



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

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**FACILITY INFORMATION:**

**Facility Name:** Triumvirate Environmental Services Inc  
**On-Site Inspection Start Date:** 02/20/2019      **On-Site Inspection End Date:** 02/20/2019  
**ME ID#:** 50649      **EPA ID#:** FLD981018773  
**Facility Street Address:** 3670 SW 47th Ave, Davie, FL 33314  
**Contact Mailing Address:** 3701 SW 47th Ave Ste 109, Davie, FL 33314-2830  
**County Name:** Broward      **Contact Phone:** (407) 859-4441

**NOTIFIED AS:**

Transfer Facility  
Transporter  
Used Oil  
VSQG

**INSPECTION TYPE:**

Routine Inspection for Used Oil Processor facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Kayla Acosta, Inspector  
**Other Participants:** Ryan Mohansingh, Environmental Specialist; Justin Stark, ES I; Norva Blandin, Environmental 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:**

A compliance evaluation inspection was conducted at Triumvirate Environmental Services, Inc. on 02/20/2019 by ES II inspector Kayla Acosta, with the Florida Department of Environmental Protection (FDEP). The inspector was accompanied by Norva Blandin, Environmental Manager and Justin Stark ES I from FDEP. Triumvirate Environmental Services, Inc. (Triumvirate) was represented by Ryan Mohansingh, Environmental Specialist. Triumvirate is a permitted facility authorized to process used oil, oily water, petroleum contact water, oily solid waste, and used oil filters. Triumvirate is also a hazardous waste transporter and transfer station. Triumvirate has been in operation since 2011; however the facility itself has been in operation for twenty years. The facility is connected to the city water and sewer system, is approximately 2.5 acres, and has 17 employees.

The facility's permit was renewed on December 8, 2017 and will expire on November 19, 2022. Permit # 77390-011HO.

Triumvirate's current registration is active for the following: Universal Waste Lamp Transporter, Universal Waste Device Transporter, Universal Waste Lamp Transfer Facility, Universal Waste Device Transfer Facility, Universal Waste Lamp Small Quantity Handler, and Universal Waste Device Small Quantity Handler (expiration date: 03/01/2019). Hazardous Waste Transporter and Hazardous Waste Transfer Facility (expiration date: 06/30/2019). Used Oil Collector, Used Oil Transporter, Used Oil Transfer Facility, Used Oil Filter Transporter, Used Oil Filter Transfer Facility, and Used Oil Filter Processor (expiration date: 06/30/2019).

**Notification History:**

09/09/2009 - Notified as a Hazardous Waste Transporter and Transfer Facility

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09/01/2009 - Notified as a Used Oil Transporter

03/06/2009 - Notified as a Universal Waste Handler/ Transporter

02/27/2009 - Notified as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. Now renamed Very Small Quantity Generator (VSQG).

04/07/1995 - Notified as a Small Quantity Generator (SQG) of hazardous waste.

#### Inspection History:

Triumvirate was last inspected on 01/18/2017 and was found to be in compliance with state and federal hazardous waste regulations. The facility was previously inspected on 11/25/2014 and was found to be out of compliance with minor violations. The case was closed without enforcement.

PPE was required to enter this facility. Department personnel were equipped with steel-toe boots, safety glasses, and hard hats.

#### Process Description:

Triumvirate transports hazardous waste from generator facilities and stores them for no more than ten days (shipping out every Thursday) before transporting the hazardous waste to the Triumvirate Orlando facility. Triumvirate also transports biomedical waste aside from the other waste activities mentioned. Their main customers include universities, pharmaceutical companies, and auto body shops.

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 a 10,000-gallon above ground treatment tank. 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 Triumvirate 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 a holding tank. The treatment process for oily water takes approximately 10 hours. Used oil filters are not consolidated but sent in generator containers to Environmental Management Conservation Oil Corp. (EPA ID FLR000000166) in Miami for processing. Oily solid wastes (rags and absorbents) are consolidated into a roll-off container for disposal at Waste Management in Pompano Beach, Florida.

