



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Triumvirate Environmental Inc

On-Site Inspection Start Date: 04/11/2013

On-Site Inspection End Date: 04/11/2013

ME ID#: 10046

EPA ID#: FLD980559728

Facility Street Address: 10100 Rocket Blvd, Orlando, Florida 32824-8565

Contact Mailing Address: 3670 SW 47th Ave Ste 109, Davie, Florida 33314-2830

County Name: Orange

Contact Phone: (954) 583-3795

NOTIFIED AS:

LQG (>1000 kg/month)

Transporter

Transfer Facility

TSD Facility Unit Type(s)

Used Oil

INSPECTION TYPE:

Pre-Arranged Inspection for TSD Facility Unit Type(s)

INSPECTION PARTICIPANTS:

Principal Inspector: Janine Kraemer, Environmental Manager

Other Participants: John White, Environmental Specialist; Merlin Russell, Environmental Specialist; Tony Tripp, Professional Engineer; Kip Buckley, Operations Manager; Jim Green, V.P. of Hydrocarbons; John Wyluda, Compliance Manager; Chris LaRusso, Corporate EHS Manager

LATITUDE / LONGITUDE: Lat 28° 25' 5.8132" / Long 81° 23' 10.5985"

SIC CODE: 4953 - Trans. & utilities - refuse systems

TYPE OF OWNERSHIP: Private

Introduction:

On April 11, 2013, Janine Kraemer, John White, Merlin Russell, and Tony Tripp, Florida Department of Environmental Protection (FDEP), met with Kip Buckley, John Wyluda, Jim Green, and Chris LaRusso, with Triumvirate Environmental, Inc (TEI). The meeting took place at the TEI facility in Orlando. The purpose of the meeting was to discuss the permit renewal for the facility. The permit renewal application was due on May 9, 2013.

The facility is a hazardous waste and used oil transporter, 10-day transfer facility, a permitted used oil processor, and permitted storage facility of solid and hazardous waste. TEI operates under hazardous waste storage permit number 26916-HO-006, issued January 28, 2009, which was transferred from Perma-Fix, Orlando to TEI on October 14, 2011.

At the time of the inspection the facility had seven employees. The facility is connected to Orange County potable water and sewer systems. The facility was previously Perma-Fix, Orlando (PFO) until 2011 when TEI purchased the facility.

INSPECTION HISTORY

TEI was most recently inspected on February 29, 2012 by the Department for compliance with state and federal hazardous waste and used oil regulations. The facility was cited for failure to have complete position descriptions, failure to have required training, and failure to document the EPA identification of a generator on a used oil disposal document. TEI provided the corrective actions

Inspection Date: 04/11/2013

and the case was closed without enforcement.

Past ten years as Perma-Fix of Orlando, Inc.

JANUARY 2010

PFO was out of compliance at the time of the inspection. PFO was cited for the following violations: failure to label a hazardous waste container with an accumulation start date; failure to label hazardous waste containers; failure to use a manifest while transporting hazardous waste; failure to ensure required information is recorded on shipping papers; failure to obtain detailed chemical and physical analysis of a representative sample of the wastes before storing hazardous or non-hazardous wastes; failure to have all required information in position descriptions; failure to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, which could threaten human health of the environment; and failure to keep the contingency plan up to date. Consent Order OGC File No. 10-1669 was executed assessing \$24,854.00 in penalties and Department costs. PFO was able to off-set \$21,919.00 of the penalty through the implementation of an inkind project.

MAY 2009

PFO came into compliance shortly after the inspection.

JUNE 2008

PFO was in compliance at the time of the inspection.

OCTOBER 2007

PFO was in compliance at the time of the inspection.

DECEMBER 2006 and FEBRUARY 2007

PFO was out of compliance at the time of the inspection. PFO was cited for the following violations: failure to label hazardous waste containers; failure to maintain hazardous waste containers closed; failure to label hazardous waste containers with an accumulation start date; and failure to maintain the facility to minimize sudden releases. Consent Order OGC File No. 07-1790 was executed assessing \$15,681.00 in penalties and Department costs. PFO was able to off-set \$11,745.00 of the penalty through the implementation of a supplemental environmental project.

APRIL 2006

PFO was out of compliance at the time of the inspection. PFO was cited for the following violation: failure to maintain the facility to minimize the possibility of a fire and sudden releases because of a fire in the consolidation building. Consent Order OGC File No. 06-1668 was executed assessing \$10,950.00 in penalties and Department costs.

MARCH 2006

PFO was in compliance at the time of the inspection.

