



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Southeast District Office
400 North Congress Avenue, 3rd Floor
West Palm Beach, FL 33401
561-681-6600

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

VIA ELECTRONIC MAIL: OSolis@triumvirate.com

Orlando Solis, Technical Service Manager
Triumvirate Environmental Of Florida
3670 SW 47th Ave.
Davie, FL, 33314

Hazardous Waste
Broward County

**Re: Hazardous Waste Compliance Inspection of Triumvirate Environmental Of Florida
3670 SW 47th Ave., Davie, FL 33314
EPA ID # FLD981018773**

Dear Mr. Solis:

Thank you for your assistance during the hazardous waste compliance inspection conducted at your facility on November 12, 2012. Attached is the report that documents this inspection. Violations were noted at the time of the inspection, and the requested corrective actions have been completed to return your facility to compliance.

Your cooperation is appreciated. If you have any questions regarding this report or hazardous waste regulation in general, please contact me at (561)681-6756 and Kathy.Winston@dep.state.fl.us.

Sincerely,

Kathy Winston
Environmental Consultant
Hazardous Waste Compliance/Enforcement

Attachment: Hazardous Waste Inspection Report dated November 15, 2012

Cc: AGomez@broward.org



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Triumvirate Environmental Florida Inc
On-Site Inspection Start Date: 11/15/2012 **On-Site Inspection End Date:** 11/15/2012
ME ID#: 50649 **EPA ID#:** FLD981018773
Facility Street Address: 3670 SW 47th Ave #109, Davie, Florida 33314
Contact Mailing Address: 3670 SW 47th Ave, Davie, Florida 33314-2830
County Name: Broward **Contact Phone:** (954) 583-3795

NOTIFIED AS:

CESQG (<100 kg/month)
Transporter
Transfer Facility
Used Oil

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility
Routine Inspection for Universal Waste Transporter facility
Routine Inspection for Hazardous Waste Transporter facility
Routine Inspection for Used Oil Processor facility
Routine Inspection for Used Oil Transporter facility
Routine Inspection for Used Oil Transfer Facility
Routine Inspection for Used Oil Marketer facility
Routine Inspection for Hazardous Waste Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kathy R. Winston, Inspector
Other Participants: Orlando Solis, Technical Services Manager

LATITUDE / LONGITUDE: Lat 26° 4' 37.8283" / Long 80° 12' 33.5153"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private, Private

Introduction:

Triumvirate Environmental Florida Inc. (TEF), formerly known as PermaFix of Ft. Lauderdale, is a permitted facility authorized to process used oil, oily wastewater, petroleum contact water, oily solid waste, and used oil filters. TEF is also a hazardous waste transporter and transfer station. The facility is situated on a 2.5 acre site in light industrial area, and is served by city water and sewer. TEF has operated from this site for approximately two years; however, the facility itself has been here for approximately thirteen years. There are 21 people employed onsite including the office staff.

In a notification to the Department on August 24, 2011, Triumvirate Environmental (Florida), Inc., recorded its' name change from PermaFix of Ft. Lauderdale, Inc. as part of a stock purchase of the corporation by Triumvirate Environmental, Inc., headquartered in Somerville, MA.

Compliance History - The Department is required to inspect TEF at least every two years.

Inspection Date: 11/15/2012

Inspections were conducted in 2011 and before that in 2009. The 2011 resulted in enforcement and was settled with a Consent Order that was executed on March 6, 2012. The facility inspection in 2009 revealed only minor violations and the facility returned to compliance without enforcement

Process Description:

Used oil and oily wastewater are received in the tank farm area located in the southeast portion of the site. Used oil is offloaded into two 20,000-gallon aboveground tanks. The used oil is filtered, and then allowed to sit for further oil/water separation. The processed oil is tested for compliance with on-specification standards, and is sold as fuel oil to TEF customers. The oily wastewater is transferred for storage into one of seven tanks. The oily water is filtered, and then transferred to a boiler tank where it is heated to 150 ° F for oil/water separation. An emulsifier is added to facilitate further oil/water separation and the temperature is raised to 200 ° F, then the process is shut down. The water readily separates from the oil, and the oil is diverted to a holding tank.