The facility owns two box trucks, four tractor trailers, two vacuum trucks, and two pump trucks. DOT placards were displayed (US DOT# 527242FL) on the side of all trucks, and the transporters keep copies of the permits, notifications, contingency plan (in case of emergency) and manifests on the truck. Also, the trucks are properly identified for their corresponding wastes and have spill kits and fire extinguishers available on site.

The inspectors toured the facility with Mr. Mohansingh to evaluate used oil, hazardous waste, and universal waste activities. The following areas were inspected: Administrative Offices, Solid Waste Area, Used Oil Tank Farms, QA/ QC Laboratory, and the Hazardous Waste 10-Day Storage Area.

#### ADMINISTRATIVE OFFICES:

The pre-inspection interview and records review were conducted at the administrative offices located just across the street from the facility. No hazardous waste was observed.

#### SOLID WASTE AREA:

Used oil filters, oily rags, used oil absorbents, and oily water are stored in this area which is protected within a concrete berm. The inspectors observed:

- > (8) Eight 60-gallon drums of used oil filters. Closed and properly labeled.
- > (24) Twenty four 55-gallon drums of used oil rags/ used oil absorbents. Closed and properly labeled.
- > (2) Two 250-gallon totes of oily water. Closed and properly labeled.
- > (16) Sixteen 55-gallon drums of oily water. Closed and properly labeled.

#### USED OIL TANK FARMS:

All tanks are stored within secondary containment on an oil impermeable surface. All tanks were properly labeled with contents (used oil or antifreeze). Spill kits and fire extinguishers were observed to be readily available throughout the tank farm area. The inspectors observed:

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#### South Tank Farm

- > (1) One 10,000-gallon above ground process tank for oily water. Properly labeled and confined in secondary containment.
- > (2) Two 10,000-gallon above ground used oil tanks, Tank #5 and #6. Properly labeled and confined in secondary containment.
- > (2) Two 6,000-gallon above ground tanks for used anti-freeze (tank #4) and used oil (tank #3). Both properly labeled and confined in secondary containment.
- > (2) Two 8,000-gallon above ground tanks. Tank #2 is for used oil and Tank #1 is an overflow tank designated for the 20,000-gallon tanks.
- >(10) Ten 20,000-gallon above ground tanks for used oil. Properly labeled and confined in secondary containment.

#### North Tank Farm

- > (1) One 100,000-gallon above ground tank for used oil. Properly labeled and confined in secondary containment.
- > (1) One 20,000-gallon above ground used oil treatment tank. Properly labeled and confined in secondary containment.

#### QA/QC LABORATORY:

This laboratory is located within a trailer on the west side of the facility where oil samples are tested for water and halogen content. The facility has not had any rejected used oil as of yet. Sniffers are also used to detect halogen content of used oil and each used oil transporter uses the device when picking up a shipment of used oil. No hazardous waste was observed in this area.

#### HAZARDOUS WASTE 10-DAY STORAGE AREA:

This area is located in a separate building on the north part of the property adjacent to the north tank farm and QA/QC Laboratory. One tractor trailer filled with hazardous waste ready for transport was observed by the loading dock. The hazardous waste inside of the tractor trailer was observed to have proper DOT shipping labels and hazardous waste labeled required for transport. The hazardous wastes were also segregated based on compatibility with other hazardous wastes.

The hazardous waste, used oil, universal waste, and biomedical waste in the 10-day storage building are all segregated. Hazardous waste is also segregated based on compatibility of waste. Adequate aisle space was observed within this area. The inspectors observed the following in the 10-day storage area:

#### Universal Waste and Used Oil:

- > (3) Three 55-gallon containers of universal waste lamps. Closed and properly labeled with start accumulation dates 02/19/2019.
- > (1) One 55-gallon drum of used oil. Closed and properly labeled.
- > (5) Five totes of lead-acid batteries to be recycled. Closed and properly labeled.

#### Hazardous Waste:

- > (5) Five 250-gallon totes of chromium and lead contaminated water (D007/ D008). Closed and properly labeled with start accumulation dates 02/19/2019.