MAY 2004

PFO was out of compliance at the time of the inspection. PFO was cited for the following violations: storing over the capacity of facility as stated in the permit; storing transfer waste longer than ten days; storing hazardous waste longer than one year; failure to conduct proper waste determinations; failure to utilize the waste analysis plan; failure to provide annual training of hazardous waste regulations; failure to conduct weekly inspections; failure to notify the Department of ability to meet a specific permit condition;

Inspection Date: 04/11/2013

failure to register above ground storage tanks; failure to provide secondary containment for above ground storage tanks; failure to obtain state approval prior to using above ground storage tanks; failure to equip above ground storage tanks with overfill protection; failure to inspect above ground storage tanks; failure to provide used oil regulationstraining; failure to document the halogen content of loads of used oil; failure to label, keep closed or protect from the weather, and store used oil filters on an oil-impermeable surface; failure to label used oil containers and tanks; unauthorized storage of solid waste; and unauthorized modification of its solid waste permit. Consent Order OGC File No. 04-1771 was executed assessing \$51,845.00 in penalties and Department costs.

MARCH 2003

PFO was out of compliance at the time of the inspection. PFO was cited with the following violation: storing four drums of hazardous waste longer than one year. The drums were shipped off-site the day after the inspection and the Department took no further action.

APRIL 2002

PFO was out of compliance at the time of the inspection. PFO was cited with the following violations: failure to label hazardous waste containers; failure to maintain hazardous waste containers closed; failure to conduct weekly inspections; failure to label hazardous waste containers with an accumulation start date; storing over the capacity of facility as stated in the permit; failure to meet land disposal treatment standards; and storing transfer waste longer than ten days. Consent Order OGC File No. 02-2060 was executed assessing \$13,350.00 in penalties and Department costs.

Process Description:

TEI collects hazardous waste from generators using TEI's own transportation services as well as other registered hazardous waste transporters. Generators serviced by TEI are those that generate hazardous waste that is exclusive of explosive or radioactive. TEI collects hazardous waste and stores the material in its warehouse for up to a year before transporting the waste to an off-site disposal facility. TEI uses its 10-day transfer facility status when possible in order to avoid re-manifesting, record keeping, reporting, and other more stringent permit requirements. Waste stored for a period longer than ten days is transferred to TEI's designated storage facility. TEI then amends the incoming manifest to reflect the change, the containers are relabeled, and the waste is managed in accordance with the permit requirements.

Hazardous wastes and solid wastes are segregated at the facility according to compatibility groups as outlined in the permit. Storage areas have secondary containment to minimize and prevent possible releases to the environment. The facility is not solidifying solid waste on-site nor are they consolidating wastes.

TEI is using a barcoding system for waste in the permitted storage area to ensure the proper compatibility designated area. The barcoding system uses an I-phone to read the barcodes.

INSPECTION NARRATIVE

At the time of the inspection the facility did not have any 10-day transfer waste on site. The permitted hazardous waste storage area contained twenty 55-gallon drums of used oil filters, fifty-six 55-gallon drums of non-hazardous LMO (terpene distillation bottoms) residue, nine 250-gallon totes of spent antifreeze, nine 55-gallon drums of spent G69 catalyst, two pallets of non-

Inspection Date: 04/11/2013

hazardous limestone, and ten containers of hazardous waste, cyanides.

The facility had no hazardous waste or used oil stored in the consolidation building. The building was storing supplies for emergencies and empty containers. Inspectors did observe that the floor needed to be resealed prior to any consolidation processes beginning. During the inspection, TEI personnel discussed possibly consolidating insulin pumps. The pumps would be delivered from home owners by Fed-Ex to TEI. The pumps contain silver; however, the manufacturer of the pumps is concerned about patent being copied and wants the equipment destroyed rather than recycled. TEI plans on sending the pumps to an incinerator.

TEI also mentioned the possibility of consolidating lab pack containers, as well as, consolidating and stabilizing sand blast media contaminated with heavy metals. FDEP personnel indicated the complete process would need to be submitted with the permit renewal application for review along with the Waste Analysis Plan and Land Disposal Restriction treatment process.

During the discussion concerning the permit renewal, FDEP personnel recommend getting a draft copy prior to the May 9, 2013 deadline for review. TEI personnel stated that would submit the draft the following week. TEI personnel also stated they are renovating the fire suppression system because the current system is out of date.

Conclusion:

TEI was inspected as a hazardous waste and used oil transporter, 10-day transfer facility, a permitted used oil processor, and permitted storage facility of solid and hazardous waste. At the time of this pre-arranged inspection the facility appeared to be in compliance.

Inspection Date: 04/11/2013

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Janine Kraemer

PRINCIPAL INSPECTOR NAME

Environmental Manager

PRINCIPAL INSPECTOR TITLE

FDEP

ORGANIZATION**Supervisor:** Gary Miller

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.