Part II.A.1 General Facility Information

PART II

Wastes accepted at Triumvirate Environmental Services, Inc. are stored, consolidated, repacked, or treated. All storage is in containers, including waste managed through the 10-day transfer area. Consolidation consists of pouring containers together into shippable drums. Re-packaging consists of removing inner containers from outer containers and placing them in appropriate containers for outbound shipments. Treatment consists of stabilization of wastes in roll-off boxes with cement or other suitable material approved by The Department.

A. General

1. a. *Attach a topographic map showing a distance of 1,000 feet around the hazardous waste management area at a scale of 1 inch to 200 feet. Contours must be shown on the map with intervals sufficient to clearly show the pattern of surface water in the vicinity of and from each operational unit of the facility (e.g. contour intervals of 5 feet if relief is greater than 20 feet or an interval of 2 feet if relief is less than 20 feet).*

Information and features of the map shown in Figure II.A.2 are consistent with instructions in the permit application form regarding the extent of the area around the facility, the scale, and contour intervals. The scale of this map is 1" = 40.' The map was produced at this scale so that all of the requirements as outlined above can be easily ascertained for review of the pattern of surface water in the vicinity of the facility.

The map should clearly show the following:

(1) *Map scale and date*: Scale and date are shown. (Figure II.A.2)

(2) *100-year floodplain areas*: Figures I.B.4 and I.B.5 are FIRM maps that show the 100-year flood plain areas. To further illustrate flood plain areas map II.A.3 has been included and indicates floodplain areas with a dark shade. The shaded area shows a floodplain area adjacent and to the east of the area.

(3) *Orientation of the map*: The north orientation of each map is shown.

(4) *Access control (fences and gates)*: The perimeter fence is indicated by a solid line that delineates the boundaries of the site. The gates have been identified in the map. (Figure II.A.2)

(5) *Injection and withdrawal wells both on-site and off-site*: There are no injection or withdrawal wells on-site or off-site within 1,000' feet from the hazardous waste facility (II A 1.a(11)). The facility drains into the storm water retention pond.

(6) *Buildings and other structures (recreational areas, access and internal roads, storm, sanitary and process sewage system, fire control facilities, etc.)*: Existing buildings and other structures are shown on Figure II.A.2.

Part II.A.1 General Facility Information

(7) *Contours sufficient to show the surface water flow*: All storm water flows into the storm water retention pond and that flows into Boggy Creek. Water from the storm water pond is discharged through underground piping to a drainage ditch. The map (Figure II.A.2) shows the path storm water follows toward the drainage ditch. Figure II A 1 shows the direction of the piping to Boggy Creek.

(8) *Loading and unloading areas*: The container loading and unloading areas are identified in Figure II.A.5.

(9) *Drainage and flood control barriers*: The facility site drains into a storm water pond located northeast corner of the property. The storm water pond is one component of the flood control barrier system at Triumvirate Environmental Services, Inc. Storm water flows from the parking lot of the facility to the northwest corner of the parking lot. A valve/pipe system is located in the northwest corner of the parking lot. This system is in the normally closed mode. After a rain event the storm water is visually inspected for potential contamination prior to opening the valve/pipe system. This inspection is documented in the operating record. Water from the storm water pond is discharged through underground piping to a drainage ditch. The map (Figure II.A.2) shows the path storm water follows toward the drainage ditch. Figure II A 1 shows the direction of the piping to Boggy Creek.

(10) *Hazardous waste units including clean-up areas*: Operational hazardous waste units for storage and treatment of waste are shown on Figure II.A.5. There are no clean-up areas at the facility. Additional Solid Waste Management Unit information is located in Parts II.P and II.Q

(11) *Runoff control system*: As explained in paragraph (9), the flow of storm water from the parking lot to the storm water pond and the procedures to control run-off are outlined.

There are no schools, churches, and other places of public gathering are within 1000' of the facility (Figure II A a. (11)

b. *Include a wind rose indicating the local prevailing wind speed and direction, legend, and date with the maps or as a separate item*: Figure II A 3 shows a wind rose which contains this information.

c. *Traffic information — Include the information required in 270.14(b)(10)*: Figure II.A.5 shows traffic volume and control information requested in 270.14(b)(10). Due to the small area of the facility site and the fact that most of it is or will be occupied by buildings, the traffic pattern and size is very simple. There are no data on the load bearing capacity of site pavements. However, the facility was developed from the beginning as a transportation facility capable of handling vehicles with a nominal combined gross weight of 80,000 pounds. Construction drawings show that the paved internal traffic areas consist of a 6-inch thick concrete slab covered with an asphalt layer.

Part II.A.2.b,c, & d Financial Responsibility

2. Financial responsibility information:

a. Attach the most recent closure estimates for the facility [264.143 and 270.14(b)(15)]. Use DEP Forms 62-730.900(4)(a), (b), (c), (d), (e), (g), (h), (i) or (j) only. Retype documents are not acceptable. Send the originally signed documents to: Hazardous Waste Financial Responsibility Coordinator; Department of Environmental Protection, Division of Waste Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

The present financial assurance mechanism for closure at Triumvirate Environmental Services, Inc. is Lexon Surety Bond (1024295), a copy of which is found in Exhibit II.A.2.a.-1. The face amount of this policy is $169,533 with an effective date of February 7, 2018.