#### RECORDS REVIEW:

All permits and documentation required by the inspectors were available for review on-site. All three years worth of records for shipments of hazardous waste, non-hazardous waste, universal waste, and medical waste were available for review. No rail cars are used by the facility to transport used oil to a refinery or Triumvirate Orlando. The inspectors reviewed the following:

- Used Oil Acceptance and Delivery Records and were kept on site and also, electronically for the last three years. All oily water is sent to Raider Environmental Services (EPA ID FLR000014891) for processing. At this location, Triumvirate did not have any waste water treatment plant. Used oil filters are sent to Environmental Management Conservation Oil Corp. (EPA ID FLR000000166) in Miami, FL to be crushed and ultimately recycled by US Foundry (EPA ID FLD004128336). Used oil rags and absorbents are sent to Waste Management Pompano Facility (EPA ID FLD981019581).

- Hazardous Waste Transfer Facility 10-Day Operation Logs: Inbound and Outbound logs were reviewed during the inspection. The facility is compliant with the 10-day maximum storage for hazardous waste and

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ships hazardous waste out every Thursday.

- Hazardous Waste Manifest: Hazardous waste manifests and waste profiles were available for review for generators for the past three years. Hazardous waste is sent to Triumvirate's Orlando facility (EPA ID FLD980559728) and then sent for incineration at Ross Incineration Services, Inc. (EPA ID OHD048415665) in Grafton, Ohio. Paint-related waste is sent to AES Environmental, LLC (EPA ID KYD 985073196) in Calvert City, Kentucky.

- Biomedical Waste is sent to Medigreen Waste Services in West Palm Beach, FL. Shipment documents were available for review. This Medical waste facility is not registered with the Department; however the site address for the facility (1044 26th Street, WPB, FL 33407) does have an EPA ID associated with it for a Very Small Quantity Generator. EPA ID FLR000090514.

- Halogen Screening Procedure: Used oil transporters use halogen leak detectors (sniffers) for the testing of used oil halogen content and document them in their shipping documents. If the load does test over 1000 PPM for halogens, the used oil is rejected at the generator facility. QA/ QC Lab results were also available for review.

- The facility provided a Contingency Plan/ SPCC Plan which contained the emergency coordinator, emergency contacts, emergency response strategy and reporting, spill control actions, spill control equipment, and discharge notification procedures. Last revised on October 06, 2018.

- Arrangements with Local Authorities: Proof of emergency response arrangements with the local authorities were available for review. Letters were sent to Davie Fire Department, Davie Police Department, Plantation General Hospital, and Broward General Hospital on October 6th, 2018.

- Weekly Container Inspections: Container inspection for hazardous waste and non-hazardous waste are conducted daily and include all required elements including date, time of inspection, who inspected the containers, number of containers, and condition of containers. Last container inspection was 02/20/2019.

- The facility submitted their 2018 Annual Report for used oil activities on 02/01/2019. It was noted that Triumvirate sent off all of their oily water to Raider for processing. The total amount of oily water sent to Raider for treatment last year, was 1,558,644 gallons.

- Employee Training Plan (last training was conducted January 2019). All employees receive initial and annual hazardous waste and used oil training, including training concerning the facility's proper hazardous waste and used oil handling, storage, and spill cleanup procedures.

- Financial Assurance Reports, Cost Estimation, and Closure Plan: Certificate of liability insurance, cost estimation form, and closure plan were available for review. Pollution liability policy# 002615003, expires on 12/31/2019. The closure cost estimation form was last submitted to the Department on 01/08/2019 and approved by the Department on 01/09/2019.

- FDEP, DOT, and Broward County permits and registrations for hazardous waste transport, used oil transport, and tank registrations were on site and displayed in the QA/ QC laboratory trailer and were all current.

