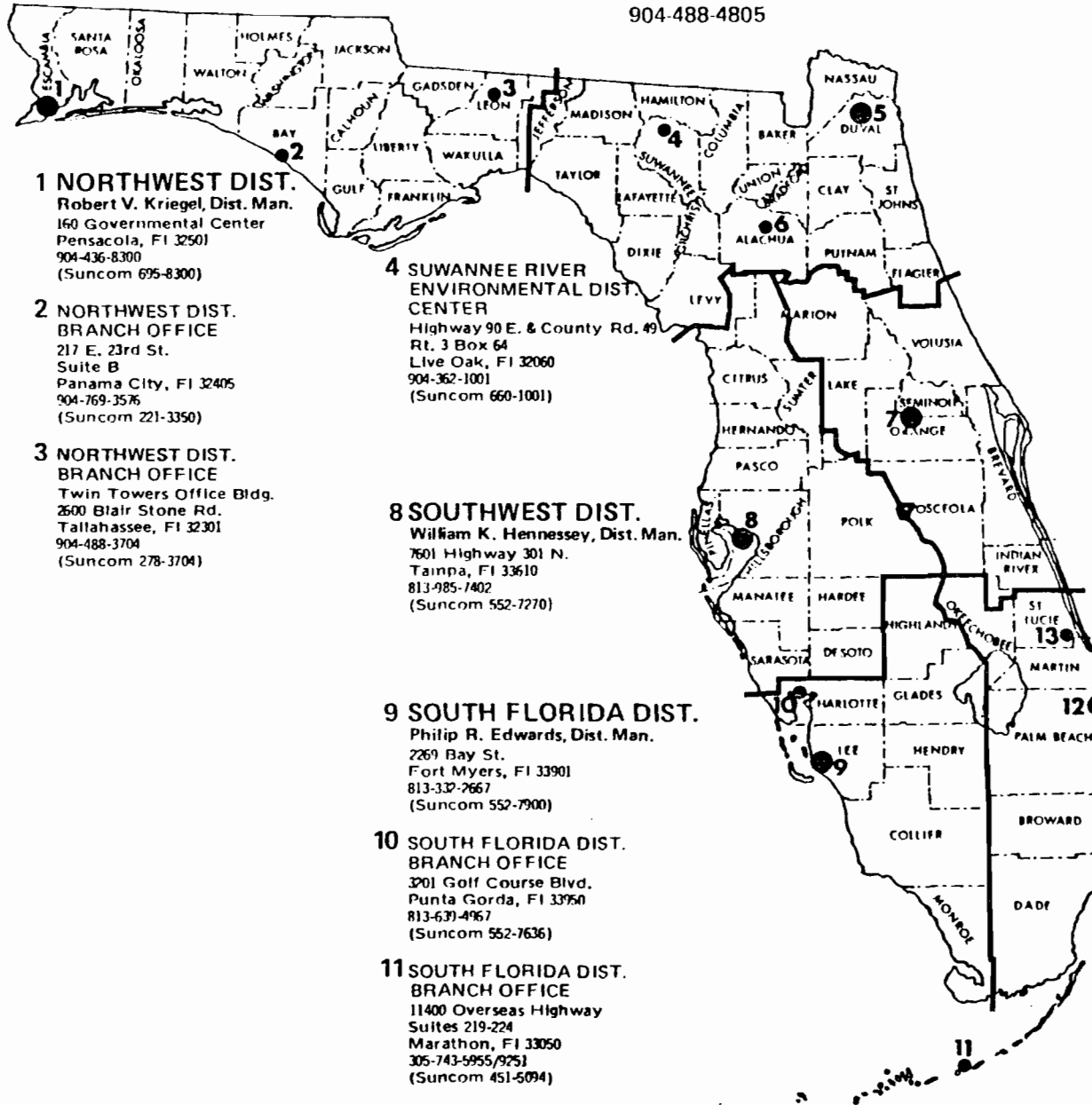
(address)

DISTRICT & BRANCH OFFICES

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

904-488-4805



1 NORTHWEST DIST.
Robert V. Kriegel, Dist. Man.
160 Governmental Center
Pensacola, FI 32501
904-436-8300
(Suncom 695-8300)

2 NORTHWEST DIST. BRANCH OFFICE
217 E. 23rd St.
Suite B
Panama City, FI 32405
904-769-3576
(Suncom 221-3350)

3 NORTHWEST DIST. BRANCH OFFICE
Twin Towers Office Bldg.
2600 Blair Stone Rd.
Tallahassee, FI 32301
904-488-3704
(Suncom 278-3704)

4 SUWANNEE RIVER ENVIRONMENTAL DIST. CENTER
Highway 90 E. & County Rd. 49
Rt. 3 Box 64
Live Oak, FI 32060
904-362-1001
(Suncom 660-1001)

8 SOUTHWEST DIST.
William K. Hennessey, Dist. Man.
7601 Highway 301 N.
Tampa, FI 33610
813-985-7402
(Suncom 552-7270)

9 SOUTH FLORIDA DIST.
Philip R. Edwards, Dist. Man.
2269 Bay St.
Fort Myers, FI 33901
813-332-2667
(Suncom 552-7900)

10 SOUTH FLORIDA DIST. BRANCH OFFICE
3701 Golf Course Blvd.
Punta Gorda, FI 33750
813-631-4967
(Suncom 552-7636)

11 SOUTH FLORIDA DIST. BRANCH OFFICE
11400 Overseas Highway
Suites 219-224
Marathon, FI 33050
305-743-5955/9251
(Suncom 451-5094)

5 NORTHEAST DIST.
G. Doug Dutton, Dist. Man.
3426 Billis Rd.
Jacksonville, FI 32207
904-396-6959
(Suncom 620-5295)

6 NORTHEAST DIST. BRANCH OFFICE
825 N.W. 23rd Ave., Suite G
Gainesville, FI 32601
904-377-7528
(Suncom 620-5150)

7 ST. JOHNS RIVER DIST.
Alex Senkevich, Dist. Man.
3319 Magulre Blvd., Suite 232
Orlando, FI 32803
305-894-7555
(Suncom 393-1011)

12 SOUTHEAST FLORIDA DIST.
Roy Duke, Dist. Man.
1301 Gun Club Rd.
P.O. Box 3858
W. Palm Beach, FI 33402
305-689-5800
(Suncom 451-5005)

13 SOUTHEAST FLORIDA DIST. BRANCH OFFICE
2745 S.E. Morningside Blvd.
Port St. Lucie, FI 33452
305-878-3890/335-4310
(Suncom 451-5063)



Acts 4:12

DIVISION OF ED Myers TRANSFORMER CONSULTANTS

P.O. Box 3575
Akron, Ohio 44310
Phone: (216) 929-2847
Toll Free: (800) 321-9580

December 27, 1983

DER
DEC 30 1983
BAQM

Florida Dept. of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting
2600 Blair Stone Road
Tallahassee, FL 32301

Dear Sir:

The enclosed legal notice should be included with our PCB-Gone operating permit request for the state of Florida, dated November 15, 1983.

This legal notice is an amendment to the inappropriate legal notice that was included with November 15th's request.

We are hopeful that this will comply with specific condition number eight (8), item (e) of the Florida Permit Application and that this final item will properly fulfill the entire permit request with regards to the utilization of our PCB-Gone process.

If there are any questions pertaining to this matter, please contact me.

John P. Wunderle, Jr.
John P. Wunderle, Jr.
Manager, Environmental Services

JW/lh

Enclosure

cc: State of Florida
Dept. of Environmental Regulations
Southwest District
7601 Highway 301 North
Tampa, FL 33610

Attn: Mr. Dan Williams

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida }
County of Hillsborough } ss.

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is Controller of The Tampa Tribune, a daily
newspaper published at Tampa in Hillsborough County, Florida; that the attached copy
of advertisement being a

LEGAL NOTICE

Notice that The Department of Environmental
Regulation intends to allow Transformer Consultants to operate
a .6 million BTU per hour heater which is an integral part of
a relocable system to dechlorinate PCB contaminated transformer
oils.
December 10, 1983.

Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has
heretofore been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first publica-
tion of the attached copy of advertisement; and affiant further says that he has neither
paid nor promised any person, firm, or corporation any discount, rebate, commission or
refund for the purpose of securing this advertisement for publication in the said
newspaper.

Sworn to and subscribed before me, this 21st day

December A.D. 19 83



(SEAL)

G. T. Gleason

J. E. P...

Notary Public, State of Florida at Large
My Commission Expires Jan. 25, 1986

PUBLIC NOTICE

The Department of Environmental Regulation intends to allow Transformer Consultants to operate a .6 million Btu per hour heater which is, an integral part of a relocable system to dechlorinate PCB contaminated transformer oils. All conditions required to insure compliance with Chapter 17-2, Florida Administrative Code, will remain unchanged. The unit will be permitted to treat 840 gallons of PCB oil located at: Borden Products Division P.O. Box 23988 Tampa, Florida 33630; Aluminum Company of America P.O. Box 896 Ft. Meade, Florida 33841 from Monday, January 23, 1984 through Wednesday, January 25, 1984. Any comments received by the State of Florida, Dept. of Environmental Regulation Southwest District, 7601 Highway 301 North, Tampa, Florida 33610 within 14 days after publication of this notice will be considered before the operation will be authorized in accordance with their permits. Any person who substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, FAC.

within 14 days of the date of this notice with:
Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting
2600 Blair Stone Road
Tallahassee, Florida 32301
A copy of this petition must also be sent to:
State of Florida
Department of Environmental Regulation
Southwest District
7601 Highway 301 North
Tampa, Florida 33610
4917 12/10/83



Acts 4:12

DIVISION OF S.D. MYERS TRANSFORMER CONSULTANTS

P.O. Box 3575
Akron, Ohio 44310
Phone: (216) 929-2847
Toll Free: (800) 321-9580

November 15, 1983

Florida Dept. of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting
2600 Blair Stone Road
Tallahassee, FL 32301

DER
NOV 18 1983
BAQM

Dear Sir:

S.D. Myer's Inc. is requesting an operating permit to utilize its PCB-Gone process within the state of Florida. In compliance with specific condition number eight (8) of your permit application we are enclosing the following information:

- a. Borden Products Division
P.O. Box 23988
Tampa, Florida 33630
- b. See Enclosure
- c. Monday, January 23, 1984
8:00 A.M. through 8:00 P.M.
- d. 840 Total Gallons
- e. See Enclosure

The same week of the Borden Products job, S.D. Myer's Inc. is scheduled to perform its PCB-Gone process in Ft. Meade, Florida, approximately 40 miles from Tampa, Florida.

The information concerning the second location is also presented in compliance with specific condition number eight (8):

- a. Aluminum Company of America
P.O. Box 896
Ft. Meade, Florida 33841
- b. See Enclosure
- c. Wednesday, January 25, 1984
8:00 A.M. through 8:00 P.M.
- d. 700 Total Gallons
- e. See Enclosure



Florida Dept. of Environmental Regulation

Page 2

In accordance with specific condition number nine (9) and relating to our Alcoa operating permit request, S.D. Myer's Inc. requests a modification to its proposed Borden Products operating permit.

If there are any questions regarding this application, please do not hesitate to contact me.

Sincerely,



John P. Wunderle, Jr.
Manager, Environmental Services

JW/1h

Enclosures

cc: State of Florida
Dept. of Environmental Regulations
Southwest District
7601 Highway 301 North
Tampa, FL 33610

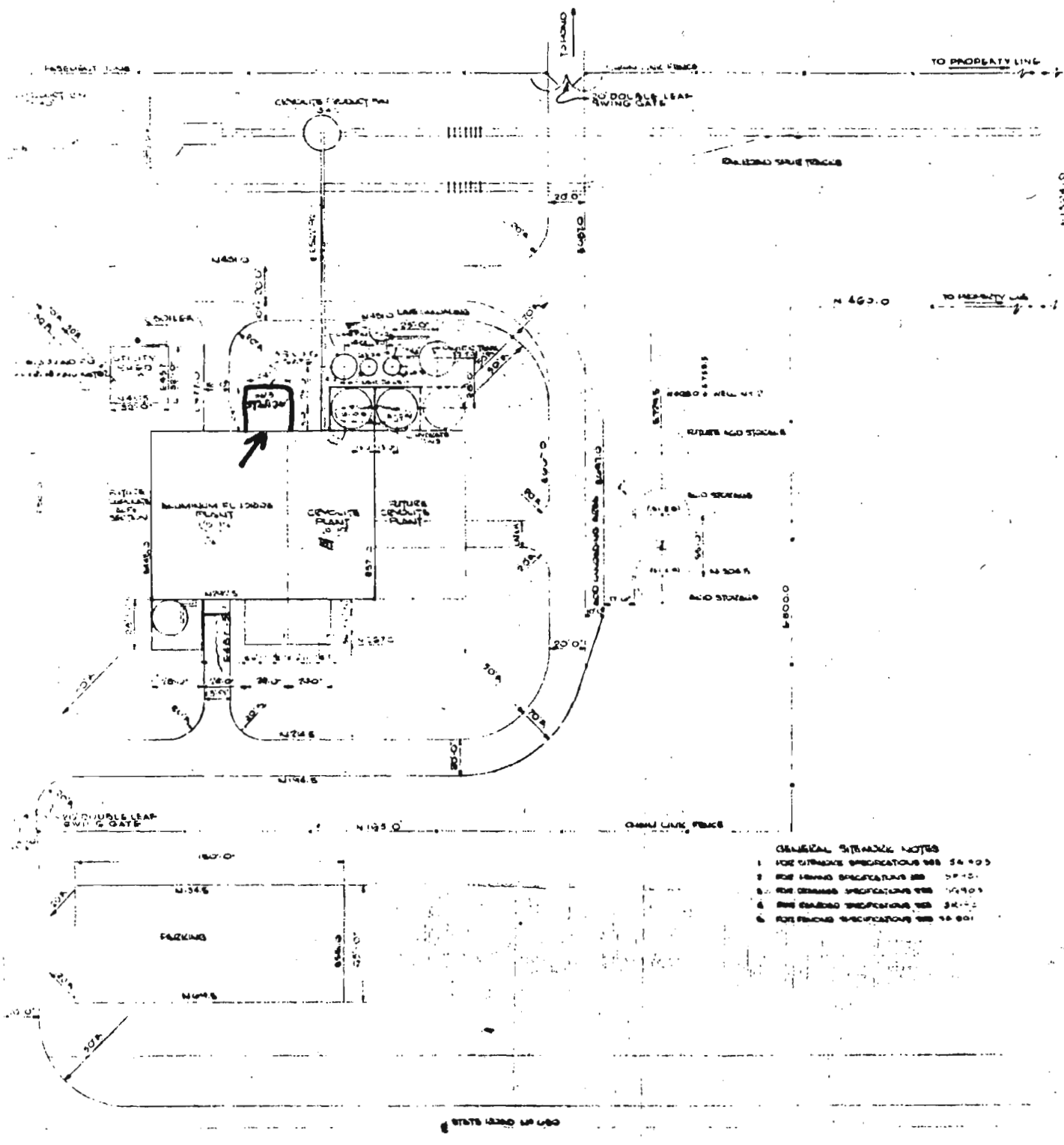
Attn: Mr. Dan Williams

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221

I. D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

SPECIFIC CONDITIONS:

8. Following approval of the initial compliance test results, a complete application for an operating permit shall be submitted to the District Office where the unit will be operated with a copy to the Department of Environmental Regulation, Bureau of Air Quality Management, Central Air Permitting, 2600 Blair Stone Road, Tallahassee, Florida, 32301. A request for an operating permit shall include the following information.
 - a. The name and address of the company whose transformer dielectric fluid is to be processed by the PCB-GONE process.
 - b. A plot plan showing the proposed location of the PCB-GONE unit.
 - note K of 1-23-84* → c. The dates and times the unit will be operated at this location.
 - d. The total number of gallons of transformer dielectric fluid to be processed at this location.
 - e. Proof of publication of a notice in a newspaper of general circulation to allow for a 14 day comment period each time the PCB-GONE unit will be moved shall be submitted with the request for an Operating Permit revision.
9. The applicant must request a modification to their Operating Permit each time the PCB-GONE processing system is relocated to another facility. The request to modify the permit must include the information requested in specific condition number 8.



- GENERAL SITEWORK NOTES
1. FOR SITEWORK SPECIFICATIONS SEE SA 403
 2. FOR GENERAL SPECIFICATIONS SEE SA 401
 3. FOR GENERAL SPECIFICATIONS SEE SA 402
 4. FOR GENERAL SPECIFICATIONS SEE SA 404
 5. FOR GENERAL SPECIFICATIONS SEE SA 405
 6. FOR GENERAL SPECIFICATIONS SEE SA 406

ALCOA

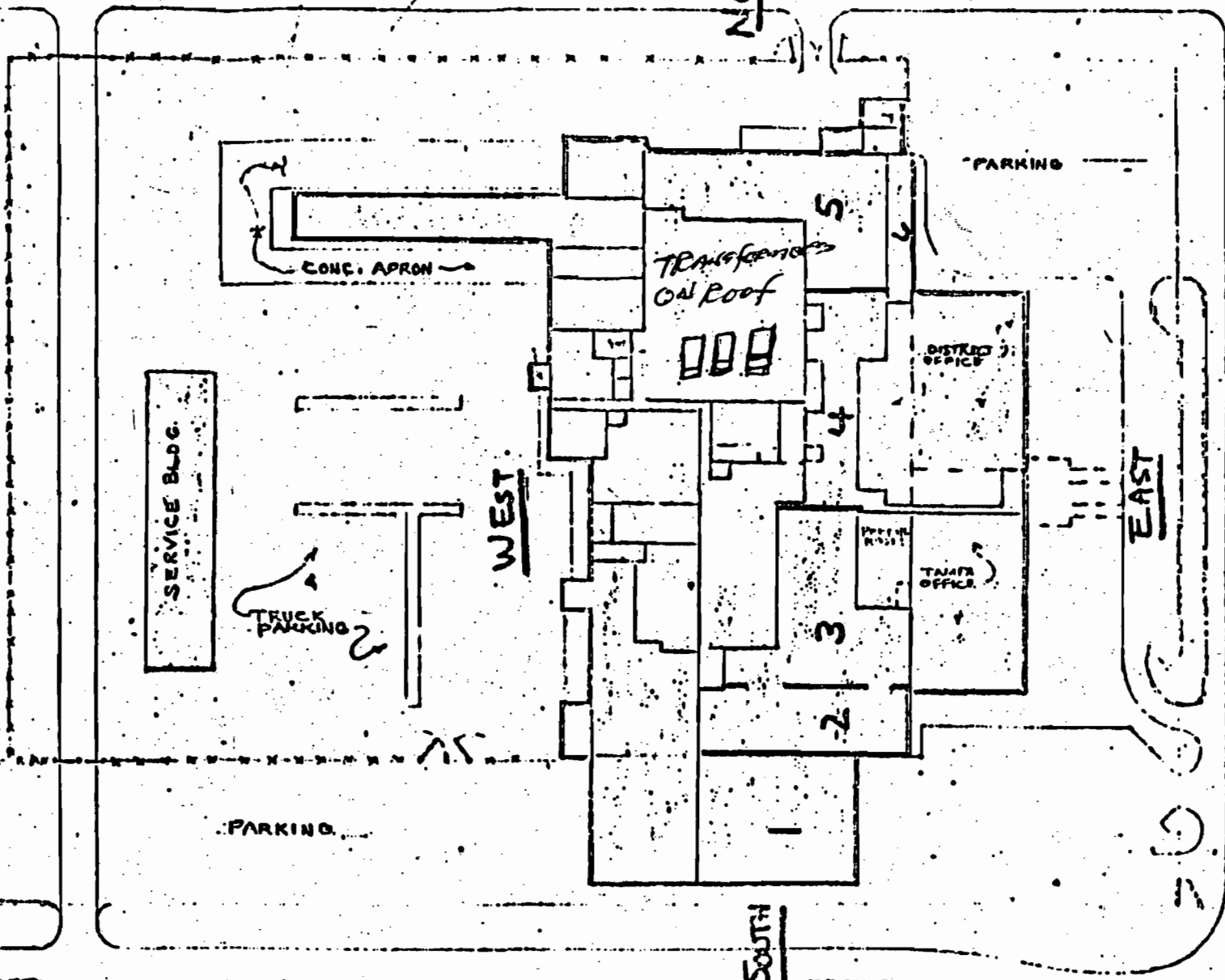
ALUMINUM COMPANY OF AMERICA FT. MEADE WORKS ALUMINUM FLOODS PLANT CIVIL PLOT PLAN - IN-PLANT AREA	
DRAWN BY 1-10-68	CHECKED BY 8-27-68
A-098329-PE.	

BEST AVAILABLE COPY

DURHAM 2

NORTH

CODE "RED"



WAREHOUSE AREA DESIGNATIONS

- 1. WAREHOUSE
- 2. MILK PROCESSING
- 3. MILK VAULT
- 4. BOTTLE WASHING & CASE STORAGE
- 5. YOGURT VAULT
- 6. PANK TRUCK UNLOADING

- 7. LABORATORY
- 8. SWEET WATER TANK
- 9. COLD STORAGE (35° & -10°)
- 10. ICE CREAM PROCESSING
- 11. HARDENING TUNNEL
- 12. ↓

- 13. HARDENING VAULT
- 14. ENGINE ROOM
- 15. BOILER ROOM
- 16. SHIPPING OFFICE
- 17. INCINERATOR ROOM
- 18. SERVICE BLDG.

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida }
County of Hillsborough } ss.

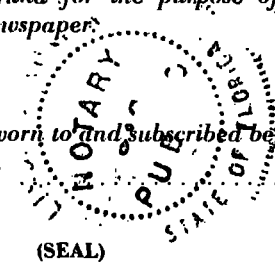
Before the undersigned authority personally appeared
J. F. Urbanski, who on oath says that he is Vice President and General Man-
ager of The Tampa Tribune, a daily newspaper published at Tampa in Hills-
borough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

.....
.....
in the matter of **Notice that the Department of Environmental Regulation**
intends to issue a permit to construct a 0.6 million Btu per hour
heater which is an integral part of a relocatable enclosed system
to dechlorinate PCB contaminated transformer oils.
was published in said newspaper in the issues of
November 2, 1983 -----

Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has
heretofore been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first publica-
tion of the attached copy of advertisement; and affiant further says that he has neither
paid nor promised any person, firm, or corporation any discount, rebate, commission or
refund for the purpose of securing this advertisement for publication in the said
newspaper.

Sworn to and subscribed before me, this 9th day
November A.D. 19 83
of _____
J. F. Urbanski
Judith E. Pennington



Notary Public, State of Florida at Large
My Commission Expires Jan. 25, 1986

PUBLIC NOTICE
The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is to be located and will be operated by Trans former Consultants, Division of S. D. Myers, Inc., 2777 Front Street, Cuyahoga Falls, Ohio 44221. The unit will be operated for short periods at various facilities located in the State of Florida.
The permit will include conditions to ensure compliance with Chapter 17-2, Florida Administrative Code.
Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:
C. H. Fancy, P. E.
Bureau of Air
Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.
Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., with in fourteen (14) days of the date of this notice with:
Ms. Mary Smallwood, Esq.,
Office of General Counsel
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
4547 11/2/83



BROWARD COUNTY ENVIRONMENTAL QUALITY CONTROL BOARD

500 S.W. 14th Court
Fort Lauderdale, Florida 33315
(305) 765-5881

October 25, 1983

Mr. J. J. Kelly, Manager
Environmental Affairs
Transformer Consultants
P. O. Box 3575
Akron, Ohio 44310

← FILE

Re: PCB-Gone Unit

Dear Mr. Kelly:


Reference is made to our letter of October 5, 1983 (copy enclosed). We have received a copy of your application to the Florida Department of Environmental Regulation and find that it meets our requirements for an air pollution license except for the following:

1. Sketch or map of the location where the equipment is to be operated.
2. Payment of fee of \$175.00 for air pollution license. Please make check payable to the Broward County Commission.

As noted in the referenced letter, this license is required to be obtained thirty (30) days prior to operation in this County.

If you have any questions, please contact the undersigned.

Yours very truly,


William P. Stone
Air Pollution Engineer

WPS/mr

Enclosure

cc: C. H. Fancy, P.E., DER, Tallahassee, FL
Tom Tittle, DER, West Palm Beach, FL
Robert T. Rudolph, P.E., EQCB

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

October 17, 1983

Mr. Robert S. Pace, P.E.
Bio-Environmental Engineer
Bio-Environmental Services
Air and Water Pollution Control
Jacksonville, Florida 32206-4397

Dear Mr. ^{Stone} Pace:

You asked how PCB emissions would be detected as required by condition No. 5 in the permit for Transformer Consultants, No. AC 16-65849.

The distillate fired heater is used to increase the temperature of the PCB containing reactants to 140-150°C. The reactor unit is a totally enclosed system and operates at 8-30 Psig. Should a leak develop in the heater coil, the opacity of the stack emissions would increase and the process audible alarm system would be activated.

The Department feels that opacity, permit condition No. 1, and the process alarm circuitry are sufficient to let the applicant know there is a possibility that PCB's are being discharged to the atmosphere.

If you have additional questions concerning this permit, please call the review engineer Edward Palagyi at (904)488-1344.

Sincerely yours,

C. H. Fancy
C. H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality
Management

CHF/EP/bjm

10/14
Ed Palagyi
Can you take a staff at a draft answer to this.
Clm

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division
Air and Water Pollution Control



October 11, 1983

Mr. Clair Fancy, P.E.
Deputy Bureau Chief
Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blainstone Road
Tallahassee, Florida 32301

DER
OCT 14 1983
BAQM

Re: Transformer Consultants
PCB - Gone Process
Permit AC16-65849

Dear Mr. Fancy:

Receipt of a copy of the captioned permit is acknowledged. Upon review of the Specific Conditions, I observed that there are no testing requirements in conjunction with Condition No. 5 which requires that no detectable PCB's may be exhausted or vented from the process. The question posed is, how will the applicant know when PCB's are exhausted or vented without testing?

The Department's response to this question would be appreciated.

Very truly yours,

Robert S. Pace, P.E.
Bio-Environmental Engineer

RSP/JEW/vj

cc: Mr. Doug Dutton - DER





BROWARD COUNTY ENVIRONMENTAL QUALITY CONTROL BOARD

500 S.W. 14th Court
Fort Lauderdale, Florida 33315
(305) 765-5881

October 5, 1983

Permit Site

DER

OCT 10 1983

BAQM

Mr. J. J. Kelly, Manager
Environmental Affairs
Transformer Consultants
P. O. Box 3575
Akron, Ohio 44310

Dear Mr. Kelly:

Reference is made to Florida DER Permit AC 37-65849 to operate a "PCB-GONE" unit. In addition, under Broward County Regulations, you will be required to obtain a County air pollution license to operate within this County. If approved, this license would contain similar conditions to the State permit and to that end, we are requesting you to forward a copy of the permit application submitted to DER.

We further require that this license be obtained 30 days in advance of intended operation in this County. It will be necessary to review your application in advance; therefore, it is suggested that you forward the copy of your DER application promptly.

If you have any questions, please contact the undersigned.

Yours very truly,

William P. Stone
Air Pollution Engineer

WPS/mr

cc: C. H. Fancy, P.E., DER, Tallahassee, FL
Tom Tittle, DER, West Palm Beach, FL
Robert T. Rudolph, P.E., EQCB

P 408 530 346
 RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. J. J. Kelly	
Street and No. P. O. Box 3575	
P.O., State and ZIP Code Akron, Ohio 44310	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 9/22/83	

PS Form 3800, Feb. 1982

PS Form 3811, Jan. 1979

● SENDER: Complete items 1, 2, and 3.
 Add your address in the "RETURN TO" space on reverse.

1. The following service is requested: (check one.)
 Show to whom and date delivered. \$
 Show to whom, date and address of delivery. \$
 RESTRICTED DELIVERY
 Show to whom and date delivered. \$
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery. \$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Mr. J. J. Kelly
 Post Office Box 3575
 Akron, Ohio 44310

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	P408530346	

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY
 SEP 26 1982

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
 [Signature]

AKRON OHIO POST OFFICE
 SEP 26 1983
 USPS

★ GPO : 1979-300-459

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

September 20, 1983

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

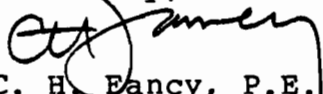
Mr. J. J. Kelly, Manager
Environmental Affairs
Transformer Consultants
Post Office Box 3575
Akron, Ohio 44310

Dear Mr. Kelly:

Enclosed is Permit Number AC 37-65849, dated September 20, 1983, to Transformer Consultants, issued pursuant to Section 403, Florida Statutes.

Acceptance of this permit constitutes notice and agreement that the department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,


C. H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality
Management

CHF/bjm

cc: S. Myers, Transformer Consultants
R. Rasor, Transformer Consultants
S. Fox, DER
N. Wright, DER
G. Parker, DER
R. Kriegel, DER Northwest District
D. Dutton, DER Northeast District
W. Hennessey, DER Southwest District
A. Senkevich, DER St. Johns River District
P. Edwards, DER South Florida District
R. Duke, DER Southeast Florida District
D. Bayly, Duval County
R. Stewart, Hillsborough County
G. Robbins, Pinellas County
F. Gargiulo, Palm Beach County
V. Howard, Broward County
R. Rodon, Dade County

Protecting Florida and Your Quality of Life

FINAL DETERMINATION

**Transformer Consultants
Division of S. D. Myers, Inc.**

Mobile PCB-GONE Unit

**Permit Number
AC 37-65849**

**Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting**

September 16, 1983

Final Determination
Transformer Consultants

Transformer Consultants' application for a permit to construct a relocatable transformer oil processing system in Florida has been reviewed by the Bureau of Air Quality Management. Public notice of the department's intent to issue the permit was published in eleven major metropolitan newspapers.

Comments concerning the proposed permit were received from the Pinellas County local air program and Gainesville Regional Utilities. The latter considered the department's action, for a source of this size, as unnecessary. The department disagrees. Florida Administrative Code Rule 17-2.210 requires any source which emits any air pollutant to obtain a construction/operating permit, unless exempted pursuant to department rule or statute. The local air program requested to be notified when the proposed unit will be located in their county. This advance notice is a requirement of Specific Condition No. 8.

The comments received did not require any permit condition to be changed; therefore, the final action of the department is to issue the permit as drafted.

RECEIVED

The Pensacola Journal

PUBLISHED DAILY EXCEPT SUNDAY

PENSACOLA, ESCAMBIA COUNTY, FLORIDA

SEP 6 1983

TRANSFORMER CONSULTANTS DIV.
S. D. MYERS, INC.

State of Florida, }
County of Escambia. }

Before the undersigned authority personally appeared

Mary Elizabeth Rost

who on oath says that she is Legal Advertising Supervisor

of the Pensacola Journal, a daily (except Sunday) newspaper published at Pensacola in Escambia County, Florida, with general circulation in Escambia, Santa Rosa, Okaloosa and Walton Counties that the attached copy of advertisement, being a NOTICE in the matter of

DER O. 6 Bru Heater

_____ in the _____ Court,

was published in said newspaper in the issues of _____

August 12, 1983

Affiant further say that the said The Pensacola Journal is a newspaper published at Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida, each day except Sunday, and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Mary Elizabeth Rost

Sworn to and subscribed before me this _____

day of September, A.D. 1983.

Detty J. Henton

NOTARY PUBLIC.

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million BTU per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated of Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17.2 Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

C.H. Fancy, P.E.
Bureau of Air
Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 285.14, F.A.C. within fourteen (14) days of the date of this notice with:

Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

LEGAL NO. 24659-1-T
AUGUST 12, 1983

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida }
County of Hillsborough } ss.

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is Controller of The Tampa Tribune, a daily
newspaper published at Tampa in Hillsborough County, Florida; that the attached copy
of advertisement being a

LEGAL NOTICE

.....
in the matter of NOTICE THAT THE DEPARTMENT OF ENVIRONMENTAL
REGULATION INTENDS TO ISSUE A PERMIT TO CONSTRUCT A 0.6 MILLION
BTU PER HOUR HEATER WHICH IS AN INTEGRAL PART OF A RELOCATABLE
ENCLOSED SYSTEM TO DECHLORINATE PCB CONTAMINATED TRANSFORMER OILS.
was published in said newspaper in the issues of
AUGUST 12, 1983

Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has
heretofore been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first publica-
tion of the attached copy of advertisement; and affiant further says that he has neither
paid nor promised any person, firm, or corporation any discount, rebate, commission or
refund for the purpose of securing this advertisement for publication in the said
newspaper.

G. T. Gleason

Sworn to and subscribed before me, this 23RD day
of AUGUST, A.D. 19 83

Judith E. Ruvinsky

(SEAL)

Notary Public, State of Florida at Large
My Commission Expires Jan. 25, 1986

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

C. H. Fancy, P.E.

Bureau of Air
Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:

Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

3907 3412/83

THE POST

Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

DER

AUG 29 1983

BAQM

STATE OF FLORIDA

COUNTY OF PALM BEACH

Before the undersigned authority personally appeared Joseph A. Ernst
who on oath says that he is Class. Adv. Mer. of The Post, a daily and Sunday
newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached
copy of advertising, being a Notice
in the matter of permit
in the ----- Court, was published in said newspaper in the
issues of August 11, 1983

Affiant further says that the said The Post is a newspaper published at West Palm Beach,
in said Palm Beach County, Florida, and that the said newspaper has heretofore been
continuously published in said Palm Beach County, Florida, daily and Sunday and has been
entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach
County, Florida, for a period of one year next preceding the first publication of the attached
copy of advertisement; and affiant further says that he has neither paid nor promised any
person, firm or corporation any discount, rebate, commission or refund for the purpose of
securing this advertisement for publication in the said newspaper.

Joseph A. Ernst

Sworn to and subscribed before me this 11 day of August A.D. 19 83

Barbara M. McLeod

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXPIRES SEPT 9 1983
BONDED WITH GENERAL INS. UNDERWRITERS

NO. 648162
PUBLIC NOTICE
The Department of Environmental Regulation
intends to issue a permit to construct a 0.6
million Btu per hour heater which is an integral
part of a relocatable enclosed system to dechlori-
nate PCB contaminated transformer oils. The
unit is owned and will be operated by Transform-
er Consultants, Division of S. D. Myers, Inc., 2737
Front Street, Cuyahoga Falls, Ohio, 44221. The
unit will be operated for short periods at various
facilities located in the State of Florida.
The permit will include conditions to assure
compliance with Chapter 17-2, Florida Adminis-
trative Code.
Any person wishing to file comments on this
proposed action may do so by submitting such
comments in writing to:
C. H. Fancy, P. E.
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
Any comments received within thirty (30)
days after publication of this notice will be con-
sidered and noted in the Department's final de-
termination.
Any person whose substantial interest would
be affected by the Department's intended action
on this permit may request an administrative
hearing by filing a petition as set forth in Section
28-5.14, F.A.C., within fourteen (14) days of the
date of this notice with:
Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
Publish: August 11, 1983

FORT LAUDERDALE NEWS/SUN-SENTINEL

Published Daily

RECEIVED

Fort Lauderdale, Broward County, Florida

AUG 13 1983

STATE OF FLORIDA
COUNTY OF BROWARD

TRANSFORMER CONSULTANTS DIV.

