Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Triumvirate Environmental Inc

On-Site Inspection Start Date: 04/13/2016 **On-Site Inspection End Date:** 04/14/2016

ME ID#: 10046 **EPA ID#:** FLD980559728

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

Contact Mailing Address: 3701 SW 47th Ave Ste 109, Davie, Florida 33314

County Name: Orange **Contact Phone:** (954) 583-3794

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: Michael Eckoff, Inspector

Other Participants: Charles Buckley, Operations Manager; Daniel Hall, Environmental Specialist

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 13 and 14, 2016, Michael Eckoff and Daniel Hall, Florida Department of Environmental Protection, accompanied by Charles Buckley, Triumvirate Environmental, Inc., inspected Triumvirate Environmental, Inc. for compliance with permit number 26916-HO-008, and with state and federal hazardous waste and used oil regulations.

Triumvirate Environmental, Inc. operates a hazardous waste container storage facility 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 it expires on November 6 2018.

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

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

INSPECTION HISTORY
The facility was inspected on July 14, 2014 by the Department and US EPA - Region IV for compliance with permit number 26916-HO-008, and with state and federal hazardous waste and used oil regulations. This was a US EPA lead inspection. The facility was not in compliance due to failure to prepare a manifest for a shipment of hazardous waste and direct that shipment to a

facility that has received an EPA identification number, failure to store hazardous waste in containers that are in good condition, failure to keep containers of hazardous waste closed while in storage, failure to maintain and operate the facility to minimize the possibility of a release of hazardous waste, failure to keep the list of emergency coordinators in the contingency plan up to date, failure to transfer hazardous waste from a container that is not in good condition to a container that is in good condition, and disposed of universal pharmaceutical waste when such activity is prohibited. Resolution of these alleged violations was referred to US EPA.

The facility was inspected on April 11, 2013 by the Department, 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.

The facility was inspected on February 29, 2012 by the Department for compliance with permit number 26916 -HO-006, and with state and federal hazardous waste and used oil regulations. The facility was not in compliance due to 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, Inc. provided the corrective actions and the case was closed without enforcement.

Process Description:

Triumvirate Environmental, Inc. 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, Inc. collects hazardous waste from generators using Triumvirate Environmental, Inc.'s own transportation services as well as other registered hazardous waste transporters. Generators serviced by Triumvirate Environmental, Inc. are those that generate hazardous waste that is exclusive of explosive or radioactive waste. Triumvirate Environmental, Inc. 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, Inc. 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, Inc.'s designated storage facility. Triumvirate Environmental, Inc. 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, Inc. 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 iPhone to read the bar-codes.

INSPECTION NARRATIVE
LOADING DOCK
Three trailers were parked at the loading dock, one was offloaded, one was being loaded, and the other is managed as the 10-day transfer facility. Waste stored on the loading dock was both offloaded from a trailer that morning and being loaded onto a trailer, according to Mr. Buckley.

The waste offloaded consisted of:
Five pallets of 5-gallon containers of non-hazardous latex paint
One 15-gallon container of hazardous waste
One 5-gallon container of non-hazardous lead vests for recycling

The trailer that was offloaded contained a 55-gallon drum of used oil, Mr. Buckley stated the oil would be added to the used oil tank.

The waste being loaded consisted of:
Eight 55-gallon drums of hazardous waste
One 30-gallon drum of hazardous waste
One 15-gallon container of hazardous waste
One 5-gallon container of hazardous waste

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 due to fire codes so the trailer is used for temporary storage. Located within the trailer were two 5-gallon containers of hazardous waste.

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 was properly labeled and closed at the time of the inspection.

A random selection of items located within the hazmat storage locker was verified against what is required to be in the locker as specified in the operation plan, no issued were noted.

CONTAINER STORAGE BUILDING
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.

Row 101 contained fifteen 55-gallon drums of non-hazardous waste and one 55-gallon drum of hazardous waste. The drum contained toxic liquid hazardous waste (chloroform and formalin) and was immediately removed and placed in the appropriate storage area.

Row 102 contained two 55-gallon drums and three 5-gallon containers of non-hazardous waste. Types of wastes included dimethyl/diisocyanate.