#### **PHOTO ATTACHMENTS:**

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Non-HW - U.O. Rags and U.O. Filters



Used Oil/ Oily Water Treatment Tank



DOT Label on Trucks



South Tank Farm



Spill Kits and Fire Extinguishers



North Tank Farm



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Permits and Registrations on Display



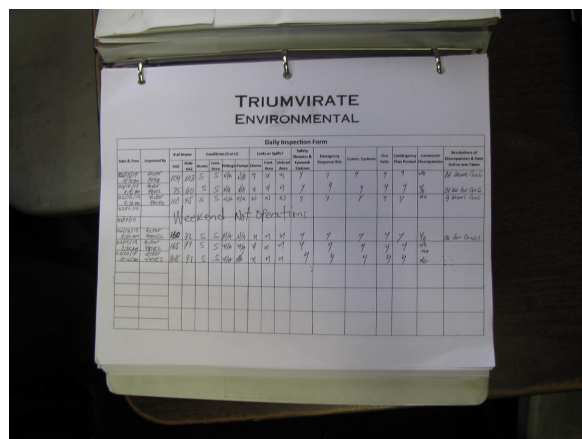
Loaded Truck Full of HW Ready for Transport



HW 10-Day Storage



HW Container Inspection Log



Conclusion:

Triumvirate Environmental Services Inc. operates as a Used Oil Processor, Used Oil Collector, Used Oil Transporter, Used Oil Transfer Facility, Used Oil Filter Transporter, Used Oil Filter Transfer Facility, Universal Waste Transporter, Universal Waste Universal Waste Transfer Facility, Hazardous Waste Transporter, and Hazardous Waste Transfer Facility. The facility was in compliance with state and federal hazardous waste regulations and with their permit conditions.

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**2.0 - VSQG 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.

**Note: Checklist items with shaded boxes are for informational purposes only.**

Item No.	Standards for Very Small Quantity Generators	Yes	No	N/A
2.1	Generator Size Determination (If the answer is No for any one question then facility is not a VSQG)			
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 262.14(a)(1)	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 261.33(e)) hazardous wastes? 262.14(a)(1)	✓		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 262.14(a)(4)	✓		
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)? 262.14(a)(3)	✓		
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) 262.14(a)(5) <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(2)	✓		

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**5.0 - Used Oil Generator 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.

**Note: Checklist items with shaded boxes are for informational purposes only.**

Item No.	Used Oil Container and Tank Management	Yes	No	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? 279.22(a)	✓		
5.2	Are used oil containers/tanks in good condition? 279.22(b)(1)	✓		
5.3	Are used oil containers/tanks not leaking? 279.22(b)(2)	✓		
5.4	Are used oil containers/tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(1)	✓		
5.5	Are fill pipes used to fill underground tanks labeled or marked clearly with the words "Used Oil"? 279.22(c)(2)	✓		
Item No.	Secondary Containment	Yes	No	N/A
5.6	Are containers/tanks 55-gallons or smaller that are stored inside:			
5.7	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.8	Are containers/tanks larger than 55-gallons that are stored inside:			
5.9	Stored on an oil-impermeable surface? 62-710.401(6)	✓		
5.10	Does the building provide adequate secondary containment, or are the containers/tanks double-walled, or stored within or on engineered secondary containment that has the capacity to hold 110% of the volume of the largest container/tank, or are the containers/tanks portable/wheeled and typically emptied every 24 hours? 62-710.401(6)	✓		
5.11	Are containers/tanks (regardless of size) that are stored outside:			
5.12	Closed or otherwise protected from the weather? 62-710.401(6)	✓		
5.13	Double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment? 62-710.401(6)	✓		
Item No.	Used Oil Releases	Yes	No	N/A
5.14	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.15	stop the release? 279.22(d)(1)	✓		
5.16	contain the released oil? 279.22(d)(2)	✓		
5.17	clean up and manage properly the released used oil and other materials? 279.22(d)(3)	✓		
5.18	if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service? 279.22(d)(4)	✓		
5.19	Is the facility in compliance with the prohibition against discharges of used oil into soils, sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters? 62-710.401(2)	✓		
5.20	Is the facility in compliance with the prohibition against using used oil for road or pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment? 62-710.401(5)	✓		
Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.21	Does the facility store used oil filters in containers? 62-710.850(5)(a)	✓		
5.22	Are the used oil filter containers clearly labeled "Used Oil Filters"? 62-710.850(5)(a)	✓		
5.23	Are the used oil filter containers in good condition? 62-710.850(5)(a)	✓		
5.24	Are the used oil filter containers not leaking? 62-710.850(5)(a)	✓		
5.25	Are the used oil filter containers closed or otherwise protected from weather? 62-710.850(5)(a)	✓		



