

Thursby, Kim

From: Green, James F. [jgreen@triumvirate.com]
Sent: Friday, October 19, 2012 9:34 AM
To: Epost HWRS
Subject: Triumvirate Environmental

Dear Mr. Bahr,

We are in receipt of your correspondence and will reply in a timely nanner.

Thank you.

James F. Green

Vice President South East Region
10100 Rocket Blvd. Orlando, FL32824

Office: (800) 345 6393
Cell Phone: (617) 413 3639



Thursby, Kim

From: Epost HWRS
Sent: Friday, October 19, 2012 9:20 AM
To: 'jgreen@triumvirate.com'
Cc: Bahr, Tim; Goddard, Charles; Winston, Kathy; Kantor, Karen E.; 'jlennon@triumvirate.com'; Miller, Randy J.; Bejnar, Tor; 'jwyluda@triumvirate.com'; Kothur, Bheem; Tripp, Anthony
Subject: Triumvirate Environmental (Florida), Inc.;FLD 981 018 773;First Request for Additional Information
Attachments: 10-19-12-TriumvirateEnvironmental (Florida) Inc RAI Comments Letter.Receipt.pdf
Tracking:

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation 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. (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.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

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.

Tim Bahr

Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us



Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

October 19, 2012

SENT VIA E-MAIL

jgreen@triumvirate.com

Mr. James Green, Vice President
Triumvirate Environmental (Florida), Inc.
3670 SW 47th Ave
Davie, Florida 33314

RE: Triumvirate Environmental (Florida), Inc.
EPA I.D. No. FLD 981 018 773
Permit Number: 077390-HO-008/077390-SO-009
Used Oil and Material Processing Facility Permit
First Request for Additional Information

Dear Mr. Green:

The Florida Department of Environmental Protection (the Department) has reviewed your permit application dated September 24, 2012 and received on September 25, 2012 to operate a Used Oil and Material Processing Facility in Davie, Florida.

The review of the permit application indicates that it is incomplete. Please provide the information requested in the enclosed Attachment. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be scheduled as needed prior to your submittal of an official response to minimize the time and effort required to formulate adequate replies to the comments. This exchange of ideas will assist you in developing a complete and adequate response that should eliminate the need for additional official responses and therefore accelerate the permit renewal process.

Mr. James Green, Vice President

October 19, 2012

Page Two

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit two hard copies of your written response (one copy to the Tallahassee Solid and Hazardous Waste Regulation Section, and one to the Southeast District Office) and one electronic copy to Tallahassee. If you cannot submit all this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Should you like to arrange a meeting or if you have any questions, please contact me at (850) 245-8781 or e-mail: Bheem.kothur@dep.state.fl.us

Sincerely,



Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/bk

Enclosure: Attachment

cc: Kathy Winston, FDEP/West Palm Beach, kathy.winston@dep.state.fl.us
Karen Kantor, FDEP/West Palm Beach, karen.e.kantor@dep.state.fl.us
John (Shawn) Lennon, Triumvirate, jlennon@triumvirate.com
Randy Miller, DEP/Tallahassee, randy.j.miller@dep.state.fl.us
Tor Bejnar, FDEP/Tallahassee, tor.bejnar@dep.state.fl.us
John H. Wyluda, Triumvirate, jwyluda@triumvirate.com

ATTACHMENT

**Triumvirate Environmental (Florida) Inc.
Fort Lauderdale Facility, Florida
EPA I.D. No. FLD 981 018 773
Permit No. 77390-HO-008; 77390-SO-009
First Request for Additional Information**

October 19, 2012

General Comments:

