

**Thursby, Kim**

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**From:** Hartshorn, Justin T <jhartshorn@triumvirate.com>  
**Sent:** Friday, October 7, 2022 9:09 AM  
**To:** Kothur, Bheem; Troy,Randy D  
**Cc:** Thursby, Kim  
**Subject:** RE: Triumvirate Environmental Services, Inc.-Florida; FLD 981 018 773; First Request for Additional Information (RAI)

**EXTERNAL MESSAGE**

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Good Morning Bheem,

We have received the email. Thank you.

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**Justin Hartshorn, CHMM, CPEA**  
**Corporate Environmental Compliance Auditor | Triumvirate Environmental, Inc.**  
200 Inner Belt Road, Somerville, MA 02143  
Office: 617-715-8902 | Mobile: 304-373-4989  
[jhartshorn@triumvirate.com](mailto:jhartshorn@triumvirate.com) | [www.triumvirate.com](http://www.triumvirate.com)

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**From:** Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>  
**Sent:** Friday, October 7, 2022 8:48 AM  
**To:** Troy,Randy D <rtroy@triumvirate.com>; Hartshorn, Justin T <jhartshorn@triumvirate.com>  
**Cc:** Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>; Thursby, Kim <Kim.Thursby@FloridaDEP.gov>  
**Subject:** FW: Triumvirate Environmental Services, Inc.-Florida; FLD 981 018 773; First Request for Additional Information (RAI)

This message was sent from outside the company. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hello Randy and all,  
Please reply to this Epost, cc me and Kim Thursby, ASAP.  
This is our standard operating procedure.  
Thanks,

Bheem

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**From:** Thursby, Kim <[Kim.Thursby@FloridaDEP.gov](mailto:Kim.Thursby@FloridaDEP.gov)>  
**Sent:** Tuesday, October 4, 2022 9:01 AM  
**To:** 'rbarry@triumvirate.com' <[rbarry@triumvirate.com](mailto:rbarry@triumvirate.com)>  
**Cc:** Smith, Michell M. <[Michell.M.Smith@FloridaDEP.gov](mailto:Michell.M.Smith@FloridaDEP.gov)>; Walker, Kim (Waste) <[Kim.Walker@FloridaDEP.gov](mailto:Kim.Walker@FloridaDEP.gov)>; 'bastek.brian@epa.gov' <[bastek.brian@epa.gov](mailto:bastek.brian@epa.gov)>; 'merizalde.carlos@epa.gov' <[merizalde.carlos@epa.gov](mailto:merizalde.carlos@epa.gov)>; Eldredge, Susan F <[Susan.Eldredge@dep.state.fl.us](mailto:Susan.Eldredge@dep.state.fl.us)>; Irwin, Alannah <[Alannah.Irwin@FloridaDEP.gov](mailto:Alannah.Irwin@FloridaDEP.gov)>; Ashwood, Janet <[Janet.Ashwood@FloridaDEP.gov](mailto:Janet.Ashwood@FloridaDEP.gov)>; 'vogel.jennifer@epa.gov' <[vogel.jennifer@epa.gov](mailto:vogel.jennifer@epa.gov)>; Petersen, Dane

<[Dane.Petersen@FloridaDEP.gov](mailto:Dane.Petersen@FloridaDEP.gov)>; 'vsanagustin@mdindustrialservices.com' <[vsanagustin@mdindustrialservices.com](mailto:vsanagustin@mdindustrialservices.com)>;

Kothur, Bheem <[Bheem.Kothur@FloridaDEP.gov](mailto:Bheem.Kothur@FloridaDEP.gov)>

**Subject:** Triumvirate Environmental Services, Inc.-Florida; FLD 981 018 773; First Request for Additional Information (RAI)

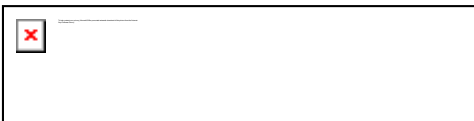
In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us) (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Michell Mason Smith  
Environmental Administrator  
Hazardous Waste Program & Permitting





# FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

October 4, 2022

Mr. Richard Barry, Vice President, Environmental, Health & Safety  
200 Inner Belt Road  
Sommerville, MA, 02143  
[rbarry@triumvirate.com](mailto:rbarry@triumvirate.com)

Re: **First Request for Additional Information (RAI)**  
**Triumvirate Environmental Services, Inc.**  
EPA ID Number: FLD 981 018 773  
Current Operating Permits: 77390-011-HO; 77390-012-SO  
DEP Application Numbers: 77390-013-HO; 77390-014-SO  
Broward County – Hazardous Waste

Dear Mr. Barry:

Thank you for your application for a Used Oil and Material Processing Permit Renewal for the above referenced Facility. A Department staff review of the application submitted on September 6, 2022, indicates the application is incomplete. Pursuant to the provisions of Rule 62-710.800, Florida Administrative Code (F.A.C.) and Chapter 403.722, Florida Statutes (F.S.), all processing of the application is suspended when a permit application is deemed incomplete. Please provide the information listed below and refer to this correspondence in your response.