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Item No.	Used Oil Filter Container Management	Yes	No	N/A
5.26	Are the used oil filter containers stored on an oil-impervious surface? 62-710.850(5)(a)	✓		
Item No.	Releases from Used Oil Filter Containers	Yes	No	N/A
5.27	Has the generator, upon detection of a release, done all of the following, as applicable:			
5.28	stop the release? 62-710.850(5)(b)	✓		
5.29	contain the released oil? 62-710.850(5)(b)	✓		
5.30	clean up and manage properly the released oil and any subsequent oily waste? 62-710.850(5)62-710.850(5)(b)	✓		
5.31	repair or replace any leaking used oil filter storage containers prior to returning them to service? 662-710.850(5)(b)4	✓		
Item No.	Used Oil Mixtures	Yes	No	N/A
	<input type="checkbox"/> Is the facility a VSQG that mixes hazardous waste with used oil and manages the mixture under 279? Note: VSQGs can mix both listed and characteristic wastes with used oil.			
	<input type="checkbox"/> Is the facility a SQG or LQG that is mixing listed waste (except for listed waste that only is listed because it exhibits a characteristic - see question below) with used oil? [VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.32	Is the mixture being managed as listed hazardous waste? 279.10(b)(1)	✓		
	<input type="checkbox"/> Is the facility a SQG or LQG that mixes only characteristic waste (or listed waste that only exhibits a characteristic) with used oil? [NOTE: This is also considered HW Treatment and other rules apply. However, VSQGs may mix HW and used oil, but they must maintain disposal documentation per 62-730.030(3), FAC.] If so:			
5.33	Is ignitability the only characteristic of the hazardous waste prior to mixing (or is the HW listed only for ignitability)? If so:			
5.34	Is the mixture managed as HW if it exhibits the ignitability characteristic? 279.10(b)(2)(iii)	✓		
5.35	Does the hazardous waste exhibit ANY characteristic other than ignitability prior to mixing (or is the HW listed only for a characteristic other than ignitability)? If so:			
5.36	Is the mixture managed as HW if it exhibits ANY characteristic (even if the characteristic of the mixture is from the used oil, rather than from the HW)? 279.10(b)(2)(i)	✓		
5.37	Does the facility generate mixtures of other materials contaminated with used oil (i.e. absorbents, rags, dirt)? If so:			
5.38	Are UO-contaminated materials that contain visible free-flowing UO managed under 279 used oil standards? 279.10(c)(3)	✓		
5.39	Does the facility either manage UO-contaminated materials that do not contain visible free-flowing UO as hazardous waste have records documenting the materials are not hazardous waste? 279.10(c)(1)(ii)	✓		
5.40	Are UO-contaminated materials that will be burned for energy recovery being managed as used oil under 279? (Used oil-contaminated materials should have a heating value of at least 5000 Btu/pound to be burned for energy recovery under 279, so low-Btu-value materials like contaminated soils and clay absorbents are solid waste, subject to 262 HW determinations.) 279.10(c)(3)	✓		
5.41	Does the facility generate mixtures of used oil with fuel or fuel products? If so:			
5.42	Does the facility manage mixtures of UO and fuel/fuel products under 279 used oil standards? [Note: 279.10(d)(2) allows on-site mixing of UO with diesel fuel for use in the generator's own vehicles.] 279.10(d)(1)	✓		
5.43	Is the facility in compliance with the prohibition against mixing or commingling used oil with solid waste that is to be disposed of in landfills or directly disposing of used oil in landfills? (Persons unknowingly disposing into a landfill used oil or used oil filters which have not been properly segregated or separated from other solid wastes by the generator are not subject to this prohibition. Oily waste, sorbents or other materials used for maintenance or clean up as a result of spills or release are not subject to this prohibition.) 62-710.401(3)	✓		
5.44	Is the facility in compliance with the prohibition against mixing or commingling used oil with hazardous substances that make it unsuitable for recycling or beneficial use? (Notwithstanding the provisions found in 40 CFR 279.10(b)(3)). 62-710.401(4)	✓		
Item No.	Space Heaters	Yes	No	N/A
5.45	Does the generator burn used oil on-site in a used oil-fired space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]			
5.46	If so, does the facility burn only used oil generated on-site or only household DIY used oil? 279.23(a)	✓		
5.47	If so, does the heater have a capacity of no more than 0.5 million BTU/hr? 279.23(b)	✓		
5.48	If so, are combustion gasses vented to the atmosphere? 279.23(c)	✓		

