



**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:** 04/06/2021 **On-Site Inspection End Date:** 04/06/2021  
**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:**

Routine Inspection for TSD Facility Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** John E. White, Inspector  
Miranda Rothenberger, Inspector; David Champagne, Inspector; Kevin Coulon, General Manager, SE Division; Tyler Klawinski, Facility Manager; Randy Troy, EHS &  
**Other Participants:** Transportation Compliance Specialist

**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 April 6, 2021, John White and Miranda Rothenberger, Florida Department of Environmental Protection, and David Champagne, U.S. EPA, conducted a routine compliance evaluation inspection of Triumvirate Environmental Services, Inc. (Triumvirate Environmental) to determine the facility's compliance with RCRA storage permit 26916-009-HO issued October 17, 2018, and state and federal hazardous waste regulations. Triumvirate Environmental was represented by Tyler Klawinski, Facility Manager, Randy Troy, ETSC, and Kevin Coulon, General Manager SE Region.

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.

Triumvirate Environmental has 15 employees at this location and operates Monday through Friday, 6:30 am to

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5:00 pm. The facility operates two box trucks, one tractor, and one tanker. An additional box truck is rented as needed.

### INSPECTION HISTORY: (past 5 years)

Triumvirate Environmental was last inspected on May 20, 2020 and was in compliance at that time.

Triumvirate Environmental was inspected on March 8, 2018 and was not in compliance at the time of inspection. Specifically, Triumvirate Environmental failed to ensure all container labels for containers in 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 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 is permitted to store up to 824 55-gallon drums for a total of 41,200 gallons or 224 cubic yards of hazardous waste in the Container Storage Unit. The Container Storage Unit consists of 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. Any 10-day transfer facility waste or non-hazardous waste managed in the container storage unit must be counted toward the total volume in storage.

Triumvirate Environmental accepts hazardous waste from generators using Triumvirate Environmental's own transportation services as well as other registered hazardous waste transporters. Generators serviced by Triumvirate Environmental are those that generate hazardous waste that is exclusive of explosive or radioactive waste. Hazardous waste accepted by the facility is stored in its warehouse for up to a year before being shipped to an off-site treatment or disposal facility.

Hazardous wastes and non-hazardous 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. Triumvirate Environmental uses a bar-coding system for containers stored in the permitted storage area to ensure the waste is staged in an area with compatible waste.

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. Vehicles with incoming shipments of permitted waste are unloaded within 3 consecutive working days of the vehicle's arrival. Containers destined for shipment off-site are loaded into trailers based on D.O.T. compatibility requirements. Vehicles containing outgoing shipments of waste from the permitted storage area are moved off-site within 5 consecutive working days of the first container being placed on the vehicle.

No 10-day transfer facility waste was on-site at the time of the inspection. Three trucks were parked at the loading dock, one was used for the storage of empty containers and two were staged for off-site shipments. One trailer contained hazardous waste destined for Ross Incineration in Ohio and the second contained flammable solids, flammable liquids, and Class 9 wastes destined for treatment facilities.

A spill kit and an emergency equipment cabinet were located on the loading dock [Figure 6]. The emergency equipment cabinet was sealed and dated 3/19/2021, the date of the last inspection. The equipment cabinet is inspected monthly to verify its contents.

On the loading dock were approximately 112 waste containers off-loaded from arriving trucks [Figures 1-4]. The waste will be inspected, compared to the manifest(s) and profiles, and moved into the storage area. Staged adjacent to the loading dock was a 30-cubic yard container of non-hazardous solid waste [Figure 5] destined for Wheelabrator South Broward, a municipal waste-to-energy facility located in South Florida.

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Adjacent to the loading dock is a two-compartment tank. The used oil portion of the tank has a 15,000-gallon capacity. The Jet-A fuel portion of the tank has a 7,000-gallon capacity.

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 the equivalent drum volume, respectively. Spill control equipment consists of absorbents, shovels, brooms and dust pans. Fire extinguishers are available throughout the facility.

The facility is permitted to store up to 824 55-gallon drums, equivalent to 41,200 gallons or 224 cubic-yards of hazardous waste. Based on the inventory log and the inspection of the facility as itemized below, Triumvirate Environmental was storing the equivalent of approximately 163 cubic yards of waste on-site.

