

## Winston, Kathy

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**From:** Winston, Kathy  
**Sent:** Tuesday, April 18, 2017 2:17 PM  
**To:** 'Lapic, Kyle A'  
**Subject:** Project closed letter for inspection of 1/18/2017  
**Attachments:** Triumvirate.pdf

Attached you will find your final inspection report for the hazardous waste and used oil inspection conducted at your facility on January 18, 2017. The facility appeared to be in compliance with all federal and state regulations concerning hazardous waste and used oil.



**Kathy Winston, CHMM**  
**Environmental Consultant**

Florida Department of Environmental Protection  
Southeast District  
Compliance Assurance Program  
3301 Gun Club Road  
MSC 7210-1  
West Palm Beach, FL 33406  
Kathy.Winston@dep.state.fl.us  
Office: 561.681.6756  
Fax: 561.681.6755

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

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**FACILITY INFORMATION:**

**Facility Name:** Triumvirate Environmental Florida Inc  
**On-Site Inspection Start Date:** 01/18/2017      **On-Site Inspection End Date:** 01/18/2017  
**ME ID#:** 50649      **EPA ID#:** FLD981018773  
**Facility Street Address:** 3670 SW 47th Ave #109, Davie, FL 33314  
**Contact Mailing Address:** 3670 SW 47th Ave #109, Davie, FL 33314-2830  
**County Name:** BROWARD      **Contact Phone:** (954) 583-3795

**NOTIFIED AS:**

CESQG (<100 kg/month)  
Transfer Facility  
Transporter  
Used Oil

**INSPECTION TYPE:**

Routine Inspection for Hazardous Waste Transfer Facility facility  
Routine Inspection for Hazardous Waste Transporter facility  
Routine Inspection for Universal Waste Transporter facility  
Routine Inspection for Used Oil Transporter facility  
Routine Inspection for Used Oil Generator facility  
Routine Inspection for CESQG (<100 kg/month) facility  
Routine Inspection for Used Oil Transfer Facility facility  
Routine Inspection for Used Oil Processor facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Kathy R. Winston, Inspector  
Other Participants: Ben Fisch, Environmental Specialist; Jacob Blaisdell, Technical Services Manager

**LATITUDE / LONGITUDE:** Lat 26° 4' 37.4777" / Long 80° 12' 33.4891"

**SIC CODE:** 4212 - Trans. & utilities - local trucking, without storage

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Triumvirate Environmental Florida Inc. (TEF), is a permitted facility authorized to process used oil, oily wastewater, petroleum contact water, oily solid waste, and used oil filters. TEF is also a hazardous waste transporter and transfer station. The facility is situated on a 2.5-acre site in a light industrial area, and is served by city water and sewer. TEF has operated from this site for approximately seven years; however, the facility itself has been here for approximately eighteen years. There are twenty people employed onsite including the office staff.

The facility's permit was renewed on May 7, 2013 and will expire on November 19, 2017. The facility was also approved for a minor modification on March 2, 2014. The modification involved the closure of tank T11 and the replacement of this tank with an upgraded tank that is designated as T11R. The modified permit will also expire on November 19, 2017.

Inspection Date: 01/18/2017

Compliance History - The Department is required to inspect TEF at least every two years. Inspections were conducted in 2012 and before that in 2011. The 2011 resulted in enforcement and was settled with a Consent Order that was executed on March 6, 2012. The facility inspection in 2012 revealed only minor violations and the facility returned to compliance without enforcement.

The facility had fire extinguishers stationed at regular intervals, a safety shower in the hazardous waste storage building, spill kits stationed in logical areas throughout the facility, and several portable eye wash stations. The eye wash station in the hazardous waste storage building was expired per the stamp on the container. The inspectors brought hard hats, hard toed shoes, safety glass and ear protection. For the facility tour, TEF required everything but the ear protection.