S. D. MYERS, INC.
Catherine M. Hebert

Before the undersigned authority personally appeared _____

who on oath says that he is _____

Classified Supervisor of the Fort Lauderdale News/Sun-Sentinel, Daily newspapers published at Fort Lauderdale in Broward County, Florida; that the attached copy of advertisement, being a _____

in the matter of construct a 0.6 million Btu per hour heater _____

_____ in the _____ Court,

was published in said newspaper in the issues of _____
Aug. 12, 1983

Affiant further says that the said Fort Lauderdale News/Sun-Sentinel are newspapers published at Fort Lauderdale, in said Broward County, Florida, and that the said newspapers have heretofore been continuously published in said Broward County, Florida, each day, and have been entered as second class matter at the post office in Fort Lauderdale, in said Broward County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspapers.

Sworn to and subscribed before me

this 12th day of August

A.D. 1983

Vera L. Bezak
Notary Public

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES JULY 20, 1985
BONDED BY OHIO CASUALTY COMPANY

[Handwritten signature]

DER

AUG 29 1983

BAOM

FSA104

PUBLIC NOTICE
The Department of Environmental Regulation
Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio 44221. The unit will be operated for short periods at various facilities located in the State of Florida. The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code. Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to: G. H. Fancy, P.E. Bureau of Air Quality Management Florida Department of Environmental Regulation 2600 Blair Stone Road Tallahassee, Florida 32301 Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination. Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with: Ms. Mary Smallwood, Esq. Office of General Counsel Florida Department of Environmental Regulation 2600 Blair Stone Road Tallahassee, Florida 32301 August 12, 1983

Affidavit of Publication

State of Florida
County of Lee

Before the undersigned authority, personally appeared

Brenda J. Yarger, who on oath says that he is the

Accts Oper Supr of the Fort Myers News-Press, a daily newspaper published at Fort Myers, in Lee County, Florida;

that the attached copy of advertisement, being a

Notice

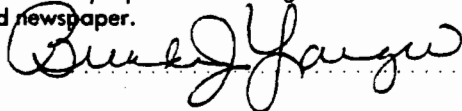
in the matter of permit to construct a 0.6 million

BTU per hour heater in the

Court, was published in said newspaper in the issues of

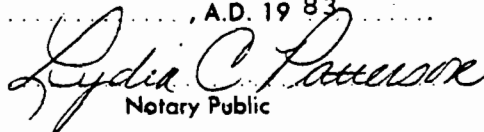
August 12, 1983

Affiant further says that the said Fort Myers News-Press is a paper of general circulation daily in Lee, Charlotte, Collier and Hendry Counties and published at Fort Myers, in said Lee County, Florida and that said newspaper has heretofore been continuously published in said Lee County, Florida, each day, and has been entered as a second class mail matter at the post office in Fort Myers in said Lee County, Florida, for a period of one year next preceding the first publication of the attached copy of the advertisement; and affiant further says that he has neither paid nor promised any person, firm or coporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



Sworn to and subscribed before me this 12 day

of August, A.D. 19 83


Notary Public

My commission Expires March 19, 1986

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S.D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods of various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to: C. H. Fancy, P.E.

Bureau of Air Quality Management, Florida Department of Environmental Regulation, 2600 Blair Stone Road Tallahassee, Florida 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final Determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C. within fourteen (14) days of the date of this notice with:

Ms. Mary Smallwood, Esq., Office of General Counsel, Florida Department of Environmental Regulation, 2600 Blair Stone Road Tallahassee, Florida 32301

Aug. 12 No. 4426

DLR

AUG 29 1983

LACIA

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S.D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting each comment in writing to:

C.H. Fancy, P.E., Bureau of Air Quality Management, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301.

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:

Ms. Mary Smallwood, Esq., Office of General Counsel, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301.

each day, and the affiant further says that he has neither paid nor promised any person, firm or corporation any discount for publication in the said newspaper.

Sworn to and subscribed before me this

16 day of Aug. 1983, A.D. 1983

Matthew X. Patterson
(Seal) Notary Public

Gary P. Miller

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXPIRES APR 8 1986
BONDED THRU GENERAL INS. UND. 5M-481-45229

Nº 3918

DER

AUG 29 1983

GAINESVILLE SUN
Published Daily and Sunday
GAINESVILLE, FLORIDA

BAQM

ALACHUA }
ALACHUA }

undersigned authority personally appeared Gary Miller
that he is Retail Advertising Manager, of the GAINESVILLE SUN, a daily

published at Gainesville in Alachua County, Florida; that the attached copy of advertisement, being a

Public Notice-Permit to Construct Heater

Court, was published in said newspaper in the issue of

August 12, 1983

er says that the said GAINESVILLE SUN is a newspaper published at Gainesville, in said Alachua and that the said newspaper has heretofore been continuously published in said Alachua County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and the said newspaper has been entered as second class mail matter at the postoffice in Gainesville, in said Alachua County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and



FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared George A. Dan

_____ who on oath says that he is

Retail Advertising Manager of The Florida Times-Union, and

Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,

Florida; that the attached copy of advertisement, being a _____

in the matter of A permit to construct a 0.6 Million BTU per hour
heater.

in the _____ Court,

was published in The Florida Times Union

in the issues of August 11.

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me
this 11 th day of
August A.D. 1983

Maria C. Linder _____
Notary Public,
State of Florida at Large.

My Commission Expires _____
Notary Public, State of Florida
My Commission Expires May 24, 1987

Boysen thru Troy Term Insurance, Inc.

PUBLIC NOTICE
The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million BTU per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Gwynopol Falls, Ohio 44221. The unit will be operated for short periods at various facilities located in the State of Florida.
The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.
Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:
G. H. Fancy, P.E.
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.
Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-514, F.A.C. within fourteen (14) days of the date of this notice with:
Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
AUG 29 1983
Linder

The Orlando Sentinel

Published Daily
Orlando, Orange County, Florida

DER

ADVERTISING CHARGE \$ 38.16

State of Florida (ss.
COUNTY OF ORANGE

AUG 29 1983

BAOM

Before the undersigned authority personally appeared _____

Nancy A. Puglia

who on oath says that

she is the Legal Advertising Representative of the Orlando Sentinel, a Daily newspaper published at Orlando, in Orange County, Florida; that the attached copy of advertisement, being a Public Notice

Re: Construct a 0.6 Million BTU Per Hour

Heater

in the _____ Court,

was published in said newspaper in the issues of _____

August 11, 1983

Affiant further says that the said Orlando Sentinel is a newspaper published at Orlando, in said Orange County, Florida, and that the said newspaper has heretofore been continuously published in said Orange County, Florida, each Week Day and has been entered as second-class mail matter at the post office in Orlando, in said Orange County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Nancy A. Puglia

Sworn to and subscribed before me this 11th day

of August A.D., 19 83

Virginia M. Hallenpworth

Notary Public

Notary Public, State of Florida at Large

My Commission Expires July 13, 1985

Bonded by American Fire & Casualty Co.

FORM NO. AD-262

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

C. H. Fancy, P. E.
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:

Ms. Mary Smalwood, Esq.
Office of General Counsel
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
CL-335

Aug. 11, 1983



ST. PETERSBURG TIMES
and EVENING INDEPENDENT

Published Daily

St. Petersburg, Pinellas County, Florida

83 2230419

DER

AUG 29 1983

STATE OF FLORIDA
COUNTY OF PINELLAS

} S. S.

BAQM

Before the undersigned authority personally appeared M. O'Hara
who on oath says that he is Front Counter Clerk of the St. Petersburg Times
a daily newspaper published at St. Petersburg, in Pinellas County, Florida; that the
attached copy of advertisement, being a Legal Notice
in the matter RE: Public Notice

..... in the August 12, 1983 Court
was published in said newspaper in the issues of

Affiant further says the said St. Petersburg Times is a newspaper
published at St. Petersburg, in Said Pinellas County, Florida, and that the said news-
paper has heretofore been continuously published in said Pinellas County, Florida,
each day and has been entered as second class mail matter at the post office in St. Pe-
tersburg, in said Pinellas County, Florida, for a period of one year next preceding the
first publication of the attached copy of advertisement; and affiant further says that
he has neither paid nor promised any person, firm, or corporation any discount, re-
bate, commission or refund for the purpose of securing this advertisement for publi-
cation in the said newspaper.

Sworn to and subscribed
before me this 12th day of August, 1983
A. D. 1983

Patricia B. [Signature]

(SEAL) Notary Public Notary Public, State of Florida at Large
My Commission Expires FEB. 1, 1987

My commission expires _____ 19 _____

PUBLIC NOTICE
The Department of Environmen-
tal Regulation intends to issue a
permit to construct a 0.5 million
Btu per hour heater which is
an integral part of a relocatable
enclosed system to dechlorinate
PCB contaminated transformer
oils. The unit is owned and will
be operated by Transformer
Consultants, Division of S. D.
Myers, Inc., 2737 Front Street,
Cuyahoga Falls, Ohio, 44221.
The unit will be operated for
short periods of various facili-
ties located in the State of
Florida.
The permit will include condi-
tions to assure compliance
with Chapter 17-2, Florida
Administrative Code.
Any person wishing to file com-
ments on this proposed action
may do so by submitting such
comments in writing to:
C. H. Fancy, P. E.
Bureau of Air Quality Manage-
ment
Florida Department of Environ-
mental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
Any comments received within
thirty (30) days after publica-
tion of this notice will be con-
sidered and noted in the De-
partment's final determination.
Any person whose substantial in-
terest would be affected by the
Department's intended action on
this permit may request an
administrative hearing by filing
a petition as set forth in Section
28-5.14, F.A.C., within fourteen
(14) days of the date of this no-
tice with:
Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of Environ-
mental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
(92229419) 12

RECEIVED

AUG 29 1983

TRANSFORMER CONSULTANTS DIV.
S. D. MYERS, INC.

Tallahassee Democrat

PUBLISHED DAILY

TALLAHASSEE — LEON — FLORIDA

STATE OF FLORIDA COUNTY OF LEON:

Before the undersigned authority personally appeared Mandy Mims who on oath says that she is Legal Control Clerk of The Tallahassee Democrat, a daily newspaper published at Tallahassee in Leon County, Florida; that the attached copy of advertising being a Legal Ad in the matter of

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a ... in the Court, was published in said newspaper in the issues of:

August 14, 1983

Purchase Order # OH 29536

Affiant further says that the said Tallahassee Democrat is a newspaper published at Tallahassee, in the said Leon County, Florida, and that the said newspaper has heretofore been continuously published in said Leon County, Florida, each day and has been entered as second class mail matter at the post office in Tallahassee, in said Leon County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this publication in the said newspaper.

Mandy Mims

Mandy Mims, Legal Control Clerk

Sworn To And Subscribed Before Me This

19th day of *August*

A.D. 1983

Arvela H. Geator

(SEAL)

Notary Public

Notary Public, State of Florida at Large
My Commission Expires July 30, 1984
Bonded Thru Troy Fair Insurance Inc.

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

C. H. Fancy, P. E.
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C. within fourteen (14) days of the date of this notice with:

Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

August 14, 1983
Ad. No. 7218763

DER

AUG 29 1983

DA

RECEIVED

AUG 25 1983

STATE OF FLORIDA
COUNTY OF DADE:

TRANSFORMER CONSULTANTS DIV.
S. D. MYERS, INC.

Before the undersigned authority personally appeared

Eddie L. Sweet

who on oath says that he/she is

Office Manager

of The Miami Herald, a daily newspaper published at Miami in Dade County, Florida; that the attached copy of advertisement was published in said newspaper in the issues of

Aug. 11, 1983

Affiant further says that the said The Miami Herald is a newspaper published at Miami, in the said Dade County, Florida and that the said newspaper has heretofore been continuously published in said Dade County, Florida, each day and has been entered as second class mail matter at the post office in Miami, in said Dade County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

E. L. Sweet

Sworn to and subscribed before me this.....18th

day of.....Aug.....A.D. 19..83

My commission expires.....*Elise Berta*

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a reliable enclosed system to dechlorinate PCB-contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Gwynn Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

C. H. Fancy, P.E.
Bureau of Air
Quality Management
Florida Department
of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Fla. 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 285.14, F.A.C., within fourteen (14) days of the date of this notice with:

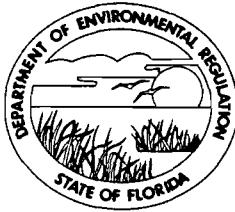
Ms. Mary Smallwood, Esq.
Office of
General Counsel
Florida Department
of Environmental
Regulation
2600 Blair Stone Rd
Talla, FL 32301

Aug. 11, 1983
Ad. No. 379-295R

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221

Permit Number: AC 37-65849
Expiration Date: January 1, 1984
County: relocatable
Latitude/Longitude:

**Project: A relocatable unit to
dechlorinate transformer oils.**

This permit is issued under the provisions of Chapter(s) 403
 , Florida Statutes, and Florida Administrative Code Rule(s)
17-2 and 17-4. The above named permittee is hereby
authorized to perform the work or operate the facility shown on
the application and approved drawing(s), plans, and other
documents attached hereto or on file with the department and made
a part hereof and specifically described as follows:

Construction of a 0.6 million Btu per hour heater which is an
integral part of a portable processor to dechlorinate transformer
oils contaminated with polychlorinated biphenyls. The mobile unit
will be operated at different facilities located within the State
of Florida. The location and hours of operation will be a
condition of the operating permit which must be modified when the
relocatable unit is moved from one facility to another.

Attachments:

1. Application to Construct Air Pollution Source (DER Form 17-1.202(1)) received February 15, 1983.
2. C. H. Fancy's letter of incompleteness dated March 22, 1983
3. J. J. Kelly's letter dated May 27, 1983
4. Robert L. Guyer's letter dated August 29, 1983
5. Joyce M. Gibbs' letter dated September 1, 1983

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221

I. D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221
GENERAL CONDITIONS:

I. D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221

I. D. Number:
Permit Number: AC 37-65849
Date of Issue:
Expiration Date: January 1, 1984

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221
GENERAL CONDITIONS:

I. D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Visible emissions to the outside air from the heater stack shall not exceed 20 percent opacity (six minute average) as determined by DER Method 9.
2. An Opacity compliance test shall be conducted on an annual basis.
3. Fuel oil fired in the burner shall be uncontaminated ASTM grade No. 2 having a sulfur content of less than 0.7 percent by weight.
4. The applicant shall notify the Department at least 15 working days prior to conducting the required annual compliance test.

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 42211

I.D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

SPECIFIC CONDITIONS:

4. The applicant shall notify the department at least 15 working days prior to conducting the required annual compliance test.
5. There shall be no detectable PCBs in exhaust or vented gases from the disposal portion of the PCB-GONE process. If gases escape and contain PCBs, the applicant must inform the Department of Environmental Regulation's district office having jurisdiction by close of business on the next regular business day, and no PCBs may be processed until the emission problem has been corrected to the satisfaction of the Department.
6. Transformer dielectric fluid must be sampled after it exits the PCB destruction portion of the PCB-GONE process but before it is returned to the transformer or other container. This sample must be tested for PCB concentration within 15 days. If the PCB concentration of the sample is 2 ppm or greater, that fluid must be treated again with the PCB-GONE process within 45 days of the test. If the transformer dielectric fluid is returned to the transformer after the PCB-GONE process has been used, that transformer cannot be reclassified as a non-PCB transformer unless the fluid is tested again after at least three months of in service use and shown to contain less than 50 ppm PCBs. Any transformer dielectric fluid treated with the PCB-GONE process must be disposed of as if it contained between 50 and 500 ppm PCBs or the original concentration of PCBs until the testing required that its PCB concentration has been reduced below 2 ppm.
7. Any solid wastes or by-products generated by the PCB-GONE system must be stored in accordance with Annex III, 40 CFR 761.42(b), and must be disposed of in a chemical waste landfill approved by EPA under Annex II of the PCB Regulation (40 CFR 761.41). Solid waste disposal must comply with all applicable federal regulations. Cleaning of the filters must be handled according to the requirements of applicable sections of 40 CFR, Part 761.

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221

I. D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

SPECIFIC CONDITIONS:

8. Following approval of the initial compliance test results, a complete application for an operating permit shall be submitted to the District Office where the unit will be operated with a copy to the Department of Environmental Regulation, Bureau of Air Quality Management, Central Air Permitting, 2600 Blair Stone Road, Tallahassee, Florida, 32301. A request for an operating permit shall include the following information.
 - a. The name and address of the company whose transformer dielectric fluid is to be processed by the PCB-GONE process.
 - b. A plot plan showing the proposed location of the PCB-GONE unit.
 - c. The dates and times the unit will be operated at this location.
 - d. The total number of gallons of transformer dielectric fluid to be processed at this location.
 - e. Proof of publication of a notice in a newspaper of general circulation to allow for a 14 day comment period each time the PCB-GONE unit will be moved shall be submitted with the request for an Operating Permit revision.
9. The applicant must request a modification to their Operating Permit each time the PCB-GONE processing system is relocated to another facility. The request to modify the permit must include the information requested in specific condition number 8.

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221
Specific Conditions:

Permit Number: AC 37-65849
Expiration Date: Jan. 1, 1984

10. Detailed monthly reports, including the number of gallons, dates, times, name, address, location, any unusual incidents, and any other pertinent information, must be submitted to Department of Environmental Regulation, Bureau of Air Quality Management Central Air Permitting, 2600 Blair Stone Road, Tallahassee Florida, 32301, and to the district office(s) that the unit has operated in during the month. These reports are due on the tenth day of the following month. If no fluids are treated during the month a report to that effect shall be submitted to the Tallahassee office at the above address.

Issued this 20 day of Sept, 1983

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

Terry Cole for
VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.



Gainesville Regional Utilities

Post Office Box 490 • Gainesville, Florida 32602

Strategic Planning
(904) 374-2910

August 29, 1983

DER
SEP 01 1983
BAQM

Mr. C. H. Fancy, P.E.
B.A.Q.M.
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Re: Public Notice to Issue a Permit to Transformer Consultants

Dear Mr. Fancy:

In regard to your public notice regarding the issuance of a permit to Transformer Consultants Division of S.D. Meyers, Inc., please receive the following comments.

Gainesville Regional Utilities (GRU) regularly contracts for the disposal of PCB-contaminated oils. Systems such as that of Transformer Consultants can be expected to bid to provide service to GRU. As such, permitting by the Department will likely have an impact upon cost and availability of disposal services available to GRU.

That the Department is permitting such de minimus air sources as a 0.6×10^6 BTU/hr mobile diesel fired heater suggests that very small potential sources of air emissions are now subject to permitting. Uniform application of this apparent policy change opens up a universe of de minimus sources which will require substantial Department time, expense, and personnel. Further, the opportunity allowed by formal permitting for delaying or stopping projects through air permits, although the air permits are for ancillary aspects perhaps only incidentally related to the main issue, will be expected to significantly impact the cost and implementation of small projects. In light of the above considerations, it seems both unnecessary and imprudent for the Department to regulate the Transformer Consultants PCB-decontamination mobile facility as an air source.

Mr. C. H. Fancy, P.E.
August 29, 1983
Page Two

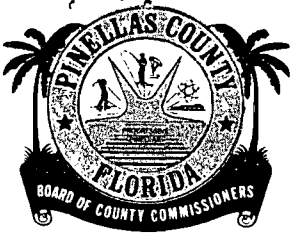
Should the Department find itself unable to accept as sufficient the USEPA approval given to PCB treatment processes, then the Department should implement permitting for these sources as PCB treatment processes.

Respectfully,



Robert L. Guyer
Electric Systems
Environmental Coordinator

RLG:kv
w7a/18



BOARD OF COUNTY COMMISSIONERS

PINELLAS COUNTY, FLORIDA

315 COURT STREET

CLEARWATER, FLORIDA 33516

COMMISSIONERS

BARBARA SHEEN TODD, CHAIRMAN
JOHN CHESNUT, JR., VICE-CHAIRMAN
GABRIEL CAZARES
CHARLES E. RAINEY
BRUCE TYNDALL

September 1, 1983

Mr. C. H. Fancy, P.E.
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
SEP 12 1983
BAQM

Re: Proposed Permit AC37-65849 for Transformer Consultants; A
relocatable PCB dechlorinator

Dear Mr. Fancy:

The Pinellas County, Division of Air Quality has reviewed the Technical Evaluation and Preliminary Determination prepared by the Department regarding the proposed project. This office has no objections to the issuance of this permit as proposed. The Department's proposed conditions are viewed as adequate and proper and we can offer no additional suggestions at this time. We would request, however, that the District Office notify the local program when the facility will be located within its boundary. This would facilitate spot checks on the operation of the system.

We appreciate the opportunity to comment on the project and if further assistance can be provided please contact our office at SUNCOM 570-6522.

Sincerely,

Joyce M. Gibbs, Chief
Division of Air Quality

JMG/wm

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Victoria J. Tschinkel
FROM: Clair Fancy *Clair Fancy*
DATE: September 19, 1983
SUBJ: Approval of Attached Air Construction Permit

RECEIVED
SEP 19 1983

Office of the Secretary

Attached for your approval and signature is one Air Construction Permit for which the applicant is Transformer Consultants. The proposed project is for the construction of a relocatable PCB destruction unit.

Day 90, after which the permit would be issued by default, is September 23, 1983.

The Bureau recommends your approval and signature. This has been widely circulated within the department and was noticed in eleven newspapers throughout the state with only two minor comments.

CF/ks

Attachment



BOARD OF COUNTY COMMISSIONERS

PINELLAS COUNTY, FLORIDA

315 COURT STREET

CLEARWATER, FLORIDA 33516

COMMISSIONERS

BARBARA SHEEN TODD, CHAIRMAN
JOHN CHESNUT, JR., VICE-CHAIRMAN
GABRIEL CAZARES
CHARLES E. RAINEY
BRUCE TYNDALL

September 1, 1983

Mr. C. H. Fancy, P.E.
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
SEP 12 1983
BAQM

Re: Proposed Permit AC37-65849 for Transformer Consultants; A
relocatable PCB dechlorinator

Dear Mr. Fancy:

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We appreciate the opportunity to comment on the project and if further assistance can be provided please contact our office at SUNCOM 570-6522.

Sincerely,

Joyce M. Gibbs, Chief
Division of Air Quality

JMG/wm



Acts 4:12

DIVISION OF
EDNyers **TRANSFORMER**
CONSULTANTS

P.O. Box 3575
Akron, Ohio 44310
Phone: (216) 929-2847
Toll Free: (800) 321-9580

September 6, 1983

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 30301-8241

DER
SEP 09 1983
BAQM

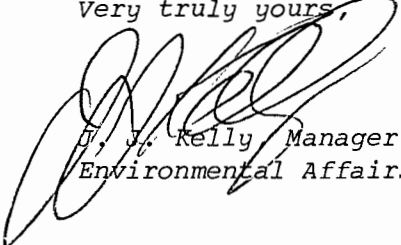
Attention: Mr. C. H. Fancy, P. E. Deputy Chief
Bureau of Air Quality Management

Dear Mr. Fancy:

Please find enclosed the last of the proofs of publication of the
"Notice of Proposed Agency Action".

We would appreciate it if we could be advised as to when our permit for
the "PCB-Gone" process will be issued.

Very truly yours,



J. J. Kelly, Manager
Environmental Affairs

JJK/jb

Encl: Proofs of Publication (3)

RECEIVED

The Pensacola Journal

PUBLISHED DAILY EXCEPT SUNDAY

PENSACOLA, ESCAMBIA COUNTY, FLORIDA

SEP 6 1983

TRANSFORMER CONSULTANTS DIV.
S. D. MYERS, INC.

State of Florida, }
County of Escambia. }

Before the undersigned authority personally appeared
Mary Elizabeth Rost
who on oath says that she is Legal Advertising Supervisor
of the Pensacola Journal, a daily (except Sunday) newspaper published at
Pensacola in Escambia County, Florida, with general circulation in Escam-
bia, Santa Rosa, Okaloosa and Walton Counties that the attached copy of
advertisement, being a NOTICE in the matter of

DER O.6 Bru Heater

_____ in the _____ Court,

was published in said newspaper in the issues of _____

August 12, 1983

Affiant further say that the said The Pensacola Journal is a newspaper published at Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida, each day except Sunday, and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million BTU per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated of Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

C.H. Fancy, P.E.
Bureau of Air
Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:

Ms Mary Smallwood, Esq.
Office of General Counsel,
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

LEGAL NO. 24659 1-T
AUGUST 12, 1983



Mary Elizabeth Rost

Sworn to and subscribed before me this 1
day of September, A.D. 1983.

Betty J. Perkin
NOTARY PUBLIC.

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

RECEIVED

AUG 29 1983

State of Florida }
County of Hillsborough } ss.

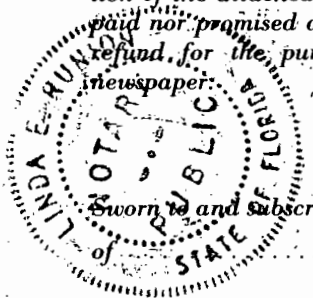
TRANSFORMER CONSULTANTS DIV.
S. D. MYERS, INC.

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is Controller of The Tampa Tribune, a daily
newspaper published at Tampa in Hillsborough County, Florida; that the attached copy
of advertisement being a

LEGAL NOTICE

in the matter of NOTICE THAT THE DEPARTMENT OF ENVIRONMENTAL
REGULATION INTENDS TO ISSUE A PERMIT TO CONSTRUCT A 0.6 MILLION
BTU PER HOUR HEATER WHICH IS AN INTEGRAL PART OF A RELOCATABLE
ENCLOSED SYSTEM TO DECHLORINATE PCB CONTAMINATED TRANSFORMER OILS.
was published in said newspaper in the issues of
AUGUST 12, 1983

Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has
heretofore been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first publica-
tion of the attached copy of advertisement; and affiant further says that he has neither
paid nor promised any person, firm, or corporation any discount, rebate, commission or
refund, for the purpose of securing this advertisement for publication in the said
newspaper.



Sworn to and subscribed before me, this ... 23RD ... day
AUGUST, A.D. 19 83

G. T. Gleason
Judi E. Roman

(SEAL)

Notary Public, State of Florida at Large
My Commission Expires Jan. 25, 1985

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

C. H. Fancy, P.E.
Bureau of Air

Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:
Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
3907 8/12/83

The Miami Herald
A KNIGHT-RIDDER NEWSPAPER
PUBLISHED DAILY
MIAMI - DADE - FLORIDA

RECEIVED

AUG 25 1983

STATE OF FLORIDA
COUNTY OF DADE:

TRANSFORMER CONSULTANTS DIV.
S. D. MYERS, INC.

Before the undersigned authority personally appeared

Eddie L. Sweet

who on oath says that he/she is

Office Manager

of The Miami Herald, a daily newspaper published at Miami in Dade County, Florida; that the attached copy of advertisement was published in said newspaper in the issues of

Aug. 11, 1983

Affiant further says that the said The Miami Herald is a newspaper published at Miami, in the said Dade County, Florida and that the said newspaper has heretofore been continuously published in said Dade County, Florida, each day and has been entered as second class mail matter at the post office in Miami, in said Dade County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this 18th day of Aug. 1983
My commission expires

[Handwritten Signature]
NOTARY PUBLIC STATE OF FLORIDA
AUG 19 1983
[Handwritten Signature]

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXPIRES FEB 7 1987
BONDED THRU GENERAL INSURANCE UND

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

C. H. Fancy, P. E.
Bureau of Air
Quality Management
Florida Department
of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Fla 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:

Ms. Mary Smallwood, Esq.
Office of
General Counsel
Florida Department
of Environmental
Regulation
2600 Blair Stone Rd
Talla, Fl 32301

Aug. 11, 1983
Ad. No. 379-295R

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

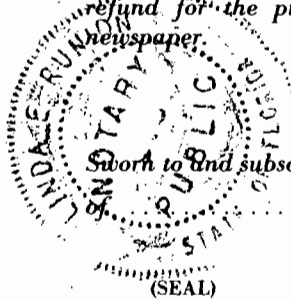
State of Florida }
County of Hillsborough } ss.

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is Controller of The Tampa Tribune, a daily
newspaper published at Tampa in Hillsborough County, Florida; that the attached copy
of advertisement being a

LEGAL NOTICE

in the matter of **NOTICE THAT THE DEPARTMENT OF ENVIRONMENTAL
REGULATION INTENDS TO ISSUE A PERMIT TO CONSTRUCT A 0.6 MILLION
BTU PER HOUR HEATER WHICH IS AN INTEGRAL PART OF A RELOCATABLE
ENCLOSED SYSTEM TO DECHLORINATE PCB CONTAMINATED TRANSFORMER OILS.**
was published in said newspaper in the issues of
AUGUST 12, 1983

Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has
heretofore been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first publica-
tion of the attached copy of advertisement; and affiant further says that he has neither
paid nor promised any person, firm, or corporation any discount, rebate, commission or
refund for the purpose of securing this advertisement for publication in the said
newspaper.



G. T. Gleason

Sworn to and subscribed before me, this 23RD day
AUGUST, A.D. 19 83
Judith E. Runyon

Notary Public, State of Florida at Large
My Commission Expires Jan. 25, 1986

PUBLIC NOTICE
The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.
The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.
Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:
C. H. Fancy, P.E.
Bureau of Air
Quality Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.
Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:
Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
3907 8/12/83



Gainesville Regional Utilities

Post Office Box 490 • Gainesville, Florida 32602

Strategic Planning
(904) 374-2910

August 29, 1983

DER
SEP 01 1983
BAQM

Mr. C. H. Fancy, P.E.
B.A.Q.M.
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Re: Public Notice to Issue a Permit to Transformer Consultants

Dear Mr. Fancy:

In regard to your public notice regarding the issuance of a permit to Transformer Consultants Division of S.D. Meyers, Inc., please receive the following comments.

Gainesville Regional Utilities (GRU) regularly contracts for the disposal of PCB-contaminated oils. Systems such as that of Transformer Consultants can be expected to bid to provide service to GRU. As such, permitting by the Department will likely have an impact upon cost and availability of disposal services available to GRU.

That the Department is permitting such de minimus air sources as a 0.6×10^6 BTU/hr mobile diesel fired heater suggests that very small potential sources of air emissions are now subject to permitting. Uniform application of this apparent policy change opens up a universe of de minimus sources which will require substantial Department time, expense, and personnel. Further, the opportunity allowed by formal permitting for delaying or stopping projects through air permits, although the air permits are for ancillary aspects perhaps only incidentally related to the main issue, will be expected to significantly impact the cost and implementation of small projects. In light of the above considerations, it seems both unnecessary and imprudent for the Department to regulate the Transformer Consultants PCB-decontamination mobile facility as an air source.

Mr. C. H. Fancy, P.E.
August 29, 1983
Page Two

Should the Department find itself unable to accept as sufficient the USEPA approval given to PCB treatment processes, then the Department should implement permitting for these sources as PCB treatment processes.

Respectfully,



Robert L. Guyer
Electric Systems
Environmental Coordinator

RLG:kv
w7a/18

Ed P - 9/1

please draft a response & I
will show it to appropriate
people.

Clair
this is ref. to the
preliminary determination -
should we not respond
in final?
Ed



Acts 4:12

DIVISION OF
ED Myers **TRANSFORMER**
CONSULTANTS

P.O. Box 3575
Akron, Ohio 44310
Phone: (216) 929-2847
Outside Ohio (800) 321-9580

August 24, 1983

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

DER
AUG 29 1983
BAQM

Attention: Mr. C. H. Fancy, P. E. Deputy Chief
Bureau of Air Quality Management

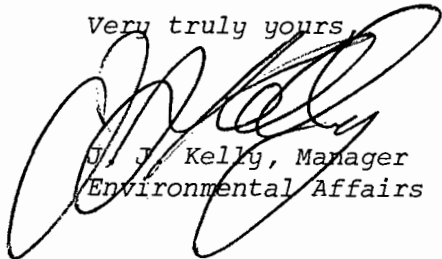
Dear Mr. Fancy:

In reply to your letter of August 1, 1983 we submit the following copies of proof of publication of the required "Notice of Proposed Agency Action".

We believe this fulfills the last requirement in our efforts to obtain a permit for our "PCB-Gone" process, we look forward to receipt of same.

If you have any questions do not hesitate to contact us on our toll-free number, 800 321-9580.

Very truly yours,



J. J. Kelly, Manager
Environmental Affairs

JJK/jb

P.S. The remaining proofs of publication are on the way to us and will be sent as soon as we receive them.

Enc: Proofs of Publication (8)



FLORIDA PUBLISHING COMPANY
Publishers
JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared George A. Dan

who on oath says that he is

Retail Advertising Manager of The Florida Times-Union, and

Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,

Florida; that the attached copy of advertisement, being a

in the matter of A permit to construct a 0.6 Million BTU per hour
heater.

in the Court,

was published in The Florida Times Union

in the issues of August 11.

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me
this August 11 day of
1983

Notary Public, State of Florida
Mary A. Krup
George A. Dan

My Commission Expires
Notary Public, State of Florida
My Commission Expires May 24, 1987

PUBLIC NOTICE
The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida. The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code. Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to: C. H. Fancy, P. E., Bureau of Air Quality Management, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301. Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination. Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with: Ms. Mary Smallwood, Esq., Office of General Counsel, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301.

DER

AUG 29 1983

CAQM



FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared George A. Dan

_____ who on oath says that he is

Retail Advertising Manager of The Florida Times-Union, and

Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,

Florida; that the attached copy of advertisement, being a _____

in the matter of A permit to construct a 0.6 Million BTU per hour
heater,

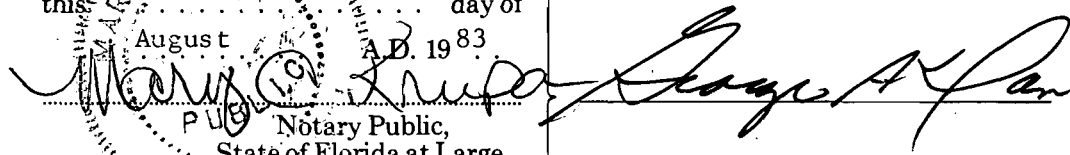
in the _____ Court,

was published in The Florida Times Union

in the issues of August 11,

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me
this 11 th _____ day of
August A.D. 1983



Notary Public,
State of Florida at Large.

