



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

FACILITY INFORMATION:

Facility Name: Triumvirate Environmental Inc

On-Site Inspection Start Date: 07/14/2014

On-Site Inspection End Date: 07/14/2014

ME ID#: 10046

EPA ID#: FLD980559728

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

Contact Mailing Address: 3701 SW 47th Ave Suite 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:

Routine Inspection for TSD Facility Unit Type(s)

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector

Other Participants: Brooke York, Inspector; Michael Eckoff, Inspector; Nicholas Vick, Environmental Tech

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 July 14, 2014, John White and Michael Eckoff, Florida Department of Environmental Protection, and Brooke York, U.S. Environmental Protection Agency, inspected Triumvirate Environmental (Florida), Inc. (Triumvirate Environmental) for compliance with state and federal hazardous waste regulations. Triumvirate Environmental was represented by Nicholas Vick, Environmental Technician, and Pat Malloy, Office Manager. Charles Buckley, Operations Manager, was not present for this inspection.

Upon the inspectors arrival to the facility the inspectors met with Ms. Malloy. The inspectors presented Ms. Malloy with their credentials and explained the purpose of the inspection. Ms. Malloy explained that Mr. Buckley and Mr. Lee Richardson were not available to escort the inspectors or discuss the operations of the facility. Ms. Malloy asked if the inspection could be rescheduled. The inspectors explained the purpose of the inspection and that the nature of the inspection was to get a clear picture of the facility's compliance with the regulations and in order to accomplish this that the agencies must conduct unannounced inspections. Ms. Malloy understood and made a phone call to the appropriate company official to inform them of the inspection.

40 CFR 264.55 requires at all times, there must be at least one employee either on the facility premises or on call (i.e. available to respond to emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency measures. This emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of wastes handled, the location of all records within the facility, and the facility layout. In addition, this person must have

Inspection Date: 07/14/2014

the authority to commit the resources needed to carry out the contingency plan. While Mr. Vick was not thoroughly familiar with facility operations he was able to assist with questions and is identified as an alternate emergency coordinator.

Triumvirate Environmental operates a hazardous waste container storage and waste treatment units and implements HSWA corrective action requirements under Permit Number 26916-HO-008. The permit was issued on January 8, 2014, and expires November 6 2018.

Triumvirate Environmental is a Large Quantity Generator, Hazardous Waste Transporter, Hazardous Waste Transfer Facility, Used Oil Transporter and Transfer Facility, Used Oil Filter Transporter and Transfer Facility, Transporter and Transfer Facility for Universal Waste Batteries, Pesticides, Lamps and Devices, and a Small Quantity Handler for Universal Waste Batteries, Pesticides, Lamps and Devices.

On October 14, 2011, the site's hazardous waste operating permit was transferred from Perma-Fix of Orlando to Triumvirate Environmental.

Triumvirate Environmental is permitted to store a maximum of 824 55-gallon drums, or equivalent, in three sub-units in the Container Storage Building, Waste Consolidation Area, and Waste Stabilization Area. The Container Storage Building sub-units consist of the South Sub-Unit, the East Sub-Unit, and the Northwest Sub-Unit. The South Sub-Unit is for storage of Acidic, Toxic, and Non-Hazardous wastes. The East Sub-Unit is for storage of Alkaline, Toxic, Universal, and Non-Hazardous wastes. The Northwest Sub-Unit is for storage of Non-Hazardous wastes.

Triumvirate Environmental was last inspected on April 11, 2013, during a pre-arranged site visit to discuss the facility's permit renewal, due on May 9, 2013. No violations were noted during this inspection.

Triumvirate Environmental was inspected on February 29, 2012, and was not in compliance. 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. Triumvirate Environmental provided the corrective actions and the case was closed without enforcement.

Process Description:

Triumvirate Environmental collects hazardous waste from generators using Triumvirate Environmental's own transportation services as well as other registered hazardous waste transporters. Generators serviced by Triumvirate Environmental are those that generate hazardous waste that is exclusive of explosive or radioactive. Triumvirate Environmental 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. Triumvirate Environmental 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 Triumvirate Environmental's designated storage facility. Triumvirate Environmental 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.

Triumvirate Environmental is using a bar-coding system for waste in the permitted storage area to ensure the proper compatibility designated area. The bar-coding system uses an I-phone to read the bar-codes.

The inspection of the facility began on the loading dock. Waste stored on the loading dock had been off-loaded from trailers that morning according to Mr. Vick. The nuts and bolts intended to secure the rings on the 55-gallon drums were observed to be improperly tightened. The inspectors

Inspection Date: 07/14/2014

asked Mr. Vic why the nuts and bolts on the 55-gallon containers were improperly tightened. Mr. Vic told inspectors that each container was opened when it arrived to the Facility to ensure that the material was properly characterized by the generator and in the case of lab packs that the containers were still intact inside the drum.