Triumvirate Environmental Services, Inc. may choose in the future to use any of the financial instruments offered in 264.143. In accordance with 264.143(e)(9), the face amount of this policy will be increased within 60 days if the current closure cost estimate exceeds the applicable face value, or another financial instrument will be obtained.

b. If applicable, attach the most recent post-closure care cost estimate for the facility [264.144] and a copy of the financial mechanism used to establish financial assurance for post-closure care of the facility [264.145, 264.146, 270.14(b)(16)]. Use DEP Forms 62-730.900(4)(a), (b), (c), (d), (e),(g), (h), (i) or 0) only. Retyped documents are not acceptable. Send the originally signed documents to the address in 2.a. above.

Triumvirate Environmental Services, Inc. is not subject and will not be subject to post-closure care because the facility does not have and it is not applying for any land disposal units.

c. If corrective action under 40 CFR 264.100 or 264.101 is requested at the facility, comply with rule 62-730.180(6), FA. C.

No corrective action under 40 CFR 264.100 or 264.101 is requested at the facility at this time.

d. Attach a copy of the documents used to demonstrate liability coverage [264. 147]. Use DEP Forms 62-730.900(4)(b), (d), (k), (1), (m) or (n) only. Retyped documents are not acceptable. Send the originally signed documents to the address in 2.a. above.

A copy of the most recent document [i.e., Form 62-730.900(4))k)] used to demonstrate liability coverage for the Triumvirate Environmental Services, Inc. facility is shown in the attached documents. Triumvirate Environmental Services, Inc. will submit an updated DEP Form 62-730.900(4)(k), or other form that is applicable to the type of liability coverage that is being utilized at such time, within 30 days after the occurrence of any of the events described in 264.147(a)(7).

Application Part II.A.3.a,b.&c.

3. **Flood Plain Information:**

Attach a flood map. The Federal Insurance Administration (FIA) of the Federal Emergency Management Agency (FEMA) Map Service Center produces flood maps that have information on flood areas. If a FIA flood map is not available for an area, use an equivalent mapping technique to determine whether the facility is within the 100-year floodplain, and if so, what the 100-year flood elevation is. The U.S. Geological Survey, the Soil Conservation Service, the Water Management Districts, and the Regional Planning Councils also have information requested in this section.

The FIRM Flood Insurance Map of Orange County shows that Triumvirate Environmental Services, Inc. is not located in a 100-year flood plain (I.B.4 and I.B.5). Triumvirate Environmental Services, Inc. has also included map II.A.3 to further delineate the 100-year flood plain boundary.

If the site is located in the 100-year floodplain, identify the 100-year flood level and any other special flooding factors (e.g. wave action) which must be considered in designing, constructing, operating, or maintaining the facility to withstand washout from a 100-year flood.

The Facility is not located in the 100-year floodplain or in any other special flooding factor.

a. An engineering analysis indicating the various hydrodynamic and hydrostatic forces expected to occur at the site as a consequence of a 100-year flood.

   The Facility is not located in the 100-year floodplain or in any other special flooding factor

b. Structural and other engineering studies showing the design of operational units (i.e., tanks, incinerators) and flood protection devices (i.e..floodwalls, dikes) at the facility and how these will prevent washout.

   The Facility is not located in the 100-year floodplain or in any other special flooding factor

c. If applicable, and in lieu of paragraphs 3.a. and 3. b. above, a detailed description of the procedures to be followed to remove hazardous waste to safety before the facility is flooded, including:

4.a. ***Security Procedure***

Attach a description of the security procedures and equipment required by 264.14 [270.14(b)(4)]

Triumvirate Environmental Services, Inc. has in place a fence that completely surrounds the facility. Access of unauthorized persons and livestock to the active portion of the facility is prevented by the six-foot chain link fence with two feet of barb wire on top of the fence and by locked gates. The gates remain locked except for entering and exiting the facility. In addition, signs have been posted near the entrance gates and at regular intervals along the fence that surrounds the site in a way that makes them legible from a distance of at least 25 feet from any direction through which the facility may be approached. A sign reading "All Visitors Check in at Office" is posted at the east entrance and provides directions to visitors. Figure II.A.5 shows locations of signs.

4.b. *Attach a copy of the contingency plan required by 40 CFR part 264, Subpart D.*
Contingency Plan is attached on pages 2ACP-1 through 2ACP-87

General Information Part II.A.4.c
Description of Procedures, Structures or Equipment Used at the Facility
(Mitigation Procedures)

4.c. Description of Procedures, Structures, or Equipment Used at the Facility

1. Mitigate effects of equipment failure and power outages

Equipment used at the Triumvirate Environmental Services, Inc. facility does not pose a human health, safety, or an environmental concern in cases of equipment failure to operate. Equipment is not used in processes for which failure may create a dangerous situation. The paragraphs below indicate what type of equipment driven by internal combustion engines or by electrical motors is used in process and storage areas at the facility and the implications that may result from not being able to operate any of this equipment at any given time.