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Item No.	Off-site Shipments	Yes	No	N/A
5.49	Does the generator only use transporters who have received EPA Identification numbers? (Include names and numbers in report narrative) 279.24	✓		
5.50	Self transport to collection centers - Does the generator only transport their own used oil and used oil from household DIY to a used oil collection center? If so:			
5.51	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(a)(1)	✓		
5.52	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(a)(2)	✓		
5.53	Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted or recognized by a state/county/municipal government to manage used oil ? 279.24(a)(3)	✓		
5.54	Self transport to aggregation points - Does the generator transport used oil that is generated at the generator's site to an aggregation point? If so:			
5.55	Does the generator transport the used oil in a vehicle owned by the generator or an employee of the generator? 279.24(b)(1)	✓		
5.56	Does the generator transport no more than 55 gallons of used oil at one time? 279.24(b)(2)	✓		
5.57	Does the generator transport the used oil to an aggregation point that is owned/operated by the same generator? 279.24(b)(3)	✓		
5.58	Tolling Agreement - is the used oil transported and then reclaimed under a contractual agreement pursuant to which reclaimed oil is returned by the processor.re-refiner to the generator for use as a lubricant, cutting oil, or coolant? If so:			
5.59	Does the contract indicate the type and frequency of shipments? 279.24(c)(1)	✓		
5.60	Does the contract indicate that the vehicle used to transport the used oil to the processing/re-refining facility is owned and operated by the used oil processor/re-refiner? 279.24(c)(2)	✓		
5.61	Does the contract indicate that the reclaimed oil will be returned to the generator? 279.24(c)(3)	✓		
Item No.	Marketing and Processing	Yes	No	N/A
	<input type="checkbox"/> Does the generator claim that the used oil meets the specification in 40 CFR 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40 CFR 279 Subpart H.]			
	<input type="checkbox"/> Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]			

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**6.0 - Transporters 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.

**Note: Checklist items with shaded boxes are for informational purposes only.**

Item No.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1)  <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)	✓		
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)	✓		
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)	✓		
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)	✓		
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)	✓		
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)	✓		
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)	✓		
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)	✓		
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)	✓		

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Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)	✓		
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)	✓		
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)	✓		
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted	✓		
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)	✓		
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)	✓		
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)	✓		
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)	✓		
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31	✓		
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

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**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.

Kayla Acosta \_\_\_\_\_ Inspector \_\_\_\_\_  
**Principal Inspector Name** **Principal Inspector Title**

KA. \_\_\_\_\_ DEP \_\_\_\_\_ 03/14/2019  
**Principal Inspector Signature** **Organization** **Date**

Ryan Mohansingh \_\_\_\_\_ Environmental Specialist \_\_\_\_\_  
**Representative Name** **Representative Title**

Triumvirate \_\_\_\_\_  
**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.

Justin Stark \_\_\_\_\_ ES I \_\_\_\_\_  
**Representative Name** **Representative Title**

FDEP \_\_\_\_\_  
**Organization**

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Norva Blandin \_\_\_\_\_ Environmental Manager \_\_\_\_\_  
**Representative Name** **Representative Title**

FDEP \_\_\_\_\_  
**Organization**

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**Report Approvers:**

**Approver:** Norva Blandin **Inspection Approval Date:** 03/14/2019