



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

FACILITY INFORMATION:

Facility Name: Triumvirate Environmental Services Inc
On-Site Inspection Start Date: 10/20/2022 **On-Site Inspection End Date:** 10/20/2022
ME ID#: 50649 **EPA ID#:** FLD981018773
Facility Street Address: 3670 SW 47th Ave, Davie, Florida 33314
Contact Mailing Address: 3701 SW 47th Ave Ste 109, Davie, Florida 33314-2830
County Name: Broward **Contact Phone:** (407) 859-4441

NOTIFIED AS:

Transfer Facility, Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Own Waste, Commercial Waste, Transfer Facility **Used Oil:** On-Spec, Off-Spec, Oil Filters, Processor, Collection Center (Commercial) **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Transport:** Batteries, Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Batteries, 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 Used Oil Processor Facility
Routine Inspection for Transfer Facility Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Hazardous Waste Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Tarin F Tischler, Inspector
Michele De Freitas, Environmental Specialist II; Johanna Polycart, Environmental Specialist II; Pamela Coffin, Environmental Consultant; Ryan Mohansingh, Senior
Other Participants: Operations Manager; John Lennon, General Manager - Operations

LATITUDE / LONGITUDE: Lat 26° 4' 37.4777" / Long 80° 12' 33.4891"

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On October 20th, 2022 (10/20/2022) Tarin Tischler with the Florida Department of Environmental Protection (FDEP) conducted a Routine Compliance Evaluation Inspection for hazardous waste and used oil at Triumvirate Environmental Services Inc (hereinafter Triumvirate or facility), located at 3670 SW 74th Avenue, Davie, Florida, 33314. Triumvirate was inspected to determine the facility's compliance with State and Federal Hazardous Waste Regulations described in Title 40 Code of Federal Regulations (CFR) Parts 260-268, and 279 adopted and incorporated by reference in Rule 62-710, and 62-730 Florida Administrative Code (F.A.C.). The inspector was accompanied by Michele De Freitas, Environmental Specialist II, Johanna Polycart, Environmental Specialist II and Pamela Coffin, Environmental Consultant with FDEP.

The inspectors were escorted around the facility by John Lennon, General Manager of Inside Operations, and Ryan Mohansingh, Senior Operations Manager of Triumvirate. Upon arrival at the facility, the inspectors

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presented their credentials and explained the purpose of the inspection.

Triumvirate has been operating at this location since the 1980s. The facility occupies an approximately 2.47-acre lot. They are connected to the city of Davie's water and sewer services and employ approximately 15 employees including drivers. The facility operates Monday to Friday from 7:00 AM to 5:00 PM, and seldom on weekends.

Notification History:

Triumvirate originally notified with the Department as Small Quantity Generator (SQG) of hazardous waste on 04/07/1995. The facility was assigned an EPA Identification (EPAID) Number FLD981018773. The facility then notified with the Department on 02/27/2009 as a Very Small Quantity Generator (VSQG) of hazardous waste, notified on 03/06/2009 as a Universal Waste Handler/Transporter, notified on 09/01/2009 as a Used Oil Transporter, and notified on 09/09/2009 as a Hazardous Waste Transporter and Transfer Facility.

The facility most recently re-notified with the Department via submittal of the 8700-12FL form on 03/08/2022 and a Certificate of Liability Insurance for Hazardous Waste Transporter and Used Oil Handler on 10/04/2021. The facility is registered as a Very Small Quantity Generator of Hazardous Waste, Hazardous Waste Transporter and Transfer Facility, Used Oil Processor, Used Oil Transporter and Transfer Facility, Generator of Universal Waste, Used Oil Filter Transporter and Transfer Facility.

Inspection History:

The facility was last inspected by the Department on 03/18/2021 and was found to be out of compliance with State and Federal Regulations for accepting hazardous waste from a generator without the correct manifest documentation. A Compliance Assistance Offer Letter was issued to the facility on 04/13/2021. The facility submitted documentation of corrective actions on 04/23/2021 and a Return to Compliance letter was issued on 04/26/2021.

Hard hats, steel-toed boots, glasses, and masks were the only Personal Protective Equipment (PPE) required to enter the facility.

Process Description:

Triumvirate provides sustainable environmental solutions to leading companies in the aspect of helping them reduce waste, stay safe and compliant, manage risk and protect their reputation. They utilize the most innovative technology and proven safety measures to provide their services efficiently.

