

July 24, 2018



Florida Department of Environmental Protection (FLDEP)
Attention: Robert Cook
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Triumvirate Response to First Request for Additional Information (RAI)
Facility ID: FLD 980 559 728
DEP Application No.: 26916-HO-009

Dear Mr. Cook,

This response addresses the items identified in the FLDEP's First Request for Additional Information (RAI) dated June 14, 2018 for Triumvirate Environmental, Inc. located at 10100 Rocket Blvd, Orlando, FL 32824. The attachment outlines Triumvirate's response to each of the items identified in the RAI. Additional supporting attachments are also provided for further clarification.

I believe this response to be complete and accurate, but of course, please let me know if there is anything more that the FLDEP requires to move the application forward.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Barry", with a stylized flourish at the end.

Richard Barry
Director, Compliance
Triumvirate Environmental, Inc.
200 Inner Belt Road
Somerville, MA 02143
617-715-8919

Cc: Bryan Baker, Environmental Administrator, FLDEP
Victor San Agustin, FECC

Attachment: Response to Request for Additional Information

Facility Name: Triumvirate Environmental, Inc.

Facility ID: FLD 980 559 728

DEP Application No.: 26916-HO-009

1. Part I.A.1: The type of unit is not provided under "Treatment".
 - **Triumvirate Response: The "Treatment" section has been updated in Part I.A.1 to include roll-off containers as a type of treatment unit. Please see Attachment 1 for the updated application form.**
2. Part I.A.: The revision number should have been "0" for the initial renewal. Ensure that your revised application is identified as Revision 1.
 - **Triumvirate Response: The revision number in Part I.A.3 has been updated to "Revision 1". Please see Attachment 1 for the updated application form.**
3. Part I.A.16 indicates a 100-year lease but also indicates that the lease expires on May 1, 2020. The 2013 application indicated an expiration date of 9/30/2020. Please address this inconsistency.
 - **Triumvirate Response: Triumvirate has confirmed the lease expires on September 30, 2021. Please see Attachment 1 for the updated application form.**
4. Part I.B.3: There are ten existing permits and registrations that are expired. Please insert the new expiration dates for each permit or registration that has been renewed.
 - **Triumvirate Response: The permit table referenced in Part I.A.19 has been updated. Please see Attachment 2 for the updated application form.**
5. Part II.A. General 1(1): The Figure II.A.2 Boundary and Topographic Survey map is illegible. Although the scale bar is on the figure, there are no distances defined on the scale bar. A legible figure must be submitted.
 - **Triumvirate Response: A legible version of the Figure II.A.2 Boundary and Topographic Survey map has been attached. Please see Attachment 3 for the updated map.**
6. Application Part I – General Information, D. Operating Information, Page 3, Facility Operations: The application states: "This permit allows the facility to store up to 824 55-gallon containers in the container storage unit, and to consolidate waste with other compatible wastes." This statement needs to specify the total volume of waste across the property, not just the volume stored in the container storage unit or consolidation area. Please consider something to the effect: "This permit allows the facility to store up to 824 55-gallon drums for a total of 41,200 gallons, or 224 cubic-yards, in the container storage unit, and to consolidate waste with other compatible wastes." For the purposes of the volume calculation the liquid volume equivalent of 1 gallon to 0.004951 cubic yards will be used. This volume includes all hazardous wastes stored on the property.
 - **Triumvirate Response: The language proposed by FLDEP is acceptable. Please see Attachment 4 for the updated application form. The updated language is shown in red in the attachment on Page 3.**

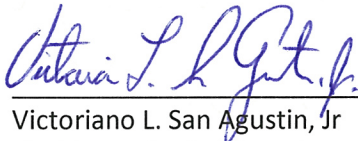
7. Application Part I – General Information, D. Operating Information, Page 4, Inspection and Testing of Incoming Wastes: Second paragraph in the section has an apparent typographical error in the second sentence: “Results from the inspection and testing of waste are entered into an electronic data base.”
- **Triumvirate Response: The typographical error has been corrected. Please see Attachment 4 for the updated application form. The updated language is shown in red in the attachment on Page 4.**
8. Application Part I – General Information, D. Operating Information, Page 5, Waste Receipt and Distribution: Second paragraph states “Containers holding transfer facility waste can be distinguished from those holding permitted waste because all waste that is permitted or terminated at Triumvirate Environmental Services, Inc. receives a barcode label. Transfer waste does not receive a barcode label.” The facility needs to provide for some type of physical separation of transfer waste and permitted waste. Just saying permitted waste has a barcode and transfer waste does not is not acceptable. Separation methods can be simple physical measures such as movable floor markers denoting an area of the storage facility that will be used for temporary storage of transfer waste.
- **Triumvirate Response: Triumvirate has modified the language to clarify the way transfer waste will be segregated. The paragraph above has been modified to include the statement: “Transfer waste will be placed in a designated area or row on the dock, within a designated area in the facility, or on designated transfer trailers. Each area will be marked to indicate it is for transfer waste only.” Please see Attachment 4 for the updated application form. The updated language is shown in red in the attachment on Page 5.**
9. Application Part II.A.7 Manifest System Recording Keeping and Reporting, Revision 3: Date: 4/24/18, Part II.A.7, Page: 2A-15 (no real page #): Section title has a typographical error. It should read “Application Part II.A.7 Manifest System Record Keeping and Reporting”.
- **Triumvirate Response: The typographical error has been corrected. Please see Attachment 5 for the updated application form. The updated language is shown in red in the attachment. A real page # is also shown on the top right corner of each page.**
10. Application Part II.A.7 Manifest System Recording Keeping and Reporting, Revision 3: Date: 4/24/18, Part II.A.7, Page: 2A-15 (no real page #): Second paragraph of section 7.0 Transfer Facility, last sentence reads “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.” The facility provides no indication on how the transfer waste is “clearly” separated from permitted waste.
- **Triumvirate Response: Triumvirate has modified the language to clarify the way transfer waste will be segregated. The paragraph above has been modified to include the statement: “Transfer waste will be placed in a designated area or row on the dock, within a designated area in the facility, or on designated transfer trailers. Each area will be marked to indicate it is for transfer waste only.” Please see Attachment 5 for the updated application form. The updated language is shown in red in the attachment on Page 20. A real page # is also shown on the top right corner of each page.**