My Commission Expires _____
Notary Public, State of Florida
My Commission Expires **May 24, 1987**

Boopog thru tray rain - Insurance, Inc.

PUBLIC NOTICE
The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.
The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.
Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:
C. H. Fancy, P. E.
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
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Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:
Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

DER

AUG 29 1983

LAJ-1

THE POST

Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

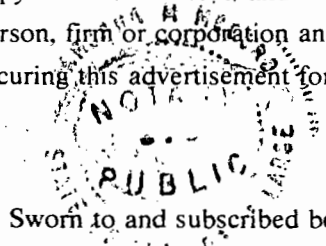
PROOF OF PUBLICATION

STATE OF FLORIDA

COUNTY OF PALM BEACH

Before the undersigned authority personally appeared Joseph A. Ernst
who on oath says that he is Class. Adv. Mer. of The Post, a daily and Sunday
newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached
copy of advertising, being a Notice
in the matter of permit
in the ----- Court, was published in said newspaper in the
issues of August 11, 1983

Affiant further says that the said The Post is a newspaper published at West Palm Beach,
in said Palm Beach County, Florida, and that the said newspaper has heretofore been
continuously published in said Palm Beach County, Florida, daily and Sunday and has been
entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach
County, Florida, for a period of one year next preceding the first publication of the attached
copy of advertisement; and affiant further says that he has neither paid nor promised any
person, firm or corporation any discount, rebate, commission or refund for the purpose of
securing this advertisement for publication in the said newspaper.



Joseph A. Ernst

Sworn to and subscribed before me this 11 day of August A.D. 19 83

Barbara M. McLeod
NOTARY PUBLIC STATE OF FLORIDA

MY COMMISSION EXPIRES SEPT 9 1983
BONDED THRU GENERAL INS. UNDERWRITERS

DER
AUG 29 1983
BAQM

NO. 668162
PUBLIC NOTICE
The Department of Environmental Regulation
intends to issue a permit to construct a 0.6
million Btu per hour heater which is an integral
part of a relocatable enclosed system to dechlori-
nate PCB contaminated transformer oils. The
unit is owned and will be operated by Transform-
er Consultants, Division of S. D. Myers, Inc., 2737
Front Street, Cuyahoga Falls, Ohio, 44221. The
unit will be operated for short periods at various
facilities located in the State of Florida.
The permit will include conditions to assure
compliance with Chapter 17-2, Florida Adminis-
trative Code.
Any person wishing to file comments on this
proposed action may do so by submitting such
comments in writing to:
C. H. Fancy, P. E.
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
Any comments received within thirty (30)
days after publication of this notice will be
considered and noted in the Department's final de-
termination.
Any person whose substantial interest would
be affected by the Department's intended action
on this permit may request an administrative
hearing by filing a petition as set forth in Section
28-5.14, F.A.C., within fourteen (14) days of the
date of this notice with:
Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
Publish: August 11, 1983

FORT LAUDERDALE NEWS/SUN-SENTINEL

Published Daily

RECEIVED

Fort Lauderdale, Broward County, Florida

AUG 15 1983

STATE OF FLORIDA
COUNTY OF BROWARD

TRANSFORMER CONSULTANTS DIV.

S. D. MYERS INC
Catherine M. Herbst

Before the undersigned authority personally appeared _____

who on oath says that he is _____

Classified Supervisor of the Fort Lauderdale News/Sun-Sentinel, Daily

newspapers published at Fort Lauderdale in Broward County, Florida; that the attached
copy of advertisement, being a Public Notice

in the matter of construct a 0.6 million Btu per hour heater

_____ in the _____ Court,

was published in said newspaper in the issues of
Aug. 12, 1983

Affiant further says that the said Fort Lauderdale News/Sun-Sentinel are newspapers published at Fort Lauderdale, in said Broward County, Florida, and that the said newspapers have heretofore been continuously published in said Broward County, Florida, each day, and have been entered as second class matter at the post office in Fort Lauderdale, in said Broward County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspapers.

Sworn to and subscribed before me

this 12th day of August

A.D. 19 83

Notary Public
Vera L. Beza
(SEAL)

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES JULY 20, 1985
BONDED BY OHIO CASUALTY COMPANY

Catherine M. Herbst

DER

AUG 29 1983

BAOM

PUBLIC NOTICE
The Department of Environmental Regulation

Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

C. H. Fancy, P.E.
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:

Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
August 12, 1983

Fort Myers, Florida

Affidavit of Publication

State of Florida
County of Lee

Before the undersigned authority, personally appeared
Brenda J. Yarger, who on oath says that he is the
Accts Oper Supr of the Fort Myers News-Press, a daily
newspaper published at Fort Myers, in Lee County, Florida;
that the attached copy of advertisement, being a
Notice
in the matter of permit to construct a 0.6 million
BTU per hour heater in the
..... Court, was published in
said newspaper in the issues of
August 12, 1983

Affiant further says that the said Fort Myers News-Press is a paper of
general circulation daily in Lee, Charlotte, Collier and Hendry Counties
and published at Fort Myers, in said Lee County, Florida and that said
newspaper has heretofore been continuously published in said Lee
County, Florida, each day, and has been entered as a second class mail
matter at the post office in Fort Myers in said Lee County, Florida, for a
period of one year next preceding the first publication of the attached
copy of the advertisement; and affiant further says that he has neither
paid nor promised any person, firm or coporation any discount, rebate,
commission or refund for the purpose of securing this advertisement for
publication in the said newspaper.

Brenda J. Yarger

Sworn to and subscribed before me this 12 day

of August, A.D. 19 83

Lydia C. Pauson
Notary Public

My commission Expires March 19, 1986

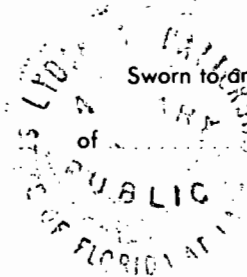
PUBLIC NOTICE
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The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.
Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to: C. H. Fancy, P.E., Bureau of Air Quality Management, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301.
Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final Determination.
Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:
Ms. Mary Smallwood, Esq., Office of

General Counsel
Florida Department of
Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida
32301
Aug. 12 No. 4426

DER

AUG 29 1983

LACM



DER

AUG 29 1983

GAINESVILLE SUN
Published Daily and Sunday
GAINESVILLE, FLORIDA

STATE OF FLORIDA }
COUNTY OF ALACHUA }

BAQM

Before the undersigned authority personally appeared Gary Miller

who on oath says that he is Retail Advertising Manager, of the GAINESVILLE SUN, a daily newspaper published at Gainesville in Alachua County, Florida; that the attached copy of advertisement, being a

Public Notice-Permit to Construct Heater

in the matter of

in the Court, was published in said newspaper in the issue of

August 12,

1983

Affiant further says that the said GAINESVILLE SUN is a newspaper published at Gainesville, in said Alachua County, Florida, and that the said newspaper has heretofore been continuously published in said Alachua County, each day, and has been entered as second class mail matter at the postoffice in Gainesville, in said Alachua County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount for publication in the said newspaper.

Sworn to and subscribed before me this

16 day of Aug, A.D. 1983
Matthew H. Patterson
(Seal) Notary Public

Gary P. Miller

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXPIRES APR 8 1986
BONDED THRU GENERAL INS. UND:

5M-481-45229

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour hearer which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S.D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting each comments in writing to:

C.H. Fancy, P.E., Bureau of Air Quality Management, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301.

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:

Ms. Mary Smallwood, Esq., Office of General Counsel, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301.

The Orlando Sentinel

Published Daily
Orlando, Orange County, Florida

DER

ADVERTISING CHARGE \$ 38.16

State of Florida) ss.
COUNTY OF ORANGE

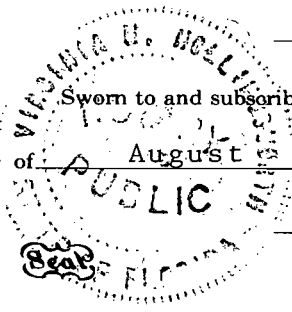
AUG 29 1983

BAQM

Before the undersigned authority personally appeared _____
Nancy A. Puglia _____, who on oath says that
she is the Legal Advertising Representative of the Orlando Sentinel, a Daily newspaper
published at Orlando, in Orange County, Florida; that the attached copy of ad-
vertisement, being a Public Notice _____ in the matter of
Re: Construct a 0.6 Million BTU Per Hour
Heater _____ in the _____ Court,
was published in said newspaper in the issues of _____
August 11, 1983 _____

Affiant further says that the said Orlando Sentinel is a newspaper published at Orlando, in
said Orange County, Florida, and that the said newspaper has heretofore been continuously
published in said Orange County, Florida, each Week Day and has been entered as second-
class mail matter at the post office in Orlando, in said Orange County, Florida for a period of
one year next preceding the first publication of the attached copy of advertisement; and af-
fiant further says that he/she has neither paid nor promised any person, firm or corporation
any discount, rebate, commission or refund for the purpose of securing this advertisement for
publication in the said newspaper.

Sworn to and subscribed before me this 11th day
of August A.D., 1983



Nancy A. Puglia

Virginia M. Hallingworth

Notary Public

Notary Public, State of Florida at Large
My Commission Expires July 13, 1985
Bonded by American Fire & Casualty Co.
FORM NO. AD-262

PUBLIC NOTICE
The Department of Environ-
mental Regulation intends to
issue a permit to construct a
0.6 million Btu per hour heater
which is an integral part of a
relocatable enclosed system to
dechlorinate PCB contaminat-
ed transformer oils. The unit is
owned and will be operated by
Transformer Consultants, Divi-
sion of S. D. Myers, Inc., 2737
Front Street, Cuyahoga Falls,
Ohio, 44221. The unit will be
operated for short periods at
various facilities located in the
State of Florida.
The permit will include condi-
tions to assure compliance
with Chapter 17-2, Florida Ad-
ministrative Code.
Any person wishing to file
comments on this proposed
action may do so by submitting
such comments in writing to:
C. H. Fancy, P. E.
Bureau of Air Quality
Management
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
Any comments received
within thirty (30) days after
publication of this notice will
be considered and noted in the
Department's final
determination.
Any person whose substan-
tial interest would be affected
by the Department's intended
action on this permit may re-
quest an administrative hearing
by filing a petition as set forth
in Section 28-5.14, F.A.C., with-
in fourteen (14) days of the
date of this notice with:
Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301
CL-335 Aug. 11, 1983

ST. PETERSBURG TIMES
and EVENING INDEPENDENT

83 2230419

DER

Published Daily

St. Petersburg, Pinellas County, Florida

AUG 29 1983

STATE OF FLORIDA
COUNTY OF PINELLAS

} S.S.

BAQM

Before the undersigned authority personally appeared M. O'Hara
who on oath says that he is Front Counter Clk of the St. Petersburg Times
a daily newspaper published at St. Petersburg, in Pinellas County, Florida: that the
attached copy of advertisement, being a Legal Notice
in the matter RE: Public Notice

----- in the August 12, 1983 Court
was published in said newspaper in the issues of -----

Affiant further says the said St. Petersburg Times is a newspaper
published at St. Petersburg, in Said Pinellas County, Florida, and that the said news-
paper has heretofore been continuously published in said Pinellas County, Florida,
each day and has been entered as second class mail matter at the post office in St. Pe-
tersburg, in said Pinellas County, Florida, for a period of one year next preceding the
first publication of the attached copy of advertisement; and affiant further says that
he has neither paid nor promised any person, firm, or corporation any discount, re-
bate, commission or refund for the purpose of securing this advertisement for publi-
cation in the said newspaper.

Sworn to and subscribed
before me this 12th day of August 1983
Patricia B. Hana
(SEAL) Notary Public

Notary Public, State of Florida at Large
My Commission Expires FEB. 1, 1987



My commission expires _____ 19 _____

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour boiler which is an integral part of a relocatable enclosed system to regenerate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 237 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods of various facilities located in the State of Florida. The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code. Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to: C. H. Fancy, P. E., Bureau of Air Quality Management, Florida Department of Environmental Regulation, 2600 Blair Stone Road Tallahassee, Florida 32301. Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination. Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with: Ms. Mary Smallwood, Esq., Office of General Counsel, Florida Department of Environmental Regulation, 2600 Blair Stone Road Tallahassee, Florida 32301 (832230419) 19

RECEIVED

AUG 22 1983

Tallahassee Democrat

TRANSFORMER CONSULTANTS DIV.
S. D. MYERS, INC.

PUBLISHED DAILY

TALLAHASSEE — LEON — FLORIDA

STATE OF FLORIDA COUNTY OF LEON:

Before the undersigned authority personally appeared Mandy Mims who on oath says that she is Legal Control Clerk of The Tallahassee Democrat, a daily newspaper published at Tallahassee in Leon County, Florida; that the attached copy of advertising being a Legal Ad in the matter of

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a ... in the Court, was published in said newspaper in the issues of:

August 14, 1983

Purchase Order # OH 29536

Affiant further says that the said Tallahassee Democrat is a newspaper published at Tallahassee, in the said Leon County, Florida, and that the said newspaper has heretofore been continuously published in said Leon County, Florida, each day and has been entered as second class mail matter at the post office in Tallahassee, in said Leon County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this publication in the said newspaper.

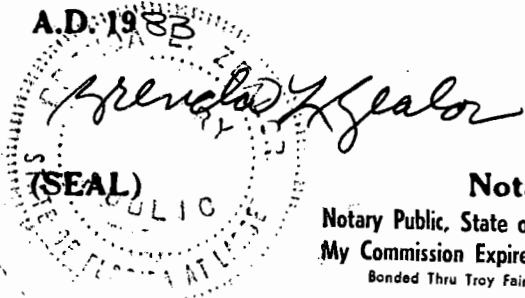
Mandy Mims

Mandy Mims, Legal Control Clerk

Sworn To And Subscribed Before Me This

17th day of *August*

A.D. 1983



Notary Public

Notary Public, State of Florida at Large
My Commission Expires July 30, 1984
Bonded Thru Troy Fain Insurance Inc.

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

C. H. Fancy, P. E.
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:

Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

August 14, 1983
Ad. No. 7216765

DER

AUG 29 1983

JAM

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION
INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Clair Fancy, BAQM
FROM: Bill Thomas, DER-Tampa *[Signature]*
DATE: July 29, 1983
SUBJECT: Your memo of July 14, 1983 regarding the PCB-GONE Process, Air Permit

DER
AUG 02 1983
BAQM

The draft permit has been reviewed by the Air and Hazardous Waste permit sections of this office and offer the following minor comments:

1. Although the federal government uses the same language, Specific Condition Number 7 of the proposed state permit may best be changed to reflect that disposal be accomplished in an approved manner. This would allow for disposal via other methods (i.e. incineration) and not limit the permittee to disposal in a EPA approved chemical waste landfill site as the wording now states.
2. Three (3) gallons per hour of No. 2 fuel oil does not compute to 0.6 MMBTU/hr.
3. We agree with your recommendations that this permit should be issued as conditioned.

Please provide this office with a copy of the application and design information.

JE/scm

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO.

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Clair Fancy

INITIAL

DATE

2.

TBAQM

INITIAL

DATE

3.

Patty

INITIAL

DATE

4.

INITIAL

DATE

REMARKS:

for permit file

INFORMATION

REVIEW & RETURN

REVIEW & FILE

INITIAL & FORWARD

DISPOSITION

REVIEW & RESPOND

PREPARE RESPONSE

FOR MY SIGNATURE

FOR YOUR SIGNATURE

LET'S DISCUSS

SET UP MEETING

INVESTIGATE & REPT

INITIAL & FORWARD

DISTRIBUTE

CONCURRENCE

FOR PROCESSING

INITIAL & RETURN

FROM:

Tampa

DATE

PHONE

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: <i>Sub AQM</i>	Loctn.: <i>601</i>	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

*Pa Hy -
Sm stk*

TO : Clair Fancy

FROM : Thomas W. Moody *TW*

DATE : July 28, 1983

SUBJECT: PCB-GONE Process, Air Permit

DER
AUG 02 1983
BAQM

The following comments are submitted on the PCB-GONE Process, Air Permit:

1. The only potential source of air pollution is addressed in Condition 5 which is a copy of EPA Condition 3, but neither condition describes any method for testing to detect PCB's in vented gases, therefore the prohibition of detectable PCB's in vented gases has no meaning.
2. The only applicable regulations are the Toxic Substances Control Act (40 CFR Part 761) which has not been delegated to the State. Therefore, other than the public notice requirements I believe all other conditions relating to control and reporting should refer to the EPA letter of December 7, 1982 granting conditioned approval, and the Department should not spend time collecting redundant files in BAQM and six districts.
3. I believe a state-wide operation permit should be issued by CAPS with simply a notice requirement to the affected District each time it moves. Why can't one state-wide public notice also suffice?
4. Why issue a construction permit? Are they actually building a unit, or simply driving a trailer into the state? What does this thing look like?
5. If a state-wide permit can't be issued, then Condition 8 appears to call for a new application for permit, while Condition 9 calls for a modification only. Which do we want?
6. I see no need for routine monthly reports as called for in Condition 10.

PS Form 3811, Jan. 1978
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
 Show to whom and date delivered.....
 Show to whom, date and address of delivery.....
 RESTRICTED DELIVERY
 Show to whom and date delivered.....
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery. \$.....
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Mr. J. J. Kelly
 P. O. Box 3575
 Akron, Ohio 44310

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | P408530336 | |
 (Always obtain signature of addressee or agent)

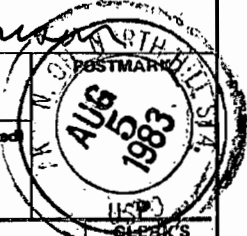
I have received the article described above.
 SIGNATURE Addressee Authorized agent
John Harrison

4. DATE OF DELIVERY
 AUG - 5 1983

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
M



☆ GPO : 1979-306-459

P 408 530 336
 RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL

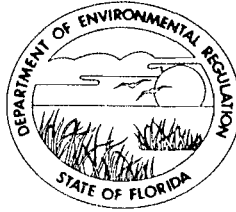
(See Reverse)

Sent to Mr. J. J. Kelly	
Street and No. P. O. Box 3575	
P.O., State and ZIP Code Akron, Ohio 44310	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 8/2/83	

PS Form 3800, Feb. 1982

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

August 1, 1983

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. J. J. Kelly, Manager
Environmental Affairs
Transformer Consultants
Post Office Box 3575
Akron, Ohio 44310

Dear Mr. Kelly:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit for the construction of a relocatable PCB destruction unit in the State of Florida.

Before final action can be taken on your proposed permit, you are required by Florida Administrative Code Rule 17-1.62(3) to publish the attached Notice of Proposed Agency Action in the legal advertising section of the Florida Times-Union, the Miami Herald, the Palm Beach Post, the Fort Lauderdale News, the Fort Myers News-Press, the Tampa Tribune, the St. Petersburg Times, the Gainesville Sun, the Orlando Sentinel, the Tallahassee Democrat, and the Pensacola Journal no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the last notice is published. Failure to publish these notices will be grounds for denial of the permit.

The Preliminary Determination and proposed permit constitute a proposed action of the department and are subject to administrative hearing under the provisions of Chapter 120, Florida Statutes, if requested within fourteen days from receipt of this letter. Any petition for hearing must comply with the requirements of Florida Administrative Code Rule 28-5.201 and be filed with the Office of General Counsel, Florida Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to file a request for hearing within fourteen days shall constitute a waiver of your right to a hearing. Filing is deemed complete upon receipt by the Office of General Counsel.

Mr. J. J. Kelly
August 1, 1983
Page Two

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Bill Thomas of the Bureau of Air Quality Management.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Attachments

cc: S. Myers, Transformer Consultants
R. Rasor, Transformer Consultants
S. Fox, DER
N. Wright, DER
G. Parker, DER
R. Kriegel, DER Northwest District
D. Dutton, DER Northeast District
W. Hennessey, DER Southwest District
A. Senkevich, DER St. Johns River District
P. Edwards, DER South Florida District
R. Duke, DER Southeast Florida District
D. Bayly, Duval County
R. Stewart, Hillsborough County
G. Robbins, Pinellas County
F. Gargiulo, Palm Beach County
V. Howard, Broward County
R. Rodon, Dade County

PUBLIC NOTICE

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable enclosed system to dechlorinate PCB contaminated transformer oils. The unit is owned and will be operated by Transformer Consultants, Division of S. D. Myers, Inc., 2737 Front Street, Cuyahoga Falls, Ohio, 44221. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

C. H. Fancy, P. E.
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:

Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

FT. LAUDERDALE NEWS
101 N. New River Drive East
P. O. Box 14430
Ft. Lauderdale, FL 33302
305/761-4000

FORT MYERS NEWS PRESS
2442 Anderson Avenue
P. O. Box 10
Ft. Myers, FL 33902
813/334-2351

GAINESVILLE SUN
101 S. E. 2nd Place
P. O. Drawer A
Gainesville, FL 32602
904/378-1411

FLORIDA TIMES-UNION
1 Riverside Avenue
P. O. Box 1949-F
Jacksonville, FL 32231
904/359-4111

MIAMI HERALD
1 Herald Plaza
Miami, FL 33101
305/350-2111

PALM BEACH POST
2751 S. Dixie Highway
West Palm Beach, FL 33402

ORLANDO SENTINEL
633 North Orange Avenue
P. O. Box 2833
Orlando, FL 32802
305/420-5000

ST. PETERSBURG TIMES
490 First Avenue South
P. O. Box 1121
St. Petersburg, FL 33731
813/893-8111

PENSACOLA JOURNAL
One News Journal Plaza
Pensacola, FL 32501
904/433-0041

TALLAHASSEE DEMOCRAT
277 N. Magnolia Drive
P. O. Box 990
Tallahassee, FL 32302
904/599-2100

TAMPA TRIBUNE
202 S. Parker Street
P. O. Box 191
Tampa, FL 33601
813/272-7600

I. PROJECT DESCRIPTION

A. Applicant

Transformer Consultants
Division of S. D. Myers, Inc.
2737 Front Street
Cuyahoga Falls, Ohio 44221

B. Project and Location

The applicant plans to operate a relocatable transformer oil processing system in the State of Florida. The PCB-GONE unit is a totally enclosed system that dechlorinates transformer oils contaminated with polychlorinated biphenyls. The only emissions to the air are the products of combustion from a 0.6 million Btu per hour heater.

The applicant does not plan to bring the mobile unit into the State until all necessary permits have been obtained, therefore no location is specified at this time.

C. Process and Controls

The PCB-GONE unit is a totally enclosed system which by nucleophilic substitution destroys the polychlorinated biphenyls yielding sodium chloride, a mild non-reactive portion of the reagent, and the biphenyl group in a polymerized chain. The only air pollutants are the products of combustion from the firing of No. 2 distillate oil in a 0.6 million Btu per hour heater. Particulate and sulfur dioxide emissions will be controlled by the firing of a specific grade of fuel oil.

II. RULE APPLICABILITY

The proposed project is subject to preconstruction review under the provisions of Rule 17-2.500, Florida Administrative Code (FAC). The fossil-fuel fired heater is not a steam generator and is exempt from the BACT determination requirements of Rule 17-2.600(6), FAC. The potential emissions from the proposed source are less than the significant emission rates as listed in Table 500-2, (17-2.500, FAC) - Regulated Air Pollutants Significant Emission Rates. A prevention of significant deterioration (PSD) review is not required.

The proposed project is subject to EPA polychlorinated biphenyl regulations 40 CFR Part 761 and the Toxic Substances Control Act. The use of the PCB-GONE process to destroy polychlorinated biphenyls in mineral oil dielectric fluid has been granted approval by USEPA, Region IV. The EPA approval lists several limiting conditions, some of which are incorporated in this permit as specific conditions. The EPA approval letter included as attachment A.

III. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS:

A. Emission Limitations

Particulate and sulfur dioxide emissions will be limited by the characteristics of grade No. 2 fuel oil. Compliance will be determined by DER Method 9 - Visible Emissions. The polychlorinated biphenyl zero emission rate is based upon information submitted by the applicant.

B. Air Quality Analysis

No modeling was required for this source.

IV. CONCLUSIONS

The use of a specific grade of fuel oil is an effective method of limiting particulate and sulfur dioxide emissions from a combustion source of this size. The PCB-GONE process has been used in other states without problems.

The General and Specific Conditions listed in the proposed permit will assure compliance with all applicable requirements of Chapter 17-2, FAC.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221

Permit Number: AC 37-65849
Expiration Date: January 1, 1984
County: relocatable
Latitude/Longitude:

Project: A relocatable unit to
dechlorinate transformer oils.

This permit is issued under the provisions of Chapter(s) 403
 , Florida Statutes, and Florida Administrative Code Rule(s)
17-2 and 17-4. The above named permittee is hereby
authorized to perform the work or operate the facility shown on
the application and approved drawing(s), plans, and other
documents attached hereto or on file with the department and made
a part hereof and specifically described as follows:

Construction of a 0.6 million Btu per hour heater which is an
integral part of a portable processor to dechlorinate transformer
oils contaminated with polychlorinate biphenyls. The mobile unit
will be operated at different facilities located within the State
of Florida. The location and hours of operation will be a
condition of the operating permit which must be modified when the
relocatable unit is moved from one facility to another.

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221

I. D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221
GENERAL CONDITIONS:

I. D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221

I. D. Number:
Permit Number: AC 37-65849
Date of Issue:
Expiration Date: January 1, 1984

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221
GENERAL CONDITIONS:

I. D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Visible emissions to the outside air from the heater stack shall not exceed 20 percent opacity (six minute average) as determined by DER Method 9.
2. An Opacity compliance test shall be conducted on an annual basis.
3. Fuel oil fired in the burner shall be uncontaminated ASTM grade No. 2 having a sulfur content of less than 0.7 percent by weight.
4. The applicant shall notify the Department at least 15 working days prior to conducting the required annual compliance test.

PERMITTEE:
Transformer Consultants
P. O. Box 3573
Akron, Ohio 44310
SPECIFIC CONDITIONS:

I.D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

5. There shall be no detectable PCBs in exhaust or vented gases from the disposal portion of the PCB-GONE process. If gases escape and contain PCBs, the applicant must inform the Department of Environmental Regulation's District Office having jurisdiction by close of business on the next regular business day, and no PCBs may be processed until the emission problem has been corrected to the satisfaction of the Department.

6. Transformer dielectric fluid must be sampled after it exits the PCB destruction portion of the PCB-GONE process but before it is returned to the transformer or other container. This sample must be tested for PCB concentration within 15 days. If the PCB concentration of the sample is 2 ppm or greater, that fluid must be treated again with the PCB-GONE process within 45 days of the test. If the transformer dielectric fluid is returned to the transformer after the PCB-GONE process has been used, that transformer cannot be reclassified as a non-PCB transformer unless the fluid is tested again after at least three months of in service use and shown to contain less than 50 ppm PCBs. Any transformer dielectric fluid treated with the PCB-GONE process must be disposed of as if it contained between 50 and 500 ppm PCBs or the original concentration of PCBs until the testing required that its PCB concentration has been reduced below 2 ppm.

7. Any solid wastes or by-products generated by the PCB-GONE system must be stored in accordance with Annex III, 40 CFR 761.42(b), and must be disposed of in a chemical waste landfill approved by EPA under Annex II of the PCB Regulation (40 CFR 761.41). Solid waste disposal must comply with all applicable Federal regulations. Cleaning of the filters must be handled according to the requirements of applicable sections of 40 CFR, Part 761.

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221

I. D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

SPECIFIC CONDITIONS:

8. Following approval of the initial compliance test results, a complete application for an operating permit shall be submitted to the District Office where the unit will be operated with a copy to the Department of Environmental Regulation, Bureau of Air Quality Management, Central Air Permitting, 2600 Blair Stone Road, Tallahassee, Florida, 32301. A request for an operating permit shall include the following information.
 - a. The name and address of the company whose transformer dielectric fluid is to be processed by the PCB-GONE process.
 - b. A plot plan showing the proposed location of the PCB-GONE unit.
 - c. The dates and times the unit will be operated at this location.
 - d. The total number of gallons of transformer dielectric fluid to be processed at this location.
 - e. Proof of publication of a notice in a newspaper of general circulation to allow for a 14 day comment period each time the PCB-GONE unit will be moved shall be submitted with the request for an Operating Permit revisison.

9. The applicant must request a modification to their Operating Permit each time the PCB-GONE processing system is relocated to another facility. The request to modify the permit must include the information requested in specific condition number 8.

PERMITTEE:
Transformer Consultants
2737 Front Street
Cuyahoga Falls, OH 44221
Specific Conditions:

Permit Number: AC 37-65849
Expiration Date: Jan. 1, 1984

10. Detailed monthly reports, including the number of gallons, dates, times, name, address, location, any unusual incidents, and any other pertinent information, must be submitted to Department of Environmental Regulation, Bureau of Air Quality Management Central Air Permitting, 2600 Blair Stone Road, Tallahassee Florida, 32301, and to the district office(s) that the unit has operated in during the month. These reports are due on the tenth day of the following month. If no fluids are treated during the month a report to that effect shall be submitted to the Tallahassee office at the above address.

Issued this ___ day of ___, 1983

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

___ pages attached.

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division
Air and Water Pollution Control



July 25, 1983

DER
JUL 26 1983
BAQM

Mr. Clair Fancy, Chief
Bureau of Air Quality
Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Mr. Fancy:

The proposed Department of Environmental Regulation permit of PCB-GONE appears compatible with local laws/rules, similar to PCBX or PPM.

Each temporary site must comply with criteria for containment, background sampling, waste by-product disposal, finished product analysis (i.e., fluid to be returned to transformer).

Bio-Environmental Services Division would obviously not approve the process without a better description and a copy of the Environmental Protection Agency's approval. In particular, information must be provided regarding direct contact of combusting fuel with PCB fluid, temperatures of PCB in process, and venting of gases due to thermal expansion.

Very truly yours,


Donald C. Bayly
Division Chief

DCB/JKF/DiM



INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Clair Fancy
FROM: Roy Duke/Jim Williams
DATE: July 22, 1983
SUBJECT: PCB-GONE Process, Air Permit

DER

JUL 25 1983

BAQM

We have reviewed the subject air permit sent down July 14, 1983 and have the following comments:

1. The permit and EPA's approval sets the level of clean up at 2 ppm. They imply that below that level the waste oil can be handled as a normal solid waste. This level of "how clean is clean" constitutes a major policy decision by the Secretary and should be recognized as such. We have no information at this point to indicate if this is a viable number. The final number will have a significant effect on the clean up of the Pepper Steel and Pratt & Whitney Aircraft sites.
2. We have been unable to do a complete review of this permit because we have not received a copy of the application, plans or any of the supporting documentation. This will also place the District in the difficult position of answering questions on the public notice without any information on the system.
3. The "Technical Evaluation and Preliminary Determination" states that the emissions from the source are less than significant. As such, the source should be exempt from permitting in accordance with Section 17-4.04(12) F.A.C. If the Department decides to permit the facility to maintain some control over the PCB process, which we do not address in our rules, we should still remember that the emissions from the heater are insignificant. We assume that a permit will be issued and our comment on the proposed permit follow.
4. The permit should be issued to a Corporate Officer rather than just Transformer Consultants. We also feel we should know the corporate headquarters location rather than just a P.O. Box number.

Memorandum
Page Two
July 22, 1983

5. Specific Condition No. 1 - We are unable to locate the rule requirement which specifies a 15 percent opacity limitation. Since this source does not qualify for a BACT determination we feel the opacity should be 20 percent as specified in Section 17-2.610(2).
6. Specific Condition No. 2 and 4 - An annual compliance test does not seem to be justified on an insignificant source.
7. Specific Condition No. 3 - Since the source is insignificant, what is the justification on the 0.5 percent sulfur? The limitation should only be ASTM grade No. 2 fuel which has a range of sulfur concentration but is generally below 0.7 percent. This restriction would not require monitoring of the sulfur content.
8. Specific Condition No. 5 - The "Technical Evaluation" indicated that the process would not emit PCB's as they are contained throughout treatment. This condition seems to conflict with this. How assured are we that the PCB's are contained during treatment? How often and where are measurements to be taken and by what test?
9. Specific Condition No. 10 - Should also state "If no fluids are treated during a month a report to that effect shall be submitted to the Tallahassee Office".

This office has a great deal of concern regarding the non-air aspects of this source. How are PCB's stored before and after treatment? Are they allowed to accumulate large amounts of PCB's before treatment or will they only be allowed to treat on the site of the generator? What type of spill control will be provided, etc.? These and numerous other questions will be generated by the public notice requirement which the Department must be in a position to answer. If you have any questions on the above please contact us.

RMD:jwm/8

cc: Bill Buzick
Craig Diltz
Doug Jones

State of Florida

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Clair Fancy
FROM: Philip R. Edwards *PRE*
DATE: July 20, 1983
SUBJECT: PCB-GONE Process, Air Permit

DER
JUL 25 1983
BAQM

This office has no objection to the proposed permitting procedures and conditions for this process. It might be advisable to include in the public notice a statement that the PCB destruction unit is totally enclosed and no contaminated oil will escape to the environment.

Please inform us of the date when you wish the public notice published.

PRE/DMK/jw

TRANSMITTAL SHEET FOR LANIER COMMUNICATIONS

TEXT NAME (include page numbers): Transformer 0-14

TO: All District Managers

FROM: Clair Fancy

DATE/TIME: July 18, 1983, 11:50 A.M.

RETRIEVED BY: Louise M. Stirk (SFD)

DATE/TIME: July 19, 1983 8.20.35

Dave : I have no objections to the procedures and conditions described in this packet. I do anticipate public outcry at least until citizens get used to this sort of thing.

Stu

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION
INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Victoria J. Tschinkel
Steve Fox
Mary Smallwood
Greg Parker
Steve Smallwood
Phil Edwards

Doug Dutton
Alex Senkevich
Bob Kriegel
William Hennessey
Roy Duke
Nancy Wright

FROM: Clair Fancy *Clair Fancy*

DATE: July 14, 1983

SUBJ: PCB-GONE Process, Air Permit

The following summary, preliminary determination, permit conditions, and proposed operating permit notice are being sent to you for concurrence for a relocatable PCB destruction unit. EPA's approval letter is being sent separately. Your comments would be appreciated by Friday, July 22, if possible. This issue is clearly a non-routine permitting matter with statewide implications.