Row 103 contained thirty-six 55-gallon drums and three 30-gallon drums of non-hazardous waste. Types of wastes included cobalt chloride, isocyanates, copper sulfate/ammonium chloride, and glycol, styrene, and water mixture. One 55-gallon drum was positioned such that the label was not facing out [403.727(1)(c), Florida Statutes (F.S.)].

Row 104 contained forty-four 55-gallon drums of non-hazardous waste. Types of wastes included dirt/carbon and oily materials. Ten 55-gallon drums were positioned such that the labels were not facing out [403.727(1)(c), F.S.].

Row 105 contained thirteen 55-gallon drums, four 30-gallon drums, and one 15-gallon container of non-hazardous waste, and sixteen boxes of biomedical waste. Types of wastes included ammonium chloride/cobalt chloride, silica gel, and benzoic acid.

Row 201 contained three 30-gallon drums, four 15-gallon containers, and thirteen 5-gallon containers of hazardous wastes. Types of wastes included hazardous waste exhibiting the characteristics of corrosivity and toxicity for mercury.

Row 202 contained one 55-gallon drum, three 30-gallon drums, three 15-gallon containers, and five 5-gallon containers of hazardous waste. Types of wastes included hazardous waste exhibiting the characteristic of toxicity for mercury, and sodium azide, a listed acutely toxic hazardous waste.

Row 203 contained six 55-gallon drums, one 15-gallon container, and three lab packs of hazardous waste. Types of wastes included hazardous waste exhibiting the characteristic of toxicity for cadmium and toxic liquids.

Row 204 contained eight 55-gallon drums of hazardous waste. One 55-gallon drum was positioned such that the label was not facing out [403.727(1)(c), F.S.]. The drum was immediately repositioned so the label was facing out.

Row 205 contained twenty-four 55-gallon drums, one 30-gallon drum, one 15-gallon container, and six 5-gallon containers of hazardous waste.

Row 206 contained ten 55-gallon drums, one 30-gallon drum, one 15-gallon drum, and six 5-gallon containers of hazardous waste, and four 55-gallon drums of non-hazardous waste. Types of wastes included silver chloride, potassium cyanide, sodium azide, selenium dioxide, barium carbonate, and cadmium.

Row 207 contained one cubic-yard box, eleven 55-gallon drums, and one 30-gallon drum of hazardous waste, and three 55-gallon drums of non-hazardous waste. Types of wastes included epinephrine, formaldehyde, chloroform, cadmium, silver, and barium acetate.

Row 208 contained three 30-gallon drums, seven 15-gallon containers, and twenty-eight 5-gallon containers of hazardous waste, and three 5-gallon containers of non-hazardous waste. Types of wastes included sodium cyanide, barium chloride, nicotine, silver cyanide, aldrin, sodium azide, and osmium tetroxide.

Row 209 contained one cubic-yard box, eight 55-gallon drums, and one 30-gallon drum of hazardous waste, and one 30-gallon drum of non-hazardous waste. Types of waste included potassium hydroxide/lithium hydroxide, ammonium solutions, amines liquid, sodium hydroxide/ammonium hydroxide, and monoethanolamine water.

Row 210 contained one over-pack drum, four 30-gallon drums, two 15-gallon containers, and six 5-gallon containers of hazardous waste, and four 5-gallon containers of non-hazardous waste. Types of waste included sodium hydroxide/potassium hydroxide, sodium sulfide, calcium hydroxide, barium hydroxide/sodium hydroxide, and sodium hypochlorite.

Row 301 contained five 55-gallon drums, one 30-gallon drum, three 15-gallon containers, and one 5-gallon container of hazardous waste, and one pallet of bags of non-hazardous waste. Types of waste included nitric acid/sulfuric acid, ferric chloride/sodium bisulfate, and zinc oxide.

Row 302 contained one tote, two 55-gallon drums, three 30-gallon drums, two 15-gallon containers and five 5-gallon containers of hazardous waste. Types of waste included nitric acid, hydrochloric acid/hydrogen peroxide, hydrofluoric acid, silver nitrate/ammonium persulfate, and copper nitrate/silver perchlorate.