Hazardous Waste Permit Number: 26916-HO-008 Part II Subpart B.1 - Specific Operating Conditions for Container Management Condition 16. "All drums shall be kept closed with rings tightened and bungholes plugged except when adding or removing waste."

40 CFR 264.31 requires that facilities be maintained and operated 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 or the environment.

There were two rows of containers on the loading dock. One row of containers held the following wastes:

- Ten 55-gallon drums
- Six blue poly 30-gallon drums
- Two black metal 30-gallon drums
- Six blue poly 15-gallon containers
- Sixteen 5-gallon pails

One of the 55-gallon drums was a formaldehyde solution generated by the University of South Florida which had a non-hazardous waste label pasted over a hazardous waste label. The containers from the University of South Florida were all dated 7/9/2014. The facility must provide documentation on why the waste was relabeled and documents used to make a determination that conflicts with the generator's determination.

The second row held the following wastes:

- One 55-gallon drum
- One 30-gallon drum
- Four 15-gallon containers
- Seven 5-gallon pails

Abutting the south side of the loading dock is a trailer used for storage of 10-day transfer waste. Flammable liquid wastes are not stored inside the building. The sprinkler system inside the building must be updated to meet current fire codes so the trailer is used for temporary storage.

Located within the trailer were forty-three 55-gallon drums and one 15-gallon container. Inspection of the drums near the doors found the wastes were listed and characteristic waste flammable liquids.

One 55-gallon, black polyethylene drum appeared to be bulging. Inspectors could not access the drum due to lack of aisle space in the trailer. Mr. Vick was informed of the bulging drum. 40 CFR 265.171 requires a facility to transfer hazardous waste from containers which are not in good condition, or have begun to leak into containers which are in good condition and manage the waste in accordance with the applicable regulations.

Hazardous Waste Permit Number: 26916-HO-008 requires that the containers stored in the transfer facility be inspected at least once weekly. Proper inspection of the containers stored on the AES Trailer was not possible at the time of the inspection due to the lack of aisle space as evident by a 55-gallon container observed bulging in the rear of the container.

Several 55-gallon drums identified as Abrasive Media / Paint Chips generated by FL DOT / Olympus Painting Contractors, Inc. had non-hazardous waste labels pasted over hazardous waste labels. The waste was originally shipped on hazardous waste manifest 005176142 FLE but were changed to non-hazardous waste shipping paper NHWM078341. Again, it appears Triumvirate is making

Inspection Date: 07/14/2014

changes to the generator's hazardous waste determination after receipt of the waste on a hazardous waste manifest.

Adjacent to the loading dock is a two-compartment tank for used oil and antifreeze. The used oil portion of the tank is 15,000-gallons and the antifreeze portion of the tank is 7,000-gallons. The used oil tank, that was properly labeled, was open at the time of the inspection. Mr. Vick indicated he was putting waste in the tank when inspectors arrived on site.

STORAGE AREA:

The waste storage area is subdivided through work practices into three areas: The north wall, with rows 101-105 for non-hazardous wastes; the east wall, with rows 201-210 for universal wastes, poisons, and corrosives; and the south wall, rows 301-306, for storage of oxidizers.

Located along the North West wall of the permitted container storage area are the non-hazardous solid waste and electronic (e-waste) storage areas. The areas consist of five rows for drums, numbered 101 - 105.

Row 101 contained thirty-eight 55-gallon drums of non-hazardous spent nickel catalyst.

Row 102 contained twenty-two 55-gallon drums, one 30-gallon drum, and one 5-gallon container of non-hazardous wastes, including waste identified as non-hazardous toxic solid organic.

Row 103 contained two trash cans and thirteen 55-gallon drums of used oil filters.

Row 104 was empty.

In row 105, the e-waste storage area, were two pallets of small television sets (cathode ray tubes), one Gaylord box (bulk container) of electronic devices, and one 55-gallon drum of crushed bulbs labeled "Crushed Mercury Lamps for Recycling." All of the waste originated on the Royal Caribbean Freedom of the Seas, Port Canaveral, Florida. The waste was landed on 7/13/2014.

Row 201 contained four 55-gallon drums and five 5-gallon containers of toxic hazardous wastes containing heavy metals, mainly mercury.

Row 202 contained three 55-gallon drums, one 30-gallon drum, and four 5-gallon containers of waste batteries. The batteries included non-hazardous batteries, lithium batteries, and batteries containing mercuric sulfate, potassium hydroxide, sulfuric acid, silver, and/or mercury.