CHF/bjm

*Basically ok
See Comments
on draft
permit
JK
7-20-83*

State of Florida

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

OK
7-29

TO: Victoria J. Tschinkel
Steve Fox
Mary Smallwood
Greg Parker
Steve Smallwood
Phil Edwards

Doug Dutton
Alex Senkevich
Bob Kriegel
William Hennessey
Roy Duke
Nancy Wright

FROM: Clair Fancy

DATE: July 14, 1983

SUBJ: PCB-GONE Process, Air Permit

The following summary, preliminary determination, permit conditions, and proposed operating permit notice are being sent to you for concurrence for a relocatable PCB destruction unit. EPA's approval letter is being sent separately. Your comments would be appreciated by Friday, July 22, if possible. This issue is clearly a non-routine permitting matter with statewide implications.

CHF/bjm

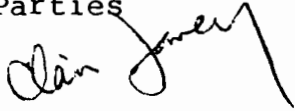
RECEIVED

JUL 19 1983

D. E. R. SO. FLA. DISTRICT

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Interested Parties
FROM: Clair Fancy 
DATE: July 12, 1983
SUBJ: PCB-GONE Process, Air Permit

The BAQM has decided to recommend issuance of permit to construct for the PCB-GONE process operated by Transformer Consultants. This is a totally enclosed chemical process destruction unit using thermo chemical decomposition. The PCB contaminated oil is heated by a .6 million BTU heater using 3 gallons per hour of No. 2 fuel oil. The only emissions result from firing of the fuel. As the system is totally enclosed, no contaminated oil escapes to the environment during processing. Once processed, the transformer oil is tested, and if the PCB concentration is less than 2 ppm, it is returned to the customer for reuse. The by-products of the process are stored and taken out of Florida for disposal.

EPA Region IV approved this process for use on December 7, 1982, with certain conditions. The attached draft air construction permit contains some of these conditions along with notice requirements and limits on the oil firing.

It is suggested that the construction permit be noticed in all major cities in Florida at the same time. These would include Jacksonville, Miami, West Palm Beach, Ft. Lauderdale, Ft. Myers, Tampa, St. Petersburg, Gainesville, Tallahassee, and Pensacola. If we are able to issue the construction permit based on little public opposition, then the firm would have to apply for an operating permit for each location it wants to operate the facility. This would entail applying to the district and publishing a notice in a newspaper in the area allowing 14 days for public comment. This should not present a serious problem as they should have a schedule with at least 30 days lead time. CAPS could draft the operating permit and send copies to all districts whereby the districts would have to fill in a few blanks and sign it. Only one operating permit fee would be required for a five year period. We use a similar approach for relocatable asphalt plants. Monthly reports would be required to be sent to CAPS and the district(s) where the unit was being operated. A sample of the required operating permit notice is attached.

CHF/bjm

PUBLIC NOTICE

The Department of Environmental Regulation intends to modify the existing operating permit for Transformer Consultants to operate a .6 million Btu per hour heater which is an integral part of a relocatable system to dechlorinate PCB contaminated transformer oils. All conditions required to insure compliance with Chapter 17-2, Florida Administrative Code, will remain unchanged.

The unit will be permitted to treat _____ gallons of PCB oil located at (Name of Facility and location) from (date) to (date).

Any comments received by the (Name) District office, (complete address) within 14 days after publication of this notice will be considered before the operating permit is modified.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, FAC, within 14 days of the date of this notice with:

Office of General Counsel
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

A copy of this petition must also be sent to:

District Manager
(Name) District
Florida Department of Environmental
Regulation

(address)

(address)

Technical Evaluation
and
Preliminary Determination

Transformer Consultants
Division of S. D. Meyers, Inc.

Application Number:
AC 37-65849

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

August 1,
~~July 18,~~ 1983

PUBLIC NOTICE

enclosed

The Department of Environmental Regulation intends to issue a permit to construct a 0.6 million Btu per hour heater which is an integral part of a relocatable system to dechlorinate PCB contaminated transformer oils. The unit will be operated for short periods at various facilities located in the State of Florida.

The permit will include conditions to assure compliance with Chapter 17-2, Florida Administrative Code.

Any person wishing to file comments on this proposed action may do so by submitting such comments in writing to:

C. H. Fancy, P. E.
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received within thirty (30) days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the Department's intended action on this permit may request an administrative hearing by filing a petition as set forth in Section 28-5.14, F.A.C., within fourteen (14) days of the date of this notice with:

Ms. Mary Smallwood, Esq.
Office of General Counsel
Florida Department of Environmental
Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

*The unit is owned and will be operated
by Transformer Consultants, Division of
S.D. Myers, Inc., 2737 Front St
Cuyahoga Falls, Ohio, 44221.*

I. PROJECT DESCRIPTION

A. Applicant

Transformer Consultants
Division of S. D. Myers, Inc.
~~P. O. Box 3575~~ 2737 Front St
~~Akron, Ohio 44310~~ Cuyahoga Falls, Ohio 44221.

B. Project and Location

The applicant plans to operate a relocatable transformer oil processing system in the State of Florida. The PCB-GONE unit is a totally enclosed system that dechlorinates transformer oils contaminated with polychlorinated biphenyls. The only emissions to the air are the products of combustion from a 0.6 million Btu per hour heater.

The applicant does not plan to bring the mobile unit into the State until all necessary permits have been obtained, therefore no location is specified at this time.

C. Process and Controls

The PCB-GONE unit is a totally enclosed system which by nucleophilic substitution destroys the polychlorinated biphenyls yielding sodium chloride, a mild non-reactive portion of the reagent, and the biphenyl group in a polymerized chain. The only air pollutants are the products of combustion from the firing of No. 2 distillate oil in a 0.6 million Btu per hour heater. Particulate and sulfur dioxide emissions will be controlled by the firing of a specific grade of fuel oil.

II. RULE APPLICABILITY

The proposed project is subject to preconstruction review under the provisions of Rule 17-2.500, Florida Administrative Code (FAC). The fossil-fuel fired heater is not a steam generator and is exempt from the BACT determination requirements of Rule 17-2.600(6), FAC. The potential emissions from the proposed source are less than the significant emission rates as listed in Table 500-2, (17-2.500, FAC) - Regulated Air Pollutants Significant Emission Rates. A prevention of significant deterioration (PSD) review is not required.

The proposed project is subject to EPA polychlorinated biphenyl regulations 40 CFR Part 761 and the Toxic Substances Control Act. The use of the PCB-GONE process to destroy polychlorinated biphenyls in mineral oil dielectric fluid has been granted approval by USEPA, Region IV. The EPA approval lists several limiting conditions, some of which are incorporated in this permit as specific conditions. The EPA approval letter included as attachment A.

III. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS:

A. Emission Limitations

Particulate and sulfur dioxide emissions will be limited by the characteristics of grade No. 2 fuel oil. Compliance will be determined by DER Method 9 - Visible Emissions. The polychlorinated biphenyl zero emission rate is based upon information submitted by the applicant.

B. Air Quality Analysis

No modeling was required for this source.

IV. CONCLUSIONS

The use of a specific grade of fuel oil is an effective method of limiting particulate and sulfur dioxide emissions from a combustion source of this size. The PCB-GONE process has been used in other states without problems.

The General and Specific Conditions listed in the proposed permit will assure compliance with all applicable requirements of Chapter 17-2, FAC.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Transformer Consultants
~~P. O. Box 3575~~
~~Akron, Ohio 44310~~

use
office address

Permit Number: AC 37-65849
Expiration Date: January 1, 1984
County:
Latitude/Longitude:

Project: A relocatable unit to
dechlorinate transformer oils.

This permit is issued under the provisions of Chapter(s) 403
17-2 and 17-4, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby
authorized to perform the work or operate the facility shown on
the application and approved drawing(s), plans, and other
documents attached hereto or on file with the department and made
a part hereof and specifically described as follows:

Construction of a 0.6 million Btu per hour heater which is an
integral part of a portable processor to dechlorinate transformer
oils contaminated with polychlorinate biphenyls. The mobile unit
will be operated at different facilities located within the State
of Florida. The location and hours of operation will be a
condition of the operating permit which must be modified when the
relocatable unit is moved from one facility to another.

PERMITTEE:

Transformer Consultants
P. O. Box 3575
Akron, Ohio 44310

I. D. Number:

Permit Number: AC 37-65849
Expiration Date: January 1, 1984

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:
Transformer Consultants
P. O. Box 3575
Akron, Ohio 44310
GENERAL CONDITIONS:

I. D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Transformer Consultants
P. O. Box 3575
Akron, Ohio 44310

I. D. Number:
Permit Number: AC 37-65849
Date of Issue:
Expiration Date: January 1, 1984

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Transformer Consultants
P. O. Box 3575
Akron, Ohio 44310
GENERAL CONDITIONS:

I. D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS: 20

1. Visible emissions to the outside air from the heater stack shall not exceed ~~5~~ percent opacity (*Six minute average*) as determined *by DER method 9*
2. ~~Annual~~ *Annual* Opacity compliance testing shall be conducted using ~~DER Method 9~~ *on an annual basis.*
3. Fuel oil fired in the burner shall be uncontaminated ASTM grade No. 2 having a sulfur content of less than ~~0.5~~ percent by weight. *0.7*
4. The applicant shall notify the Department at least ~~18~~ *15* working days prior to conducting the required annual compliance test.

PERMITTEE:
Transformer Consultants
P. O. Box 3573
Akron, Ohio 44310
SPECIFIC CONDITIONS:

I.D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

5. There shall be no detectable PCBs in exhaust or vented gases from the disposal portion of the PCB-GONE process. If gases escape and contain PCBs, the applicant must inform the Department of Environmental Regulation's District Office having jurisdiction by close of business on the next regular business day, and no PCBs may be processed until the emission problem has been corrected to the satisfaction of the Department.

6. Transformer dielectric fluid must be sampled after it exits the PCB destruction portion of the PCB-GONE process but before it is returned to the transformer or other container. This sample must be tested for PCB concentration within 15 days. If the PCB concentration of the sample is 2 ppm or greater, that fluid must be treated again with the PCB-GONE process within 45 days of the test. If the transformer dielectric fluid is returned to the transformer after the PCB-GONE process has been used, that transformer cannot be reclassified as a non-PCB transformer unless the fluid is tested again after at least three months of in service use and shown to contain less than 50 ppm PCBs. Any transformer dielectric fluid treated with the PCB-GONE process must be disposed of as if it contained between 50 and 500 ppm PCBs or the original concentration of PCBs until the testing required that its PCB concentration has been reduced below 2 ppm. *done done*

7. Any solid wastes or by-products generated by the PCB-GONE system must be stored in accordance with Annex III, 40 CFR 761.42(b), and must be disposed of in a chemical waste landfill approved by EPA under Annex II of the PCB Regulation (40 CFR 761.41). Solid waste disposal must comply with all applicable Federal regulations. Cleaning of the filters must be handled according to the requirements of applicable sections of 40 CFR, Part 761.

PERMITTEE:
Transformer Consultants
P. O. Box 3575
Akron, Ohio 44310

I. D. Number:
Permit Number: AC 37-65849
Expiration Date: January 1, 1984

SPECIFIC CONDITIONS:

8. Following approval of the initial compliance test results, a complete application for an operating permit shall be submitted to the District Office where the unit will be operated with a copy to the Department of Environmental Regulation, Bureau of Air Quality Management, 2600 Blair Stone Road, Tallahassee, Florida, 32301. A request for an operating permit ~~must~~ ^{shall} include the following information.
- a. The name and address of the company whose transformer dielectric fluid is to be processed by the PCB-GONE process.
 - b. A plot plan showing the ^{proposed} location of the PCB-GONE unit.
 - c. The dates and times the unit will be operated at this location.
 - d. The total number of gallons of transformer dielectric fluid to be processed at this location.
 - e. Proof of publication of a notice in a newspaper of general circulation to allow for a 14 day comment period each time the PCB-GONE unit will be moved shall be submitted with the request for an Operating Permit revision.
9. The applicant must request a modification to their Operating Permit each time the PCB-GONE processing system is relocated to another facility. The request to modify the permit must include the information requested in specific condition number 8.

Central Air Permitting

PERMITTEE:
Transformer Consultants
P. O. Box 3573
Akron, Ohio 44310
Specific Conditions:

Permit Number: AC 37-65849
Expiration Date: Jan. 1, 1984

10. Detailed monthly reports, including the number of gallons, dates, times, name, address, location, any unusual incidents, and any other pertinent information, must be submitted to BAQM, FDER, 2600 Blair Stone Road, Tallahassee Florida, 32301, and to the district office(s) that the unit has operated in during the month. These reports are due on the fifth day of the following month.

If ~~there is~~ no fluids are extracted during the month a report to that effect shall be submitted to the Tallahassee office at the above address.

LOH
spill-out → *BAQM, CAPS*

~~*First working day after the 10/1/82*~~

ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

___ pages attached.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DEC 7 1982

REF: 4A&WMD

Mr. J. J. Kelly, Manager
Environmental Affairs
Transformer Consultants
Post Office Box 3575
Akron, Ohio 44310

Dear Mr. Kelly:

I hereby grant approval to Transformer Consultants and its agents, to destroy Polychlorinated Bipheyls (PCBs) in mineral oil dielectric fluid by using the PCB-GONE process, as described in the application for approval submitted on June 25, 1982. This approval is granted pursuant to Section 6(e) of the Toxic Substances Control Act and 40 CFR 761.10(e) and is subject to the attached set of limiting conditions. The limiting conditions set forth in the permit do not preclude existing regulations established under 40 CFR 761. This approval is based upon the ability of PCB-GONE to destroy PCBs in mineral oil dielectric fluid to a level below 2 parts per million (ppm) without resulting in the emission of any PCB's into the air or water. Moreover, this approval is based on the Agency's belief that by-products of this process will be PCB-free and present no risk of injury to health or the environment.

This approval is effective upon receipt. This approval may be withdrawn, or further conditions may be added to it, at any time EPA has reason to believe that operation of the PCB-GONE system presents an unreasonable risk of injury to health or the environment. Withdrawal of the approval or the imposition of further conditions also may result from future EPA rulemaking with respect to PCBs. Moreover, violation of any condition included as part of this approval may subject Transformer Consultants to enforcement action and/or termination of the approval.

If you have any questions regarding this matter, please call Ralph Jennings of my staff at: 404/881-3864.

Sincerely yours,

for John A. Lelle, Deputy
Charles R. Jeter
Regional Administrator

Enclosure

Conditions for Authorization of PCB-GONE System (continued)

6. Any solid wastes or by-products generated by the PCB-GONE system must be stored in accordance with Annex III, 40 CFR 761.42(b), and must be disposed of in a chemical waste landfill approved by EPA under Annex II of the PCB Regulation (40 CFR 761.41). Solid waste disposal must comply with all applicable Federal regulations. Cleaning of the filters must be handled so that the oils escaping from the filter medium must be captured and handled according to the requirements of applicable sections of 40 CFR, Part 761.
7. This authorization is for the PCB destruction/disposal portion of the PCB-GONE system as described in the confidential business information on file at EPA Region IV. No modifications may be made to the disposal portion of the PCB-GONE system without prior notice to EPA for approval.
8. Transformer Consultants or its agents must develop and maintain the following records:
 - (a) the name of each person whose transformer dielectric fluid was processed by the PCB-GONE process;
 - (b) the date such service was performed;
 - (c) an identification of the PCB-GONE truck performing the service;
 - (d) the amount of transformer dielectric fluid processed;
 - (e) the location, manufacturer (if known), and serial number (if any) of the transformer from which the fluid was processed;
 - (f) a copy of the gas chromatograph or data record from the tests required by paragraph 2; and
 - (g) a summary of the total number of gallons of transformer dielectric fluid processed through PCB-GONE during the previous calendar year.

The documents must be compiled within 60 days of the servicing date, must be kept at one centralized location and must be available for inspection by authorized representatives of the Environmental Protection Agency. Such documents shall be maintained for at least 10 years. Transformer Consultants or its agents must also maintain the records required by 40 CFR section 761.45(f).

9. Transformer Consultants or its agents must take all necessary precautionary measures to ensure that operation of the PCB-GONE system is conducted in compliance with applicable Federal, State or local regulations and ordinances.

Conditions of Authorization for PCB-GONE
for Destroying PCBs

1. The PCB-GONE process may be used by Transformer Consultants and its agents to decontaminate transformer dielectric fluid from any mineral oil transformer regardless of PCB concentration. The term "mineral oil transformer" includes all transformers designed to use mineral oil as dielectric fluid which actually use mineral oil as a dielectric fluid.
2. Transformer dielectric fluid must be sampled after it exits the PCB destruction portion of the PCB-GONE process but before it is returned to the transformer or other container. This sample must be tested for PCB concentration within 15 days. If the PCB concentration of the sample is 2 ppm or greater, that fluid must be treated again with the PCB-GONE process within 45 days of the test. If the transformer dielectric fluid is returned to the transformer after the PCB-GONE process has been used, that transformer cannot be reclassified as a non-PCB transformer unless the fluid is tested again after at least three months of in service use and shown to contain less than 50 ppm PCBs. Any transformer dielectric fluid treated with the PCB-GONE process must be disposed of as if it contained between 50 and 500 ppm PCBs or the original concentration of PCBs until the testing required by this paragraph shows that its PCB concentration has been reduced below 2 ppm.
3. There may be no detectable PCBs in exhaust or vented gases from the disposal portion of the PCB-GONE process. If gases escape and contain PCBs, Transformer Consultants or its agents must inform the appropriate EPA Regional Office by close of business on the next regular business day, and no PCBs may be processed in that system until the emission problem has been corrected to the satisfaction of the EPA Region IV.
4. Any chemical accident or injury occurring with the use of the PCB-GONE process must be reported to the EPA Regional Office by the next regular business day.
5. Any reports required by conditions 3 and 4 are to be submitted by telephone to the Regional Administrator in the Regional Office with responsibility for the State where the incident occurred, and in writing to the Deputy Assistant Administrator for Toxic Substances, Office of Pesticides & Toxic Substances, 401 M Street, S. W., Washington, D. C. 20460, and to the appropriate Regional Administrator.

ATLANTA COMPANY DESTROYS PCBS IN CANADA;
WILL ASSIST WITH DISPOSAL OF PCBS

The Atlanta, Ga., firm, PPM, Inc., will be helping and advising the Canadian government on chemical disposal techniques for eliminating polychlorinated biphenyls. The company announced last month that it had successfully cleansed 23,000 liters of PCB oils, which marked the first time PCBs had been destroyed in Canada. In the test, PPM reduced concentrations of PCBs from 260 parts per million to less than one ppm, and the project was declared a success by Environment Canada.

Canadian regulations prevent the landfilling and incineration of PCBs. However, since PPM's method is a closed chemical destruction process, PPM is expected to offer PCB disposal services in Canada because there is no environmental release of PCBs.

SEMINAR PLANNED TO EXPLAIN PMN RULES,
INSTRUCTIONS AND RESPONSIBILITIES

Nitans' Law- a push on a wheel locked on
dead center will cause rotation.

Environmental Protection Agency is sponsoring a free seminar designed to explain the agency's final premanufacture notification requirements under the Toxic Substances Control Act. Seminar is sponsored by the agency's TSCA Assistance Office to discuss all aspects of PMN policy and regulations, including directions on how to complete the PMN form required under the TSCA Section 5 rules that were published May 13.

Seminar will be held June 23 at the Disabled American Veterans' Auditorium in Washington, D.C., from 9-4. To register, contact the TSCA Assistance Office, (800) 424-9065, or in D.C., 554-1404.

TOXIC MATERIALS NEWS IN BRIEF

• The Illinois House has overwhelmingly approved a series of hazardous waste disposal regulations that, among other things, would prohibit the landfilling of liquid hazardous wastes in the state, beginning in 1985. In addition, the measure, which passed last month 101-8, would require the state to compile an inventory of all wastes that are considered hazardous. The House also approved a mini-Superfund measure that would impose a five-fold increase in fees charged to handlers of hazardous wastes. The money collected would then be used to clean up waste sites and to support research alternatives to landfilling of hazardous wastes.

• Manville Corp. intends to sell its Canadian asbestos mine to a group of Canadian investors. Manville's Jeffrey Asbestos Mine in Asbestos, Quebec, is the largest asbestos operation in the free world. The company said last week that letter of intent for the sale has been signed and that the sale price for the transaction will be announced when the sale is final in July.

• EPA's Office of Toxic Substances has announced the availability of the third edition of a chemical report that provides detailed updates on the agency's chemical activities. The data base, "EPA Chemical Activities Status Report (EPACASR)", is arranged by Chemical Abstracts Service Registry numbers and identifies the regulations, guidance, assessments and technical and health studies concerning 3,850 chemicals currently "tracked" in the current edition. Compiled by EPA's Office of Chemical Coordination, the data base is also available on computer tape, which will be updated twice a year.

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Acts 4:12

DIVISION OF ED Myers TRANSFORMER CONSULTANTS

P.O. Box 3575
Akron, Ohio 44310
Phone: (216) 929-2847
Toll Free: (800) 321-9580

Ed P.

May 27, 1983

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Attention: Mr. C. H. Fancy, P.E.
Deputy Chief,
Bureau of Air Quality Management

DER

MAY 31 1983

BAQM

Re: Application to Permit
"PCB-Gone" Process

Dear Mr. Fancy:

We have finally received a registration from the Florida Board of Professional Engineers for our Mr. Robert Rasor.

We believe this is the last requirement that we must meet in order to be permitted to operate in your State.

Please advise us of our status as we are eager to begin work on some jobs we have scheduled.

Thank you for your assistance and patience.

Very truly yours,


J. J. Kelly
Manager Environmental Affairs

JJK/jb

Enclosures: (1) Application
(2) Letter of May 13, 1983



Department of Professional Regulation

Governor
Bob Graham

Board of Professional Engineers

130 North Monroe Street,
Tallahassee, Florida 32301
(904) 488-9912

May 13, 1983

Mr. Robert Thomas Rasor
515 Meredith Lane 3C
Cuyahoga Falls, OH 44223

Re: Temporary Registration #33397

Dear Mr. Rasor:

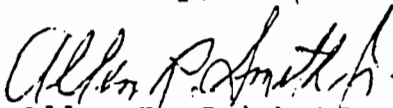
Temporary Registration Number 33397 to practice Professional Engineering in the State of Florida has been issued to you for a period of one year, effective May 12, 1983.

This temporary registration is restricted to professional consulting engineering for the removal process of Polychlorinated Biphenyl in mineral oil in conjunction with the Florida Environmental Protection Agency, Mr. C. H. Fancy, Twin Towers Office Building, 2600 Blairstone Road, Tallahassee, Leon County, Florida with the United States Environmental Protection Agency, Region IV, Mr. Charles R. Jeter, Regional Administrator, 345 Courtland Street, Atlanta, Georgia and is not for the general practice or the offering to practice engineering in the State of Florida.

Processing of your application for permanent registration will continue. Please be advised that you are responsible for distributing the yellow employer forms, white character reference forms, and educational verification form that were enclosed with your application packet.

We suggest that you contact your references and employers to see that they respond to the routine queries as soon as possible.

Sincerely,


Allen R. Smith, Jr.
Executive Director

ARSjr/ljj

Board Members

Amado J. Acosta, P.E. Eugene N. Bechamps, P.E. Emily W. Black, P.E. William B. Bradley, P.E.
Robert W. Day, Public Member Robert D. Kersten, P.E. Edward A. Lobnitz, P.E.
Allen H. Seckinger, P.E. Robert P. Lawton, Public Member

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2500 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
VICTORIA J. TECHINKEL
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: _____ [] New¹ [] Existing¹
APPLICATION TYPE: [] Construction [] Operation [] Modification
COMPANY NAME: Transformer Consultants, Div. S. D. Myers, Inc. COUNTY: (State of Ohio)

Identify the specific emission point source(s) addressed in this application (i.e. Line
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Vacuum pump emission of "PCB-Gone" Process

SOURCE LOCATION: Street Variable City _____
UTM: East _____ North _____
Latitude _____° _____' _____"N Longitude _____° _____' _____"W

APPLICANT NAME AND TITLE: Stanley D. Myers, Owner
APPLICANT ADDRESS: P. O. Box 3575, Akron, Ohio

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

Transformer Consultants,
Div. S. D. Myers, Inc.

I am the undersigned owner or authorized representative* of Div. S. D. Myers, Inc.

I certify that the statements made in this application for a Air pollution source (mobile), permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: *Stanley D. Myers*
S. D. Myers, President & Owner
Name and Title (Please Type)
Date: 2/8/83 Telephone No. (216) 929-2847

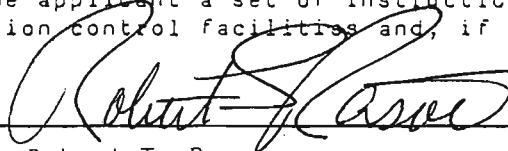
B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed



Robert T. Rasor

Name (Please Type)

Transformer Consultants, Div. S. D. Myers, Inc.

Company Name (Please Type)

P. O. Box 3575, Akron, Ohio 44310

Mailing Address (Please Type)

Florida Registration No. 33397 Date: Feb. 8, 1983 Telephone No. (216) 929-2847

SECTION II: GENERAL PROJECT INFORMATION

- A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

The process called "PCB-Gone" is a mobile chemical process used as an alternate method of PCB destruction to remove parts per million (PPM) quantities of PCBs from transformer mineral oil dielectric fluid according to our Federal approval under 40 CFR 761.

- B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction _____ Completion of Construction April 1982

- C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

None necessary

- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

None



Acts 4:12

DIVISION OF ED Myers TRANSFORMER CONSULTANTS

P.O. Box 3575
Akron, Ohio 44310
Phone: (216) 929-2847
Toll Free: (800) 321-9580

March 24, 1983

DER
MAR 29 1983
BAQM

*Pat Hy
Ed
will be incomplete
until this is
satisfied*

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Attention: Mr. C. H. Fancy, P. E.
Deputy Chief
Bureau of Air Quality Management

Re: Application for
"PCB-GONE" process

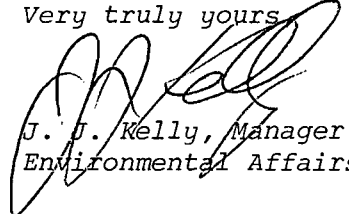
Dear Mr. Fancy:

We are currently working with the Department of Professional Regulation to obtain a certificate for our Professional Engineer, Mr. Robert T. Rasor.

We will provide the proper document to your office as soon as we receive the registration.

If you have further need for information, do not hesitate to contact us on our toll-free number, 800 321-9580.

Very truly yours,


J. J. Kelly, Manager
Environmental Affairs

JJK/jb

BEST AVAILABLE COPY

No. 0157990
 RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

SENT TO		J. J. Kelly, Transformer Consultants		
STREET AND NO.		P.O. Box 3575		
P.O., STATE AND ZIP CODE		Akron, Ohio 44310		
POSTAGE		\$		
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	\$		
	SPECIAL DELIVERY	\$		
	RESTRICTED DELIVERY	\$		
	OPTIONAL SERVICES	RETURN RECEIPT SERVICE	\$	
		SHOW TO WHOM AND DATE DELIVERED	\$	
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY		\$		
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY		\$		
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	\$		
TOTAL POSTAGE AND FEES		\$		
POSTMARK OR DATE				

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1979

① SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
 Show to whom and date delivered. \$
 Show to whom, date and address of delivery. \$
 RESTRICTED DELIVERY Show to whom and date delivered. \$
 RESTRICTED DELIVERY Show to whom, date, and address of delivery. \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 J. J. Kelly, Manager
 Environ. Affairs, Transformer Con.
 P.O. Box 3575
 Akron, Ohio 44310

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 0157990
 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY
 MAR 18 1983

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

REMARKS
 INITIALS
 Cur

POSTMARK: MAR 18 1983

☆ GPO - 1979-300-459

L. file

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

March 15, 1983

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. J. J. Kelly, Manager
Environmental Affairs
Transformer Consultants
Post Office Box 3575
Akron, Ohio 44310

Dear Mr. Kelly:

The Bureau of Air Quality Management is currently processing the PCB-GONE air pollution construction application. The application has been determined to be incomplete until the Bureau receives your temporary Florida professional engineering certificate.

Florida Administrative Code Rule 17-4.05(4) requires that an application for a department permit must be certified by a professional engineer registered in the State of Florida.

Processing of the application will resume upon receipt of the requested information.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

cc: Robert T. Rasor, Transformer Consultants
Steve Fox

DIVISION OF
EDNyers **TRANSFORMER**
CONSULTANTS



P.O. Box 3575
Akron, Ohio 44310
Phone: (216) 929-2847
Toll Free: (800) 321-9580

February 8, 1983

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Attention: Mr. Clair Fancy, Air Bureau

DER

FEB 15 1983

BAQM

Re: Air pollution permits

Dear Mr. Fancy:

We have been advised by letter by your Assistant General Counsel, Mr. Douglas H. Mac Laughlin, dated January 27, 1983, that in order for us to operate our alternate method of PCB destruction called, "PCB-Gone" in your State, we would need air pollution permits.

Thus, we submit the attached application and supporting documents to obtain both a construction permit (the mobile unit has already been constructed) and an operation permit.

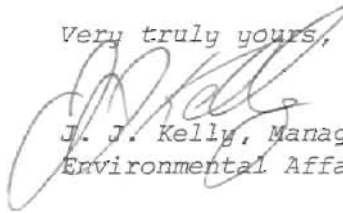
Our mobile chemical destruction process has been permitted by U.S.E.P.A., Region IV and will be of great assistance to the people in your State requiring destruction of PCBs contaminating transformer mineral oil dielectric fluid.

Of the attached submissions, one is considered confidential as it contains proprietary business information and is stamped "Confidential".

We have requested through your State Board of Registrations a temporary permit for our Professional Engineer, Mr. Robert T. Razor, who was responsible for the design and construction of our unit.

If you have further need for information, please do not hesitate to contact us as we have been approached by many companies in your State that desire to use our services.

Very truly yours,


J. J. Kelly, Manager
Environmental Affairs

JJK/jb

- Enclosures: (1) Application for Permit
(2) Check for required fee
(3) USEPA Region IV approval for Process
(4) Confidential Commerical Application Demonstration Plan (1)
(5) Non-confidential Review of Plan (5)

ACTS 4:12

56-1381
412



P. O. BOX 3575 AKRON, OHIO 44310-0575

26519

PAY THE SUM 100 DOLLARS 00 CTS DOLLARS

DATE	TO THE ORDER OF	GROSS AMOUNT		DISCOUNT	CHECK AMOUNT
		OTHER	ACCTS PAYABLE		
2-8-83	Dept. of Environmental Regulation	100.00			100.00

TRANSFORMER CONSULTANTS
DIV. S. D. MYERS, INC.
VOID IF NOT CASHED WITHIN 60 DAYS

THE GOODYEAR BANK
AKRON, OHIO

[Signature]

⑆026519⑆ ⑆041213814⑆ 460 2250⑆

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Nº 33651

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Transformer Consultants Date Feb 15, 1983

Address P.O. Box 3575 Akron, Ohio 44310 Dollars \$ 100.00

Applicant Name & Address Same as above

Source of Revenue _____

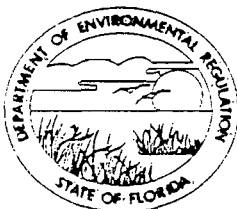
Revenue Code 0101 Application Number AC 37-165849

By Patricia A. Adams

AC 31-65449

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



DER

FEB 15 1983

BAQM

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: _____ [] New¹ [] Existing¹

APPLICATION TYPE: [] Construction [] Operation [] Modification

COMPANY NAME: Transformer Consultants, Div. S. D. Myers, Inc. COUNTY: (State of Ohio)

Identify the specific emission point source(s) addressed in this application (i.e. Line
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Vacuum pump emission of
"PCB-Gone" Process

SOURCE LOCATION: Street Variable City _____

UTM: East _____ North _____

Latitude _____° _____' _____"N Longitude _____° _____' _____"W

APPLICANT NAME AND TITLE: Stanley D. Myers, Owner

APPLICANT ADDRESS: P. O. Box 3575, Akron, Ohio

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

Transformer Consultants,
Div. S. D. Myers, Inc.

I am the undersigned owner or authorized representative* of _____

I certify that the statements made in this application for a Air pollution source (mobile) permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Stanley D. Myers

S. D. Myers, President & Owner
Name and Title (Please Type)

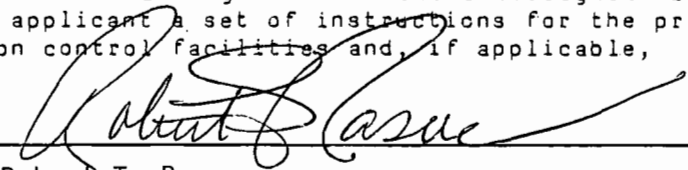
Date: 2/8/83 Telephone No. (216) 929-2847

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471; F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed 
Robert T. Rasor

Name (Please Type)

Transformer Consultants, Div. S. D. Myers, Inc.

Company Name (Please Type)

P. O. Box 3575, Akron, Ohio 44310

Mailing Address (Please Type)

Ohio
~~FLORIDA~~ Registration No. 46873 Date: Feb. 8, 1983 Telephone No. (216) 929-2847

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

The process called "PCB-Gone" is a mobile chemical process used as an alternate method of PCB destruction to remove parts per million (PPM) quantities of PCBs from transformer mineral oil dielectric fluid according to our Federal approval under 40 CFR 761.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction _____ Completion of Construction April 1982

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

None necessary

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

None

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 6 ; wks/yr 52 ;
if power plant, hrs/yr _____; if seasonal, describe: Note: above applies only
when in area.

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? No
a. If yes, has "offset" been applied? _____
b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. No

3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. No

4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? No

5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? No

H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? No

a. If yes, for what pollutants? _____

b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

NOTE: We are requesting a permit to work on transformer mineral oil dielectric fluid.
Our reagent is not hazardous and all by-products are harmless. The only effluent
is the vent gas for the vacuum pump at about 1CFM. The gas has been tested
and contains only low parts per million PPM quantities of oil vapor.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Proprietary -	See attached	confidential	Commercial Application	Demonstration
	Plan			

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): Variable - depends upon PBC content concentration in PPM
2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
See attached	Confidential	Commercial	Application	Demonstration	Plan		

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

J. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
None needed				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Fuel Oil #2	3 gallon/hour		600,000 BTU/hour

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis: Not required

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

See Confidential Commercial Application Demonstration Plan. Also, all wastes are to
be disposed of in a USEPA chemical waste landfill (even though they are innocuous) per
our Federal approval (attached).