Row 303 contained thirty-one 30-gallon drums, one 15-gallon container, and eight 5-gallon containers of hazardous waste. Types of wastes included lead nitrate/potassium permanganate, potassium nitrate/potassium nitrite, and silver nitrate/nitric acid. Two 30-gallon drums were positioned such that the labels were not facing out [403.727(1)(c), F.S.]. The drums were immediately repositioned so the labels were facing out.

Row 304 contained seven 55-gallon drums, four 30-gallon drums, eight 15-gallon containers, and twelve 5-gallon containers of hazardous waste. Types of waste included chromic trioxide/sulfuric acid, nitric acid, sodium nitrate/sodium dichromate, iron nitrate/potassium nitrate, and acetic acid.

Row 305 contained three 55-gallon drums, one 30-gallon drum, five 15-gallon containers, nineteen 5-gallon containers of hazardous waste, and one 15-gallon container and nine 5-gallon containers of non-hazardous waste. Types of waste included hydrochloric acid/sulfuric acid, ferric chloride/sulfosalicylic acid, hydrofluoric acid, formic acid/phosphoric acid, and nitric acid.

Row 306 contained two totes, nine 55-gallon drums, one 30-gallon drum, and one 5-gallon container of hazardous waste, and one 55-gallon drum of non-hazardous waste. Types of waste included hydrochloric acid/sulfuric acid, phosphoric acid, nitric acid, and maleic anhydride.

The location of a random selection of emergency equipment was verified as to their location specified in the operation plan, no issues were noted.

CONSOLIDATION BUILDING
No consolidation activities were being conducted at the time of the inspection. Mr. Buckley stated consolidation consists of only non-hazardous waste lab packs and repacking smaller containers of hazardous waste into larger containers.

The area is also used for storage of supplies.

Outside the west side of the Consolidation Building was a covered 30-yard roll-off dumpster that was empty. The used oil/antifreeze tank was also in this area. The tank was properly labeled and closed.

On the east side of the property was a shed containing emergency response supplies. Next to the shed were four tractor-trailers and two smaller trailers. The trailers are used to store empty containers and drums. Located just outside the east side of the Consolidation Building was a shed containing parts and supplies.

RECORDS
A copy of the permit and application were available on-site.

Review of the contingency plan required under permit condition Part II. Subpart A. Number 12. and 40 CFR Part 264 Subpart D found no issues.

Review of employee job titles and descriptions required under permit condition Part II. Subpart A. Number 9. and 40 CFR 264.16(d) found no issues.

Review of weekly inspections required under permit condition Part II. Subpart B.2 Number 7. and 40 CFR 264.174 found no issues.

Review of employee training records required under permit condition Part II. Subpart A. Number 9., 40 CFR 264.16, and 40 CFR 265.16 found no issues.

Review of non-hazardous waste shipping papers found solid waste is shipped to Covanta Lake, Inc., Okahumpka, Florida.

Review of hazardous waste manifests for wastes received found manifest #007703007 FLE, Prime Therapuetics-FLR000195578, listed non-hazardous waste that corresponds to waste profile #TO32139. In that profile, Forteo 600mcg/2.4mL (NDC 00002-8400-01) was listed as non-hazardous waste. When declared a waste, Forteo exhibits the hazardous waste characteristic of toxicity for m-cresol, EPA waste code D024.

Review of hazardous waste manifests shipped off-site found no issues.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	403.727(1)(c)
Explanation:	Fail to comply with a permit. Specifically, Triumvirate Environmental, Inc. failed to ensure all labels were facing out.
Corrective Action:	On May 6, 2016, Kyle Lapic, EHS & Transportation Compliance Specialist, emailed stating containers were immediately relabeled with new outside-facing labels.

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 and Transfer Facility, Used Oil Transporter, Transfer Facility, and Marketer, Transporter and Transfer Facility for Universal Waste Lamps and Devices, and a Small Quantity Handler for Universal Waste Lamps and Devices, and was not in compliance at that time. Corrective actions were completed prior to the issuance of this report.

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.

Michael Eckoff	Inspector
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**

Supervisor: **Nathan Hess**

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.