Container Storage Unit: Forklifts may be used in this area to move drums and will not jeopardize safety if they cannot be operated at any given time. Fire alarm actuators located in this unit and in other parts of the facility are operated by a battery backup system in case of commercial power failure. The sprinkler system that covers both buildings at the facility is activated by mechanical heat sensors. The storage area sprinkler system is functional, but does not meet NFPA standards for the storage of class 1 flammables.

Consolidation/Stabilization Operations: These operations may use a backhoe, small mixer, and portable pumps and hoses. This equipment will not present a safety threat in case of power failure. Once approved and the operations commence proper equipment will be purchased

2. Prevent hazards in unloading operations (i.e., ramps, special forklifts);

The Triumvirate Environmental Services, Inc. facility loads and unloads waste materials in containers and in bulk at several locations in the facility. Drums and other non-bulk containers are transferred throughout the facility with forklifts. Drums are loaded and unloaded at the existing dock located on the west side of the container storage unit. The containers are transferred with forklifts from the transportation vehicles, secured with truck chocks, to the container storage unit and from there to the consolidation/stabilization areas or back to the loading dock for shipment. Loading and unloading of waste material in bulk occurs in the consolidation area inside the building. Solid hazardous wastes may be consolidated into a bulk container in accordance with the Solid Waste Permit. This includes bulk loading and unloading into the permitted tank and loading and unloading of waste material in the Waste Consolidation and Stabilization Area.

The container loading/unloading dock is provided with manufactured dock plates that have been secured to the dock structure at the locations where the trailers park to load and unload containers. The dock plates are adjustable ramps that provide forklifts the safest means to access containers inside the van trailers. Before a forklift goes inside a trailer, and while any bulk transportation vehicle is being loaded or unloaded, the wheels of the vehicle are chocked to

General Information Part II.A.4.c
Description of Procedures, Structures or Equipment Used at the Facility
(Mitigation Procedures)

prevent them from moving. Ramps and roll-over berms used by forklifts when transferring drums at the facility have been designed with a gentle slope.

3. Prevent undue exposure of personnel to hazardous waste (ie., protective clothing);

Selection of proper personal protective equipment has been made in accordance with the hazard presented by the operation. The next paragraphs discuss the types of personal protection equipment provided by Triumvirate Environmental Services, Inc. and the operations and locations where the equipment used is required.

Head Protection: Hard hats are required to be worn when working at the Triumvirate Environmental Services, Inc. Facility. Hard hats are not required indoors in the office space.

Eye and Face Protection: Protection to the eye and to the face from injuries caused by flying objects and corrosive liquids is provided by safety glasses and by face shields, respectively. Safety glasses are required to be worn by personel in the facility. Safety glasses and a face shield, or full face respirator, must be worn by personnel conducting consolidation operations and sampling and testing corrosive liquid. Operators consolidating, sampling and testing non-corrosive waste liquids and solids in drums should wear a face shield.

Respiratory Protection: Respirators prevent breathing air contaminated with harmful vapors. Operators will wear respiratory protection when sampling hazardous wastes or consolidating any liquid hazardous wastes. The selection of cartridges appropriate for the material being handled is made in accordance with guidelines pulished by the National Insitute for Occupational Safety and Health (NIOSH). Cartidges are used for no more than one shift and are changed out more frequently, if required by the manufactors instructions. Triumvirate Environmental (Florida), Inc will not consolidate inhalation hazards, oxidizers, reactives (D003), or acids.

Hearing Protection: When necessary, hearing protection is provided in accordance with OSHA regulations.

Torso Protection: All facility personel wear clothing equivelant to level D protection, with eye and head protection depending on the operation or the location where it is being conducted, as explained in other parts of this section. The level of protection is supplemented with permeable and non-permable coveralls and corrosive-resistant aprons and suits in accordance with the guidelines shown below.

Permeable coveralls: For consolidation of waste solids in bulk containers and in drums.

Non-Permeable Coveralls: For consolidation of non-corrosive waste liquids.

General Information Part II.A.4.c
Description of Procedures, Structures or Equipment Used at the Facility
(Mitigation Procedures)

Corrosive-Resistant aprons: For sampling and testing waste drums.

Corrosive-Resistant Suits: Such suits should be worn for consolidation of corrosive liquids.

Arm and Head Protection: Gloves are used at the Triumvirate Environmental Services, Inc. facility to prevent injuries due to cuts, absorption of chemicals, and acid burns of the skin. Leather gloves are worn for handling closed drums and by operators working in the consolidation of waste solids. If leather gloves are contaminated with RCRA hazardous waste they are disposed of. Chemical/Corrosive resistant gloves are used for sampling and testing waste in drums.

Foot and Leg Protection: Safety and corrosive-resistant boots or boot covers prevent workers at the Triumvirate Environmental Services, Inc. facility from injuries due to falling objects and from corrosive liquids. Steel toe safety boots are worn by operators handling closed drums and consolidating waste liquid and solids. Personnel consolidating alkaline liquids should wear corrosive-resistant boots or covers.