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: Not required ft. Stack Diameter: _____ ft.
 Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.
 Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION

Not Applicable

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration
Not applicable	

D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.
- b. Diameter: ft.
- c. Flow Rate: ACFM
- d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1. Not applicable

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data See attached Confidential Commercial Application Demonstration Plan

1. _____ no. sites _____ TSP _____ () SO₂+ _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

¹Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? [] Yes [] No
- b. Was instrumentation calibrated in accordance with Department procedures?
[] Yes [] No [] Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
- 2. Surface data obtained from (location) _____
- 3. Upper air (mixing height) data obtained from (location) _____
- 4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

- 1. _____ Modified? If yes, attach description.
- 2. _____ Modified? If yes, attach description.
- 3. _____ Modified? If yes, attach description.
- 4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ²	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

TRANSFORMER CONSULTANTS

DIVISION OF S. D. MYERS, INCORPORATED

PCB CHEMICAL DESTRUCTION PROCESS

PCB-GONETM

DER

FEB 15 1983

BAQM

Commercial Application Demonstration
Plan and Non-Confidential
Review Presented to the

United States Environmental Protection Agency,

Revision 0

June 14, 1982

Submitted By

Robert T. Rasor, P.E.
Member
ASME, ASHRAE, IEEE

*The following report is a detailed
review of the theory, design, and
operational technique of
S. D. Myers, Inc. mobile PCB eradicators.*

*The unit has been constructed in
accordance with the latest revisions
of the National Electric Code, OSHA
Handbook, and American Society of
Mechanical Engineers Pressure Vessel and
Boiler Code.*

*The intent of the paper is to
provide information toward EPA
approval of PCB-GONETM as an alternate
method of PCB destruction under 40CFR761.*

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I. INTRODUCTION

S. D. Myers, Inc. has designed, developed, and built a mobile oil processor that efficiently dechlorinates transformer oils contaminated with Polychlorinated Biphenyls (PCBs) thereby destroying the PCBs. The unit has two major systems that combine to perform the environmentally and economically desirable process of chemically destroying PCBs in oil and yielding a re-usable dielectric fluid with excellent properties.

The oil purification system employs traditional oil reclaiming procedures and components that are used worldwide in upgrading mineral oil dielectric fluids. Heat, vacuum, fullers earth, submicronic filtration, and positive displacement pumps typically come to mind in oil reclamation.

Coupled to this oil purifier will be the dechlorination loop to remove the chlorines from the PCBs and render them harmless. Reagent pumps, reagent storage tanks, a 300 gallon reactor, a centrifuge, and a heat exchanger comprise this system. The PCB eradication will be performed prior to the reclamation mode.

The PCB-GONETM unit is a totally enclosed system and presents no risk to the environment or human health.

II. CHEMISTRY OF PCB-GONETM

Thermochemical Decomposition of Polychlorinated Biphenyls

PCB-GONETM Eradication Process
June 14, 1982

Prepared By

Mitchell E. Fadem, BA, MA, IHE
Director Research and Development
ACS, AIHA, SAS, AET, ASSE

Wally Moon, BA
Laboratory Manager
ACS

A. Introduction

Environmental contamination by polychlorinated biphenyls (PCBs), which are extremely stable compounds, is a widespread ecological and economic problem. Because we feel that other methods of polychlorinated biphenyl decomposition in transformer oil are impractical and costly, such as open flame incineration, we are presenting a cost efficient and environmentally safe method for polychlorinated biphenyl dechlorination in contaminated transformer oil.

Decomposition and destruction of polychlorinated biphenyls by dechlorination was studied and researched by R. E. Moon and M. E. Fadem. Over 200 articles were studied on the subject of dechlorination which included information pertaining to thermochemical, hydrothermal, and catalytic techniques used by Japanese, Hungarian, German, Russian, and American research laboratories. These experiments were reproduced in our laboratory and the following chemical process was determined to be the most effective.

The process involves the thermochemical decomposition of polychlorinated biphenyl (PCB). The process involves adding a specially

PCB-GONETM Eradication Process
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prepared reagent to the oil and elevating the temperature with vigorous agitation in a chemical reactor. The PCB is then destroyed by means of nucleophilic substitution. The reagent itself is non-flammable and does not react with moisture making the handling of the material safe.

B. Reaction Mechanics

The reaction mechanics of PCB-GONETM are confidential.

C. Basic Stoichiometric Relationship and Mass Balance

In the destruction process of the PCB molecule, the sodium-based reagent dechlorinates the PCB yielding the following byproducts:

- NaCl
- A mild, non-reactive portion of the reagent
- The biphenyl group in a polymerized chain

From the reaction mechanics, basic stoichiometry, and some simple calculations, the theoretical amounts of NaCl formed in the process were determined.

Batch treatment and continuous flow: NaCl = .991 (PCB)

D. Laboratory Testing

The PCB-GONETM field process will be quality control checked at various sample points as will be discussed in Section IV. E., sampling, testing, and quality control. The following section will address the actual testing procedures, equipment, and personnel.

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1. Testing procedures and quality assurance

- a. 1:100 dilution of sample in isooctane clean-up with sulfuric acid and florisil. Sample injected into OV-101 and OV-17 GC columns to confirm results.

Standards of PCBs are run at concentrations of 0.1, 0.5, 1.0, 10.0, 100.0 ppm and spiked oil samples are analyzed to insure accuracy.

2. Testing equipment

In-House Laboratory Instrument (PCB) - Hewlett-Packard 5840A Gas Chromatograph equipped with an electron-capture detector. The column used is a three-foot glass column filled with 5 percent OV-101 on 80/100 mesh chromosorb GHP and a 3 percent OV-17 on a 80/100 mesh chromosorb GHP.

Field Testing Equipment (PCB) - Analytical Instrument Development Inc. (A.I.D.) model 511 portable gas chromatograph equipped with an electron-capture detector. The column used is a three-foot stainless steel column packed with 3 percent SE-30 on 80/100 mesh chromosorb WHP.

Air Sampling Equipment - Bendix Super Sample Pump BDX 55-HD with Florisil tubes for air sampling. Samples tested by Battelle Institute for PCB, PCD-Dioxin, and PC-Dibenzofuran. AID #511 portable GC with Tritium ECD-HP3830 lab GC with Nickle ECD-HP computing integrators-printer-plotters. Fully equipped lab to

PCB-GONETM Eradication Process
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insure proper handling of samples according to EPA regulations and correct analytical technique.

3. Names, addresses, and qualifications of persons who will perform the PCB analyses of samples:

Mitchell E. Fadem - 7 years lab experience
BA, MA Manager Research and Development
11492 Ravenna Rd.
Chardon, OH 44024

Raleigh E. Moon, Jr. - 20 years lab experience
BA Laboratory Manager
1040 Clark Rd.
Wadsworth, OH 44281

Randall M. Walker - 5 years lab experience
BS Master Technician
4397 Edison Rd.
Kent, OH 44240

Michael D. Dietz - 5 years lab experience
BS, CLT Senior Technician
2538 Royal County Down
Uniontown, OH 44685

William E. Raber - 10 years lab experience
MT Laboratory Supervisor
2675 13th St.
Cuyahoga Falls, OH 44223

III. GENERAL DESCRIPTION OF FLOW

The flow schematic of the PCB-GONETM process can be simplified to the following block diagram, see Figure II. I. A detailed description will follow in the sections pertaining to the reagent/eradication loop and the oil purification loop.

As shown in the schematic, there are basically two combined systems that can either perform reclamation of oil or PCB destruction combined

PCB-GONETM Eradication Process
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with oil reclamation. Due to the requirement that only good, re-usable dechlorinated oil exit the unit, the dechlorination loop cannot exist alone unless a customer has specified "no re-use" on the oil.

A. The Oil Purification System

1. Performance

In accordance with the modern, accepted performance criteria of oil purifiers set forth by ASTM, ANSI, IEEE, EPRI, etc., the oil purification system incorporated into PCB-GONETM produces an oil to meet the following:

- Dielectric break-down voltage ASTM D-877	40 KV
- Total water content ASTM D-1533	10 PPM max.
- Total gas content ASTM D-2945	.25% max.
- Solid particle removal at 99% efficiency	.5 micron
- Acid reduction ASTM D-974	.03 mg KOH/g
- Interfacial tension ASTM D-971	36 dynes/cm

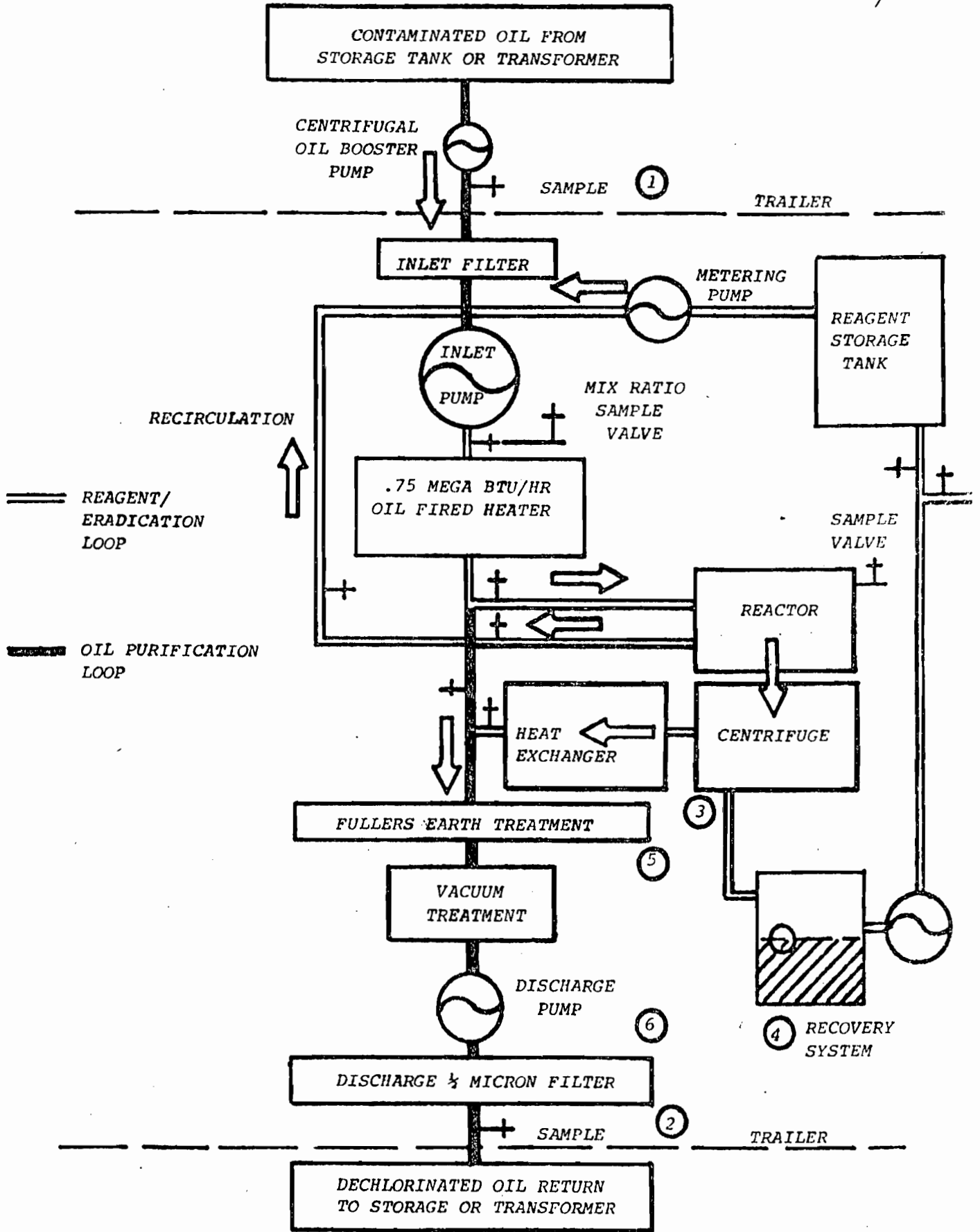


FIGURE II. 1

PCB-GONETM Eradication Process
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2. General Flow Description

- Refer to simplified schematic Figure II. I., page 7.
- Oil is drawn from the source by either the suction of the inlet pump or a centrifugal oil booster pump in cases where the oil is at an inconvenient distance from the PCB-GONETM trailer.
- A sample valve located past the booster pump will sample contamination levels in the inlet stream.
- An edge-wound 90 micron filter protects the inlet pump from particulate damage. It cleans in the dynamic mode.
- Positive displacement rotary gear pump with variable flow from 3-23 GPM. Pump is powered by a 1200 RPM 1½ H.P. 480 VAC 3Ø TEFC motor.
- .75 MEGA BTU/HR oil-fired heater with 23 GPM flow (capable of a 300^oF ΔT at 10 GPM) using a low-watt density coil.

$$\begin{array}{rcccc} \text{Heat} & = & \text{Flow} & \times & \text{Specific} & \times & \text{Change} \\ \text{Transfer} & & & & \text{Heat} & & \text{in} \\ & & & & & & \text{Temperature} \end{array}$$

$$Q = M C_p \Delta T$$

$$\text{BTU} = \frac{(10) \text{ gal.}}{\text{min.}} (500) \frac{\#/\text{HR}}{\text{gal/min.}} (.89) (.425) \frac{\text{BTU}}{\# \text{ } ^\circ\text{F}} (300) ^\circ\text{F}$$

specific gravity

$$= 600,000 \text{ BTU/HR}$$

Reclamation heater output temperature ~ 90^oC

Dechlorination heater output temperature ~ 140^oC

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- Dual 850# bulk-type 30/60 mesh LVM fullers earth filtering tanks. Capable of series, parallel, or solo flow arrangements.
- S. D. Myers, Inc. standard HV-20 coalescing vacuum chamber. Kinney Model KDH-150 CFM single-stage, air-cooled duplex vacuum pump.
- Positive displacement rotary gear pump with variable flow from 3-23 GPM. Pump is powered by a 900 RPM 1½ H.P. 480 VAC 3Ø TEFC motor.
- Discharge ½ micron filter with differential pressure alarm.
- Discharge sample valve
- Oil is returned to either the storage tank or transformer.

3. Component Description

The component descriptions in terms of model numbers and design features are confidential. The manufacturers' names are available along the overall capacity.

MAJOR EQUIPMENT COMPONENTS AND PERTINENT INFORMATION SUCH AS CAPACITY, EFFICIENCY, MATERIALS, ETC. (OIL RECLAMATION SYSTEM)

Component	Description
Inlet Pump	Worthington Variable flow 0-20 GPM

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Oil-Fired Heater	Volcanic Modulating flame Differential pressure Flow switch Thermostatic control Fire-eye logic comparator
Fullers Earth System Tanks	S. D. Myers, Inc. DFE-850-HM
Saturation Pump	Worthington 15 GPM
Air Compressor	Cambell Hausfield 10.5 FCFM
Vacuum Degasifier	S. D. Myers, Inc. Model HV-20
Vacuum Pump	Kinney KDH-150
Discharge Pump	Worthington Variable flow 0-20 GPM
Final $\frac{1}{2}$ Micron Filter	S. D. Myers, Inc. $\frac{1}{2}$ Micron Filter

B. The PCB-GONETM Process

1. General Information

The PCB-GONETM process is a chemical reaction of PCB contaminated oil with a proprietary reagent developed by S. D. Myers, Inc.

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After the oil has been dechlorinated in the reactor, it is reclaimed in a 0-1200 GPM vacuum oil processor:

IA-1200-HSV Insul-Aider^R

DFE-850-HM Fullers Earth System

All testing has verified a PCB-GONETM treated oil has excellent dielectric properties for reuse in electrical equipment.

2. Reagent Preparation

The reagent for the PCB-GONETM process is prepared by S. D. Myers, Inc. in a specially designed chemical reactor. It is shipped to the jobsite in 55 gallon drums or tankers for larger jobs.

3. Performance

The USEPA and other authorities have enforced performance guidelines of PCB-GONETM along with concurrence to the Federal Register. The unit must operate within the scope of its approval in the specific regions.

Based on test data and oil classified in the ASTM "good" range, the PCB-GONETM unit will be capable of handling oils at varying flow rates depending on the contamination levels. Mixing of streams (dilution) can provide treatment of oils up to 20,000 PPM or the upper bound of the approval.

4. Description of Flow

Section II. A., The Oil Purification System, is necessary for the PCB-GONETM process to produce reusable oil. In following

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through the PCB-GONETM process, we will keep in mind the purpose of our demonstration and the sampling points required by the EPA.

Sampling Points: (as shown in Figure II. 1.)

- a. Inlet stream (1)
- b. Discharge stream (2)
- c. Sludge/solids from centrifuge (3)
- d. Used reagent (4)
- e. Fullers earth (5)
- f. Fibers from $\frac{1}{2}$ micron filter (6)
- g. Reactor (S. D. Myers, Inc. use only for determination of endpoint). (7)

- Refer to simplified schematic Figure II. 1., page 7. Since components in the oil purification loop have been elaborated on, just mentioning components should suffice.
- Inlet oil stream with centrifugal booster pump.
- Sample #1 - Inlet stream
- Inlet filter
- Reagent injection: The trailer has storage capacity for 500 gallons of reagent. A positive displacement metering pump draws the reagent from the tanks and injects it into the suction side of the inlet pump at a mix ratio predetermined and based on the PCB contamination level. The recirculation

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- cycle is crucial for complete dechlorination. As shown in the simplified schematic, the inlet pump is used to circulate oil and reagent through the heater and reactor until complete dechlorination is achieved. This is monitored by electron capture gas chromatography during the process at the job site.
- Inlet pump
 - Mix ratio sample valve: During the eradication, it is necessary to monitor the ratio of oil and reagent in the mix. Our operators will periodically check this stream, then centrifuge the sample in the test lab to confirm the proper mix.
 - Oil-fired heater
 - Reactor tank: S. D. Myers, Inc. PCB reactor is a four-level unit that has a total capacity of 300 gallons. Seven (7) high pitch propeller stirrers in the tanks agitate the reagent and oil at high temperatures (^{243°F}140-145°C) until the reaction goes to completion. The reactor sees variable pressures from 8-30 PSI. The reactor is constructed in excess of the material and the structural design as required by the ASME Boiler and Pressure Vessel Code. See Section V. B.
- Sample Valve #7 - S. D. Myers, Inc. use only to determine endpoint of the reagent usage.
- Centrifuge: A 10 GPM capacity Alpha Laval centrifuge is used to separate the oil and reagent into two pure streams. The oil exits through a "paring disk" that is basically an impeller,

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which acts as a centrifugal pump to continue the oil processing. The reagent is drained at atmospheric pressure into a separate tank that is leveled automatically by the recovery pump. The used reagent is then transported either off the trailer or back to storage for re-use. Sample #4 - Used reagent. The solids in the centrifuge are trapped in what is called the sludge pan. Periodic cleaning of the centrifuge is required. Sample #3 - Solids from centrifuge. Vent Gas Test #1 will also be taken from the centrifuge exhaust.

- A 50,000 BTU/HR cross-flow air to oil heat exchanger drops the oil temperature to acceptable reclamation temperatures in the vicinity of 200^oF.
- Fullers earth treatment. Sample #5.
- Vacuum system. Vent Gas Test #2.
- Discharge pump.
- Discharge $\frac{1}{2}$ micron filter. Sample #6.
- Sample Valve #2 - Discharge stream.

5. Component Description

The component descriptions in terms of model numbers and design features are confidential. Listed below are the suppliers of the components and the overall capacity.

MAJOR EQUIPMENT COMPONENTS AND PERTINENT
INFORMATION SUCH AS CAPACITY, EFFICIENCY,
MATERIALS, ETC. ARE AS FOLLOWS

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Component	Description
Metering Pump	Vican 0-6 GPM variable flow
Chemical Reactor	S. D. Myers, Inc. 300 gallon capacity
Centrifuge	Alpha Level 10 GPM maximum flow light/heavy phase ratio 60/40 Self-cleaning package with self primer
Heat Exchanger	Voss Finn Tube $\Delta T \sim 50^{\circ}F$ at 6 GPM
Recovery Pump	Vican 6 GPM flow

IV. THE DEMONSTRATION OF PCB-GONETM

A. Operational Procedure

The trial run of PCB-GONETM will be performed on 190 gallons of transformer oil spiked to 2000 PPM PCB. In following the process, page 45, a detailed block diagram of the unit will be helpful.

1. PCB contamination is not permitted past the centrifuge. This eliminates handling the disposal of contaminated fullers earth and $\frac{1}{2}$ micron cartridge filters. Should the unit become contaminated past the centrifuge, a recirculation valve permits dechlorination of the oil throughout the unit.

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2. The unit will be set up in the oil purifying mode and "warming up" on innerflow. There is no PCB in the trailer at this point.
3. Reclamation system will be shut down.
4. The 190 gallons of 2000 PPM oil will be pumped on board into the reactor with the inlet pump, while metering in the reagent at a 40 percent mix ratio. Sample #1 should now be taken. Periodic (every 10 minutes) checks on the mix ratio will be made.
5. After all the contaminated oil has been drawn into the reactor, the temperature will be elevated to 145^oC and reacted until our reactor sample shows complete dechlorination. (This can be done in one pass also for continuous flow).
6. Oil-fired heater will be turned off for discharge cycle. Energize vacuum pump.
7. Centrifuge will be up to speed and primed.
8. Centrifuge will slowly be put on line, yielding a flow from the reactor into the Fullers Earth System.
9. As the oil level in the degasifier begins to rise, the discharge pump will be energized.
10. All systems will then be checked for typical pressures, temperatures, visual conditions, etc. Audible alarm circuitry backs the operation.
11. After flow has been established for half an hour, Sample #2, a discharge sample, will be taken.

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12. Draw Sample #4 from the heavy phase discharge (used reagent) of the centrifuge.
13. Return all 190 gallons to the return storage tank.
14. De-energize entire unit to begin drawing Samples #3, #5, and #6.
Sample #3 - Solids from centrifuge
Sample #5 - Fullers earth (core sample with 1" pipe)
Sample #6 - Fibers from $\frac{1}{2}$ micron filter
15. Resecure all the components from step 14 and begin preparation for a 2000 PPM run where steps 1-14 will be repeated. This is a continuous flow demonstration at a slow flow rate (maintaining the same dwell time). Continuous flow process uses the identical process except the oil is continuously fed into the unit while clean dechlorinated oil is discharged. The 75 minute dwell time will be the same.

In accordance to the regulation of the USEPA, the material balances, PCB destruction efficiency, and PCB reaction mechanics have been determined. The PCB-GONETM unit follows these formulas. The following full-scale physical data can be manipulated to account for the PCB destruction efficiency.

B. Performance Data and Analysis of Batch Process

As discussed in Section IV, the PCB destruction takes place in the reactor inlet recirculation line and heater coil.

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Capacity of reaction products:

Reactor	290 gallons
Inlet piping	10 gallons
Heater coil	<u>15 gallons</u>
Total	315 gallons

The mix ratio (reagent to oil) is normally as close to 40/60 as possible for optimum reaction efficiency. The reagent is reused two to three times depending on reaction effectiveness.

1. Materials in Terms of Mass

The continuity equation states that the mass into a reaction must balance the existing mass, or

$$\bar{M}_{in} = \bar{M}_{out}$$

Considering the inlet stream:

Transformer oil	1393.2#
PCB	2.79#
Reagent	<u>1223.6#</u>

$$\bar{M}_{in} = \text{Total Reactants } 2619.6\#$$

Considering the discharge stream:

Transformer oil	1393.2#
PCB	.0006#
Used reagent	1222.5#
PCB retention (filters)	.000425#
NaCl formation	<u>2.79#</u>

$$\bar{M}_{out} = \text{Total Products } 2618.5\#$$

2. The Mass Balance

$$\sum \bar{M}_{in} = \sum \bar{M}_{out}$$

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$\bar{M}_{in} \longleftrightarrow \bar{M}_{out}$ 2619.6# \longleftrightarrow 2618.5#	99.96%
---	--------

Chlorine Exchange:

Theoretical	=	.991 (PCB)
Section II. C.	=	.991 (2.79)
	=	2.76#
NaCl Actual	=	2.79#

$$\text{Efficiency Chlorine Exchange} = 1 - \left(\frac{2.79 - 2.76}{2.79} \right)$$

$\eta_{cl} = 98.9\%$

3. PCB Destruction Efficiency

$$\% \text{ efficiency mass} = \frac{\overline{PCB}_{in} - \sum PCB_{out}}{\overline{PCB}_{in}} = \frac{2.79 - (.0006 + .000425)}{2.79}$$

$\eta_{destruction} = 99.963\%$	(time to completion 75 min.)
---------------------------------	------------------------------

$$\% \text{ efficiency PPM} = \frac{2000 - .425}{2100}$$

$\eta_{destruction PPM} = 99.978\%$

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C. Performance Data and Analysis of Continuous Flow Process

The continuous flow process discharges oil at the same rate as it is drawn on board. The dwell time in the reactor is most important for complete dechlorination. Based on the 75 minutes for the batch treatment, the total flow through the reactor must be:

$$\frac{315 \text{ gallons}}{75 \text{ min.}} = 4.2 \text{ GPM}$$

@ 40/60 mix ratio:

$$\begin{aligned} \text{Oil flow} &= 2.5 \text{ GPM} \\ \text{Reagent flow} &= 1.7 \text{ GPM} \end{aligned}$$

1. Materials in Terms of Mass Flow

From the continuity equation:

$$\sum \dot{M}_{in} = \sum \dot{M}_{out}$$

Considering the inlet stream:

Transformer oil	1105.8 #/hr
PCB	2.32 #/hr
Reagent	<u>990.0 #/hr</u>

$$\sum \dot{M}_{in} = \text{Reactant Flow } 2098.12 \text{ #/hr}$$

Considering the discharge stream:

Transformer oil	1105.8 #/hr
PCB	.000885 #/hr
Reagent	998.7 #/hr
NaCl accumulation	2.29 #/hr
PCB retention	<u>.00064 #/hr</u>

$$\sum \dot{M}_{out} = \text{Product Flow } 2096.8 \text{ #/hr}$$

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NaCl accumulation data was obtained from both sludge and reagent. NOTE: The reaction byproducts, namely sludge and reagent were analyzed by independent laboratories as follows:

- a. PCB contamination
- b. PCDF and PCDD (polychlorinated dibenzo furans and polychlorinated dibenzo dioxines)
- c. Environment Pollution Toxicity Test
- d. Dermal Skin Sensitization Test on guinea pigs by Topical Patch Method (TSCA).

2. The Mass Balance

$$\boxed{\begin{array}{c} \sum \dot{M}_{in} = \sum \dot{M}_{out} \\ 2098.12 \text{ \#/hr} \longleftrightarrow 2096.8 \text{ \#/hr} \end{array}} \quad 99.94\%$$

Chlorine Exchange:

$$\begin{array}{lcl} \text{Theoretical} & = & .991 \text{ (PCB)} \\ \text{Section II. C.} & = & .991 \text{ (2.32 \#/hr)} \\ & = & 2.3 \text{ \#/hr} \end{array}$$

$$\begin{array}{lcl} \text{Efficiency} & = & \frac{1 - (2.3 - 2.29)}{2.3} \\ \text{Chlorine Exchange} & & \end{array}$$

$$\boxed{\eta_{cl} = 99.56\%}$$

3. PCB Destruction Efficiency

$$\% \text{ destruction mass} = \frac{\dot{PCB}_{in} - \sum \dot{PCB}_{out}}{\dot{PCB}_{in}}$$

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$$\eta_{\text{PCB mass}} = \frac{2.32 - (.000883 + .00064)}{2.32}$$

$$\eta_{\text{PCB mass}} = 99.59\%$$

$$\eta_{\text{PCB PPM}} = \frac{2100 - .8}{2100}$$

$\eta_{\text{PCB PPM}} = 99.96\%$

D. Heat Exchangers

There are two main heat exchangers in the PCB-GONETM system. The oil-fired heater and after cooler are shown in the following figure.

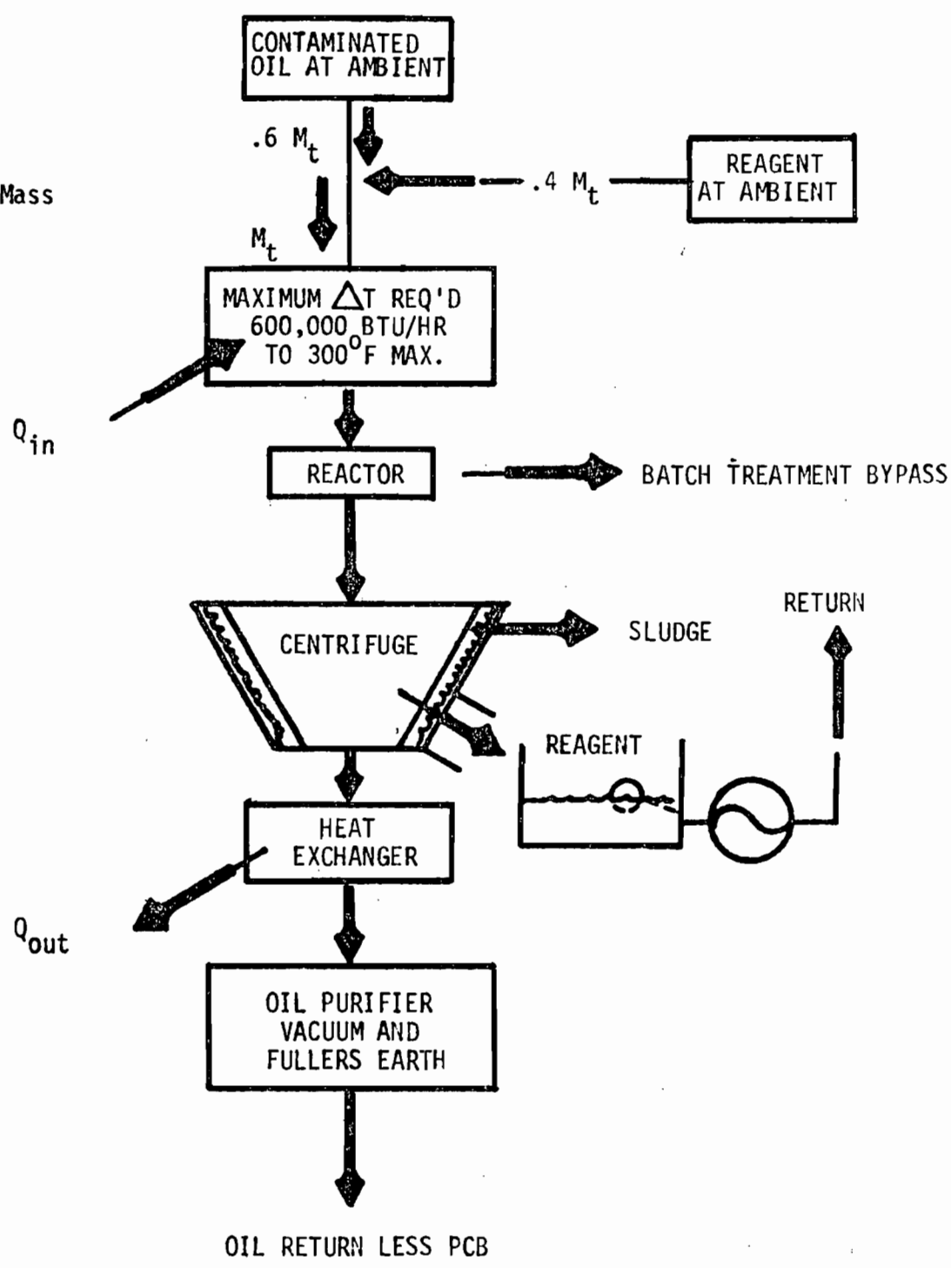
The oil-fired heater is subject to PCB contaminated oil; yet, can be also considered part of the reactor so residual levels have been very low. Our recirculation valve for clean up can then reduce the contamination to a trace.

$$\text{Heat Rise in Heater} = Q = MC_p \Delta T_{\text{oil}} + MC_p \Delta T_{\text{reagent}}$$

$$Q = (6) \frac{\text{gal}}{\text{min}} (.89) (8.3) \frac{\#}{\text{gal}} (60) \frac{\text{min}}{\text{hr}} (.425) \frac{\text{BTU}}{\# \text{ } ^\circ\text{F}} (250^\circ\text{F}) + (4) \frac{\text{gal}}{\text{min}}$$

$$(1.2) (8.3) \frac{\#}{\text{gal}} (60) \frac{\text{min}}{\text{hr}} (.5) \frac{\text{BTU}}{\# \text{ } ^\circ\text{F}} (250^\circ\text{F})$$

M_t = Total Mass



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$$Q = 282552 \frac{\text{BTU}}{\text{hr}} \Big/ \text{oil} + 298800 \frac{\text{BTU}}{\text{hr}} \Big/ \text{reagent}$$

$$P_{\text{total}} = 581,350 \text{ BTU/HR}$$

The after cooler reduces oil temperature to acceptable reclaiming limits ($\sim 220^{\circ}\text{F}$). There is no PCB contamination in this unit due to its location past the reactor. Cross-flow air to oil cooler.

Heat Exchange
after Reactor
and Centrifuge

$$\text{Oil Flow} = 6 \text{ GPM}$$

$$\Delta T = 50^{\circ}\text{F}$$

$$Q = MC_p \Delta T$$

$$= (6) \frac{\text{gal}}{\text{min}} (.89) (8.3) \frac{\#}{\text{gal}} (60) \frac{\text{min}}{\text{hr}} (.425) \frac{\text{BTU}}{\#^{\circ}\text{F}} (50)^{\circ}\text{F}$$

$$Q_{\text{cooling}} = 56,510 \text{ BTU/HR}$$

E. Sampling, Testing, and Quality Control

The sampling points have previously been discussed in the flow schematic description, Section III. B. 4.

1. Inlet oil
2. Discharge oil
3. Sludge from centrifuge
4. Reagent after use
5. Fullers earth
6. Final $\frac{1}{2}\mu\text{m}$ filter
7. Mix ratio valve
8. Reactor sample
9. Air vent of centrifuge
10. Exhaust of vacuum pump

The following six charts will be used as job site testing a quality control sheet. NOTE: All PCB tests will be drawn in glass bottles

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with teflon seals. Other samples can be drawn in plastic 12 ounce sample bottles. The PCB tests will be done in the mobile laboratory. Sample #7 is for the operator's use only to be sure his reagent oil mix is correct. Samples #9 and #10 were performed by S. D. Myers, Inc. for the EPA along with PCDF, PCD dioxine, and skin sensitization tests on the reagent, sludge, and oil tests. Proof tests will be sent to our Akron laboratory.