Triumvirate transports hazardous waste from generators and stores them at their facility for no more than ten days before transporting the waste to their designated facility in Orlando which has a one (1) year storage permit or to Ross Incineration in Ohio. They usually ship out every Tuesday. Triumvirate also transports used oil, oily wastewater, petroleum contact water (PCW), and biomedical waste.

Triumvirate has 3 tractor trailers, 4 box trucks, 2 tank wagons (for oil collection), 1 vacuum truck, and 7 tanker trucks, that primarily handle oily water and used oil but minimal petroleum contact water (PCW).

They also have onsite 2 tank farms one old painted in green and one new painted in white, a drum storage area, mobile office, hazardous waste warehouse, truck storage area and a retention pond.

Drum Storage Area:

This area was located directly in front of the old tank farm to the right of the entrance of the facility. Inspectors observed in this area:

- In one row, twenty-four (24) drums, twenty-two (22) 55-gallon drums labeled Used Oil and two (2) 55-gallon drums labeled Non-Hazardous Waste.
- In the second row, there were thirty-three (33) 55-gallon drums labeled non-hazardous waste, and two are in 65-gallon overpack drums.
- In the third row was a 20-yard roll off.
- In the fourth row there were, two (2) 250-gallon totes which was indicated to be product both labeled "OT 53 Demulsifier" with a flammable and corrosive DOT placard. Infront of the totes were twenty-four (24) 5-gallon

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drums labeled Non-Hazardous Waste and fifty (50) 55-gallon drums labeled non-hazardous waste. Infront of these drums were two (2) 55-gallon drums labeled, waste jet fuel with a flammable DOT placard but indicated to be non-hazardous.

The non-hazardous drums held used oil, used oil filters, alcohol, used fuel and waste fuel diesel. The 5-gallon drums of used oil were indicated by facility representatives will be consolidated in 55-gallon drums. Any minor oil spills from these drums or otherwise happens onsite is usually pumped with the vacuum truck and put into the used oil processor.

Run off storm water goes into retention pond in front of the facility. The water at the time of the inspection was oil and he said it would go into the retention pond. However, when later asked for clarification, representatives indicated that the oily water gets vacuumed up as well and is sent to CBI and not put into the retention pond.

Whenever Triumvirate collect PCW it is usually disposed of in the used oil processing tank.

Tank Farm Area:

There were approximately 22 tanks observed onsite in secondary containment that has a capacity of 20,000 gallons and one was approximately 100,000 gallons.

At the old tank farm area there are seven (7) horizontal tanks, and one is a treatment tank. There are also ten (10) vertical tanks.

Inspectors observed the following in the tank farm area:

Horizontal Tanks:

- Tank 1 was an overflow tank for when other tanks become full the excess waste is channeled into this tank
- Tanks 2-3 were Used Oil
- Tank 4 was Oily Water
- Tank 5-6 were Used Oil
- Tank 7 was a Used Oil Processing tank.

Vertical Tanks:

- Tank 8 – 14 were Used Oil
- Tank 15 was empty
- Tank 16 – 17 was Used Oil
- Tank 18 – 20 used to be Used Oil but are no longer in operation and has since been removed.
- Tank 21 is Oily Water (100,000 gallons)
- Tank 22 is a treatment tank (22,000 gallons)

The facility does not have an oil/ water separator on site and their maximum storage for used oil and oily water is 450,000 gallons. Most of their waste is generated from customers in auto shops, airports, dealerships, marinas and third-party independent collectors of used oil.

Boiler Room:

This area was located in the northwest corner of the facility behind the hazardous waste warehouse storage. This area had one boiler that supplies heat to the treatment tanks in the tank area, primarily Tanks 7 and Tank 22. The oily water is processed by heating the water to 200 degrees to separate the oil and water. This process is done overnight and the demulsifier is used in the process. The water falls out of the oil and transferred out while the oil is recovered to sell. The recovered oil is then sent to permitted burners and if there is any excess they would sell wholesale to rail cars. The water treatment is done using a product called 16480 Chem Aqua, which is sued for water quality. There were three (3) 15-gallon drums of the product in the boiler room.

Inspectors observed the following in front of the mobile office area:

- Four (4) 55-gallon drums labeled sludge
- Three (3) 55-gallon drums labeled Alcohol DRD with an accumulation date of 10/15/2022.
- Two (2) 250-gallon Used Oil Totes
- One (1) 55-gallon drum labeled PCW
- One (1) 55-gallon drum unlabeled
- Approximately 10 5-gallon buckets labeled Hydraulic Fluid

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- One (1) empty forty-foot container

Their consolidated oily waste sludge is sent to Wheelabrator to whom they have a permit with to consolidate the waste to turn it to energy.