Air Contaminants Reduction: Triumvirate Environmental Services, Inc. waste management operations will meet current requirements from the Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA) regarding contaminant exposure levels that are considered safe for the health of the workers. There are two areas where employee exposure to air contaminants is a potential concern. These are: the container storage unit and the liquid consolidation operations.

The container storage unit presents a potential danger to operators only when the unit is opened for the first time during the day. There is a concern that toxic vapors may accumulate during workdays at night, weekends, or holidays. This will affect the first operator entering the container storage unit. When opening the container storage unit, after it has been closed during the night, weekend, or holiday, the worker will wear a respirator and open the doors for ventilation.

Liquid Consolidation operations may take place at the consolidation and stabilization area with the adjacent doors kept open. Contingent upon NFPA upgrades explosion-proof exhaust fans will be used to evacuate fumes from the consolidation area.

Explosion Protection: The potential for an explosion exists at the container storage unit and during the consolidation operations. If flammables are stored in the building, contingent upon NFPA upgrades, a hand-held explosion meter will be available at the facility to monitor accumulation of explosive vapors. Currently no flammables are stored in the building and no explosion meter is stored at the facility, this would change if the building went through a NFPA upgrade.

General Information Part II.A.4.c
Description of Procedures, Structures or Equipment Used at the Facility
(Mitigation Procedures)

Materials capable of causing an explosion at the container storage unit are vapor or fumes that may accumulate during weekdays at night, weekends or holidays. Such fumes may result from chemical reactions and high vapor pressure of materials stored in the unit.

Explosion-proof lighting and the lack of other possible ignition sources minimizes the potential for an explosion at the container storage unit due to accumulated vapors or fumes. At the beginning of the work day, the first operator(s) entering the container storage unit will wear appropriate respirator(s) and open the doors for ventilation.

Other operations that may emit dust, mist, or vapor having the potential to form an explosive environment are consolidation operations. These are operations in which waste is transferred from drums into tanks or into trailers. Waste liquid transfer operations will be conducted inside a confined environment where the possibility of an explosion is minimal. The air inside this environment is removed constantly, which prevents the accumulation of vapors. Years of experience in bulking waste in trailers have proven that this operation does not generate a significant amount of dust and does not cause clouds of dust. Should waste materials change such that dust emissions become a problem, equipment to spray a water mist over the consolidation area will be used to suppress dust generation.

4. Prevent contamination of water supplies;

There are no drinking or other types of water supply wells located near the Triumvirate Environmental Services, Inc. facility that could become contaminated due to normal waste management operations or accidents at the facility. There are no surface water bodies used for water supply that could be effected by facility operations. All liquid releases will be contained in secondary containment to prevent contamination of water supplies. Spills and large releases are managed in accordance with the Preparedness and Prevention Plan and the Contingency Plan.

5. Prevent run-off from hazardous waste handling areas to other areas of the facility or environment, or to prevent flooding (i.e., dikes, berms, trenches);

Section 7.1 of the Contingency Plan for Solid and Hazardous Waste Operations was prepared in response to requests in section II.A.4.b. of the permit application form. It contains a description of the containment systems used to prevent releases from the various processes and operations conducted at the facility. Storage areas are provided with secondary containments capable of containing at least 10% of the maximum volume permitted for storage in containers in each area.

According to the 2009 FEMA floodplain map, the Triumvirate Environmental Services, Inc. site is not located in a 100-year floodplain area.

General Information Part II.A.4.c
Description of Procedures, Structures or Equipment Used at the Facility
(Mitigation Procedures)

6. Prevent releases to atmosphere; and

The facility will prevent releases of air contaminants to the atmosphere that may pose a threat to the environment or to human health. Similar processes conducted at other Triumvirate Facilities without the emissions control systems have not experienced odor problems. Therefore, it is not expected that this Triumvirate Environmental Services, Inc. facility will generate odors at unacceptable levels. Environmental concerns with respect to these contaminants are mitigated by compliance with RCRA requirements of 40 CFR 264, Subpart CC.

Accidental releases may also occur during consolidation operations at the consolidation area. These releases could be caused by a reaction between waste materials or by the high vapor pressure of the waste material.

7. Prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes [270.14(b)(9)]

Processes and operations where ignitable wastes are handled at the Triumvirate Environmental Services, Inc. facility are operated in a manner that reduces or eliminates the possibility of ignition and the formation of explosive environments. Equipment and tools used to manage ignitable wastes have been designed and manufactured with materials that prevent the generation of sparks. Operators use equipment to handle open drums in a way that reduces the impact between hard surfaces, and the equipment is made of materials that do not produce sparks upon impact or friction. Non-manual driven parts and equipment are operated either by air or explosion-proof electric motors. There are no operations conducted at the facility that generate open flames or sparks. Smoking of tobacco products will be restricted to areas small in number and size, segregated from operation and process areas.

Waste streams received at the facility are segregated in compatibility groups in accordance with the DOT hazard class displayed on the drum. The hazard class is determined by an evaluation conducted on the waste before receipt by the facility. The segregation of wastes in compatibility groups is designed to prevent the accidental commingling of waste or materials during spills or other incidents. Before waste streams are commingled or consolidated, the waste streams will be tested for compatibility using the method described in sub-section 14.0 of the Waste Analysis Plan.