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1. Sample List and Frequency Chart

Sample #	Frequency of sample	Description and Purpose
1	One sample per pass for transformers. Verify start sample.	Inlet to eradicator. Determines mix ratio, transformer PCB count and whether batch or continuous flow is recommended.
2	One sample per hour. Constantly.	Determines the effectiveness of the reagent, the PCB count on discharge.
3	One sample per discard.	Before sludge is discarded extraction and PCB count must be determined.
4	One sample per total batch use of reagent.	Before reagent is discarded (when dechlorination strength reduced per sample at reactor) the PCB count must be determined.
5	One sample prior to disposal	Fullers earth cannot be contaminated per disposal.
6	One sample prior to disposal	PCB to be extracted from paper and monitored prior to used filter disposal.
7	Sample every 10-15 min.	Determines mix ratio 1:10 thru 4:6 depending on contamination.
8	Sample every hour.	Determines potency of reagent and verifies mix ratio. Sample taken from reactor.

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9	Sample periodically (one per month).	Vent to atmosphere from centrifuge. Contains oil and PEG mist. Check for PCB. Original test were for PCDF and dioxine.
10	Sample periodically (one per month).	Vent to atmosphere from vacuum pump. Contains oil mist and as dissolved gases in transformer oil. Original tests were for PCDF and dioxine.

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JOB INFORMATION SHEET

S. D. Myers, Inc. PCB-GONETM Process Chart

Company _____ Date _____

Location _____

Contact Man _____ Telephone _____

Operators on Duty _____ (lead man)

(lab technician)

TRANSFORMER INFORMATION

Valving _____ TC# _____

Manufacturer _____ Serial No. _____

KVA _____ Capacity _____ Primary/Secondary Volts _____ / _____

PCB Contamination Acid _____ IFT _____

_____ 1260

_____ 1254

_____ 1242

_____ Total

CONDITIONS OF CONTRACT

COMMENTS

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F. Waste Volumes and Disposal Requirements

The waste volumes of the PCB-GONETM process are free of PCB. The worst case contamination levels are those of the oil being discharged, which have all been below 1 PPM which is a 99.96 destruction efficiency. Our quality control sheets will verify the "trace" levels of PCB in the disposed materials. S. D. Myers, Inc. is well aware that the written conditions of the approval require that PCB laden materials must be disposed of in an Annex II land fill.

Full production of our units in graduated production increases for the next three years may produce the following waste volumes. (All have been deemed ecologically safe and/or biodegradeable).

Reagent (used)	200 gal/day 1982
	600 gal/day 1983
	600 gal/day 1984
Filter Elements	6 #/wk 1982
	18 #/wk 1983
	18 #/wk 1984
Sludge	30 #/day 1982
	100 #/day 1983
	100 #/day 1984
Fullers Earth	3000 #/wk 1982
	18000 #/wk 1983
	18000 #/wk 1984

G. Safety Measures, Problem Areas, and Contingency Planning

S. D. Myers, Inc. has been involved with the servicing of transformer oil in mobile 40 foot semi trailer-mounted vacuum oil

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reclaimers for 17 years. Our expertise in this type of equipment has also enabled us to become manufacturers of all types of oil treatment equipment with some eighty different units in the field since 1979.

The design features under Section V entitled PCB-GONETM Construction, has minimized problem areas to the obvious such as spill prevention, fire hazards (our reagent is non-flammable), personnel safety, quality control, and maintenance procedures. Our operators are familiar with equipment maintenance on the machinery listed under Section III. A. 3. and III. B. 5., Component Descriptions.

1. Spill Prevention Plans

The construction on the unit, in following our original plan, has the following safeguards:

- Oils drawn in from the source through red oil hose. (All quick disconnect couplings have been sealed, leak checked, and taped to assure against leakage or accidental oil spills).
Drip pans, caps, and plugs are put in each hose after usage.
At the end of each dechlorination run, the hoses are connected together such that discharge line is pumping clean dechlorinated oil through the inlet hose. After a five minute flush, the discharge pump is shut down and each of the hoses are sucked dry using special valves and the inlet pump. The hoses can then be disconnected and stored on a reel enclosed by a drip-proof bin.

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- The storage tanks, PCB-GONETM unit, and any other contaminated oil vessel is diked or in a drip-proof containment.

The support vehicle to PCB-GONETM is a 20 foot FRP box truck complete with laboratory and spill prevention and clean-up supply cart. The components of this system are as follows:

- 3-M organic vapor respirator
- Hard hat
- Chemical splash goggles and face shielding
- Polycoat disposable coveralls with Nomex heat resistance uniforms
- Polycoat disposable shoe covers
- Norton blue nitrile gloves
- Shovels
- Squeegee
- Pentone
- PCB labels
- Chemical spill sign
- Absorbent 30/60 mesh

The operators have been trained to handle PCB spills in accordance to the Federal Register. Clothing, absorbents, and disposal containers are all readily accessible.

2. Number of Employees may be Exposed to PCB and OSHA Protection

The operating crew for the PCB-GONETM unit will be two or three men. The men will not be exposed to the transformer oil that

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is contaminated with PCB as the entire system is totally enclosed. The system is vented to atmosphere. The vapors have been tested after being collected in florasil tubes by Bendix Super Sample Pump (BDX 55-HD). Special emphasis was placed on detection of the following components: hydroxides, glycols, PCBs, and organic vapors, PCDD's, and PCDF's.

RESULTS: Air samples, absorbents, and purged samples were negative for hydroxides, glycols, and PCBs. Oil vapors were slightly detected. PCDD's and PCDF's were also not present.

In the event of rupture of a line in the trailer, organic vapor masks are provided for all employees.

3. Site Security and Fire Safety

S. D. Myers, Inc. has been operating oil processing units in the field domestically and abroad for 17 years on over 50,000 transformers, most of which energized. Our unit is no more flammable than a standard vacuum oil processor due to our reagent being non-flammable and chemically stable. Fire extinguishers are placed in accordance to OSHA standards.

Security and standard substation safety are never overlooked in the field.

At each job site we are working as a guest of the host company under authority of their purchase order. Access to the general

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area is always limited. Further, since we will be working on transformers, the transformer is normally enclosed in a vault or a fenced-in substation.

Access to our equipment is controlled and permitted to only those from the host company that demonstrate a need to be there.

Fire safety is coordinated with the host company. Fire extinguishers are mounted and maintained on both the PCB-GONETM trailer and the support (lab) vehicle.

H. Job Site Planning

Depicted in Section VI. F. is a typical substation layout with the location of the S. D. Myers, Inc. PCB-GONETM system. The system consists of three vehicles:

1. PCB-GONETM eradicator
40 foot semi trailer, self contained with 150 foot power cable.
2. S. D. Myers, Inc. mobile lab with supply area.
20 foot box truck with PCB lab, reagent and fullers earth storage.
Houses spill-prevention and clean-up materials.
3. Pickup/support vehicle with dumpster. Used for fullers earth disposal and miscellaneous travel.

The PCB-GONETM system has a total power requirement of 41.5 KVA. This power must be 50 amps. of 480 VAC 3 ϕ . Generator rentals are sometimes necessary. The main power cable is 150 feet in length

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followed the rules and guidelines of the ASME Boiler Code and, as presented, they exceeded the requirements. All welding was done with a Linde Model VT 252 Mig Welder with .0035 copper wire/Argon atmosphere.

An additional safety incorporated into the unit is a pressure switch located near the discharge port of the pump. A pressure of 80 psi will de-energize the inlet pump. A pop-off valve to the main storage tank backs up the pressure switch for additional safety. It should also be noted that while under pressure of 10-15 psi during its separation cycle, the reaction process pressure is 6-8 psi, which the Code states, need not be certified.

All piping that exposes danger to operators due to excessive temperatures are insulated and clearly marked. All piping has been constructed in accordance to the standards which apply.

C. Control and Electrical Construction

The electrical operation of the PCB-GONETM eradicator has been engineered as a dual-voltage unit capable of operating at either 240 VAC or 480 VAC as an input voltage with a full load rating of 80 amps. at 240 VAC or 40 amps. at 480 VAC.

All motors and motor-control equipment are pre-wired to operate at 480 VAC; however, when necessary for the unit to operate on a 240V supply, a selector switch energizes a 45 KVA dry-type transformer,

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which steps up the incoming voltage (240 VAC) to 480 VAC making this change over quick and easy.

The power and control circuitry were carefully designed with the safety and convenience of the operators in mind. Once power is applied and standard start-up procedures have been followed, the fail-safe alarm circuitry and automated controls help to keep the operator informed of operation at all times.

The following alarm features have been incorporated in the control circuitry of this unit, which triggers an audible alarm capable of being heard throughout the entire unit:

- A phase-reversal upon initial power-up preventing any further operation, possible starting a motor in the wrong direction.
- A phase unbalance of more than 10 percent of the total 3 ϕ loads, disconnecting all 3 ϕ power and cannot be reset until the unbalance is found and corrective action taken.
- A flow switch has been installed as a safety device in the inlet section of the operation to shut off the oil-fired heater under a no-flow condition.
- Other features such as liquid level and pressure switches are used to control the operation of certain motors while in an automatic mode of operation.
- An infrared foam detector in the vacuum system operates solenoid valve, which automatically breaks the vacuum periodically when necessary to prevent pull over of foam into the vacuum pump.

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For protection of electrical equipment and operational personnel, the following general requirements have been followed to conform to the latest standards set by the National Electric Code.

- To keep the electrical components free from oil and dust, a special enclosure of the NEMA 12 type is used (suitable for industrial application).
- The indicating lights, push buttons, and selector switches are NEMA 13, oil tight, which are U.L. and C.S.A. listed and IEC rated for service on 600 VAC circuits.
- All motor starters and motor starter heater coils have been selected according to the nameplate full load currents to comply with article 430-432 of the National Electric Code.
- Any conductors outside of the control enclosure have been sheathed in either rigid metal conduit or liquid-tight, flexible metal conduit. The number of conductors used in either of the two types of conduit complies with the specifications given in the National Electric Code articles 346 and 351.

Using the state of the art controls and wiring methods, we are confident our unit meets and exceeds the standard requirements of the National Electric Code.

D. OSHA Compliance

We have endeavored to meet every requirement to OSHA standards, State of Ohio - August, 1977. Air tests inside the trailer have been conducted. They report no violations to OSHA standards.

PCB-GONETM Eradication Process
June 14, 1982

Our trailer meets DOT standards of all 50 states. When set up for operation, our work space is well illuminated, adequately ventilated (four wall fans), equipped with non-slip steel decking, and pipes carrying heat well insulated. All movable machinery has been equipped with guards (motor and pump couplings). Pipe valves, visual gauges, etc., are all readily accessible.

Our one hand rail on the access step-up into the trailer is adequate; however, OSHA calls for two rails. This would not be practical for our unit, as the trailer door must be open (sometimes entirely) and the second rail would be an obstruction. Also, when merely opened for access into the trailer, the door itself serves as protection.

In summation, the S. D. Myers, Inc. eradicator has endeavored to meet every OSHA requirement.

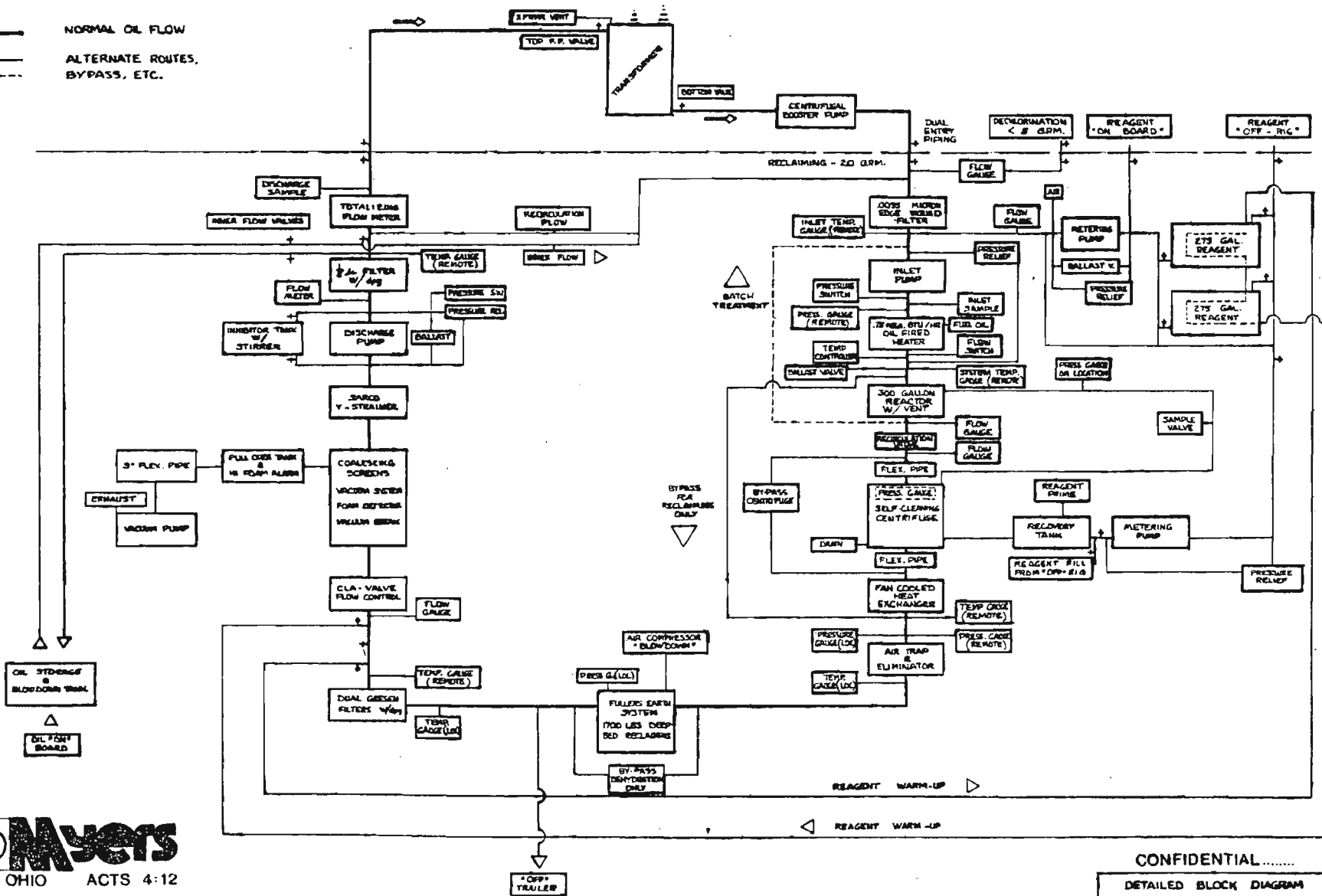
PCB-GONETM Eradication Process
June 14, 1982

VI. APPENDIX

- A. Detailed Block Diagram
- B. Start Sample
- C. Finish Sample
- D. Typical Substation Layout
- E. Photographs of PCB-GONETM Unit

Best Available Copy

——— NORMAL OIL FLOW
 ——— ALTERNATE ROUTES,
 BYPASS, ETC.



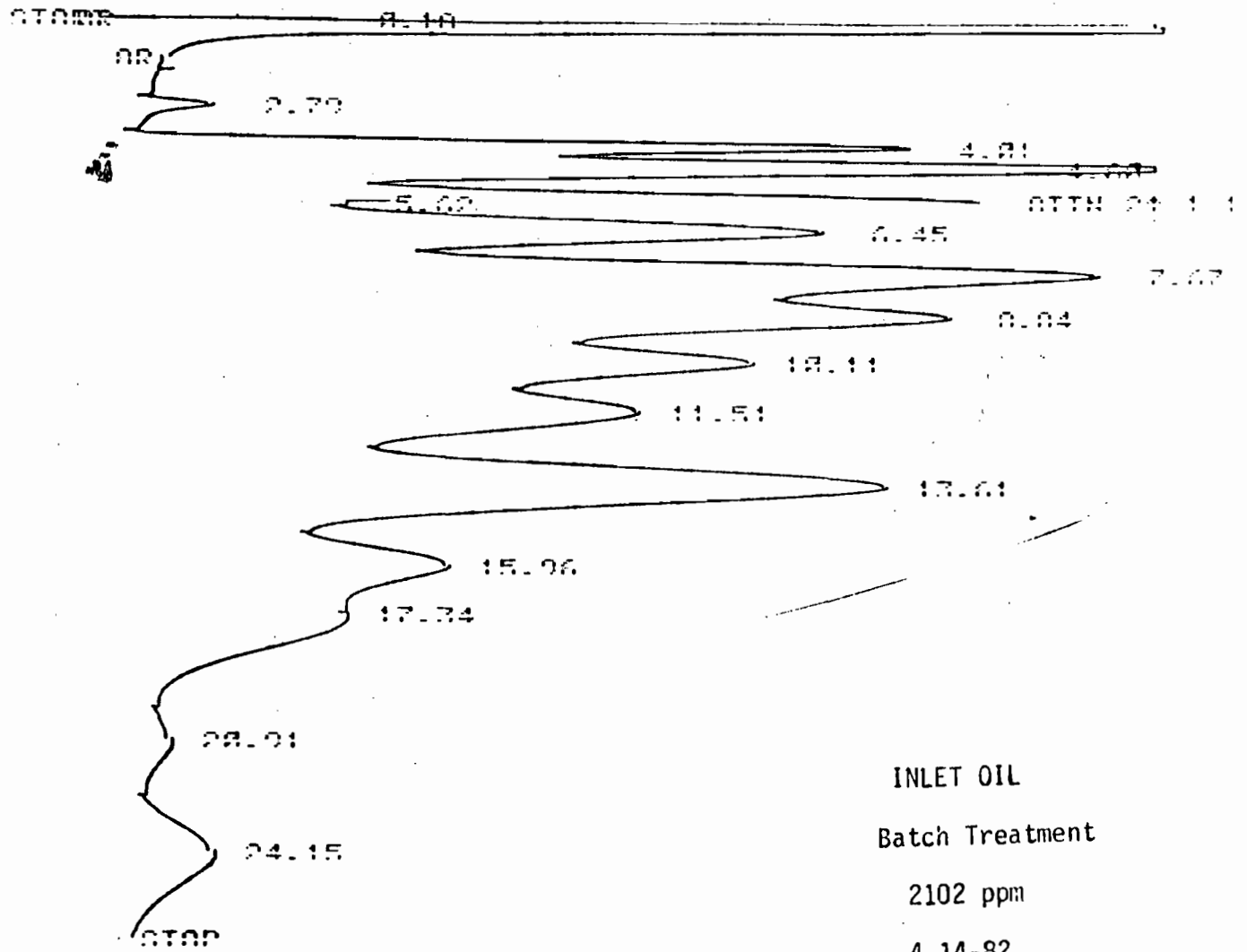
ED Myers
 AKRON, OHIO ACTS 4:12

CONFIDENTIAL.....

DETAILED BLOCK DIAGRAM

DATE: 5-8-86	DESIGNED BY:	APPROVED BY: L.A.
PCB-GONE UNIT # 6		
S.D. MYERS INC. OF-1094-D		

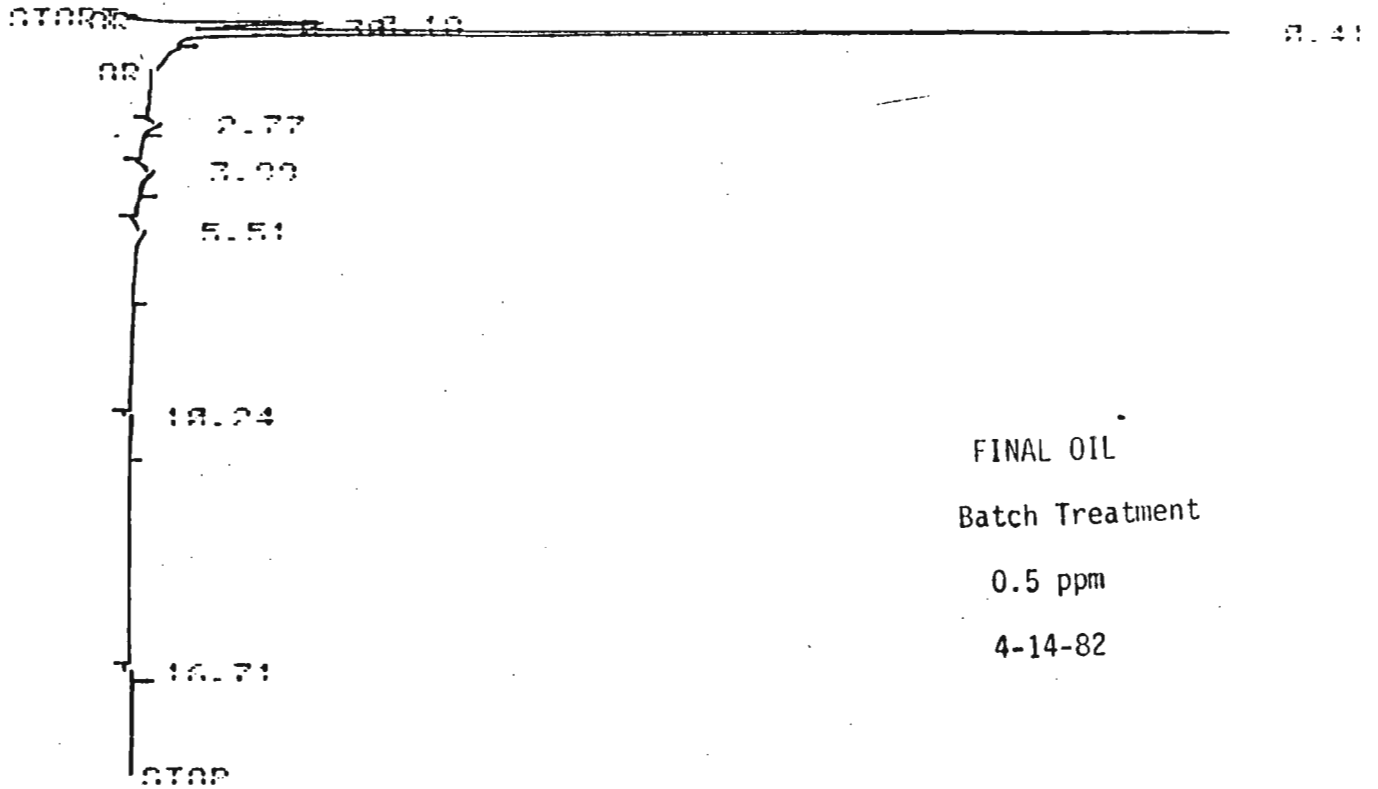
WATERS ASSOCIATES



INLET OIL
 Batch Treatment
 2102 ppm
 4-14-82

HP RUN #6585 APR/14/82
 AREA %

RT	AREA	AREA %
8.10	71000	8.878
8.48	0788888	0.451
2.70	72788	8.871
4.81	1110888	1.806
4.68	0842888	1.083
5.60	1424888	1.383
6.45	0110888	0.857
7.67	1307888	13.578
8.84	1285888	11.785
18.11	1832888	18.824
11.51	1820888	9.285
13.61	1608888	16.319
15.06	0168888	7.926
17.34	4067888	4.825
28.01	1142888	1.189
24.15	0714888	2.636



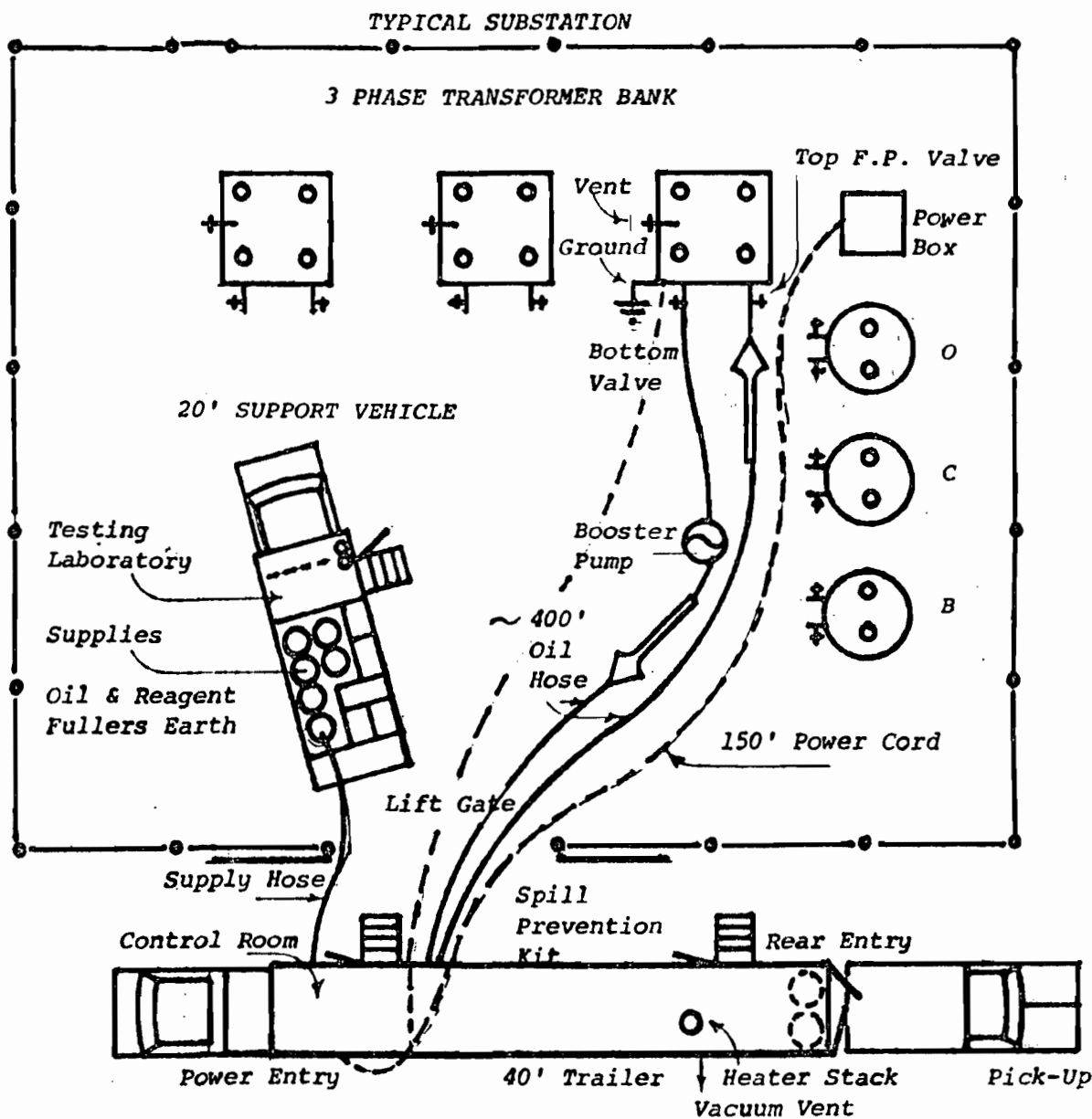
FINAL OIL
 Batch Treatment
 0.5 ppm
 4-14-82

HP RUN #6503
 AREA %

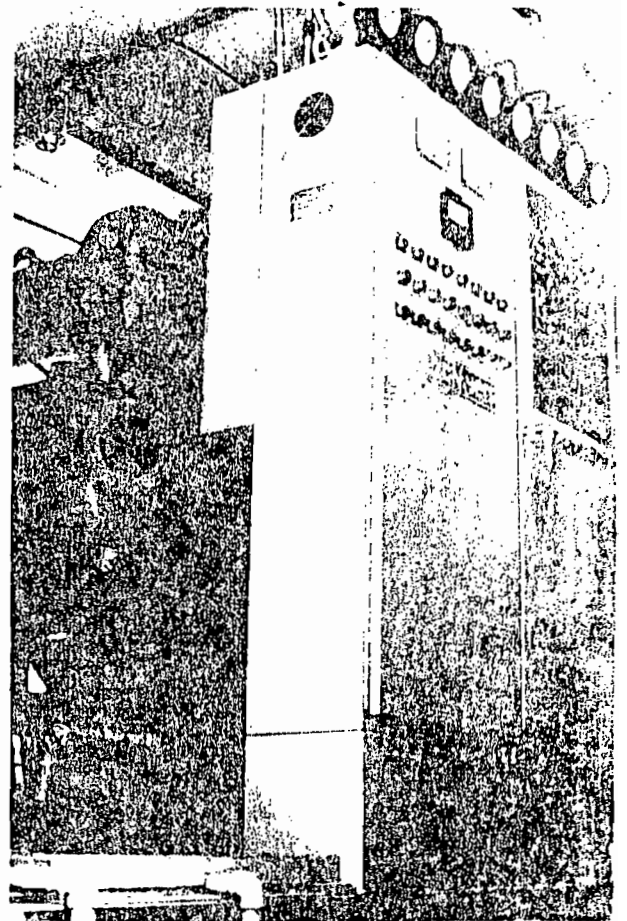
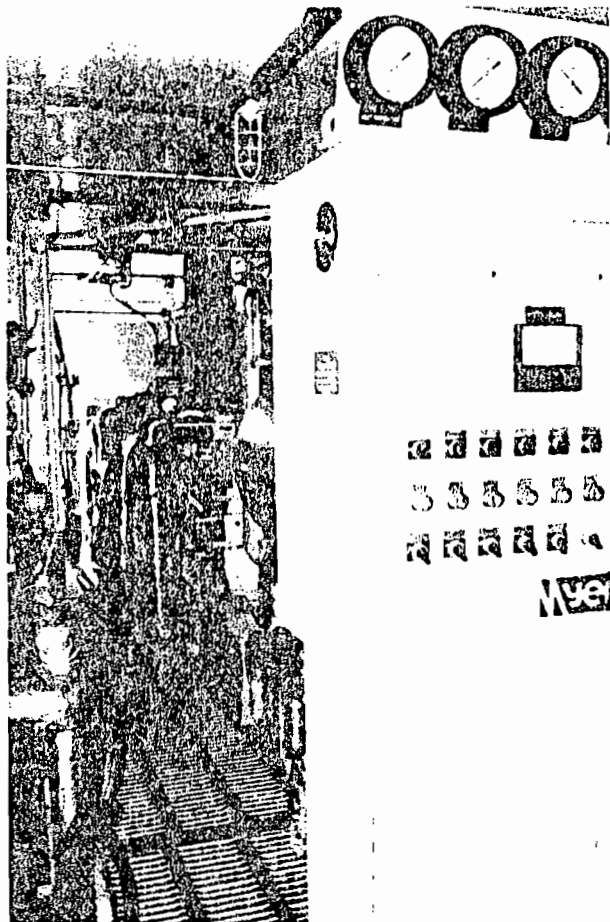
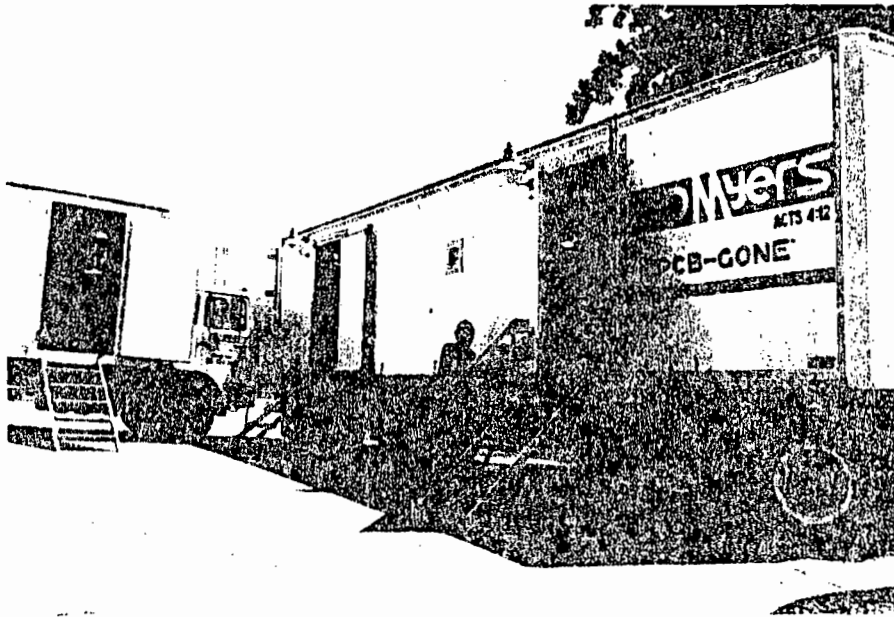
08/14/82

RT	AREA	AREA %
8.10	53778	10.658
8.38	10408	4.348
8.41	380888	70.607
2.77	18218	2.482
3.09	16238	3.018
5.51	15268	3.508
18.24	1668	0.392
16.71	437	0.182

1



PCB-GONE™



PCB-GONETM Eradication Process
June 14, 1982

VII. TEST RESULTS

The test results obtained from our demonstration runs of April 14th and 15th were for both batch and continuous flow processing. Samples were drawn according to the plan and made available to:

S. D. Myers, Inc. Laboratory
USEPA Laboratory
Independent Testing Laboratories

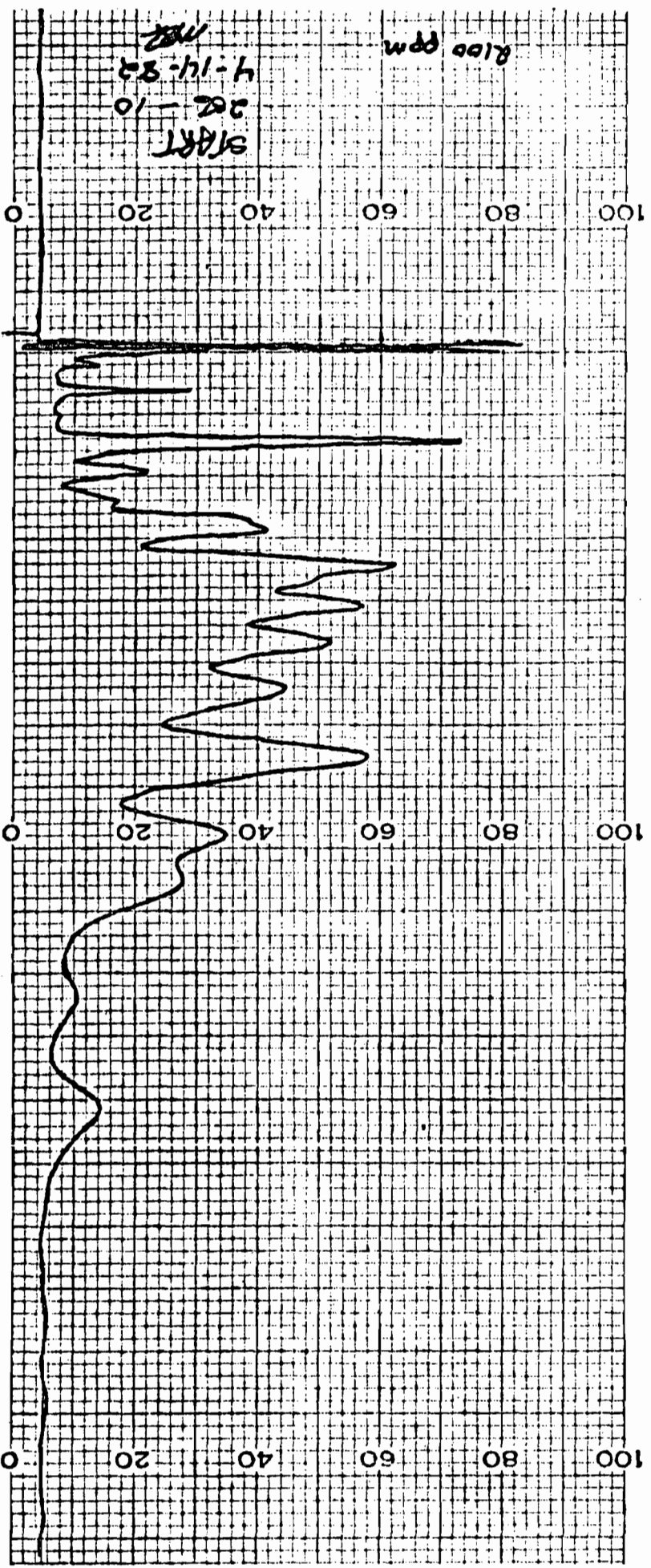
As of the date of this writing (4-15-82), the following results have been accumulated with other testing still in process.