Row 203 contained three 55-gallon drums, one 30-gallon drum, two 15-gallon drums, and thirteen 5-gallon containers of toxic wastes. Types of wastes included potassium cyanide, sodium cyanide, nitro ferricyanide, pyridine, and sodium azide.

Row 204 contained six 55-gallon drums and one 15-gallon drum of toxic wastes. Types of wastes included formaldehyde, bromomethane, phenol, chloroform, ethidium bromide, and cadmium. One of the drums was not labeled. The packing slip indicated it contained waste toxic, acrylamide, silica gel. The drum number was identified as F17870-06-01. Another drum was turned and the label was not readable.

Row 205 contained nine 55-gallon drums, two 30-gallon drums, one 15-gallon drum, and five 5-gallon containers of waste. The oldest storage start date was 1-31-2014.

Row 206 contained one cubic yard bag, three 55-gallon drums, two 15-gallon drums, and eleven 5-gallon containers of waste.

Row 207 contained nine 55-gallon drums and three 30-gallon drums of waste. The oldest storage start date was 12-18-2013.

Row 208 contained one cubic yard bag and nine 55-gallon drums of waste. The oldest storage start date was 12-26-2013.

Inspection Date: 07/14/2014

Row 209 contained four 55-gallon drums, three 15-gallon drums, and three 7.5-gallon containers of waste. The oldest storage start date was 1-3-2014.

Row 210 was empty.

Row 301 contained eight 55-gallon drums, fourteen 15-gallon drums, and one 5-gallon container of ignitable toxic waste. Types of waste included a blend of nitric acid, silver nitrate, lead nitrate and potassium permanganate.

Row 302 contained three 30-gallon drums, nine 15-gallon drums and twenty-three 5-gallon containers of waste corrosive liquids, oxidizers.

Row 303 contained ten 55-gallon drums, four 30-gallon drums, seven 15-gallon drums, and one 5-gallon container of toxic corrosive wastes. One 30-gallon drum, identified with the bar code number F18867-08-03, contained waste with EPA waste codes D001, D002, D005, D007, D008, and D011. The poly-drum was pulling a vacuum and collapsing in on itself.

40 CFR 265.171 requires a facility to transfer hazardous waste from containers which are not in good condition, or have begun to leak into containers which are in good condition and manage the waste in accordance with the applicable regulations.

Row 304 contained eight 55-gallon drums, eighteen 15-gallon drums, and one tote of oxidizers. Types of waste included lead nitrate and potassium permanganate, mercury and sulfuric acid, chromic acid and sulfuric acid, and hydrofluoric acid and nitric acid. The oldest storage start date was 2-25-2014.

Row 305 contained two 55-gallon drums and one 30-gallon drum of acidic waste. Types of waste included spent nitric acid, hydrofluoric acid, and rags contaminated with hydrochloric acid. The oldest storage start date was 3-24-2014.

Row 306 contained seven 55-gallon drums, three 30-gallon drums, and one 15-gallon drum of acidic wastes. Types of waste included hydrochloric acid and sulfuric acid, citric acid and sulfuric acid, nitric acid and hydrofluoric acid, and nitric acid. One drum of waste hydrofluoric acid, with an accumulation start date of 4/28/14 and Triumvirate Environmental (Florida) Inc. identified on the label as the generator had a bar code label, number 202800FL, with no additional information other than the handwritten initials "HF."

Again, it was consistently noted that bolts on drum lid locking rings were not secured for containers stored in the warehouse.

Outside of the Warehouse

Five roll-off containers stored on the east side of the property contained no hazardous waste. Four contained rain water

Located just outside the warehouse bay door, on the east side of the building, was a roll-off container for scrap metal. The roll-off, which was not covered, contained crushed 5-gallon cans, punctured aerosol cans, empty 1-gallon cans, drum lids, and aluminum frames from totes. The roll-off is an unidentified solid waste management unit located in the area formerly identified as Solid Waste Management Unit (SWMU) 6, Portable Band Saw Area, which is closed due to no evidence of a release. Due to the types of wastes accumulated in the roll-off, and the fact that it was not provided with a tarp, rainwater could result in the release of hazardous waste constituents to the ground beneath the roll-off. The permittee must comply with the requirements of Part V - Corrective (Remedial) Action Conditions, Subpart A - General Corrective Action Conditions, Condition 3 of the permit in response to the previously unidentified SWMU.

