



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

FACILITY INFORMATION:

Facility Name: Triumvirate Environmental Services Inc
On-Site Inspection Start Date: 05/20/2020 **On-Site Inspection End Date:** 05/20/2020
ME ID#: 10046 **EPA ID#:** FLD980559728
Facility Street Address: 10100 Rocket Blvd, Orlando, Florida 32824-8565
Contact Mailing Address: 10100 Rocket Blvd, Orlando, Florida 32824-8565
County Name: Orange **Contact Phone:** (407) 859-4441

NOTIFIED AS:

LQG (>1000 kg/month), TSD Facility, Transfer Facility, Transporter, Used Oil

WASTE ACTIVITIES:

Generator: LQG **Other Status:** Offsite Waste Received **Transporter:** Own Waste, Commercial Waste, Transfer Facility **TSD:** Treater, Disposer, Storer **Used Oil:** On-Spec, Off-Spec, Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

INSPECTION TYPE:

Pre-Arranged Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector
Other Participants: Michael Eckoff, Inspector; Tyler Klawinski, Facility Manager; Randy Troy, ETSC

LATITUDE / LONGITUDE: Lat 28° 25' 5.8132" / Long 81° 23' 10.5985"

NAIC: 562211 - Hazardous Waste Treatment and Disposal

TYPE OF OWNERSHIP: Private

Introduction:

On May 20, 2020, John White and Michael Eckoff, Florida Department of Environmental Protection, accompanied by Tyler Klawinski, Facility Manager, Randy Troy, ETSC, and Kevin Coulon, General Manager SE Region, inspected Triumvirate Environmental for compliance with RCRA storage permit 26916-009-HO issued October 17, 2018, and state and federal hazardous waste regulations. Due to current health concerns, the facility was notified of the inspection in an email dated May 18, 2020. The email included requests for documents in an effort to limit inspectors time at the facility.

Triumvirate Environmental operates a hazardous waste container storage facility and waste treatment units on approximately six acres of land. Triumvirate Environmental also operates a 10-day hazardous waste transfer facility, is a large quantity generator of hazardous waste, and is a transporter of hazardous waste, used oil, used oil filters, and universal waste. The site currently consists of two attached buildings. The south building houses administrative offices and the hazardous waste storage unit. The north building is used for treatment and consolidation of waste, lab packing operations, and storage of supplies.

Inspection History (past 5 years):

Triumvirate Environmental was last inspected on March 8, 2018 and was not in compliance at the time of inspection. Specifically, Triumvirate Environmental Inc failed to ensure all container labels for containers in

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storage face out, position titles for two employees did not match position descriptions identified in the operation plan, and the facility failed to document in the weekly inspection logs that storage capacity in the warehouse had not been exceeded. The violations were corrected, and the case was closed without formal enforcement.

Triumvirate Environmental was inspected on April 13, 2016 and was not in compliance at the time of inspection. Specifically, Triumvirate Environmental Inc failed to ensure all container labels for containers in storage faced out as required by the permit conditions. The violation was corrected, and the case was closed without formal enforcement.

Process Description:

Triumvirate Environmental, Inc. is permitted to store a maximum of 824 55-gallon drums, or equivalent, in three sub-units in the Container Storage Building, Waste Consolidation Area, and Waste Stabilization Area. The Container Storage Building sub-units consist of the South Sub-Unit, the East Sub-Unit, and the Northwest Sub-Unit. The South Sub-Unit is for storage of Acidic, Toxic, and Non-Hazardous wastes. The East Sub-Unit is for storage of Alkaline, Toxic, Universal, and Non-Hazardous wastes. The Northwest Sub-Unit is for storage of Non-Hazardous wastes.

Triumvirate Environmental, Inc. collects hazardous waste from generators using Triumvirate Environmental, Inc.'s own transportation services as well as other registered hazardous waste transporters. Generators serviced by Triumvirate Environmental, Inc. are those that generate hazardous waste that is exclusive of explosive or radioactive waste. Triumvirate Environmental, Inc. collects hazardous waste and stores the material in its warehouse for up to a year before transporting the waste to an off-site disposal facility. Triumvirate Environmental, Inc. also operates a 10-day transfer facility.

Hazardous wastes and solid wastes are segregated at the facility according to compatibility groups as outlined in the permit. Storage areas have secondary containment to minimize and prevent possible releases to the environment. At the time of inspection, the facility was not stabilizing wastes containing heavy metals to render them non-hazardous. Triumvirate Environmental, Inc. is using a bar-coding system for waste in the permitted storage area to ensure the waste is staged in an area with compatible waste. The bar-coding system uses an iPhone to read the bar-codes.

