

## Eckoff, Michael

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**From:** Hartshorn, Justin T <jhartshorn@triumvirate.com>  
**Sent:** Wednesday, August 8, 2018 3:26 PM  
**To:** Eckoff, Michael  
**Cc:** Barry, Richard M; Klawinski, Tyler T; Coulon, Kevin P; Troy,Randy D  
**Subject:** Triumvirate Orlando Incident Report and Follow-up  
**Attachments:** 2018-08-08\_TEI Orlando Incident Report Response to FLDEP.pdf

Good Afternoon Michael,

Triumvirate Environmental Inc. (TEI) is providing follow-up details to the incident in which we notified you on August 2, 2018 regarding the acceptance of a self-reactive material at the Triumvirate Orlando facility. The attached PDF summarizes the incident that occurred, the steps taken to correct the situation, and practices put in place to prevent recurrence. In addition to the incident report, we have attached the training records and training content used as part of the corrective action process.

Triumvirate is confident the incident has been appropriately resolved and effective corrective and preventative actions have been taken. If you have any questions regarding the attached document or if you require additional information, please do not hesitate to contact me.

Regards,

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**Justin Hartshorn, CHMM, CPEA**  
**Corporate Environmental Compliance Auditor | Triumvirate Environmental, Inc.**  
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**August 8, 2018**



Michael Eckoff

[michael.eckoff@dep.state.fl.us](mailto:michael.eckoff@dep.state.fl.us)

**RE: Triumvirate Orlando Incident Report and Follow-up**

Dear Mr. Eckoff,

On July 17, 2018, Triumvirate Orlando received a self-reactive, solid type D waste stream, with the chemical name 4-methylbenzene sulfonyl hydrazide. Per our operating permit, this material is prohibited from being received into the facility.

The material arrived at the facility the evening of July 13, 2018 as part of a week-long lab clean out at Florida State University. The waste was packed by Triumvirate personnel adhering to lab pack guidelines with the related packing slips submitted for QA/QC the morning of July 13, 2018. The shipping name chosen for this specific waste was incorrectly identified as UN3226, Waste self-reactive solid type D, Class 4.1, and the constituent listed on the packing slip was identified as p-toluenesulfonyl hydrazide. During the initial review of this packing slip, the waste stream was approved into the Triumvirate Orlando facility by Triumvirate Orlando QA/QC staff because p-toluenesulfonyl hydrazide is not listed in the self-reactive table under 49 CFR 173.224(b).

The waste container was given the Orlando barcode F117506-28-01 upon receipt and was placed in the list of lab packs to be submitted for approval into Ross Environmental Services (Ross) on manifest 009774566 FLE and scheduled for delivery to Ross on August 15, 2018.

On August 2, 2018, the lab pack was in the final review process and we were preparing to have the packing slip submitted to Ross Environmental Services when Tyler Klawinski, Triumvirate Orlando Facility Manager, conducted an additional review of the material safety data sheet (SDS) to confirm that in its current state it was packed in strict conformance with Ross Environmental Services "pack-to-burn" guidelines.

While reviewing the SDS, under Section 14 (Transportation), the DOT shipping name for this material was observed as UN3226, "Waste Self-reactive solid type D 4.1 (4-methylbenzene sulfonyl hydrazide)".

Noticing the disparity between this description and that originally listed on manifest 008908010 FLE, it was determined that 4-methylbenzene sulfonyl hydrazide was listed on the self-reactive Table under 49 CFR 173.2249(b). Upon further review, it was determined that 4-methylbenzene sulfonyl hydrazide is a synonym for p-toluenesulfonyl hydrazide, which was listed on the original packing slip accepted into TEI Orlando on July 17, 2018.

At approximately 10:00 AM on August 2, 2018, immediately after determining that the material was prohibited from being received at the facility, Tyler Klawinski verbally notified Kevin Coulon, Triumvirate General Manager of the Southeast Division, of the situation. Immediate action was also taken to notify the Triumvirate Compliance Department.

A review of this incident was conducted by Richard Barry, Director of Compliance, and Justin Hartshorn, the Corporate Environmental Compliance Auditor. Based on this review, the decision was made that this incident required notification to the FLDEP. Mr. Barry and Mr. Hartshorn contacted Michael Eckoff the afternoon of August 2, 2018 to provide notification with the details of the incident.

After reviewing this incident, it was decided that the material was in safe condition but as an added measure was over-packed into a 30-gallon container and marked with security tape and with the Facility Manager's initials and dated. It was then placed in the designated "on hold" area on the covered loading dock outside the facility.

