

Eckoff, Michael

From: Wyluda, John H. [jwyluda@triumvirate.com]
Sent: Friday, June 08, 2012 11:25 AM
To: Eckoff, Michael
Cc: Green, James F.; Barry, Richard M.; LoRusso, Christopher M.; Buckley, Charles P.
Subject: RE: Please Review: FW: Triumvirate Environmental, FLD 980559728, WACS ID 9536, Non-Compliance Letter OCD-HW-12-121

Dear Mr. Eckoff,

Triumvirate Environmental, Inc. (TEI) is in receipt of your request to have U.S. EPA ID numbers listed on used oil transportation documents ("pick-up receipts"), as well as your request for TEI to modify our emergency coordinator list within the hazardous waste contingency plan. Below, you will find the actions that are being implemented per your requests. Should you have any questions, please feel free to contact me at your earliest convenience, thank you.

Actions in response to FDEP request:

1. TEI will review the used oil customer list. Customers will be contacted to verify their U.S. EPA ID number. Once verified, the records will be populated with the U.S. EPA ID numbers as they correspond to that customer.
2. The emergency coordinator list will be modified to include, trained employees that live within 30 minutes of the TEI Orlando facility.

John H. Wyluda
Lab Services/Compliance Coordinator
Triumvirate Environmental-Florida LLC
Cell: 407-859-4441
Office: 410-636-3700

From: Eckoff, Michael [<mailto:Michael.Eckoff@dep.state.fl.us>]
Sent: Tuesday, June 05, 2012 9:06 AM
To: Green, James F.
Cc: LoRusso, Christopher M.; Barry, Richard M.; Green, James F.; Buckley, Charles P.
Subject: RE: Triumvirate Environmental, FLD 980559728, WACS ID 9536, Non-Compliance Letter OCD-HW-12-121

Hello Ms. Gilbert,

I have reviewed your response and have the following comments:

Used oil transporters are required to list EPA ID Nos. for facilities who have notified and received an EPA ID No. on the receipt for the used oil pickup. You provided a list of used oil generators that you transport their used oil for them. I checked the list and there are at least ten companies that have notified and received an EPA ID No. that were listed with a "CESQG" number that you assigned to them. Please ensure that EPA ID Nos. are listed on the used oil pick up receipt for those generators that have notified and received an EPA ID No.

The primary emergency coordinator listed in the contingency plan lives approximately one hour driving distance from the facility, this is not acceptable to the Department. 40 CFR 264.55 states: "At all times, there must be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures....." The Department considers a short period of time no greater than thirty

minutes from the facility. Please list a primary emergency coordinator in your contingency plan that can reach the facility in a short period of time.

If you have any questions please contact me.

Thank you,

Michael Eckoff
Environmental Specialist
Solid and Hazardous Waste Compliance Enforcement
FDEP - Central District
(407) 897-4308
Fax (850) 412-0488

Please take a few minutes to share your comments on the service you received from the department by clicking on this link [DEP Customer Survey](#).

From: Gilbert, Sara L. [<mailto:SGilbert@triumvirate.com>]

Sent: Tuesday, May 15, 2012 3:38 PM

To: Eckoff, Michael

Cc: LoRusso, Christopher M.; Barry, Richard M.; Green, James F.; Buckley, Charles P.

Subject: Triumvirate Environmental, FLD 980559728, WACS ID 9536, Non-Compliance Letter OCD-HW-12-121

Dear Mr. Eckoff,

Attached is the documentation you requested in your April 17, 2012 correspondence Non-Compliance Letter OCD-HW-12-121 for the above-referenced facility. TEI appreciates this opportunity to cooperate with the FDEP regarding this matter. Please feel free to contact me if you have any questions or require additional information.

Best Regards,

Sara Gilbert, P.G.

Environmental Health, Transportation, Safety, & Compliance Specialist

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