Inspection Narrative:

At the time of inspection, the roof of the warehouse was scheduled for repair. Work on the roof was set to resume on Thursday, May 22, 2020.

On the west side of the facility is a loading dock that serves as a loading area for container trucks. Containers destined for temporary storage, either in the 10-day transfer area or in the permitted drum storage area are off-loaded upon arrival. Containers destined for shipment off-site are loaded based on D.O.T. compatibility requirements. No 10-day transfer facility waste was on-site at the time of the inspection.

On the loading dock at the time of the inspection were the following mix of hazardous waste and non-hazardous waste containers:

- Row with 30 containers of various sizes; seven 55-gallon drums, three 30-gallon drums, eleven 15-gallon drums, and nine 5-gallon containers.
- Row with 17 containers of various sizes; eight 55-gallon drums, three 30-gallon drums, three 15-gallon drums, and three 5-gallon containers.
- Row with seven containers of various sizes; two 55-gallon drums, two 15-gallon drums, and three 5-gallon containers.

Located at the front of the loading dock, where the trucks unload, were the following:

- Five 55-gallon drums of non-hazardous wastewater
- One 5-gallon container of non-hazardous waste
- One cubic-yard box of hazardous waste solids
- One pallet with 36 small containers of hazardous waste pharmaceuticals

Along the south side of the loading dock were four trucks. One had off-loaded waste, two were empty, and one

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was being filled with waste containers for shipment off-site.

Adjacent to the loading dock is a two-compartment tank for used oil, 15,000-gallons, and Jet-A fuel, 7,000-gallons. The used oil tank was properly labeled "Used Oil" and appeared closed at the time of the inspection.

A solid waste roll-off container normally staged adjacent to the loading dock was shipped off-site the morning of the inspection. The waste was shipped to Wheelabrator located in Broward County, Florida.

A roll-off container, tanker trailer, and two pump trucks were staged/parked on the west side of the property along the fence. The roll-off is used to solidify metal wastes. Mr. Klawinski stated solidification has not been conducted for years and the roll-off is empty. The tanker trailer is used for both storage and transportation of oily water. One pump truck is not in use and the other was empty.

An emergency equipment/spill supply cabinet was taped closed. Mr. Troy inspects the cabinet monthly to verify its contents, secures the cabinet with tape, and initials and dates the tape to verify the cabinet has not been accessed since the last inspection.

No issues were identified on the loading dock.

Inside the Warehouse containers are separated by compatibility groups into rows along the north wall, east wall, and south wall. Rows along the north wall are numbered from 101 to 105. Rows along the east wall are numbered from 201 to 210. Rows along the south wall are numbered from 301 to 306. The south, east, and north storage units are permitted to store 144, 240, and 440 55-gallon drums, or equivalents, respectively. Spill control equipment consists of absorbents, shovels, brooms and dust pans. Fire extinguishers are available throughout the facility. The warehouse floor was resealed in April 2020.

Row 101 contained one pallet of 30 5-gallon containers of non-hazardous epoxy resin waste.

Row 102 contained three boxes of universal waste lamps.

Row 103 contained eight containers and one pallet with 22 boxes of non-hazardous wastes.

Row 104 contained fourteen containers of non-hazardous waste.

Row 105 contained one 250-gallon tote of non-hazardous ultrasonic oil/water.

A containment shed was located between rows 105 and 201. Mr. Klawinski stated the shed is empty and identified a tag hanging from the door handle indicating the same.

Row 201 contained seven boxes of universal waste lamps and three containers of non-hazardous waste.

Row 202 contained several containers of regulated medical waste.

Row 203 contained two cubic-yard bags of non-hazardous oily rags/absorbent.

Row 204 contained fifteen 55-gallon drums and one 5-gallon container of hazardous waste. Types of wastes stored in this area included toxic/reactive – alodine/sodium cyanide/potassium cyanide/mercury waste. The oldest storage date for hazardous waste stored in the row was 1/7/2020.

Row 205 contained two 55-gallon drums, one 30-gallon drum, twelve 5-gallon containers, and one 2.5-gallon container of hazardous waste. Types of waste stored in this area included wastes toxic for silver chloride, chromium, sodium azide, and nicotine. The oldest storage date for hazardous waste stored in the row was 12/20/2019. Two 20-gallon poly drums of non-hazardous latex paint/tartar stain remover were also staged in this row.