Due to the nature of this incident, an alternate waste destination was chosen so that the waste could be shipped offsite as quickly as possible. An appropriate packing slip was approved into American Environmental Services (AES) in Calvert City, KY on August 3, 2018 and the material was shipped from the Triumvirate Orlando facility at 9:00 AM on August 6, 2018. The material was shipped on manifest 009774578 FLE, with delivery into AES on August 8, 2018.

### **Corrective Actions**

Immediate action has been taken to prevent future incidents from occurring. This included the Facility Manager creating a training document listing each category of "prohibited" wastes, and then training the appropriate staff. This training was delivered to staff members who handle, ship, and transport hazardous materials in and out of the Florida branches of Triumvirate. This training took place on August 6, 2018. Documentation of the training is attached for reference.

As an additional precaution against a recurrence, beginning August 3, 2018, all self-reactive materials and organic peroxides must be submitted for approval along with a SDS attached with the packing slip for initial QA/QC approval.

Triumvirate is confident that this incident has been appropriately resolved and will not recur. Please contact me if you have any questions regarding this matter or any aspect of our response.

Sincerely,



Justin Hartshorn  
Corporate Environmental Compliance Auditor

Attachments: Training Record for Prohibited Waste Training  
Prohibited Waste Training Content

Cc: Richard Barry, Director of Compliance  
Kevin Coulon, General Manager of the Southeast Division  
Tyler Klawinski, Facility Manager  
Randy Troy, EHS and Transportation Compliance Specialist



LMS Administration Use Only

## Internal Training Attendance Form

Training Type: ☒ Classroom ☐ On-The-Job

Date: 8/7/2018 Training Location (Room) Conference Room

Please select from common trainings listed below. Please provide start & end times in 15 minute increments. If you do not see your training listed below, please fill in "Other."

Check	Regulatory Training Title	Start Time	End Time	Instructor Full Name
	Asbestos Awareness			
	Bloodborne Pathogens (BBP)			
	Confined Space Awareness			
	Electrical Safety Awareness			
	Fall Protection			
	Fall Protection: Scissor Lifts Safety			
	Ergonomics Awareness & Materials Handling			
	Fire Extinguisher Safety			
	Forklift Classroom Training			
	Forklift Practical Training (Attach Evaluation)			
	HazCom/GHS Training			
	HAZWOPER 8-hr Refresher			
	Knife and Hand Tool Safety			
	Lock-Out Tag-Out (LOTO)			
	Personal Protective Equipment (PPE)			
	Respiratory Protection			
	DOT FMCSR			
	DOT FMCSR Entry Level Drivers			
	DOT Hazardous Materials, General Awareness & Function Specific (RMW Specific? Y N )			
	DOT Hazardous Materials Security Awareness			
	DOT In-Depth Security Plan			
	RCRA Hazardous Waste Training (RMW Specific? Y N )			
	Stop Auditor			
	Operations / Safety Meeting			
✓	Other: <u>Material Prohibited at Orlando T&amp;E</u>	<u>4:00pm</u>	<u>4:30pm</u>	<u>Tyler Klawinski</u>
✓	Other: <u>Material Prohibited at Orlando T&amp;E</u>	<u>5:30pm</u>	<u>6:00pm</u>	<u>Tyler Klawinski</u>
Notes/Agenda:				
Were any of these trainings Train the Trainer? Y N If yes, please note which.				

☐ Corporate  
 ☐ Somerville  
 ☐ Lowell  
 ☐ GE  
 ☐ Rhode Island  
 ☐ Portland  
 ☐ Astoria  
☐ Baltimore  
☐ Ashland  
☐ FDA  
☐ GSK  
☐ North Carolina  
☐ Jeannette  
☒ Florida



**TRIUMVIRATE  
LEARNING  
CENTER**

[illegible]

## **Waste Prohibited to be received at TEI Orlando**

- A. **Forbidden Material:** Materials showing the word “forbidden” in column (3) of the 49 CFR 172.101 – Hazardous Materials Table (HMT),
- B. **DOT Explosive Materials:** Materials having a DOT hazardous class 1 (Divisions 1.1, 1.2, 1.3, 1.4, 1.5 and 1.6) are not permitted.
- C. **Temperature Controlled Material:** Materials that must be maintained at temperatures below ambient temperature to prevent reactions.
- D. **Radioactive Materials:** Materials having a DOT hazard class 7 are not permitted.
- E. **Listed Self-Reactive Materials:** Materials listed in the 49 CFR 173.224(b) as self-reactive materials.
- F. **Prohibited Organic Peroxide Materials:** (i) Organic Peroxides type A and B listed in the HMT and defined at 49 CFR 173.128. (ii) Organic Peroxides type C, D, E and F defined in 49 CFR 173.128 and listed in the HMT requiring temperature control.