Oily rags/ absorbents are sent to Waste Management in Pompano Beach.

Used oil filters are shipped to World Petroleum (EPAIS FLD980709075) or Karmi Environmental LLC (EPAID FLR000000166) whose name was EMC in Miami, but no filters are processed here.

The area was equipped with the following emergency equipment: spill kits, 2 eye wash stations, and fire extinguishers. There were also empty containers along the fence.

The four box trucks that Triumvirate has transports both hazardous and non-hazardous waste.

Hazardous Waste Warehouse:

This area was a building on the property to the west side of the property grounds. There was a forty-foot container outside the warehouse building, to which Mr. Mohansingh indicated is used to transport waste to their Orlando facility and vice versa. He also stated that they use it to send supplies to their Orlando facility as needed.

Chemical and biohazardous wastes are picked up every Thursday.

The area had fire extinguishers, mercury spill kit, first aid kit, bio-hazard spill kit and an eyewash station, but no sprinkler systems, fire alarms or two-way communication device. The facility representatives indicated that they use a cell phone and keep an emergency horn which is used in the event of the emergency, but inspectors provided compliance assistance on-site and indicated that this was not sufficient or substantial in regard to the regulation 40 CFR 262.252.

Inspectors observed the following inside the Hazardous Waste Storage Warehouse:

- Forty-three (43) 55-gallon drums labeled Non-Hazardous Liquids ABS Solids
- Three (3) 55-gallon drums labeled Non-Hazardous Liquids, Oil & Water
- Five (5) 55-gallon drums labeled Universal Waste; one had an accumulation start date of 03/08/2022 and another had an accumulation start date of 7/18/2022
- Forty-six (46) 55-gallon drums labeled Hazardous Waste placarded with flammable and toxic DOT stickers.
- Four (4) 55-gallon drums labeled Hazardous Waste Other with a corrosive DOT sticker.
- Two (2) 55-gallon drums labeled Non-Hazardous Waste.
- One (1) 250-gallon tote with a corrosive DOT sticker.
- Two pallets with 5-gallon buckets, approximately seventeen (17) buckets labeled Hazardous Waste.

Mr. Mohansingh indicated that all the waste drums are usually tagged with different color tags to indicate their final disposal destination facility. He showed that any drums tagged with a blue tag is shipped to Ohio and anything with a pink tag is shipping to Ross Incineration.

In this area inspectors also noted a testing machine for testing the used oil. Mr. Lennon indicated that Halogen tests are done in the field when pick-up is in process, the type of test used is the halogen sniffer and 3 ppm standard deviation. On-spec testing is done by Precision Petroleum Lab in Texas, for every 100,000 gallons, a sample is shipped to Texas and a full TCLP and PCB analysis is done on the sample. The testing that they conduct in the field and on-site at Triumvirate is regulatory which is to ensure more than five percent (5%) water content.

Records Review:

Records were reviewed at Triumvirate's main office which was located directly across the street from the Used Oil Processing and Hazardous Waste Storage Facility.

The following records were reviewed:

Liability Insurance:

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The facility provided the inspectors during the inspection a copy of their Certificate of Liability Insurance. It is issued and certified by Willis Towers Watson Certificate Center. Their coverage covers all their facilities in Florida. The coverage includes Commercial General Liability under policy number IEPICB5ZC6002. They also have coverage for Automobile Liability under policy number AL1700358 at a combined single limit of \$2,000,000. The facility also has Umbrella Liability under policy number EELCASCNFNB001 at \$25,000,000 for each occurrence and aggregate. They also have Workers' Compensation and Employer's Liability under policy number WC018325750 in the amount of \$1,000,000 and they also have Workers' Compensation & Employee Liability per Statute Policy under Policy Number: WC018325751 at \$1,000,000.

Triumvirate's policies were issued on 12/31/2021 and expires on 12/31/2022. This supports the use of provision 62-730.170(2)(a) F.A.C.

Certificates:

The facility had its Hazardous Waste Transporter, Used Oil Transporter, Transfer Facility Collection Center, Used Oil Processor, Used Oil Fuel Marketer for both on-spec and off-spec oil, Used Oil Filter Transporter, Transfer Facility and Processor up to date and the expiration on these certificates is 06/30/2023. The facility most recently notified using the 8700-12FL Form and they are still registered as a Very Small Quantity Generator (VSQG) of Hazardous Waste Large Quantity Handler (LQH) of Universal Waste Batteries, Pesticides, Pharmaceuticals, Mercury Containing Devices and Mercury Containing Lamps. They also renewed their Hazardous Waste Transfer Facility Registration. This form was dated 03/08/2022 and the expiration of these certificates is 03/01/2023.