4.d. Preparedness and Prevention:

Attach a description of the preparedness and prevention procedures required by 40 CFR Part 264, Subpart C, including design and operation of the facility, required equipment, testing and

General Information Part II.A.4.c
Description of Procedures, Structures or Equipment Used at the Facility
(Mitigation Procedures)

maintenance of equipment, access to communications or alarm system, required aisle space, and arrangement with local authorities.

A preparedness and Prevention plan is attached and located on in section 2APP

4.e Attach an outline of both the introductory and continuing training programs used to prepare persons to operate or maintain the hazardous waste management facility in safe manner to demonstrate compliance with 2964.16 [270.14(b)(12)] and a brief description of how training will be designed to meet actual job tasks [264.16(a)(3)]

The training program has been attached and is located in section 2ATP

Application Part II.A.5 and 6 Chemical & Physical Analysis & Waste Analysis Plan

5. *Attach a copy of the reports of the chemical and physical analysis of the hazardous wastes handled at the facility, including all information which must be known to treat, store or dispose of the wastes in accordance with 40 CFR 264.13 and 40 CFR 270.14(b)(2)*

6. *Attach a copy of the waste analysis plan required by 40 CFR 264.13(b) and 40 CFR 270.14(b)(3) . Include the following:*
   - *a. Parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters;*
   - *b. Test methods used;*
   - *c. Sampling methods used;*
   - *d. Frequency of analysis to ensure accuracy;*
   - *e. Waste analyses that generators supply;*
   - *f. Methods used to meet additional waste analysis requirements; and if applicable,*
   - *g. For off-site facilities, the procedures used to inspect and ensure that the wastes received match the accompanying manifest.*

Item 5 above requires the applicant to include copies of analysis reports for wastes managed at the facility. The number of pages of analysis reports the facility keeps in files for waste managed at the site would add several voluminous books to this application, without adding significant information that could be used to review the method used by the facility to evaluate incoming waste. Instead of submitting the analysis reports required in item 5, the facility's waste analysis plan included in this application to satisfy the requirements contained in item 6 above is considered to define the information to be shown in the waste evaluation documents. This information is that needed to properly treat, store, or dispose of the wastes in accordance with 264.13. This section of the permit application has been identified with the number IIAWP.

Copies of the wash solvent material and contaminated debris are included (II.A.5(1) and II.A.5(2))

Application Part II.A.7 Manifest System Recording Keeping and Reporting

7. Attach a copy of the procedures used to comply with 264.12 and 40 CFR Part 264, Subpart E (Manifest System, Recordkeeping, and Reporting).

Pages 2A-15 through 2A-23 addresses this question.

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RECORDKEEPING, AND REPORTING
PERMIT APPLICATION SECTION NO. II.A.7**

MANIFESTS, RECORDKEEPING, AND REPORTING

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Application Part II.A.7 Manifest System Recording Keeping and Reporting

1.0 INTRODUCTION

This section of the permit application describes the procedures used to record and maintain information required by hazardous waste regulations for the waste management operations conducted at the facility. It also describes the system used to complete and review shipping documents and to address deficiencies and discrepancies discovered in the documents by the review process. The hazardous waste regulations contain requirements to report information pertaining to incidents and operations related to waste management activities at the facility.

2.0 OBJECTIVES

This part of the permit application describes the process used by the facility to:

Review and process inbound shipping documents and resolve deficiencies and discrepancies found in the documents and in the shipment.

Review inbound waste shipments and record management activities used to process the waste and to track the waste from the inbound shipment to the outbound shipment.

Prepare and process outbound shipping documents for shipment and resolve deficiencies and discrepancies found in the documents and in the shipments.

Manage transfer facility waste and unauthorized waste shipments.

Complete, submit, and maintain records and reports related to incidents and operations at the facility.

3.0 SHIPPING DOCUMENTS

Shipping documents are the paperwork prepared by the generators, and the hazardous waste permitted facility, that must accompany hazardous waste shipments during transportation to off-site facilities. The generator must complete the shipping documents for shipments originating at the generator site. Similar responsibilities apply to the hazardous waste treatment, storage, and disposal facilities (TSDFs) when shipments originate at the TSDF. The shipping documents consist of the following:

The uniform hazardous waste manifest
The land disposal restriction (LDR) notification form and
The universal treatment standard (UTS) notification form

The LDR and UTS forms are combined and are required to accompany the first (i.e., initial) shipment only. They are optional for subsequent shipments.

4.0 INBOUND SHIPMENTS

TSDFs are required to inspect shipments and review accompanying manifests to assure the waste received coincides in type and size with the manifest and that the information provided in the LDR and UTS notifications (when required to accompany the shipment) complies with the regulations. The first step in this process consists of inspecting the shipment to identify the drums listed on the manifest(s). All waste that is received by the facility is assigned a barcode label. Operators at the facility inspect the incoming hazardous waste label and the container type and count the number of drums in the shipment for each waste stream and place the barcode label next to the original shipping label. During this process the description of the waste is verified, and the number and type of containers must match the manifest description. Inadequate and incomplete markings on the hazardous waste label are amended by the facility operators. Discrepancies regarding the shipment and the manifest are noted on the manifest and on the online tracking system.