PCB ANALYSES (Batch Treatment)

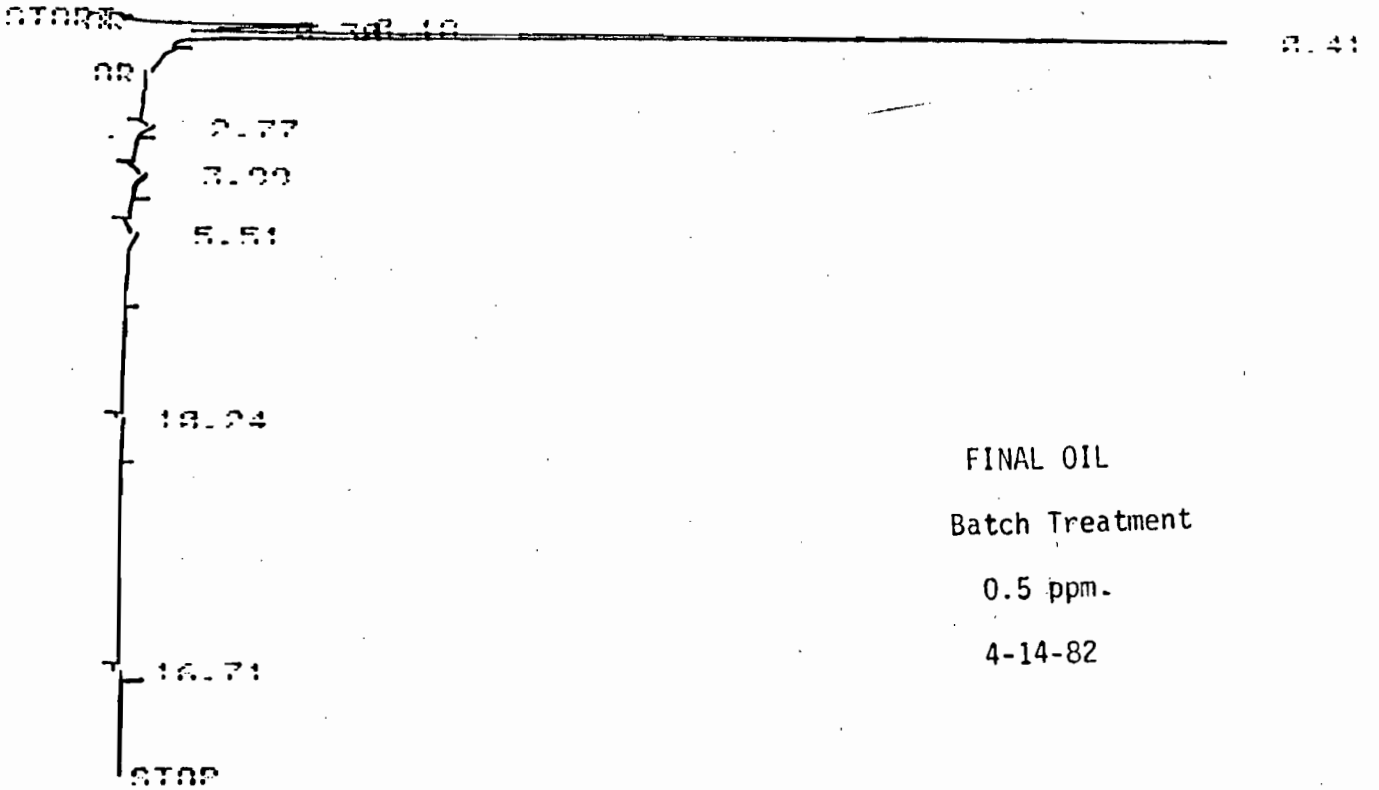
Sample Point	U.S.E.P.A. (PPM)	S. D. Myers, Inc. (PPM)
Inlet contamination	2880/2950	2102
Discharge oil	.98/1.1	.5
Fullers earth	ND	.5
reagent spent	ND	ND
sludge	ND	ND
filter cartridge	ND	UP*
Air samples	NA	ND
Inlet oil	2080	2067
Discharge oil	.90	.90
Fullers earth	ND	1.0
Reagent spent	ND	.3
Sludge	ND	ND
Filter cartridge	ND	UP

*An unidentified peak on the chromatograph

continued



INLET OIL
Batch Treatment
2100 ppm
4-14-82
AID PORTABLE GC

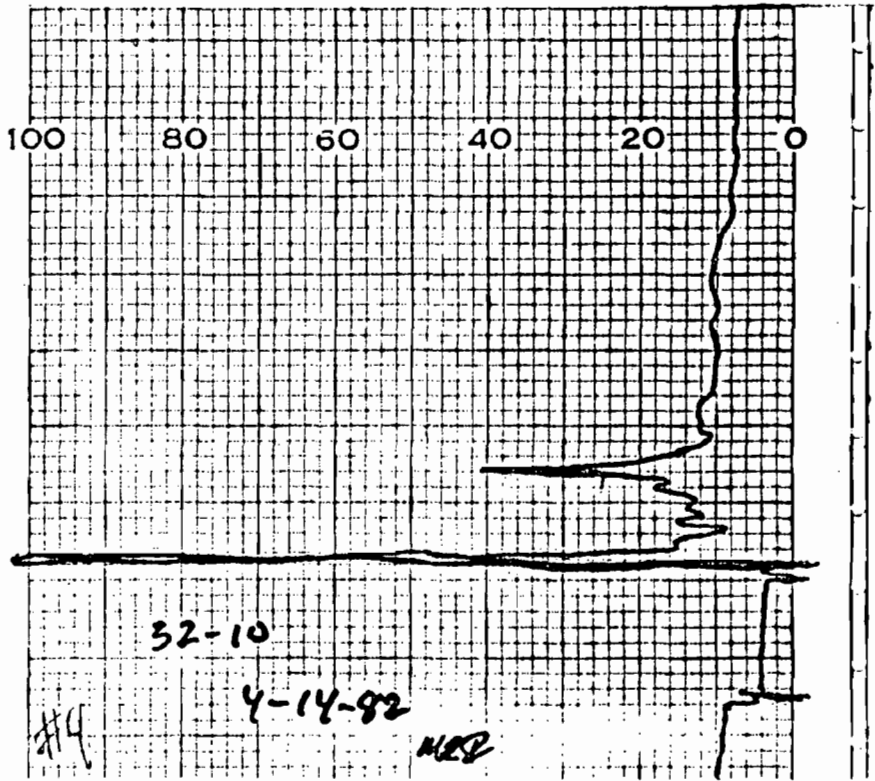


FINAL OIL
 Batch Treatment
 0.5 ppm.
 4-14-82

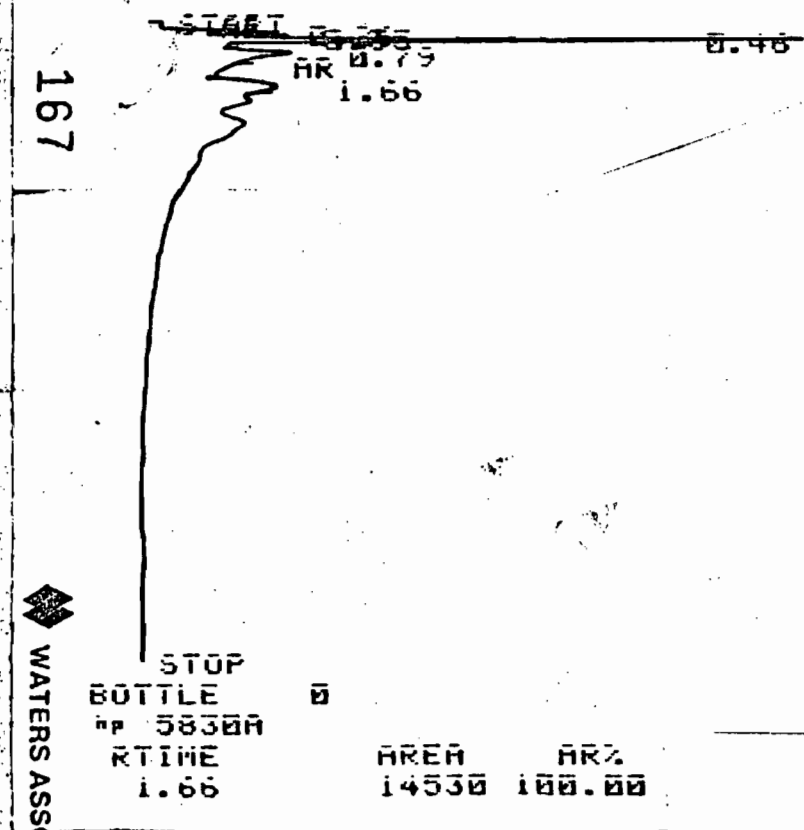
HP RUN #6503
 AREA %

APR/14/82

RT	AREA	AREA %
0.10	53778	10.058
0.38	10408	4.748
0.41	380888	72.607
0.77	18018	2.482
3.00	16038	3.018
5.51	15008	3.508
18.24	1000	0.300
16.71	433	0.182



FINAL OIL
Batch Treatment
0.5 ppm
4-14-82
AID PORTABLE GC

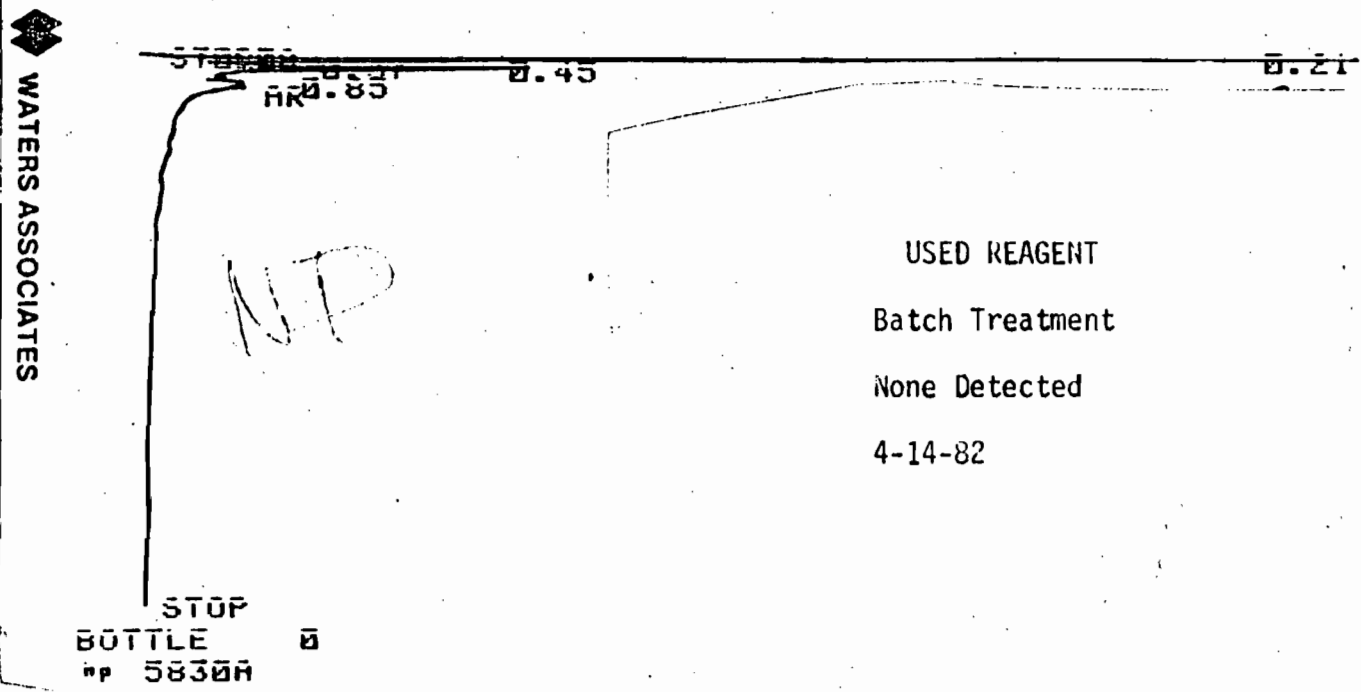


FULLERS EARTH

Batch Treatment

0.5 ppm

4-14-82

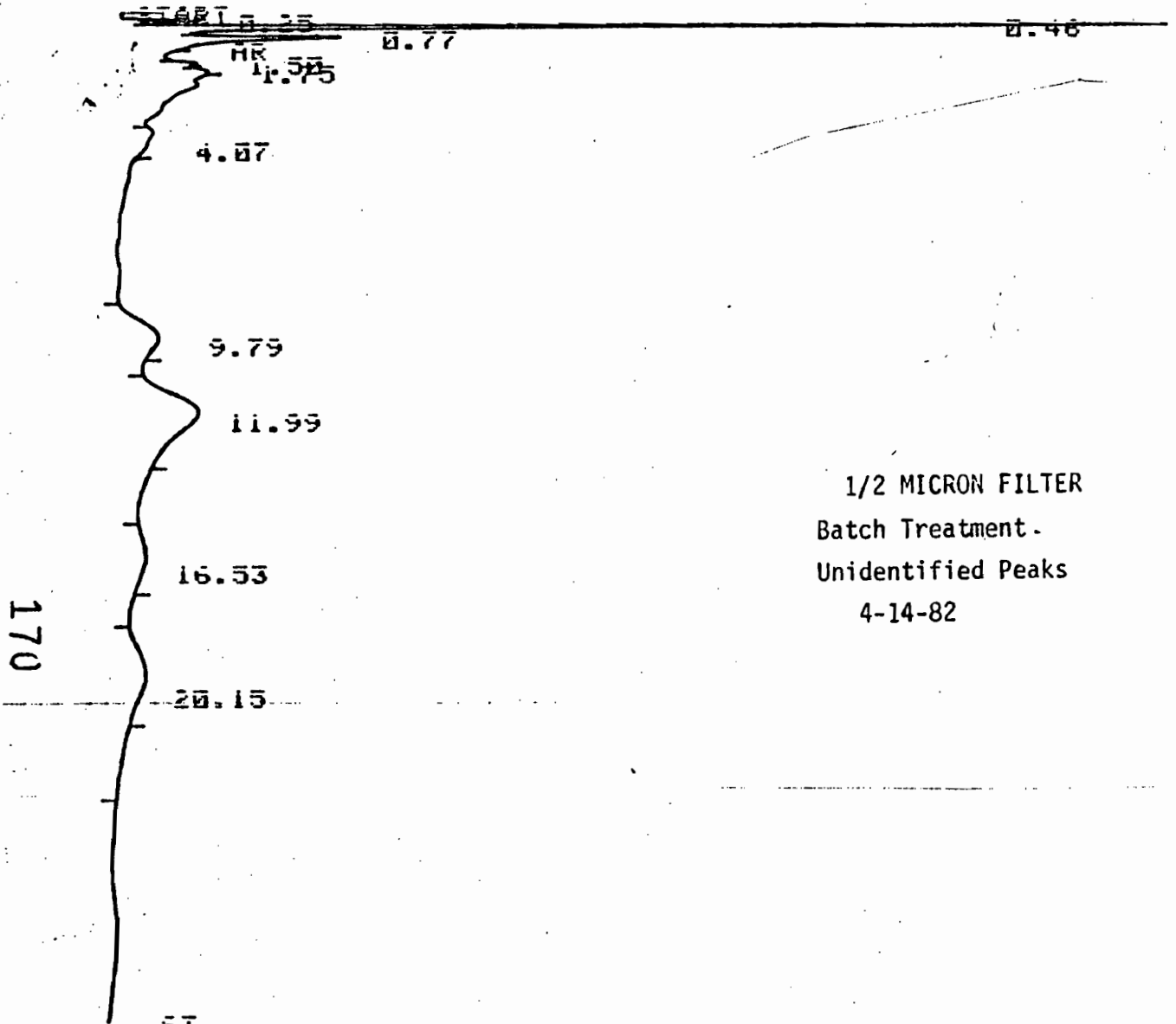


USED REAGENT

Batch Treatment

None Detected

4-14-82



1/2 MICRON FILTER
 Batch Treatment.
 Unidentified Peaks
 4-14-82

170

ST

BOTTLE # 5830A

RTIME

AREA

AREA %

1.55 3032 1.08

1.75 2007 0.71

4.07 11850 4.22

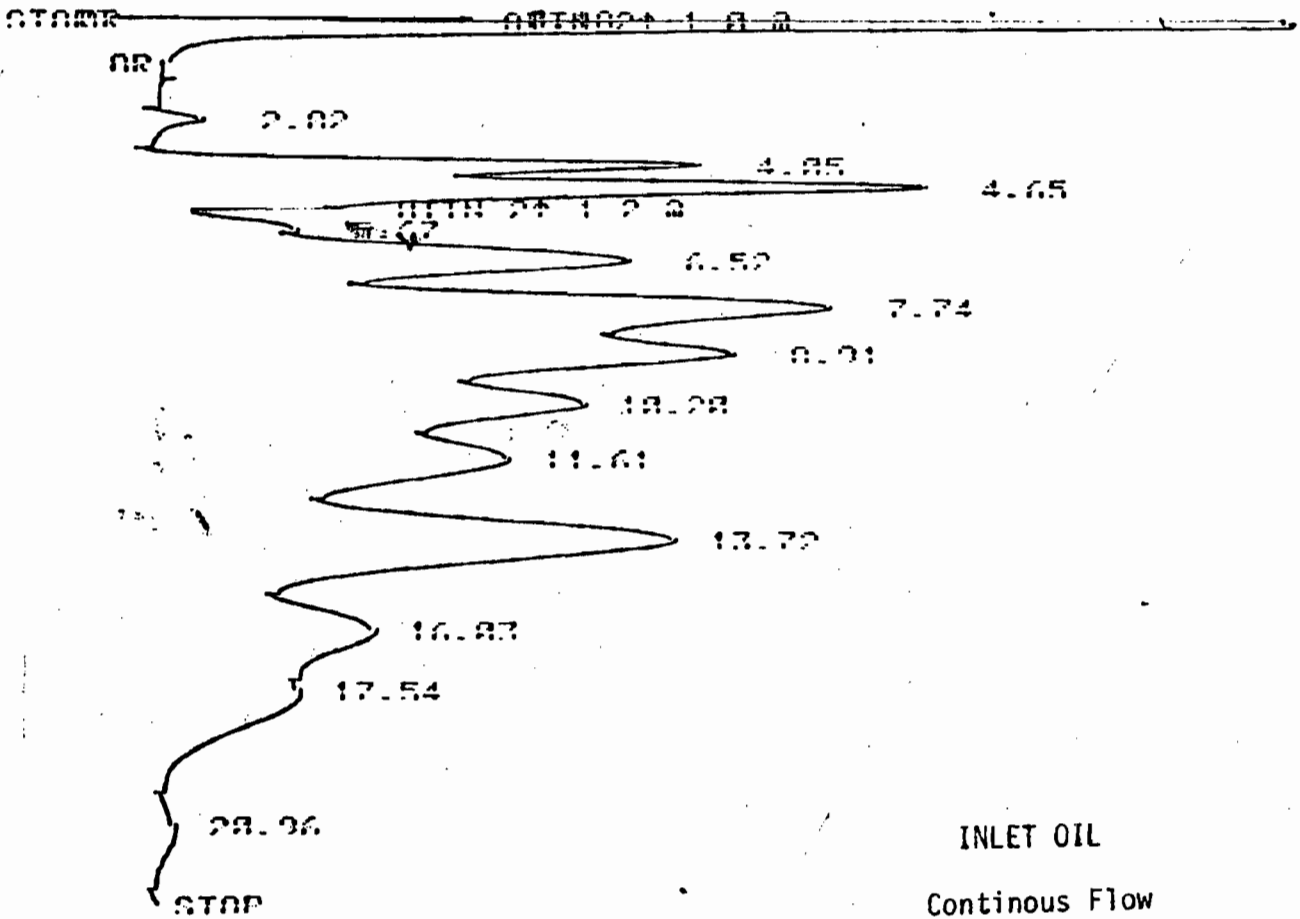
9.79 43250 13.40

11.99 144100 51.31

16.53 24890 8.86

20.15 51730 18.42

WATERS ASSOCIATE



INLET OIL
 Continuous Flow
 2067 ppm
 4-15-82

HP 8111 #6543
 AREA %

RT	AREA	AREA %
2.82	182588	3.881
4.85	18740888	3.146
4.65	97668	3.877
6.52	1440888	1.139
7.74	2678888	2.183
8.91	1060888	1.472
10.28	11088888	2.296
11.61	17788888	13.244
13.72	15058888	12.487
16.83	13278888	12.454
17.54	13368888	12.525
28.26	21318888	16.788
	18168888	3.884
	6888888	4.798
	868688	8.684

79

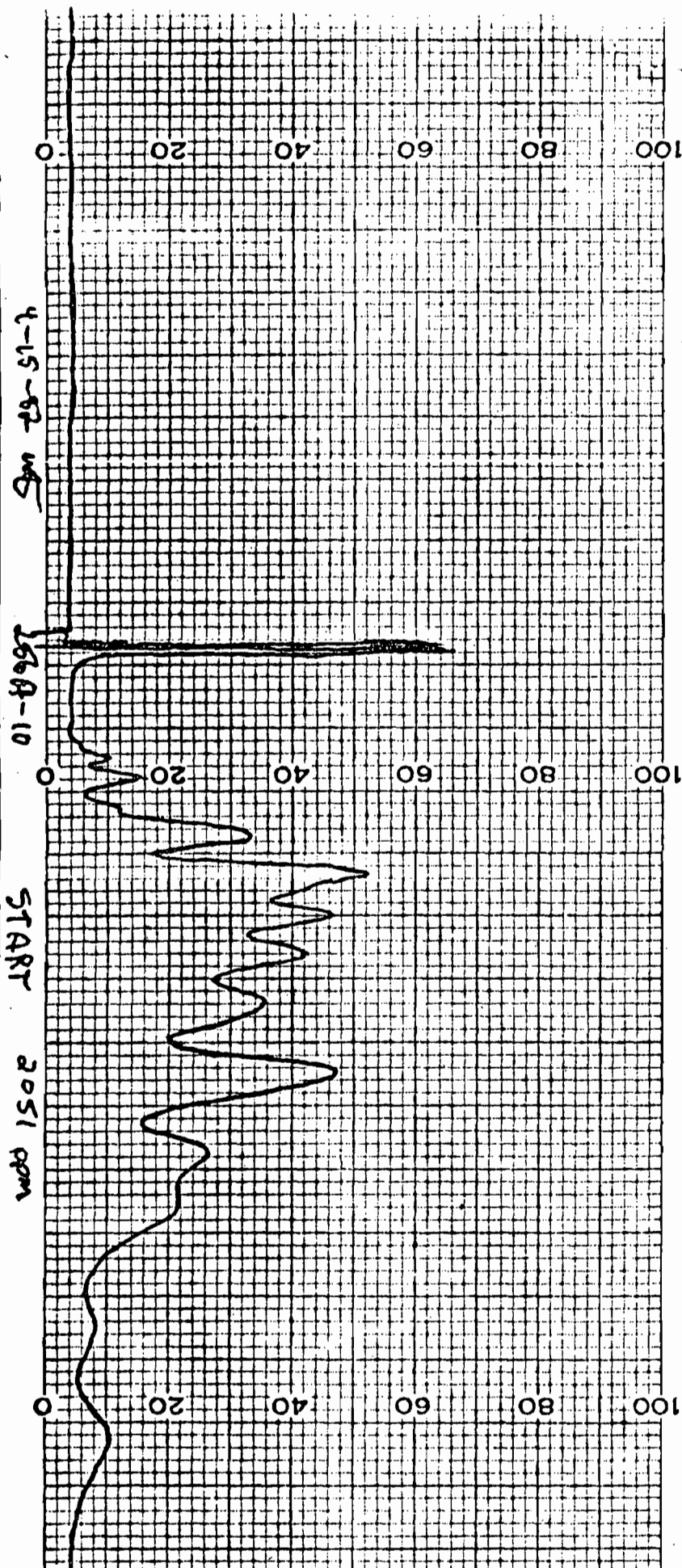
ESTERINE ANCOUS INDIANAPOLIS, IND. U.S.A. MADE IN CANADA CHART No. 39001

4-15-82 WGS

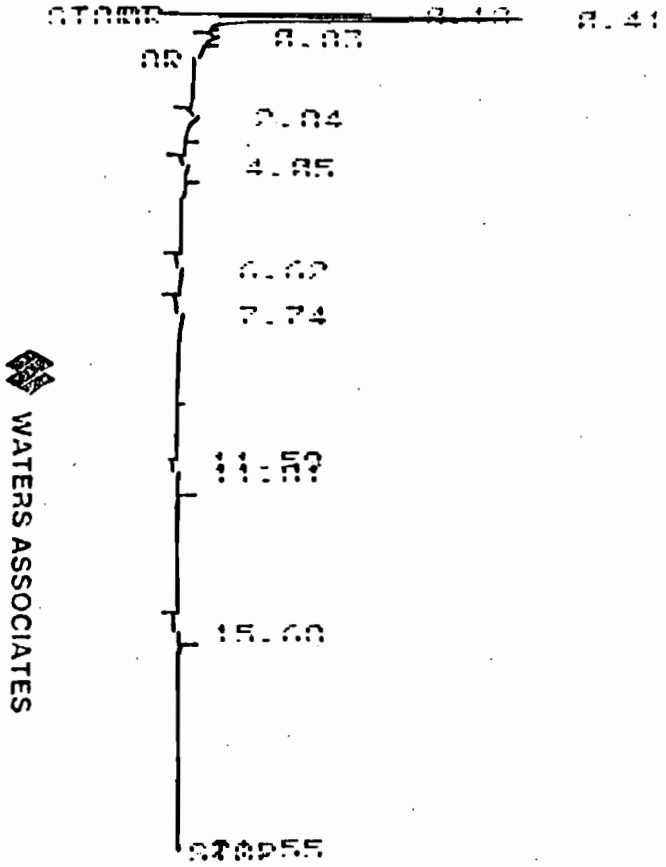
256A-10

START

2051 ppm



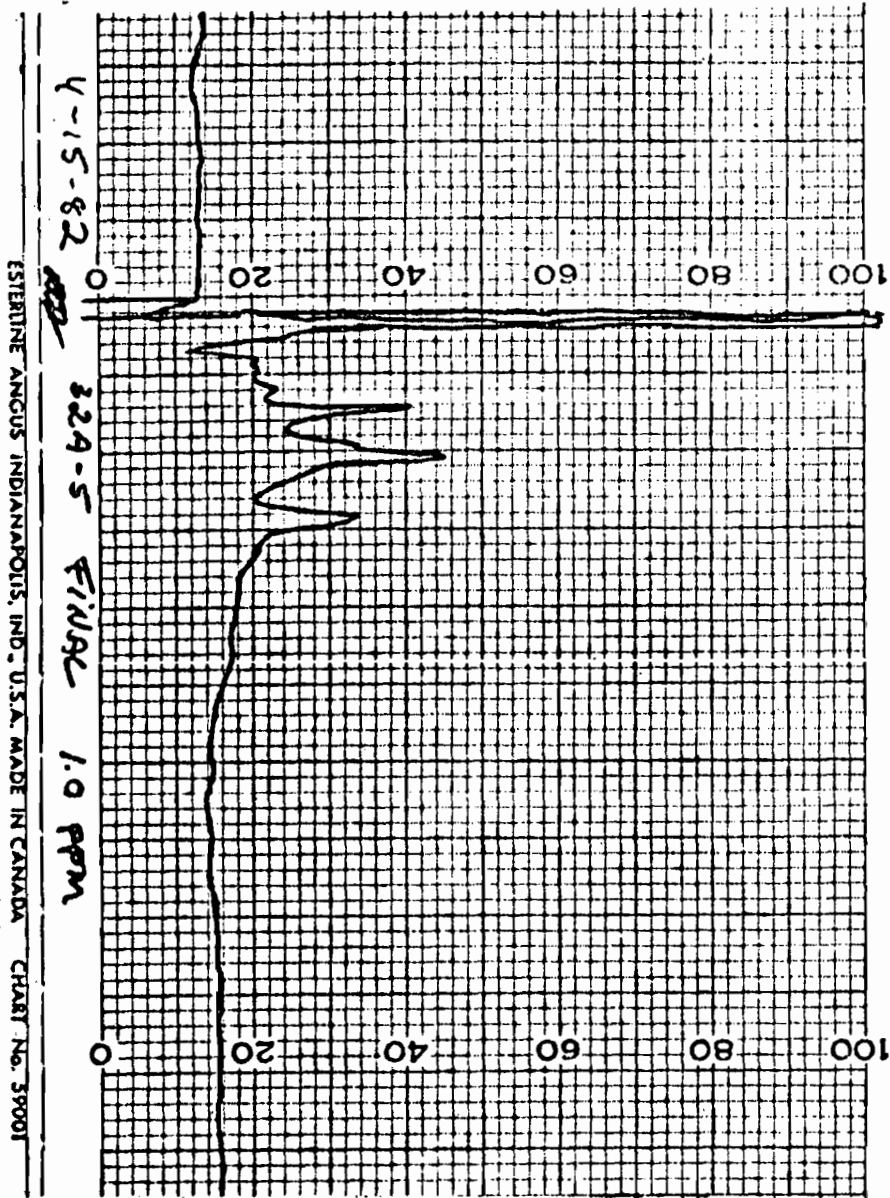
INLET OIL
Continuous Flow
2051 ppm
4-15-82
AID PORTABLE GC



FINAL OIL
 Continous Flow
 0.9 ppm
 4-15-82

HP RUN #0556
 AREA %

RT	AREA	AREA %
8.10	65000	30.000
8.41	90000	40.000
8.87	4100	0.860
9.04	6500	3.000
4.85	4245	0.100
6.09	4715	0.304
7.74	11700	5.075
11.01	2410	1.000
15.00	770	0.300



FINAL OIL
Continous Flow
1.0 ppm
4-15-82
AID PORTABLE GC

ESCAPE



FULLERS EARTH

Continous Flow

1 ppm

4-15-82

STOP

BOTTLE

MP 5830A

RTIME

1.51

1.99

2.49

AREA

24200

10420

8332

AR%

56.34

24.26

19.40

52

YERS ASSOCIATES

STOP

MP 5830A

AR

2.55

10437

0.21

USED REAGENT

Continous Flow

0.3 ppm

4-15-82

STOP

BOTTLE

MP 5830A

RTIME

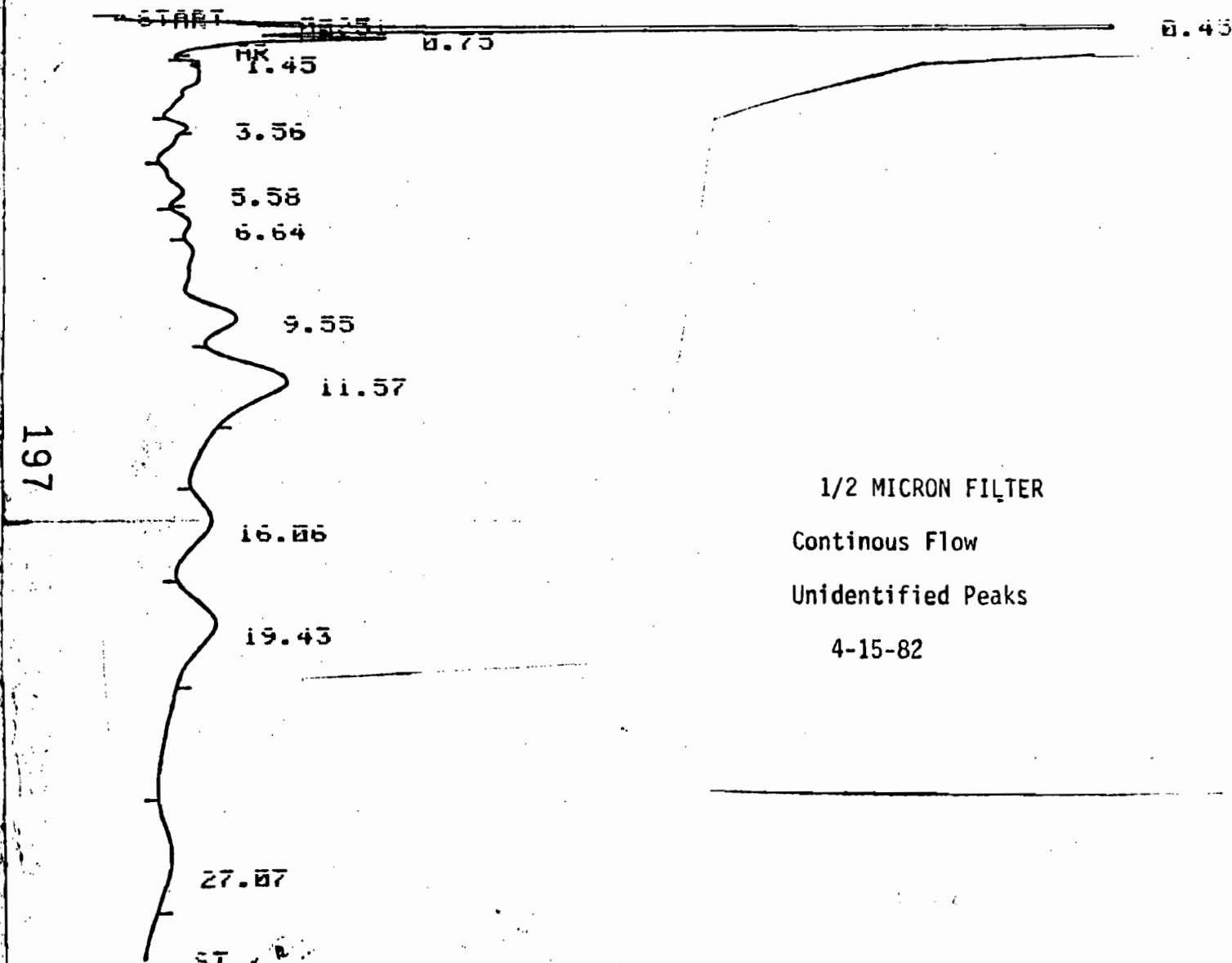
2.55

AREA

10220

AR%

100.00



1/2 MICRON FILTER
 Continous Flow
 Unidentified Peaks
 4-15-82

BOTTLE
 # 5830A

RTIME	AREA	PR%
1.45	2705	0.39
3.56	8382	1.22
5.58	24230	3.52
6.64	20990	3.05
9.55	104100	15.11
11.57	232100	33.68
16.06	81240	11.79
19.43	154300	22.59
27.07	61020	8.86

ANA-LABS

24 HOUR PHONE
216/383-8700

ANALYTICAL LABORATORIES OF OHIO
15602 WATERLOO ROAD
CLEVELAND, OHIO 44110

April 21, 1982

Mr. Mitchell A. Fadem
Transformer Consultants
P.O. Box 3575
Akron, Ohio 44310

Re: Air Sampling

On February 17, 1982 air sampling was conducted in the trailer at 2723 Front Street, Cuyahoga Falls, Ohio for the purpose of detecting foreign substances in the atmosphere following the dechlorination process of PCB's.