1. *Used Oil Processing Facility Permit Application (DEP Form 62-710.901(6), incorporated in Rule 62-710.800(3), F.A.C. Effective Date: 12/2019), Part I, A. General Information, Item number 1., Page 1 of 9:* Facility marked "X" to indicate a renewal and a modification, which is incorrect. Facility should mark "X" only in renewal. Please update the application to reflect the adjustment.
2. *Used Oil Processing Facility Permit Application (Permit Application), Part I, A. General Information, Item number 3. NOTE, page 1 of 9:* On the facilities 8700-12 FL, Florida Notification of Regulated Waste Activity, Item 16, Used Oil and Used Oil Filter Activities, (1) – (8), page 6 of 10: It is indicated that the facility is a transporter. Transporters (Subpart E) was not indicated as an applicable subpart on the Permit Application. Please review and revise as appropriate for your facility to include all applicable subparts on your Permit Application. Please review the 8700-12FL form and the Permit Application to assure the two (2) forms are consistent.
3. *Used Oil Processing Facility Permit Application, Part I. C. Operating Information,*

- Item number 2. List Applicable EPA Hazardous Waste Codes, Page 3 of 9:* Permit application lists D001, D004 – D0043, however, Form 8700-12FL, Florida Notification of Regulated Waste Activity, Item Number 10, Waste Codes for Federally Regulated Hazardous Wastes, lists additional waste codes. Please review the 8700-12FL form and the Permit Application to assure the two (2) forms are consistent and modify as appropriate.
4. *Cover Letter dated September 1, 2022, Used Oil and Solid Waste Processing Facility Permit Renewal Application, Item Numbers 8 and 10 (Preparedness and Prevention Plan, and Unit Management Description, respectively), Page 2 of 3; Attachments H & R(Preparedness and Prevention, and Emergency Action & Fire Plan, respectively), Page 1 of 1; Attachments J & M (SPCC Plan, and Unit Management, respectively), Page 1 of 1: Cover letter Permit Application items 8 and 10, and attachments H, R, J and M are inconsistent. Please review, revise as appropriate.*
  5. *Application Form for a Used Oil Processing Permit, Part II - Certification, Item Number 6, Page 9 of 9:* The Consultant certified as an Initial Certification. This is not an Initial Certification, it is Recertification. Please review and revise as appropriate.
  6. *8700-12FL – Florida Notification of Regulated Waste Activity, Used Oil and Hazardous Secondary Material, Item Number 16, Used Oil and Used Oil Filter Activities (Mark “X” and complete all that apply), Item (5), Off-Specification Used Oil Burner, Page 6 of 10:* This activity is not listed on the 8700-12FL form but it is listed on the Permit Application. Please review the 8700-12FL form and the Permit Application to assure the two (2) forms are consistent and revise as appropriate.
  7. *Attachment E, Waste Analysis Plan, Table of Contents, Items G through N (G. Hazardous Waste, H. Antifreeze and Coolants (Unless Identify the Tank No.), I. Commercial Chemical Products and Off Specification Products, J. Hazardous Empty Drums, K. Batteries, L. Universal Waste Lamps and Devices, M. Industrial Wastewater and N. Prohibited Waste), Page 2 of 9; Waste Analysis Plan and Material Profiling, Page 7 of 9:* These activities can be performed under Florida Rule 62-737, The Management of Spent Mercury Containing Lamps and Devices Destined for Recycling. Facility is not authorized to perform the above activities by the “Used Oil and Material Processing Permit”. Please update the application to reflect the modification.
  8. *Attachment J, SPCC Plan, Table 1, Summary of Storage Tanks and Its Locations, Evaluation and Testing, Page 4:* Tanks shall be evaluated, and the re-testing frequency shall be established and implemented in accordance with API Std 653, November 2014, incorporated by reference in subsection 62-762.411(3), F.A.C. Storage tanks shall be evaluated at the time of installation. Evaluations shall be certified by a professional engineer licensed in the State of Florida or approved by an API Std 653 certified inspector. Non-destructive testing shall be performed by qualified personnel as specified in API Std 650, March 2013, incorporated by reference in subsection 62-672.201(67), F.A.C. and API Std, November 2014. All field erected tanks shall be repaired in accordance with API Std 653, November 2014. Field erected tanks with storage capacities of less than 250,000 gallons may be evaluated in accordance with STI SP001, January 2018, incorporated by reference in subsection 62-782.411(3), F.A.C., in lieu of API Std 653, November 2014. Internal and External inspections of the tanks may be required, to assess the condition of the