Bottom Warehouse - Consolidation Area

Inspectors observed the waste Consolidation Area to contain five pallets of universal pharmaceutical waste in black containers, one pallet of containers with blue lids that had two black

Inspection Date: 07/14/2014

hazardous waste containers on top of it, eleven super sacks, and two pallets of red biomedical waste containers.

Many of the containers were not properly closed. Inspectors asked Mr. Vick about the consolidation processes that take place in the area. Mr. Vick explained that the facility's standard operating procedure was to open the containers of universal pharmaceutical waste and separate out the solid waste. The solid waste components including needles, IV lines, bags and tubing, paper towels, gloves, and other wastes that the generator had determined to be hazardous/universal wastes. These wastes were removed from the black containers and combined in with solid waste or biomedical waste. Inspectors obtained a SOP for the separation/consolidation procedure.

The facility personnel do not have sufficient knowledge of the use and potential contamination of the waste through a visual examination of the material to determine if the waste would meet the definition of hazardous waste, whether by characteristic or listing. Furthermore, the generator is responsible for making hazardous waste determinations at the point the waste is generated. The generator has already made the determination that the waste in the black containers is a hazardous waste and sent it for management and disposal, as such. The further reclassification of the waste and subsequent shipment of the reclassified waste as a non-hazardous solid waste, or biomedical waste without the required documentation to a facility that is not permitted to manage the waste is problematic. The universal pharmaceutical waste standards found at 62-730.186, F.A.C. require very specific criteria and management standards to be met in order to manage the waste as a universal pharmaceutical waste, which includes but is not limited to keeping containers closed and a prohibition on the disposal of universal waste pharmaceuticals.

Pursuant to 62-730.186(5), F.A.C., a handler of universal pharmaceutical waste is prohibited from disposing of universal pharmaceutical waste.

Triumvirate Environmental does not appear to be meeting these criteria or management standards. Therefore, pursuant to 62-730.186(3), F.A.C. the hazardous waste pharmaceuticals not managed as universal waste in accordance with this section shall be managed in accordance with Chapter 62-730, F.A.C., and shall be disposed of at a permitted hazardous waste treatment, storage or disposal facility.

Pursuant to 40 CFR 264.71 and 40 CFR 262.20(a)(1), a generator who transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal must prepare a Manifest on EPA Form 8700-22.

Pursuant to 40 CFR 264.71, 40 CFR 262.12(c) and 40 CFR 262.20(b), a generator must not offer his hazardous waste to transporters or to treatment, storage, or disposal facilities that have not received an EPA identification number and that the generator must designate on the manifest one facility which is permitted to handle the waste.

Hazardous Waste Permit Number: 26916-HO-008 requires that "Consolidated waste is assigned the same codes that belonged to the waste put into the consolidated containers."

Also located in this portion of the warehouse was a roll-off containing stabilized waste. The roll-off container had a hazardous waste label on two sides and a loose tarp over the top of the waste. The waste was identified as Sand Blast Media RQ D007 (Lead) [sic]. The waste had been stabilized (treated) and the waste sampled to determine the effectiveness of the treatment. The facility was waiting on sample results.

RECORDS

The biennial report for calendar year 2013 was signed February 20, 2014, and appears to have been submitted by March 1, 2014.

Review of the Contingency Plan found the primary contact, Thomas Montgomery, had left the company sometime in 2014. The secondary contact, Lee Richardson, and alternate contact, Nicholas Vick, were both still employed by Triumvirate.

Inspection Date: 07/14/2014

40 CFR 264.52(d) requires that the facility's Contingency Plan list the names, addresses, and phone numbers (cellular and home) of all persons qualified to act as emergency coordinator, and that this list must be kept up to date.

Review of employee job titles and descriptions required under 40 CFR 264.16(d) found no issues.

Review of weekly inspections required under 40 CFR 264.174 found no issues.

Review of employee training records required under 40 CFR 264.16 and 265.16 found no issues.

Review of non-hazardous waste shipping papers found medical waste sharps are shipped to B&D Biomedical Services, Okeechobee, Florida, and solid waste is shipped to Covanta, Okahumpka, Florida. Used antifreeze for recycling is shipped to FCC Environmental, Plant City, Florida.