Rows 101 to 105 contained approximately 208 55-gallon drums, 12 cubic-yard bags, and several small boxes and containers of non-hazardous solid waste. The warehouse floor had been resealed in April 2020. During the inspection, floor damage was found in the north drum storage area where non-hazardous waste was stored [Figure 7]. The floor had been crushed in an area measuring approximately six inches in diameter. According to Mr. Troy, the floor was still under warranty and the contractor had been contacted to repair the damaged area. On April 8, 2021, Mr. Troy provided a photograph documenting the area had been repaired [Figure 8].

Rows 301 and 302 were storing 28 containers of oxidizers. Row 303 is a floater row used to store either oxidizers or acids. Four containers were stored in this row. Rows 304 and 305 were storing 26 containers of acids. Rows 209 and 210 were storing 37 containers of caustics. Rows 207 and 208 were storing 17 containers of toxic wastes. Row 206 was empty. Rows 205 and 204 were storing 33 containers of toxic waste. Row 203 was storing 7 containers of mercury waste. Row 202 was empty. Row 201 was storing one container of toxic waste identified as insulin pumps toxic for lithium.

Inspection of the Consolidation and Waste Stabilization Area found the facility has not performed stabilization of metal bearing waste since 2015. The area is currently being used for repacking hazardous waste into lab packs or loose packs and for storage of non-hazardous wastewater destined for consolidation and off-site shipment to Aqua Clean Environmental, an industrial wastewater treatment facility. Wastes in the area included five totes of non-hazardous hot melt adhesive waste, twenty-five 55-gallon drums and two 5-gallon containers of non-hazardous wastewater, one cubic-yard bag of oily debris, and eight 55-gallon drums of limestone used for spill control.

### RECORDS REVIEW:

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

A copy of the current inventory for wastes stored on-site was provided on April 6, 2021. Based on the information provided and inspection of the facility, the volume of waste stored on-site is below the permitted limit. No containers have been stored on-site for greater than one year.

Review of the contingency plan found the plan was last reviewed on August 3, 2020 and was up to date. No issues were found.

Documentation of required training provided to staff during 2020 and 2021 was provided in an email on April 6, 2021. RCRA Hazardous Waste Training was last completed in March 2021. The information provided also included the job title for each employee. Job descriptions were provided in an email on March 26, 2021. No issues were noted with training documentation.

Documentation of weekly inspections for the warehouse and loading dock was provided in an email on April 6, 2021. Review of the weekly inspections found no issues.

Documentation of monthly inspections of emergency equipment was provided in an email on April 6, 2021. Review of the monthly inspections found no issues.

Review of financial assurance documentation found the facility is currently in compliance.



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**PHOTO ATTACHMENTS:**

1. Loading Dock



2. Loading Dock



3. Loading Dock



4. Loading Dock



5. Non-hazardous Waste Roll-Off



6. Equipment Cabinet on Loading Dock



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**7. Damaged Floor in Warehouse****8. Repaired Section of Floor****Conclusion:**

Triumvirate Environmental Services, Inc. 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	✓		

## Triumvirate Environmental Services Inc Inspection Report

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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	
<b>Principal Investigator Name</b>	<b>Principal Investigator Title</b>	
JW	DEP	05/04/2021
<b>Principal Investigator Signature</b>	<b>Organization</b>	<b>Date</b>
Miranda Rothenberger	Inspector	
<b>Inspector Name</b>	<b>Inspector Title</b>	
	FDEP	
	<b>Organization</b>	
David Champagne	Inspector	
<b>Inspector Name</b>	<b>Inspector Title</b>	
	U.S. EPA	
	<b>Organization</b>	
Kevin Coulon	General Manager, SE Division	
<b>Representative Name</b>	<b>Representative Title</b>	
	Triumvirate	
	<b>Organization</b>	
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.		
Tyler Klawinski	Facility Manager	
<b>Representative Name</b>	<b>Representative Title</b>	
	Triumvirate	
	<b>Organization</b>	
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.		

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Randy Troy

**Representative Name**

EHS & Transportation Compliance Specialist

**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.

**Report Approvers:**

**Approver:**

Daniel K. Hall

**Inspection Approval Date:**

05/05/2021