- above ground tanks and determine its suitability for continued service. Therefore, provide copies of the most recent internal and external tank inspections for all tanks listed in the application.
9. *Attachment K, Closure Plan, B. Closure Plan for Solid Waste Processing Facility, Item number 3. Closure Plan, page 5 of 5*: The closure cost estimate has been reviewed and is approved for an additional amount of \$3,382.50 for a 200 drum increase to the maximum storage capacity of Non-Hazardous Solid Waste Storage Area (see last page, unnumbered, of Attachment K). The revised total amount is \$521,832.63. Please contact Susan Eldredge, in PCAP, Financial Assurance at 850-245-8740 or email: [susan.eldredge@floridadep](mailto:susan.eldredge@floridadep) to update the financial assurance mechanism to the approved amount. The financial assurance mechanism must be in place before the Department can deem the Permit Application complete.
  10. *Used Oil Processing Facility Permit Application, Part I. C. Operating Information, Item Number 9., Page 4 of 9*: Attach a copy of facility's employee training for used oil management. This attachment should describe the facility's employee training program. This description should document:
    - a) The methods and/or materials used to familiarize employees with all state and federal rules and regulations.
    - b) The method of documenting that employees have been trained to use emergency equipment.
    - c) How the employee education program is updated to address changes in applicable regulations or facility operations.
  11. *Attachment J, SPCC Plan, Tank Table 1, Product Stored, AST #T4, Used Oil/ Oily Water, Page 4, and Attachment M, Unit Management, Oil Tank Table, Product Stored, AST #T4, Anti-Freeze, Page 3 of 4*: Facility identified in Tank Table 1, AST #T4 as "Used Oil/Oily Waster", Whereas in Attachment M, Oil Tank Table, AST #T4 identified as "Anti-Freeze". Please review "Product Stored" in AST #T4 in both tank tables and be consistent.
  12. *Attachment P, Cylinder Devalve SOP, Compressed Gas Cylinder Devalving, Page 1 of 1*: The requested activities are not authorized in this application, as per Used Oil, Rule 62-710 or Solid Waste, Rule 62-701. Please update the application to reflect the modification.
  13. Please provide us a word document and pdf of the Site Plan and the Tank Table, that can be easily inserted into the renewal permit.
  14. Please provide a brief history and description of any environmental enforcement actions taken by the Department, delegated local program, or federal agency against the applicant and provide a history of any reported releases or spills by the applicant within the past five (5) years.

In order for the Department to continue processing your Permit Application and deem it complete, please submit the information requested as soon as possible, and refer to this correspondence in your response. The response must be signed, sealed, and dated by a registered Florida Professional Engineer. The Department must receive a response within 60 days of the date of this letter, or December 4, 2022, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to subsection 62-730.220(6),

F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application.

Please submit the response in electronic format to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [Bheem.kothur@floridadep.gov](mailto:Bheem.kothur@floridadep.gov); If the file is very large, you may post it to a folder on this office's ftp site at: <ftp://ftp.dep.state.fl.us/pub/incoming/DWM/FOLDER>. After posting the document, send an e-mail to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [Bheem.kothur@floridadep.gov](mailto:Bheem.kothur@floridadep.gov); alerting us that it has been posted.

If you have any questions, please contact Bheem Kothur by telephone at (850) 245-8781 or by e-mail at [bheem.kothur@floridadep.gov](mailto:bheem.kothur@floridadep.gov)

Sincerely,



Michell Mason Smith, Environmental Administrator  
Hazardous Waste Program & Permitting

MS/bk

Cc:

Brian Bastek, EPA Region 4, [bastek.brian@epa.gov](mailto:bastek.brian@epa.gov)  
Carlos Merizalde, EPA Region 4, [merizalde.carlos@epa.gov](mailto:merizalde.carlos@epa.gov)  
Susan Eldredge, DEP Headquarters, [susan.eldredge@floridadep.gov](mailto:susan.eldredge@floridadep.gov)  
Alannah Irwin, DEP Southeast District, [Alannah.irwin@floridadep.gov](mailto:Alannah.irwin@floridadep.gov)  
Janet Ashwood, DEP Headquarters, [janet.ashwood@floridadep.gov](mailto:janet.ashwood@floridadep.gov)  
Jennifer Vogel, EPA Region 4, [vogel.jennifer@epa.gov](mailto:vogel.jennifer@epa.gov)  
Dane Petersen, OGC Tallahassee, [dane.petersen@floridadep.gov](mailto:dane.petersen@floridadep.gov)  
Victorian L. San Augustin, Jr. [vsanagustin@mdindustrialservices.com](mailto:vsanagustin@mdindustrialservices.com)