Review of hazardous waste manifests for wastes received and shipped off-site noted the potential acceptance of chemical wastes identified in the facility's permit application on Table II.A.5/6.-1a. It was also found the facility has missing and incomplete EPA waste codes in box 13 of the manifests. Waste codes for consolidated wastes do not match list of waste codes provided by original generator.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.12(c), 262.20(a)(1)
Explanation:	<p>A generator who transports, or offers for transport a hazardous waste for off-site treatment, storage, or disposal, or a treatment, storage, and disposal facility who offers for transport a rejected hazardous waste load, must prepare a Manifest (OMB Control number 2050-0039) on EPA Form 8700-22, and, if necessary, EPA Form 8700-22A, according to the instructions included in the appendix to this part. A generator must not offer his hazardous waste to transporters or to treatment, storage, or disposal facilities that have not received an EPA identification number.</p> <p>Specifically, Triumvirate staff removed hazardous waste/universal waste from containers received from generators and redirected the contents of the containers to a facility that had not received EPA identification number and the waste was not accompanied by a Manifest.</p>
Corrective Action:	Resolution of this alleged violation is being referred to EPA as the lead inspection agency.

Type:	Violation
Rule:	264.171
Explanation:	<p>If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition or manage the waste in some other way that complies with the requirements of this part.</p> <p>Specifically, containers of hazardous waste stored in the warehouse were found to be in deteriorating condition. One 30-gallon drum of D001, D002, D005, D007, D008, and D011 hazardous waste was pulling a vacuum and was collapsing in on itself.</p>

Inspection Date: 07/14/2014

Corrective Action: Resolution of this alleged violation is being referred to EPA as the lead inspection Agency.

Type: Violation

Rule: 264.173(a)

Explanation: A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. Also Hazardous Waste Permit 26916-HO-008 Part II Subpart B.1 - Specific Condition 16 requires all drums be kept closed with rings tightened and bungholes plugged except when adding or removing waste.

Specifically, Triumvirate Environmental failed to ensure rings on containers were re-tightened after the facility verified waste met the profile and lab pack containers were undamaged during transport.

Corrective Action: The resolution of this alleged violation is being referred to EPA as the lead inspection Agency.

Type: Violation

Rule: 264.31

Explanation: Facilities must be designed, constructed, maintained, and operated 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 or the environment.

Specifically, Triumvirate Environmental failed to secure drum lids on hazardous waste containers following verification that drum contents met waste profiles and that lab packs were not damaged during transport. This has the potential to allow the release of vapors from hazardous waste containers into the storage portion of the facility.

Corrective Action: Resolution of this alleged violation is being referred to EPA as the lead inspection Agency.

Type: Violation

Rule: 264.52(d)

Explanation: The Contingency Plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see 264.55), and this list must be kept up to date.

Specifically, Triumvirate Environmental failed to keep the list of emergency coordinators in the document up to date.

Corrective Action: Resolution of this alleged violation is being referred to EPA as the lead inspection Agency.

Type: Violation

Rule: 265.171

Inspection Date: 07/14/2014

Explanation: If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part.

Specifically, a bulging black polyethylene drum was noted in the Flammable Waste Storage Trailer used for accumulation of 10-Day Transfer Waste. The drum was bulging and could not be accessed due to lack of aisle space around the container.

Corrective Action: Resolution of this alleged violation is being referred to EPA as the lead inspection Agency.

Type: Violation

Rule: 62-730.186(11)(a)

Explanation: In accordance with 62-730.186(5)(a), A large or small quantity handler of universal pharmaceutical waste is prohibited from disposing of universal pharmaceutical waste. Also, a handler is prohibited from sending or taking universal pharmaceutical waste to a place other than to a handler or a reverse distributor who has notified the department pursuant to subsection 62-730.186(6), F.A.C.; a destination facility as defined in 40 CFR 273.9 [as adopted in subsection 62-730.185(1), F.A.C.]; or a foreign destination in accordance with the requirements of paragraph 62-730.186(11)(j), F.A.C.

Specifically, Triumvirate Environmental staff opened universal pharmaceutical waste containers, removed contents from those containers, and disposed of the waste as non-hazardous solid waste. Also, if sharps were noted in any universal pharmaceutical waste container, the entire contents of the universal pharmaceutical waste container were managed as non-hazardous waste sharps.

Corrective Action: Resolution of this alleged violation is being referred to EPA as the lead inspection Agency.

Conclusion:

Triumvirate Environmental was inspected as an operator of a hazardous waste container storage and waste treatment unit, a Large Quantity Generator, Hazardous Waste Transporter, Hazardous Waste Transfer Facility, Used Oil Transporter and Transfer Facility, Used Oil Filter Transporter and Transfer Facility, Transporter and Transfer Facility for Universal Waste Batteries, Pesticides, Lamps and Devices, and a Small Quantity Handler for Universal Waste Batteries, Pesticides, Lamps and Devices.

The facility was not in compliance at the time of this inspection. This was an EPA lead inspection and action and resolution regarding potential violations will be addressed by EPA.

Inspection Date: 07/14/2014

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.

John E. White

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE

FDEP

ORGANIZATION**Supervisor:**Aaron Watkins

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.