1. Attachment A, Part I, Completed Used Oil Processing facility Permit Application Form, A.2. Revision Number, Page 8: Triumvirate Environmental, Inc. Florida (TEIFL), Facility is submitting the complete initial permit application (the initial revision number should be 0). Please review the General Instructions for completing the permit application and revise as appropriate.
2. Attachment, Part I, Item B.1: The first entry is for the "county" (e.g. Broward), not "country". The latitude should be 26° rather than 28°. Please revise.
3. Attachment A, Part II: None of the certification signatures are dated.
4. Attachment B, Completed Solid Waste Processing Facility Permit Application DEP Form 62-701.900(1): Please delete this Form in its entirety and re-submit the DEP Form 62-701.900(4) which can be found at:
[http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-701/62-701.900\(4\).pdf](http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-701/62-701.900(4).pdf)
5. Please identify non-hazardous and solid waste activities conducted at the site and address the quantities of solid waste stored on site at any given time per day and per month.
6. Attachment C, Brief Description of Facility Operations, Sixth Sentence: "Used Oil is processed at the facility utilizing proprietary physical and chemical methodologies." Please describe such methodologies to this operations and request to the department to honor as proprietary methodologies as appropriate.
7. Attachment D, Detailed Process Description, Treatment Storage and Other Processing, Second Paragraph, Fourth Sentence: The location of these storage tanks are shown in Figure 1C- Site Plan. Please review this reference figure in the Table of Contents and revise as appropriate.

8. Attachment D, Detailed Process Description, Second Paragraph: TEIFL accepts Coolants (Antifreeze), and Petroleum Contact Water (PCW). However, in Attachment J, Spill Control and Emergency Procedures (SPCC), Table 1- Summary of Storage Locations are not identified. Please review the Table 1 and revise as appropriate. Also, any oily wastes or sludge generated at the facility that cannot be managed for energy recovery, will require a hazardous waste determination and the materials shall be managed in accordance with 40 CFR Part 279.10 (c) and (e).
9. Attachment D, Detailed Process Description, On Specification Used Oil, Table 1: Please add these constituents to the existing list as appropriate. The maximum Halogens 4,000 ppm and PCB 2 ppm maximum to the Table. Also revise the Total Halogens 1,000 ppm maximum instead of 4,000 ppm maximum.
10. Attachment D, Detailed Process Description, Solid Waste Processing: Please indicate on the site plan where the drums/containers of non-hazardous solid wastes will be stored before and after processing (in Figure 2F and 2G, is this area inside secondary containment)? Will the containers be covered? How long will they be stored on site prior to disposal? What will be the maximum throughput for solidification/consolidation of non-hazardous solid wastes? How many drums/containers will be stored on site at any one time for closure cost estimate purposes? Will only one 20 cubic yard roll off container be used for solidification/consolidation and will it be kept covered?
11. Attachment E, Waste Analysis Plan, & Material Profiling, Section 7.0 Antifreeze and Coolants: The current Florida DEP Used Antifreeze Guidance document is dated May 22, 2012. Please access the web to view the latest document at: http://www.dep.state.fl.us/waste/quick_topics/publications/shw/hazardous/Antifreeze-Guidance_2012.pdf
12. Attachment E, Waste Analysis Plan, & Material Profiling: Does TEIFL sign manifest as a generator? Depending on the amount of waste, TEIFL may become a large quantity generator (LQG). Please show on a map where this waste will be stored until transported off-site.
13. Attachment E, Waste Analysis Plan & Material Profiling: Absorbents, Filters, And Oily Wastes, Oily Contaminated Solids and Sludges: Please describe and identify where these materials are stored.
14. Attachment E, Waste Analysis Plan, Industrial Wastewater: Please include the information regarding industrial wastewater in this application, it must be made

clear that the permit being applied for does not grant any authority to handle or dispose industrial wastewater. Also explain and identify where and how industrial wastewater will be stored at this site. Please identify the units.