Row 206 contained eight 55-gallon drums, one 20-gallon drum, and one 15-gallon drum of hazardous waste. Types of waste stored in this area included wastes toxic for mercury and corrosive. The oldest storage date for hazardous waste stored in the row was 7/10/2019. Other wastes staged in this row included two 2.5-gallon containers of universal waste batteries, three 5-gallon containers of universal waste mercury containing equipment, and sixteen containers of non-hazardous waste.

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Row 207 contained four non-hazardous waste containers; three 55-gallon drums and one 15-gallon drum. All contained glacial acetic acid contaminated rags.

No containers were noted in row 208.

Row 209 contained one over-pack drum, three 55-gallon drums, two 30-gallon drums, four 15-gallon containers, and nineteen 5-gallon containers of corrosive hazardous waste. The oldest container in the row was dated 12/13/2019.

Row 210 contained five 55-gallon drums, one 30-gallon drum, five 15-gallon containers, and nine 5-gallon containers of corrosive hazardous waste. The oldest container in the row was dated 1/23/2020.

Located adjacent to the rows of containers on the east wall were two containers of non-hazardous waste in the center of the warehouse floor. One 55-gallon drum of used oil and water and one 55-gallon poly drum of non-hazardous zinc sulfate solution

Row 301 contained two 55-gallon drums, four 30-gallon drums, two 15-gallon containers, and sixteen 5-gallon containers of hazardous waste corrosive/oxidizers. The oldest container in the row was dated 12/12/2019.

Row 302 contained sixteen 55-gallon drums, two 30-gallon drums, one 15-gallon container and ten 5-gallon containers of hazardous waste corrosive/oxidizers. The oldest container in the row was dated 12/30/2019.

Row 303 contained five 55-gallon drums, six 30-gallon drums, one 15-gallon container and five 5-gallon containers of hazardous waste corrosive/oxidizers. The oldest container in the row was dated 3/18/2020.

Row 304 contained one 55-gallon drum, one 30-gallon drum, and three 5-gallon containers of hazardous waste corrosive/oxidizers. The oldest container in the row was dated 4/6/2020.

Row 305 contained three 55-gallon drums, one 30-gallon drum, one 15-gallon container, and three 5-gallon containers of hazardous waste corrosive/toxics. The oldest container in the row was dated 12/23/2019.

Row 306 contained four 55-gallon drums, three 30-gallon drums and ten 5-gallon containers of corrosive/poisons. The oldest container in the row was dated 3/13/2020.

Consolidation Building

The Consolidation Building is used for bulking of wastes, including pharmaceuticals. The last shipment from this area was last week. The area is currently empty of wastes but is storing supplies and equipment.

Outside the north side of the Consolidation Building was storage of empty totes.

Outside the east side of the Consolidation Building was a box truck containing empty biohazard bins.

On the north side of the property along the fence were seven trailers used to store empty containers.

Records Review:

A copy of the permit and application were on site and available for review.

A copy of the current inventory for wastes stored on-site was provided in an email on May 18, 2020. Based on the information provided, there are a total of 324 containers currently on-site. No containers have been stored on-site for greater than one year. During past inspections it was noted there could be up to a two week delay in the inventory record. This issue has been addressed and the inventory is current.

Documentation of required training provided to staff during 2019 and 2020 was provided in an email on May 18, 2020. RCRA Hazardous Waste Training was last completed June 2019 and is expected to be repeated in June 2020. No issues were identified during review of the training documents.

Job titles and job descriptions were provided in an email on May 18, 2020. No issues were identified during review of the job titles and job descriptions.

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Review of financial assurance documents found the facility is in compliance with these requirements.

Copies of weekly inspections were provided in an email one May 18, 2029. Review of the documents found no issues. Monthly inspection records were on-site during the inspection but were not reviewed at this time.

Review of select manifests for 2019 and 2020 found no issues.

PHOTO ATTACHMENTS:

1. North wall in warehouse



2. South wall in warehouse



3. North wall in consolidation area



4. South wall in consolidation area



Conclusion:

Triumvirate Environmental was inspected as a permitted RCRA storage facility and was in compliance at the time of this inspection.

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1.0: Pre-Inspection 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.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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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

John E. White	Inspector	
Principal Investigator Name	Principal Investigator Title	
JW	DEP	06/11/2020
Principal Investigator Signature	Organization	Date

Michael Eckoff	Inspector	
Inspector Name	Inspector Title	
	FDEP	
	Organization	

Tyler Klawinski	Facility Manager	
Representative Name	Representative Title	
	Triumvirate Environmental Services	
	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.

Randy Troy	ETSC	
Representative Name	Representative Title	
	Triumvirate Environmental Services	
	Organization	

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:

Approver:	Daniel K. Hall	Inspection Approval Date:	06/11/2020
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