11. Application Part II.A.7 Manifest System Recording Keeping and Reporting, Revision 3: Date: 4/24/18, Part II.A.7, Page: 2A-15 (no real page #): Last inset sentence before Section 8.0 reads "Transfer facility drums will be placed on the dock or transfer trailers." This does not match operation descriptions in other parts of the document that indicate transfer waste may also be stored in the warehouse.
- **Triumvirate Response:** Triumvirate has modified the language to clarify the way transfer waste will be segregated. The paragraph above has been modified as follows: *"Transfer waste will be placed in a designated area or row on the dock, within a designated area in the facility, or on designated transfer waste trailers. ~~Transfer facility drums will be placed on the dock or transfer trailers.~~"* Please see Attachment 5 for the updated application form. The updated language is shown in red in the attachment on Page 21. A real page # is also shown on the top right corner of each page.
12. Part II.A.4.b Contingency Plan, Page 15: Under Item (b) Prevent hazards in unloading operations the two sentences appear to contain grammatical errors and are unclear. Please consider the following correction: "In any operation at the facility, including unloading operations, only facility staffs staff that are trained in the unique hazards of the facility can conduct work. All personnel working in the facility receive an extensive two-part training that is outlined in the training program."
- **Triumvirate Response:** The typographical error has been corrected. Please see Attachment 6 for the updated application form. The updated language is shown in red in the attachment on Page 15.
13. Waste Analysis Plan Section 8.2 On Specification Used Oil, 2A-13/2AWP, Page 17: Is Triumvirate Environmental Services, Inc. indicating through this section that it will be operating as a used oil marketer?
- **Triumvirate Response:** Triumvirate currently stores used oil onsite for consolidation in the 22,000 gallon AST. The used oil is stored until transferred to other facilities within the Triumvirate network for further processing.
14. Waste Analysis Plan Section 13.0 Sampling Methods, Initial Analysis of Untreated Waste: 2A-13/2AWP, Page 23: The paragraph reads: "The composite sample will be analyzed for TCLP metals in order to determine the initial metals' concentrations prior to treatment. Wastes that fail to meet UTS for constituents other than the RCRA metals (D004-D008, D010-D011) and mercury will not be eligible for treatment." If Triumvirate Environmental Services, Inc. is only sampling the waste for TCLP metals than how can it fail to meet UTS for constituents other than RCRA metals. Please note the range "D004-D008, D010-D011" only excludes D009, Mercury. However, mercury is included separately without a waste code reference in the same sentence. If Triumvirate Environmental Services, Inc. means to include all inorganic constituents identified in 40 CFR 268.48 please make this clear.
- **Triumvirate Response:** Triumvirate has modified the language to clarify the testing that will be performed prior to treatment. The paragraph mention above has been modified as follows: *"The composite sample will be analyzed for TCLP metals in order to determine the initial metals' concentrations prior to treatment. Wastes that fail to meet UTS for ~~constituents other than the RCRA metals (D004-D008, D010-D011)~~ and mercury (D009) will not be eligible for treatment."* Please see Attachment 7 for

the updated application form. The updated language is shown in red in the attachment on Page 23.

15. Professional Engineer Certification

This is to certify that the engineering features of this written response to the Department's First Request for Additional Information and referenced attachments have been examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgement, this facility, when properly constructed, maintained, and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

 7-24-18

Victoriano L. San Agustin, Jr. Date

Florida Professional Engineer No. 40226

FECC, Inc.

3652 Old Winter Garden Road

Orlando, FL 32805

Tel. 813-842-5520

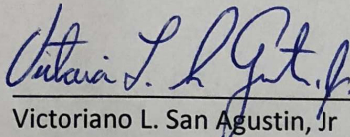
Email: vsanagustin@feccorporation.com

VSA
7-24-18

the updated application form. The updated language is shown in red in the attachment on Page 23.

15. Professional Engineer Certification

This is to certify that the engineering features of this written response to the Department's First Request for Additional Information and referenced attachments have been examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgement, this facility, when properly constructed, maintained, and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

 7-24-18

Victoriano L. San Agustin, Jr. Date

Florida Professional Engineer No. 40226

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