Following the inspection of the shipment and manifest by facility operators, the manifest, the LDR and UTS notification forms (when provided with the shipment), are forwarded to a competent person for review. The review is to verify that the shipping documents are in compliance with the regulations and to resolve discrepancies and deficiencies discovered in the shipment and in the documents. Specific objectives of the review are:

Take notice of discrepancies discovered during the waste receiving operation.

Ensure that the manifest has been completed in accordance with standards in the Rule 62-730.160 F.A.C., and in Subpart B of the 40 CFR Part 262.

Verify that the LDR and UTS notification forms (when required by regulations to accompany the shipment) comply with the requirements of Part 268.

Notify the generator of discrepancies and deficiencies discovered in the shipment, manifest, and/or LDR and UTS notification forms. All discrepancies must be resolved within 15 days of shipment receipt.

To comply with the regulations of 264.71(b)(2), shipment and manifest discrepancies, as well as regulatory deficiencies contained in the manifest, are noted in item 18a of the manifest. A copy of the manifest is signed and dated by the facility and returned to the generator within 30 days of waste delivery. The manifest discrepancy notifications are generated automatically by our custom-made computer tracking program and are used by the facility to resolve problems related to shipments and shipping documents. The generator is requested to notify the facility within 15 days of the waste delivery date on the resolution of the problem. In most cases the problem is resolved in the manner indicated in the form without the generator revisions. However, in cases of missing or incomplete documents, or when the waste is significantly different from the one described in the evaluation documents, active involvement of the generator becomes necessary. The waste analysis plan describes methods to determine when an incoming waste is significantly different from the one approved for shipment to the facility. Failure to resolve discrepancies will result in return of the shipment to the generator, or to an alternate facility designated by the generator.

5.0 PROCESSES AT THE FACILITY

The previous sub-section describes procedures utilized by the facility to review inbound shipping documents and to resolve regulatory deficiencies and discrepancies discovered in the shipment and in shipping documents. This sub-section deals with the system the facility uses to record the processes undergone by the waste accepted by the facility.

Triumvirate Environmental Services, Inc. uses a custom computer application to track and account for individual waste containers as they are received stored, handled, re-packaged, consolidated or stabilized and shipped out of the facility. The application and database is called PERMIT and it is housed in servers. PERMIT can be accessed by staff members via a secured internet connection and password at any location, at any time. A general description of PERMIT and how it functions is indicated below.

PERMIT is an electronic system that tracks all waste that is at the Triumvirate Environmental Services, Inc. facility. Wasteland is an electronic program that creates manifests, shipping documents, packing slips, LDRs, and manages profiles. All waste that is accepted at the facility needs to be accepted into PERMIT. This can be done by importing a manifest from wasteland or by manually entering the manifest into PERMIT. All waste that is accepted at the facility is given a barcode label from PERMIT. Transfer Waste is accepted in PERMIT but it is not barcoded. Barcode labels are printed by facility staff members and adhered to the appropriate containers before the containers are accepted at the facility. Facility staff members are responsible for updating the information in the barcode system to reflect the storage location of each container in the facility. Facility staff members use hand held barcode scanners to update the application database whenever any container is moved, repackaged, consolidated, stabilized or manipulated within the facility. The application database is also updated whenever

containers are shipped out of the facility. All outbound manifests from the facility are created from PERMIT to keep the inventory in PERMIT accurate.

The barcode labels on the drums contain process codes which dictate how the waste can be handled. The process codes are assigned to the waste profiles before the waste is accepted at the facility and they are assigned by competent facility employee(s). When a waste is accepted in PERMIT the barcode will track the waste and the DOT shipping description will determine where it can be stored.

The server which houses the Triumvirate Environmental Services, Inc.'s computer application and its database is connected to the internet. On a daily basis, the data that has been collected through the use of the application is exported to a secure electronic data storage repository located outside the facility property.

At any time software upgrades may occur and electronic tracking systems may change. Any change will not affect the general tracking as previously described.

6.0 OUTBOUND SHIPMENTS

The facility prepares shipping documents for waste shipments that originate at the facility. Manifests are printed by either PERMIT or Wasteland and both programs interact with each other and store shipping manifests, profiles and other related documents. This data management system maintains files for outbound waste streams that have been approved by off-site facilities. Off-site facilities approve waste streams for treatment and disposal prior to shipment from Triumvirate Environmental Services, Inc. The outbound system is similar to the inbound system. Information from outbound approvals is inputted into PERMIT and Wasteland, which are used to print manifests for outbound shipments. Outbound shipments are only printed from PERMIT to keep the inventory in PERMIT accurate. The waste that is sent to a TSDF will meet the characteristics of the profile. The Waste Analysis Plan describes the procedures that should be used to determine the DOT description and the hazardous waste codes that should be used for outbound wastes. The same procedures also address the method that is used to complete LDR and UTS notification forms. After completion, the manifest, LDR and UTS notification forms (when applicable) are submitted to a competent person for review to assure compliance with regulations.