### **Process Description:**

Used oil and oily wastewater are received in the tank farm area located in the southeast portion of the site. Used oil is offloaded into two 20,000-gallon aboveground tanks. The used oil is filtered, and then allowed to sit for further oil/water separation. The processed oil is tested for compliance with on-specification standards and is sold as fuel oil to TEF customers. The oily wastewater is transferred for storage into one of seven tanks. The oily water is filtered, and then transferred to a boiler tank where it is heated to 150 ° F for oil/water separation. An emulsifier is added to facilitate further oil/water separation and the temperature is raised to 200 ° F, then the process is shut down. The water readily separates from the oil, and the oil is diverted to one of holding tank.

Used oil filters are not consolidated but sent in generator containers to EMC, Inc. in Miami for processing. Oily solid wastes are consolidated into a rolloff container for disposal at the Central Landfill in Pompano Beach, Florida.

### **Facility Tour –**

The inspectors noted that the main containment area was free of an accumulation of precipitation that could compromise its' ability to provide 110% of the volume of the largest tank. The used oil filter storage area is inside the bermed containment area. The rolloff for the oily solids consolidation sits directly in front of the processing operations and shares the same berm system.

The secondary containment for both the main tank farm and the single large tank in the rear of the property were clean, dry and there was no visible damage to the sealant. In the rear of the property was a three-sided pole barn that contained the boiler for the processing operation and some equipment and chemical feed drums associated with a system to control the buildup of scalant in the boiler itself.

The large Drum Storage building is divided into several different sections and is used for many aspects of the operation. A large section of the rear of the facility serves as storage for everything from emergency response equipment, to spare parts for the processing operation, as well as, tools and products for facility maintenance. The only repair work performed onsite involves the processing equipment and its' related pumps and valves, as the maintenance of the truck fleet and forklifts are contracted out.

On the other side of the building, there were four distinct storage zones. There was the Hazardous Waste Transfer facility, the liquid non-regulated waste area, the solid non-regulated waste area and the Universal Waste storage area. This area was empty at the time except for some e-scrap because TEF had a shipment of universal waste the day before the inspection.

### **Records Review -**

The inspectors were reviewing the acceptance and delivery logs for used oil and hazardous waste when a discrepancy in a log entries was discovered. There was a non-hazardous manifest indicating a delivery by Harry's Oil of 400 gallons of oily water and 55 gallons of used oil; however, the entry in the acceptance log didn't include the 55 gallons of used oil. TEF was reminded to make sure all entries match the corresponding manifests. All other records appeared to be in order including: the Contingency Plan, weekly container inspection logs, general facility inspection logs, the closure plan, training records, and the remaining manifests.

Inspection Date: 01/18/2017

**PHOTO ATTACHMENTS:**

Facility entrance



spill kits



used oil filter storage



HW storage area building



**Conclusion:**

The facility appeared to be in compliance at the time of the inspection.

Inspection Date: 01/18/2017

**2.0 - CESQG Checklist**

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Standards for Conditionally Exempt Small Quantity Generators	Yes	No	N/A
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 261.5	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes? 261.5	✓		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 261.5	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 261.5	✓		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 <input type="checkbox"/> Is it excluded under 261.4? <input type="checkbox"/> Is it listed in subpart D of 261 or appendix IX of 261? <input type="checkbox"/> Has the waste been analyzed? <input type="checkbox"/> Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 261.5(g)(3) <input type="checkbox"/> Name and address of the generator and TSD/authorized facility. <input type="checkbox"/> Type and amount of hazardous waste delivered. <input type="checkbox"/> Date of shipment	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(3)	✓		

Inspection Date: 01/18/2017

**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.

Kathy R. Winston Inspector  
**PRINCIPAL INSPECTOR NAME** **PRINCIPAL INSPECTOR TITLE**

  
**PRINCIPAL INSPECTOR SIGNATURE** **ORGANIZATION** DEP 03/22/2017  
**DATE**

Ben Fisch Environmental Specialiaalist  
**Inspector NAME** **Inspector TITLE**

FDEP  
**ORGANIZATION**

Jacob Blaisdell Technical Services Manager  
**Representative NAME** **Representative TITLE**

Triumvirate Environmental  
**ORGANIZATION**

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.

**Report Approvers:**

**Approver:** Karen E. Kantor **Inspection Approval Date:** 03/22/2017