15. Attachment E, Waste Analysis Plan & Material Profiling, Petroleum Contact Water: How does TEIFL verify that the generators process knowledge is correct?
16. Attachment, F, Description of Sludge, Residue, And By-Product Management: Please show on a map where this activity will be conducted. Please ensure that the sludges are also tested similarly? Also, correct the spelling of "Residue" not "Reside" in the main title.
17. Attachment G, Waste Tracking Plan: Please specify what materials (used oil?). Please attach the example of the "Shipping" document and "Daily Tank Inventory" document. Please review and revise as appropriate.
18. Attachment H, Preparedness and Prevention Plan: Please show the location of all emergency equipment on a map.
19. Attachment H, Preparedness and Prevention Plan: Please update the FDEP West Palm Beach District Bureau of Emergency Response's (BER) phone number to read (561) 393-5877 and the office is located in Boca Raton. The address is: 7251 West Palmetto Park Road, Suite 303, Boca Raton, Florida 33433. Please review and revise as appropriate.
20. Attachment H, Preparedness and Prevention Plan, Notification and Reporting, Page 6 of 40: The FDEP district office physical address and mailing address are the same. The address is: Southeast District Office, 400 N Congress Ave, Suite 200, West Palm Beach, Florida 33401. Please change the mailing address as appropriate. Also add the EPA Emergency Phone Number: 404-562-8700.
21. Attachment I, Contingency Plan & Emergency Procedures, Appendix D, and Appendix E, Page 15 of 40 and Page 17 of 40: The evacuation route map and site location map appear to be very poor. Please review and update these maps.
22. Attachment I, Contingency Plan & Emergency Procedures, Appendix B, Page 11 of 40: Please add the addresses of the Primary Emergency Coordinator and Alternate Emergency Coordinator to Appendix B. Also include your outside cleanup contractor information here.

23. Attachment J, Spill Control and Emergency Procedures, Figure 1, Facility Location Map, and Figure 2, Site Layout Map: These maps are in very poor (not readable) condition. Please review these maps and resubmit.
24. Attachment K, Closure Plan: The closure plan addresses only Solid Waste Processing facility closure. In section 6.0, how many drums of non-hazardous waste will be stored at any one time for cost estimate purposes? The closure plan should also include detailed closure information for used oil tanks, including schedules. Please review and revise as appropriate.
25. Attachment K, Closure Plan. All wastes need to be tested for hazardous waste characteristics. Please revise as appropriate.
26. Attachment K, Closure Plan, Closure of Tank Farm Containment: Please describe the decontamination process and how a completion determination will be made.
27. Attachment K, Closure Plan, Closure Cost Estimate: The facility shall propose vertical and horizontal soil sampling (including parameters) around all waste handling areas to determine if any contamination exists. Also propose groundwater sampling which may be contingent upon results of soil sampling. The closure cost estimate should address these items.
28. Attachment L, Employee Training: These paragraphs need to be expanded to include that the written training records, including name of the employee, date and type of training, will be kept at the site.
29. Tank Inspection: Some of the Tanks were installed in the year 1987. The facility must provide documentation of each Tank's last detailed inspection and certification to the Department.
30. Facility needs to submit a site map in an electronic format (pdf preferred) so that this map can be inserted into the permit.
31. Facility needs to submit a used oil tank table in an electronic format (pdf preferred) so that this table can be inserted into the permit.
32. Solid Waste Renewal Permit Application dated September 24, 2012 and DEP Received on September 25, 2012: The facility described the solid waste operations as bulking and solidification of oily waste and petroleum impacted soil and groundwater, with reference to the used oil application for further details. However, the details provided in the used oil application with respect to the bulking, solidification, and management of non-hazardous oily wastes were not

adequate to address the items. Please review and provide additional details for these items as appropriate.

33. Used Oil and Solid Waste Processing Permit Renewal Application, dated September 24, 2012: The submitted permit application is not properly paginated, rather it is confusing except for the "Contingency Plan & Emergency Procedures" section. Please review the entire application, revise, and paginate as appropriate.
34. TEIFL should provide the piping diagram for all tanks and process equipments.
35. Please clarify if UO and PCW will be picked up from generators in one truck or separate trucks.
36. Please provide the secondary containment calculations for the tank storage area. These calculations need to have been certified by a professional engineer registered in the State of Florida.