Waste shipments that originate from the Triumvirate Environmental Services, Inc. facility may be classified as follows:

- Waste bulked in containers such as tankers, roll-off boxes, dump trailers, totes, cubic yard boxes, or containers having a smaller size.
- Lab pack containers.

- Waste in transfer consisting of waste that was not removed from the transportable containers received by the Triumvirate Environmental Services, Inc. facility.

The first step in preparing a waste shipment consists of completing a list of inbound waste containers contents included in the outbound shipment. The shipment preview report is generated from that list which shows, among other things, the barcode number affixed to the container, the location where the drum is located onsite, the container size, type of container and profile number for the contents from every inbound waste container in the outbound load. For waste bulked at the facility the shipment preview report is completed from the data management system that tracks the movement of bulked wastes. A manifest is then prepared for the bulked materials from the system.

7.0 TRANSFER FACILITY

Triumvirate Environmental Services, Inc. operates a transportation fleet that has been licensed by the State of Florida to transport hazardous waste. Triumvirate Environmental Services, Inc. facility in Orlando is also a hazardous waste transporter and also operates a transfer facility which allows waste to be held in transit for up to ten days.

Waste regulated by transfer facility requirements is a waste transported on a manifest that shows as a designated facility one which is not Triumvirate Environmental Services, Inc. and is referred to as Transfer Waste. Currently, the transfer facility waste is managed in trailers parked at the loading dock. Containers holding transfer facility waste are only placed in the container storage unit when no space is available for transfer from trailer to trailer, which rarely happens. When waste is placed inside the facility it is clearly separated from permitted waste and segregated to clearly identify it as 10-day transfer waste.

Provisions in Rule 62-730.171, F.A.C. specify that transfer facilities must have a written contingency and emergency plan that meets the requirements of 40 CFR Part 265, Subpart D, and a written closure plan that conforms to 265.111, 265.112(c), 265.114, and 265.115. This subsection complies with this requirement. Transfer facilities are also required to maintain written records showing arrival and departure dates for transfer waste, as well as the generator's name and EPA I.D. No. and the document number for the manifest used to ship the waste. Triumvirate Environmental Services, Inc. logs in the information described for waste streams that arrive at The Facility and records the departure date when each transfer facility waste and permitted waste shipment leaves the facility. The information is stored in PERMIT and can be printed at any time.

The number of drums holding transfer facility waste in the container storage unit at any time is not expected to be a large number. Drums to be transferred from one trailer to another may be grouped together in the unit and/or at the specified 10 day location as posted on the dock. These drums have the following unique markings and features when located in the container storage unit:

The approval code written on permitted waste drums contain characters that identify them as Triumvirate Environmental Services, Inc. approval codes; transfer facility waste drums do not show Triumvirate Environmental Services, Inc. approval codes.

Every permitted waste drum in the container storage unit is clearly separated from Transfer Waste drums. Transfer Waste drums do not show drum barcoded stickers marked on their sides and are segregated and identified to clarify that they are 10-day transfer waste.

A box located inside the office will be designated and identified to hold manifests showing transfer facility waste placed in the cell, or designated area for that waste code.

Transfer facility drums will be placed on the dock or transfer trailers. Only wastes having compatible DOT hazard classes will be placed together. Incompatible wastes will be placed on pallets having integral containment systems.

8.0 UNAUTHORIZED WASTE SHIPMENTS

When inbound waste streams are tested and inspected in accordance with the procedures described in the Waste Analysis Plan and are found not to conform to information provided in the waste profile evaluation documents, these waste streams are subject to the procedures explained below. Regulations in 40 CFR 264.72(c) indicate the facility may resolve discrepancies in waste types within 15 days from the date the waste in question was received and if not resolved the FDEP must be notified. The first step to resolve a discrepancy created by a non-conforming waste is to obtain instructions from the generator indicating whether the waste should be returned to the generator or an amendment to the waste evaluation documents to correct the deficiencies discovered by the verification process is possible. If the generator chooses to amend the evaluation documents, the waste profile must be modified by the generator and, depending on the nature of the discrepancy, additional analyses or SDSs may be required. If it is found that the waste can be processed by Triumvirate Environmental Services, Inc., under its permit, a corrected letter of approval is issued, and processing of the waste is initiated. If efforts to resolve the discrepancy determine the waste should be assigned waste codes not permitted at the facility, or that the waste exhibits

characteristics prohibited at the facility, the waste in question must be rejected by Triumvirate Environmental Services, Inc. Under instructions from the generator, the facility has the option to ship the waste back to the generator or to manage the waste under the transfer facility provisions of Rule 62-730.171 F.A.C., which requires shipment of the waste to an off-site facility within ten days after the discovery date. Waste exhibiting characteristics prohibited at the facility are shipped out immediately after discovery as specified by the generator.