Special emphasis was placed on detection of the following components: Hydroxides, Glycols, PCB's and Organic Vapors.

Results: Air samples, absorbents, and purged samples were negative for hydroxides, glycols and PCB's. Oil vapors were detected in the low PPM range.

All analyses were conducted utilizing standard acceptable methods.


Donald J. Niftskoff
Analytical Chemist

DJN/mt



WADSWORTH TESTING LABORATORIES, INC

P.O. Box 208 • 1600 Fourth St. S.E. • Canton, Ohio 44701 • (216) 454-5809

CHEMISTS • METALLURGISTS • ENGINEERS

ESTABLISHED 1938

S. D. Myers
2737 Front St.
Cuyahoga Falls, Ohio 44222

DATE 4/16/82

Dechlorination By-Products

Mercury --- Less than .005 mg/L
 Arsenic --- Less than .005 mg/L
 Selenium -- Less than .005 mg/L
 Lead ----- .35 mg/L
 Barium ----- .3 mg/L
 Cadmium --- .07 mg/L
 Chromium -- .08 mg/L
 Silver ----- .04 mg/L

Flash Point = Greater than 200^oF
 (combustible at room temperature)

pH of leachate (initial) = 11.5

WADSWORTH TESTING LABORATORIES, INC.

W. D. Myers, S. D.

PCB-GONETM Eradication Process
June 14, 1982

A. Personnel, Addresses, and Qualifications of Independent Test Laboratories

1. Air Sampling

Analytical Laboratories of Ohio
15602 Waterloo Road
Cleveland, OH 44110

Donald J. Nittskoff B.S., 25 years experience
Director
Analytical Toxicologist

Chairman - American Chemical Society - Analytical Chemistry Section
Chairman - National Association of Drug Detection Laboratories

2. E P Toxicity and Sludge Analysis

Wadsworth Testing Laboratories
1600 Fourth Street, S.E.
Canton, OH 44701

Marvin Stephens, B.S., M.S., PH.D.
Director
Analytical Chemist

3. PCDF and PCDD

Battelle Institute
Columbus, OH

Fred DeRoos, B.S., M.S., PH.D.
Environmental Toxicologist

4. Skin Sensitization Tests

ToxiGenics
1800 East Pershing Road
Decatur, IL 62526

Gale D. Taylor, M.P.H., D.V.M., PH.D.
Toxicology Director
Clinical Toxicologist

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

January 27, 1983

J. J. Kelly, Manager
Environmental Affairs
P. O. Box 3575
Akron, Ohio 44310

DER
FEB 04 1983
BAQM

Dear Mr. Kelly:

As we have discussed, the Department has determined that your PCB-Gone process needs air pollution permits from this agency prior to its installation and operation in Florida. Therefore enclosed are two permit applications (one for your draft copy), which you should submit to Mr. Clair Fancy, Air Bureau, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32301.

Please note that both a construction permit and operation permit are needed. Application for both can be made on a single form. Permit fees vary based on potential emissions per year. Note Section 17-4.05(4)(a), F.A.C., enclosed. For your information, the Department is considering the PCB-Gone source subject to the relocatable facilities requirements, as described in Sections 17-2.500(3)(a) and 17-2.510(3)(b), F.A.C. (pages 44 and 59). Please direct any technical questions you have to Mr. Fancy.

Also enclosed is a copy of a PCB ordinance recently passed by the City of Jacksonville. It is the only local ordinance I am aware of which comprehensively regulates PCB wastes.

Sincerely,

Douglas H. MacLaughlin
Assistant General Counsel

DHM/jr

ENCL.

cc: Clair Fancy
Marshall Mott-Smith



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DEC 7 1982

REF: 4A&WMD

Mr. J. J. Kelly, Manager
Environmental Affairs
Transformer Consultants
Post Office Box 3575
Akron, Ohio 44310

Dear Mr. Kelly:

I hereby grant approval to Transformer Consultants and its agents, to destroy Polychlorinated Bipheyls (PCBs) in mineral oil dielectric fluid by using the PCB-GONE process, as described in the application for approval submitted on June 25, 1982. This approval is granted pursuant to Section 6(e) of the Toxic Substances Control Act and 40 CFR 761.10(e) and is subject to the attached set of limiting conditions. The limiting conditions set forth in the permit do not preclude existing regulations established under 40 CFR 761. This approval is based upon the ability of PCB-GONE to destroy PCBs in mineral oil dielectric fluid to a level below 2 parts per million (ppm) without resulting in the emission of any PCB's into the air or water. Moreover, this approval is based on the Agency's belief that by-products of this process will be PCB-free and present no risk of injury to health or the environment.

This approval is effective upon receipt. This approval may be withdrawn, or further conditions may be added to it, at any time EPA has reason to believe that operation of the PCB-GONE system presents an unreasonable risk of injury to health or the environment. Withdrawal of the approval or the imposition of further conditions also may result from future EPA rulemaking with respect to PCBs. Moreover, violation of any condition included as part of this approval may subject Transformer Consultants to enforcement action and/or termination of the approval.

If you have any questions regarding this matter, please call Ralph Jennings of my staff at: 404/881-3864.

Sincerely yours,

John A. Jeter, Deputy
for Charles R. Jeter
Regional Administrator

Enclosure

Conditions of Authorization for PCB-GONE
for Destroying PCBs

1. The PCB-GONE process may be used by Transformer Consultants and its agents to decontaminate transformer dielectric fluid from any mineral oil transformer regardless of PCB concentration. The term "mineral oil transformer" includes all transformers designed to use mineral oil as dielectric fluid which actually use mineral oil as a dielectric fluid.
2. Transformer dielectric fluid must be sampled after it exits the PCB destruction portion of the PCB-GONE process but before it is returned to the transformer or other container. This sample must be tested for PCB concentration within 15 days. If the PCB concentration of the sample is 2 ppm or greater, that fluid must be treated again with the PCB-GONE process within 45 days of the test. If the transformer dielectric fluid is returned to the transformer after the PCB-GONE process has been used, that transformer cannot be reclassified as a non-PCB transformer unless the fluid is tested again after at least three months of in service use and shown to contain less than 50 ppm PCBs. Any transformer dielectric fluid treated with the PCB-GONE process must be disposed of as if it contained between 50 and 500 ppm PCBs or the original concentration of PCBs until the testing required by this paragraph shows that its PCB concentration has been reduced below 2 ppm.
3. There may be no detectable PCBs in exhaust or vented gases from the disposal portion of the PCB-GONE process. If gases escape and contain PCBs, Transformer Consultants or its agents must inform the appropriate EPA Regional Office by close of business on the next regular business day, and no PCBs may be processed in that system until the emission problem has been corrected to the satisfaction of the EPA Region IV.
4. Any chemical accident or injury occurring with the use of the PCB-GONE process must be reported to the EPA Regional Office by the next regular business day.
5. Any reports required by conditions 3 and 4 are to be submitted by telephone to the Regional Administrator in the Regional Office with responsibility for the State where the incident occurred, and in writing to the Deputy Assistant Administrator for Toxic Substances, Office of Pesticides & Toxic Substances, 401 M Street, S. W., Washington, D. C. 20460, and to the appropriate Regional Administrator.

Conditions for Authorization of PCB-GONE System (continued)

6. Any solid wastes or by-products generated by the PCB-GONE system must be stored in accordance with Annex III, 40 CFR 761.42(b), and must be disposed of in a chemical waste landfill approved by EPA under Annex II of the PCB Regulation (40 CFR 761.41). Solid waste disposal must comply with all applicable Federal regulations. Cleaning of the filters must be handled so that the oils escaping from the filter medium must be captured and handled according to the requirements of applicable sections of 40 CFR, Part 761.
7. This authorization is for the PCB destruction/disposal portion of the PCB-GONE system as described in the confidential business information on file at EPA Region IV. No modifications may be made to the disposal portion of the PCB-GONE system without prior notice to EPA for approval.
8. Transformer Consultants or its agents must develop and maintain the following records:
 - (a) the name of each person whose transformer dielectric fluid was processed by the PCB-GONE process;
 - (b) the date such service was performed;
 - (c) an identification of the PCB-GONE truck performing the service;
 - (d) the amount of transformer dielectric fluid processed;
 - (e) the location, manufacturer (if known), and serial number (if any) of the transformer from which the fluid was processed;
 - (f) a copy of the gas chromatograph or data record from the tests required by paragraph 2; and
 - (g) a summary of the total number of gallons of transformer dielectric fluid processed through PCB-GONE during the previous calendar year.

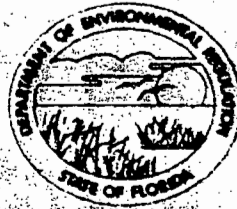
The documents must be compiled within 60 days of the servicing date, must be kept at one centralized location and must be available for inspection by authorized representatives of the Environmental Protection Agency. Such documents shall be maintained for at least 10 years. Transformer Consultants or its agents must also maintain the records required by 40 CFR section 761.45(f).

9. Transformer Consultants or its agents must take all necessary precautionary measures to ensure that operation of the PCB-GONE system is conducted in compliance with applicable Federal, State or local regulations and ordinances.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
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Sincerely,

Douglas H. MacLaughlin
Assistant General Counsel

DHM/jr

ENCL.

cc: Clair Fancy
Marshall Mott-Smith

University of Florida Combustion Laboratory
Department of Mechanical Engineering
Gainesville, Florida 32611 (904)392-0827

June 16, 1982

Steven Smallwood, Director
Bureau of Air Quality Management
Florida Dept. of Environmental Regulation
2600 Blairstone Rd.
Tallahassee, FL 32301

DER
JUN 17 1982
BAQM

Dear Mr. Smallwood:

Enclosed is a copy of a report submitted to Gainesville Regional Utilities which examines the disposal of PCB contaminated dielectric fluid in Deerhaven 2.

If you have any questions concerning its content, or if you would like to discuss hazardous waste disposal by incineration or the research going on at the University of Florida Combustion Laboratory, please feel free to call me.

Sincerely,



Charles L. Proctor II
Assistant Professor and
Director, Combustion Laboratory

Encl: GRU 820607

CLP:js

ENERGY
ENVIRONMENT
TRANSPORTATION



U Combustion
F Laboratory

An equal opportunity/affirmative action employer.

THE THERMAL DISTRUCTION
OF PCBs
IN DEERHAVEN 2

submitted to
GAINESVILLE REGIONAL UTILITIES

by
Dr. Charles L. Proctor II

June 7, 1982

THE THERMAL DISTRUCTION
OF PCBs
IN DEERHAVEN 2

The safety of using the coal fired boiler unit at Gainesville Regional Utilities' Deerhaven Electrical Power Generation Station for the disposal of PCB containing dielectric fluid has recently come into question. The following is provided to assist in the evaluation of Deerhaven 2 for this purpose and to suggest appropriate monitoring of the facility if PCB burning is done.

BACKGROUND

As set forth in the Federal Register, 40 CFR Part 761, May 31, 1979, the U.S. Environmental Protection Agency determined that high efficiency boilers meeting specific operational standards can be used to dispose of low level PCB-contaminated mineral oil dielectric fluid without presenting an unreasonable risk to human health or the environment. The dielectric fluid can contain 50 to 500 ppm PCB. The coal fired unit must operate at a firing rate greater than 50 million BTU/hr. Based on gas samples extracted from the stack, the combustion emissions must contain at least three percent (3%) excess oxygen and no more than 100 ppm carbon monoxide. When firing the PCB contaminated mineral oil the unit must be at normal operating temperature (i.e., not during startup, shutdown, or severe transient) and the dielectric feed rate must be ten percent (10%) or less of the total fuel flow rate based on weight.*

*Verified through Gary Baker, EPA, Washington, D.C.

These criteria are based on characteristics associated with high efficiency boilers capable of producing the temperatures and residence times necessary for the effective destruction of PCB molecular structures.

Recent evaluation of the Deerhaven 2 unit indicates that it meets or exceeds all the operational criteria set forth by the US EPA for candidate units that could be used for burning dielectric materials of 50 to 500 ppm PCB. With the installation of appropriate monitoring equipment for CO and O₂, the Deerhaven 2 unit is a candidate for PCB burning. The remainder of this report examines the specific consequences of burning low level (50 to 500 ppm) PCB dielectric fluid in Deerhaven unit 2.

UNCONTROLLED PCB EMISSIONS INFORMATION

The burning of PCB materials relies on the thermal destruction of the PCB molecular structure and the oxidation of its carbon and hydrogen constituents. The following development addresses the scenario of no thermal degradation of the PCB molecule, thus producing worst case values for PCB emissions (uncontrolled emissions). The thermal effects of injecting PCB materials directly into the fireball of the boiler will be addressed later.

GRU has specified in their proposal for PCB burning that the dielectric materials to be burnt contain on the order of 50 ppm PCB. To effect a factor of 2 safety margin in the following calculations, a value of 100 ppm PCB has been selected.

Assuming a typical coal molecule, C₇₀H₃₅O₃N, one mole of fuel mixed with 100% theoretical air will produce 70 moles of CO₂ and

17.5 moles of H_2O , while 329 moles of N_2 will be carried through the unit as diluent. Thus, for every mole of coal burned about 416.5 moles of combustion products are generated.

For a 10% feed rate of dielectric fluid, the following can be observed:

for every	1.000 000	pound of coal
there is	0.100 000	pound of dielectric,
	0.000 010	pound of PCB material,
and	11.41	pounds of air

input into the boiler.

On a molar basis, for every mole of coal fired into the boiler,

70 moles of CO_2
17.5 moles of H_2O
329 moles of N_2
0.000 008 moles of PCB

would be emitted if uncontrolled burning of the PCB occurred. This translates to 1 : 50,000,000 PCB to exhaust gases or 20 ppb PCB.

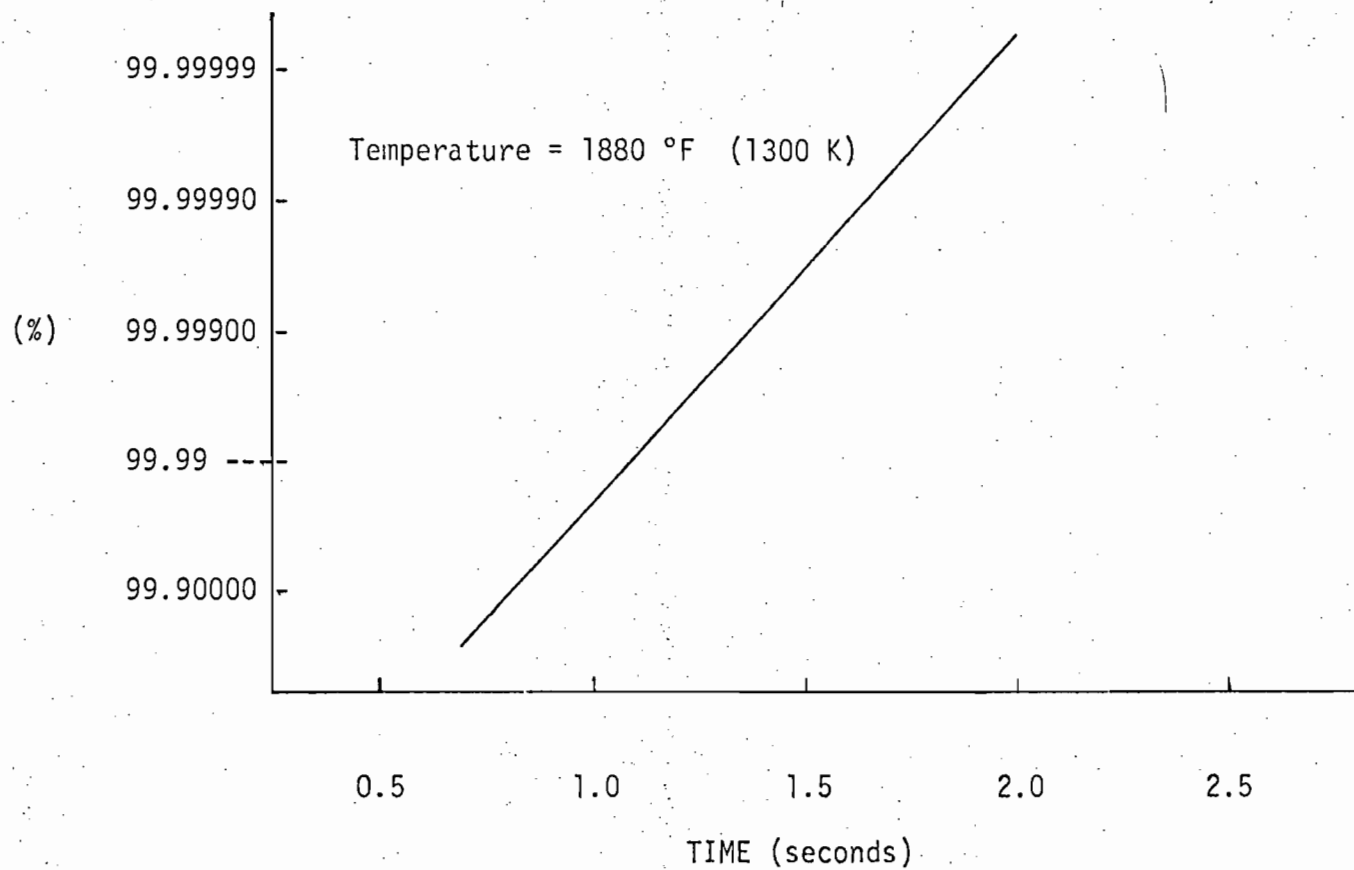
The total emissions of PCBs would be based on the total fuel feed rate, and can be directly calculated for any given operating condition. The Deerhaven 2 unit operating at normal conditions will burn coal at a rate of 3450 pounds per minute, and will have a maximum uncontrolled emissions rate of 26 $\mu g/s$ PCB based on 100 ppm PCB in the dielectric fluid.

PCB EMISSIONS CONTROLLED BY THERMAL DEGRADATION

The thermal destruction of polychlorinated biphenyls is centered on rupturing chemical bonds of the molecules and oxidizing the carbon and hydrogen constituents of the compounds. In oxidizing environments such as those found in boilers, free radicals and products of combustion often assist in the process of destroying chemical bonds. The most difficult environment to produce molecular degradation is one in which only thermal processes promote bond rupture. Decomposition in this type of environment is referred to as pyrolysis. Although one might not anticipate an oxygen starved region in a boiler, within droplets or the localized vapor formed by evaporating droplets, such conditions can and do exist. Since pyrolysis is the most difficult and time consuming molecular degradation process, it is the one considered here.

The University of Dayton Research Institute, funded by the US EPA, has produced kinetic data describing the decomposition of various PCB compounds in both oxidative and inert (pyrolysis) environments. These data relate the extent of molecular decomposition to time and temperature. The Acurex Corporation, also under contract to the US EPA, took these data and developed rate equations for the decomposition of the different PCBs. The PCB used in the following discussion is pentachlorobiphenyl - a typical polychlorinated biphenyl compound.

Figure 1 indicates the percent decomposition of pentachlorobiphenyl as a function of time at 1880 °F (1300 K). By inspection, one can observe that 1.1 seconds are required at a temperature of 1880 °F for 99.99% destruction in pyrolysis. Based on temperature measurements made at Deerhaven, temperatures in the coal fired boiler



Pentachlorobiphenyl
 $A = 7.44 \times 10^9 \text{ sec}^{-1}$
 $E = 53.6 \text{ kcal/g-mole}$
(pyrolysis)

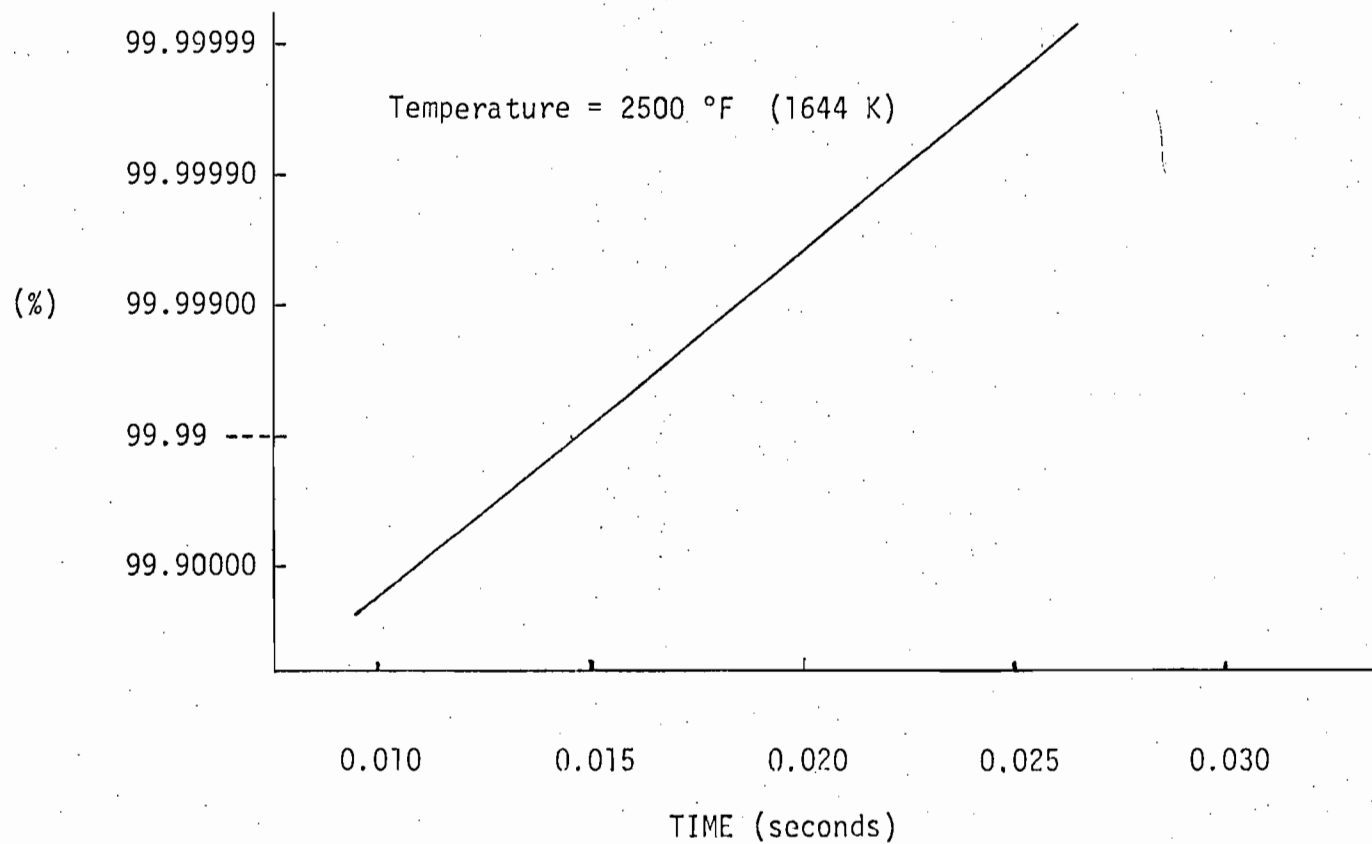
Figure 1. Kinetic data for pentachlorobiphenyl pyrolysis.

range from 2700 °F in the fireball to 1890 °F near the exit of the combustion zone. Minimum times required for gases entering the boiler to leave the combustion zone are 2 to 5 seconds. Thus, liquids injected into the coal fired boiler are exposed to gas temperatures of no less than 1890 °F for at least 2 seconds. Furthermore, the liquid injector locations are positioned such that the dielectric fluid will be injected directly into the fireball. Figure 2 presents kinetic data for pentachlorobiphenyl at 2500 °F (1644 K). At this elevated temperature, which is typical of the fireball, a destruction efficiency of 99.99% requires only 0.015 seconds. It is based on this information that a minimum of 99.99% destruction efficiency must be concluded.

With 99.99% destruction of the injected PCB at 100 ppm, and a dielectric flow rate of 10% of the total fuel flow rate, exhaust gas emissions of PCB will be on the order of 2 parts per trillion or 0.002 ppb.

COLLECTION OF GASEOUS EMISSIONS AND ANALYSIS FOR PCB

The US EPA has tentatively approved use of a modified method 5 gas sampling train to measure PCB emissions in stack gases (Figure 3). Estimates of the collection efficiency of this configuration range from 85 to 95%. Due to the very low concentrations of PCBs anticipated in the stack gases, the most difficult task in establishing PCB emissions is analysis of the



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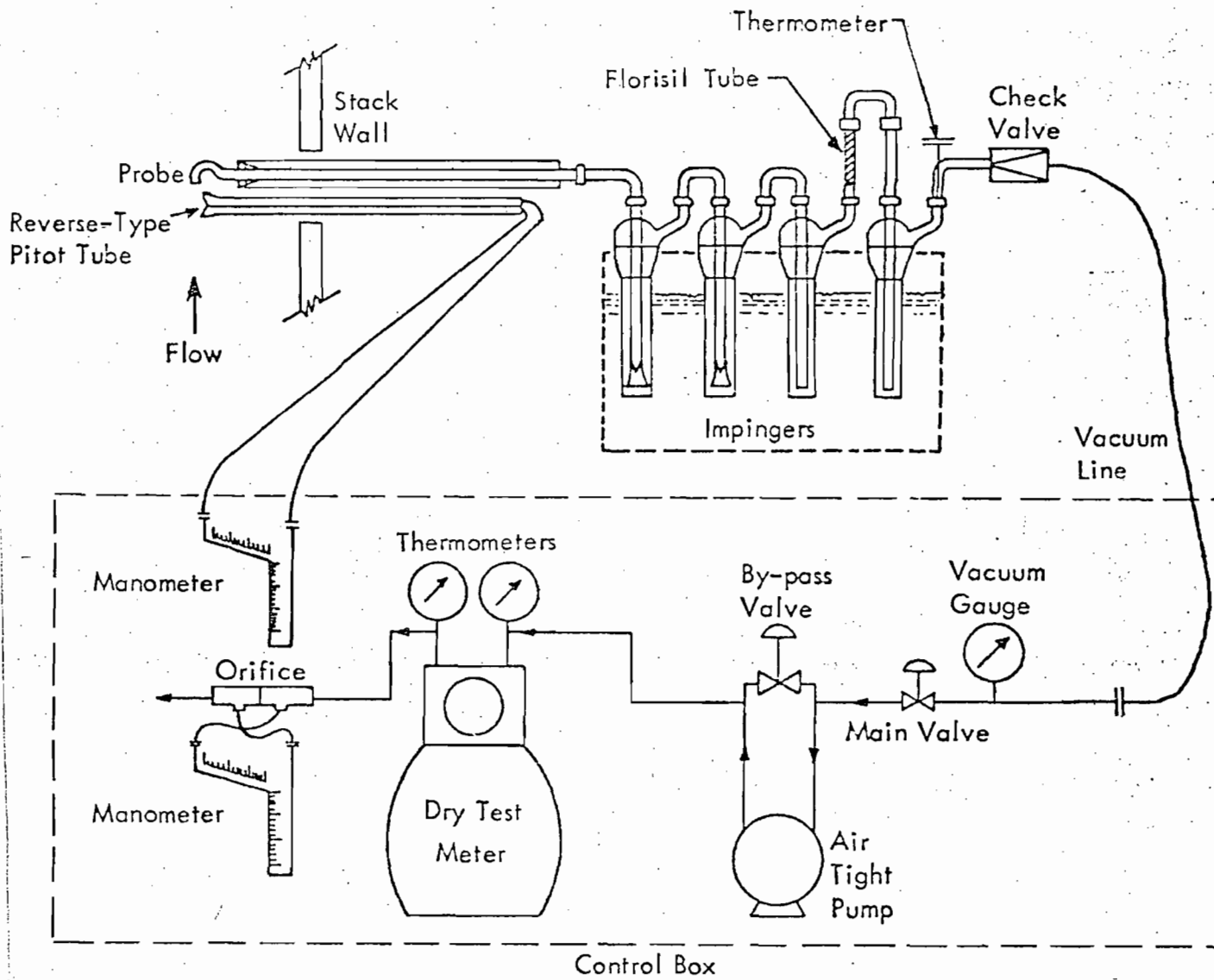


Figure. 3 PCB Sampling Train for Incinerators

collected sample. Most of the common techniques employed for the analysis of PCBs simply cannot detect the concentrations of PCBs that can be practically obtained during low level PCB contaminated dielectric fluid burns. Using the modified method 5 sampling train, exhaust gases would have to be extracted continuously for 1.17 years to obtain enough PCB material to be measured. The only technique that can possibly provide data on PCB emissions from low level burns is electron capture negative ion chemical ionization mass spectrometry (NI-CI). This technique can be used successfully to selectively search for chlorinated compounds. Whereas common techniques require sample amounts on the order of 1 to 10 μg (1 to 10 $\times 10^{-6}$ g) to be collected, NI-CI can respond to levels on the order of femtograms (10^{-15} g).

PRODUCTS OF INCOMPLETE COMBUSTION

Since products of incomplete combustion can be toxic or potentially carcinogenic, assurance must be made that once a PCB molecule decomposes, the resulting molecular form is rendered safe. This is the purpose of the excess air in the combustion process. The most difficult process in thermally destroying a compound is the initial rupturing process to break the first bond. Once this is achieved, the broken PCB molecule, now a radical form, is very receptive to attack by other molecules to further reduce it to more fundamental forms (e.g., CO, H₂O, HCl). This process is relatively fast compared to the initial rupturing process when reactive species such as those found in flames are available.

Since relatively low values of CO emissions are required of candidate boilers, excellent oxidation of fuels is necessary. Thus, once a large molecular structure is degraded, further reaction to more fundamental forms is assured.

RECOMMENDATIONS

It is reasonable to conclude, based on the characteristics of high efficiency boiler technology, that units operating at standard conditions are capable of effectively destroying low level PCB contaminated dielectric fluids to well beyond any concentration which might pose any significant health or environmental risk. The Deerhaven 2 unit is a high efficiency boiler as exemplified by its operating temperatures within the boiler and gas residence times through the combustion zone.

It is my recommendation that when PCB-contaminated mineral oil dielectric fluid in the range 50 to 100 ppm PCB is injected using Deerhaven unit 2's standard #2 fuel oil injector guns into the Deerhaven 2 coal fired unit operating at steady conditions with a power rating of 235 megawatt electric, at a rate not exceeding 10% of the total fuel flow rate by weight, and gases sampled from the stack indicate excess oxygen concentrations greater than or equal to 3% and a maximum CO emissions value of 100 ppm, no further analysis of the stack emissions is necessary.

If however, it is determined that analysis for PCBs is required, the following is offered as a guideline.

Analysis For PCBs In Deerhaven 2

1. Use the modified method 5 gas sampling train to collect stack samples for analysis.
2. Extract and perchlorinate the samples.*
3. Assay the perchlorinated extracts for decachlorobiphenyl (DCB) by electron capture negative ion chemical ionization mass spectrometry (NI-CI).

Sampling Schedule

1. Develop baseline data for standard emissions by operating the sampling train continuously for two hours making standard sweeps of the stack. This should be for three different two hour runs so as to obtain three data points
2. For each of the four two-hour dielectric injection runs, collect gas samples using the sampling train in a manner identical to that for the non-dielectric injection runs above.

Data Analysis

Analysis of the data collected during the dielectric injection operation of the boiler should be done after subtracting baseline data information from it. This is vital since (a) coal has a very high concentration of naturally occurring chlorine

* "Measurement of PCB Emissions from Combustion Sources," EPA-600/7-79-047.

relative to the amount introduced by dielectric injection, and could potentially produce interference in the measurements, and (b) due to the perchlorination process, biphenyl type compounds that are not PCBs may be transformed into DCB and thus contribute to DCB measurement values.

The data collected following this outline should provide definitive information concerning the destruction-removal efficiency (DRE) of Deerhaven 2 with respect to PCB burning.

For a DRE of 99.99%, the amount of PCB collected after two hours using the modified method 5 sampling train and corrected for background amounts would be on the order of 10^{-10} g. A sample containing DCB of this order would provide statistically valid data enabling evaluation of DRE. If samples indicate significantly less DCB (e.g. 10^{-14} g which would imply a DRE of 99.999999%) the data would be of questionable statistical significance, but it would indicate DRE values well in excess of 99.99%.