Their Annual Report for Used Oil was also reviewed onsite as well as all their required permits.

Training:

Training was conducted for 7-employees most recently as of 2021. Each year an annual review on all employee training is conducted as indicated by Mr. Mohansingh.

Contingency Plan/Spill Prevention, Control, and Countermeasure (SPCC) Plan:

During the inspection, inspectors reviewed the Contingency Plan onsite which included all local authority's notification in the Davie area, emergency contacts for Triumvirate, local emergency responders, cleanup contractors, and neighboring property owners. This plan also details all emergency contacts, emergency coordinator, emergency response strategy and reporting, spill control actions, spill control equipment, and discharge notification procedures. All contact information was up to date for this new location. There were maps of the facility to show where all emergency equipment and emergency exit routes are located.

This contingency plan was revised as of October 2022.

Inspection Logs:

The facility was able to provide inspectors with Drum Inventory Logs that details the origin of the waste, the manifest it was documented on, the transporter, the date in and out of the facility, the quantity and if it was non-hazardous or hazardous waste. The most recent drum inventory log was for 10/19/2022. The logs were missing the EPA ID's of the generator the waste originated from but on 11/09/2022, Mr. Mohansingh sent documentation to show that their logs have since been updated to show the generator's EPA ID.

Annual Report for Used Oil and Used Oil Filter Activities:

Triumvirate had their Annual Report for Used Oil and Used Oil Filter Activities readily available onsite for review. This report was for the period January 1st, 2021, through December 31st, 2021. The total amount of Used Oil and Oily Wastes collected was 1,450,936 gallons, the amount managed was from marketed on-spec used oil fuel and treated oil at a wastewater treatment unit in total was 1,370,538 gallons. The end of year on-hand estimate was 80,398 gallons.

Manifests & Rebuttable Presumption:

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Manifest records are maintained onsite and were readily available for review from 2019 to 2022. The most recent 2022 Uniform Hazardous Waste Manifest reviewed was dated 09/23/2022, under manifest tracking number 017486192FLE. This manifest documented two hundred and seventy-five pounds (275lbs) of Waste Flammable Liquids (Ethanol, Sodium Chloride with EPA Waste Code D001 and one hundred and fifty pounds (150lbs) of Waste Flammable Liquids (Methanol, Phosphate Buffer) with EPA Waste Codes D001 and F003. The waste was picked up by Triumvirate Environmental Services Inc from ADMA Biologics (EPA ID: FLR000035493) located at 5800 Park of Commerce Blvd, NW, Boca Raton, Florida, 33487. It was then shipped to the designated facility Ross Incineration Services Inc. (EPA ID: OHD048415665) located at 36790 Giles Road, Grafton Ohio, 44044.

The waste was shipped out on 10/03/22 which was exactly ten (10) days.

PHOTO ATTACHMENTS:

Tanks 2



Hazardous Waste Area



Labels



Tanks

Conclusion:

Triumvirate Environmental Services Inc. was inspected as a very small quantity generator (VSQG) of hazardous waste, hazardous waste transfer facility, hazardous waste transporter, used oil generator and transporter, used oil filter generator and transporter, used oil and used oil filter transfer facility, used oil and used oil filter processor, and a large quantity universal waste handler, and was found to be in compliance at the time of the 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

Tarin F Tischler

Environmental Specialist III

Principal Investigator Name**Principal Investigator Title**

FDEP

12/29/2022

Principal Investigator Signature**Organization****Date**

Michele De Freitas

Environmental Specialsit II

Inspector Name**Inspector Title**

FDEP

Organization

Johanna Polycart

Environmental Specialist II

Inspector Name**Inspector Title**

FDEP

Organization

Pamela Coffin

Environmental Consultant

Inspector Name**Inspector Title**

FDEP

Organization

Ryan Mohansingh

Senior Operations Manager

Representative Name**Representative Title**Triumvirate Environmental
Services Inc**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.

Inspection Date: 10/20/2022

John Lennon

Representative Name

General Manager - Operations

Representative Title

Triumvirate Environmental
Services Inc

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:

Alannah B Irwin

Inspection Approval Date:

12/29/2022