9.0 OPERATING RECORDS

Movement of waste within the facility is controlled and recorded to establish the identification and disposition of the wastes. Incoming and outgoing wastes are monitored and recorded to maintain an inventory of the waste at the facility. Documents providing characterization of waste shipped and received at the facility, shipping documents, personnel training records, safety inspection records, incident records, and process, operation and safety equipment inspection records and logs are maintained in an organized manner. The records and logs referenced above are as required by 40 CFR 264.73.

10.0 REQUIRED REPORTS AND NOTIFICATIONS

Triumvirate Environmental Services, Inc. will comply with the reporting requirements listed below:

Hazardous waste biennial report for generators, as required by 40 CFR 264.75;

Exception reports when the shipper of hazardous waste has not received confirmation of delivery from the designated facility

Notification of intent to export hazardous waste, when required by 262.53;

Exception reports for exports of hazardous waste for which a copy of the manifest from the transporter or confirmation of delivery has not been received, as indicated in 262.55;

Annual report for exported hazardous waste, as required in 262.56;

Notification that the facility has arranged to receive hazardous waste from a foreign source, as required in 264.12(a);

Notification to generators shipping hazardous waste to the facility indicating that the facility has the appropriate permits, as required in 264.12(b);

Notification to new owner or operator before transferring ownership or operation of the facility of the requirements in Parts 264 and 270, as required in 264.12(c);

Reports of incidents requiring the implementation of the contingency plan, when required in 264.56(i).Letter describing manifest discrepancies that have not been resolved within 15 days, as required in 264.72(b);

Hazardous waste biennial report for permitted facilities, as required in 264.75;

Unmanifested waste reports, as required in 264.76;

Reports indicating effectiveness of a corrective action for releases, as required in 264.100(g).

Reports of exceedances of the air emission standards for containers, as required in 264.1090;

Notices of planned changes to the permitted facility, in accordance with 270.30(1)(1);

Notices of anticipated non-compliance situations at the facility, as required in 270.30(1)(2);

Twenty-four-hour report of non-compliance situations which may endanger health or the environment, in accordance with 270.30(1)(6)

11.0 AVAILABILITY, RETENTION, AND DISPOSITION

Records, logs, notices, sheets, reports, or documents mentioned in the preceding paragraphs are maintained at the facility for the period of time required by the applicable regulation. Record maintenance is extended automatically during the course of any unresolved enforcement action. These documents are available to the appropriate regulating agency or personnel upon request.

Application Part II.A.8 Other Federal Laws

8. Indicate all other federal laws that may apply to the issuance of the permit according to 270.3.

Regulations for permit application for hazardous waste facilities require determining the applicability of several federal laws to the facility with respect to the issuance of the hazardous waste facility permit. When any of these laws are applicable, the regulations require the adoption of permit conditions that ensure compliance with the federal law or denial of the permit if issuance would impair compliance with the law. The federal laws under consideration are listed below.

(a) The Wild and Scenic Rivers Act 16 V.S.C. 1273 et seq. Section 7 of the Act prohibits the Regional Administrator from assisting by license or otherwise the construction of any water resource project that would have a direct, adverse effect on the values for which a national wild and scenic river was established. The permit resulting from this application will not have a direct or adverse effect on values protected by this law.

(b) The National Historic Preservation Act of 1966. 16 V.S.C. 470 et seq. Section 106 of the Act and implementing regulations (36 CFR Part 800) require the Regional Administrator, before issuing a license, to adopt feasible measures to mitigate potential adverse effects of the licensed activity on properties listed or eligible for listing in the National Register of Historic Places. The Act's requirements are to be implemented in cooperation with State Historic Preservation Officers and upon notice to, and when appropriate, in consultation with the Advisory Council on Historic Preservation. The property site for the facility to which the permit will be issued is not listed, nor eligible for listing in the National Register of Historic Places.

(c) The Endangered Species Act 16 V.S.C. 1531 et seq. Section 7 of the Act and implementing regulations (50 CFR Part 402) require the Regional Administrator to ensure, in consultation with the Secretary of the Interior of Commerce, that any action authorized by EPA is not likely to jeopardize the continued existence of any endangered or threatened species or adversely affect its critical habitat. The permit resulting from this application will not jeopardize the continued existence of any endangered or threatened species or adversely affect critical habitat.

(d) The Coastal Zone Management Act 16V.S.C. 1451 et seq. Section307(c) of the Act and implementing regulations (15 CFR Part 930) prohibit EPA from issuing a permit for an activity affecting land or water use in the coastal zone until the applicant certifies that the proposed activity complies with the State Coastal Zone Management program, and the State or its designated agency concurs with the certification (or the Secretary of Commerce overrides the State's

Application Part II.A.8 Other Federal Laws

nonoccurrence). The facility to which the permit will be issued is not located in a coastal zone.

(e) The Fish and Wildlife Coordination Act 16 V.S.C. 661 et seq. requires that the Regional
Administrator, before issuing a permit proposing or authorizing the impoundment (with certain exemptions), diversion, or other control or modification of any body of water, consult with the appropriate state agency exercising jurisdiction over wildlife resources to conserve those resources. This permit application does not propose the impoundment, diversion, or other control or modification of any body of water.