Used oil filters are not consolidated but sent in generator containers to US Foundry in Medley, Florida and EMC, Inc. Oily solid wastes are consolidated into a rolloff container for disposal at the Central Landfill in Pompano Beach, Florida.

Inspection - During the inspection it was noted that the labeling on the used oil cooker tank was barely legible. Also, the labels on tanks #13 and #14 read both "Used Oil" and "Oily Water" and it was requested that these labeling issue be addressed. The rest of the storage tanks were labeled appropriately with tank #11 indicated as "out of service." The inspector noted no other violations or compliance issues in the Used Oil processing area or the solid waste consolidation area. The consolidation area sits directly in front of the processing operations and shares the same berm system. TEF stores used oil filter containers here before shipment, as well as, the oily solids rolloff.

The secondary containment for both the main tank farm and the single large tank in the rear of the property were clean, dry and there were no visible damage to the sealant. In the rear of the property was a three sided pole barn that contained the boiler for the processing operation and some equipment and chemical feed drums associated with a system to control the buildup of scalant in the boiler itself.

The large Drum Storage building is divided into several different sections and is used for many aspects of the operation. A large section of the rear of the facility serves as storage for everything from emergency response equipment, to spare parts for the processing operation, as well as, tools and products for facility maintenance. The only repair work performed onsite involves the processing equipment and its' related pumps and valves, as maintenance of the truck fleet and the forklifts are contracted out.

On the other side of the building there were four distinct storage zones. There was the Hazardous Waste Transfer facility, the liquid non-regulated waste area, the solid non-regulated waste area and the Universal Waste storage area which also contained a small collection of escrap. The drums in those zones were all properly labeled and aisle space was acceptable.

However; on the far side of the building, near the office trailer, and immediately adjacent to the product lubricants was a hole in the concrete. This hole appeared to reach the soils below the foundation of the building. There appeared to be visible staining of the soil inside the hole and the staining could be traced back to the product lubricants stored on a pallet in close proximity to the hole.

Records Review -

The Closure Plan supplied to the inspector at the time of the inspection was not up-to-date and needed the proper company name included. Other than that, all records appeared to be in order: acceptance and deliveries logs for used oil and hazardous waste, weekly container inspection logs, general facility inspection logs, Contingency Plan, training records, and manifests.

Inspection Date: 11/15/2012

New Potential Violations and Areas of Concern:**Violations**

Type: Violation

Rule: 279.54(f)

Question Number: 28.190

Question: Are ASTs, UST tank fill lines and containers labeled "used oil"?

Explanation: At the time of the inspection, the used oil label on the cooker tank was becoming illegible and needed to be replaced. Also, tanks #13 and #14 were labeled both "Used Oil" and "Oily Water"

Corrective Action: Please replace the used oil label on the cooker tank and send a photo to the Department for documentation that the item has been corrected. Also, find out what is in both tanks #13 and #14 and then properly label them and send a photo demonstrating compliance.

Areas of Concern

Type: Area Of Concern

Rule: 279.54(g)

Question Number: 28.200

Question: Does the facility clean up releases of used oil, repairing or replacing any leaking units as applicable?

Explanation: There is a hole in the concrete floor of the storage building, next to the pallet of product lubricants. It appears that over time some oil has leaked down in this hole and there is visible staining of the soil.

Corrective Action: Please remove the soil from the hole until there is no visible staining and then block the hole so that fluid can not flow down there again. Send photos and provide information on how the stained soil was managed.

Type: Area Of Concern

Rule: 62-710.800(3)(a)

Question Number: 28.730

Question: Has the facility submitted a written closure plan?

Explanation: The facility didn't have an updated version of their closure plan with the proper company name available at the time of the inspection.

Corrective Action: Please provide a copy of your most recently updated closure plan that includes the correct company name.

Conclusion:

The facility was not in compliance at the time of the inspection. The facility was given seven days to return to compliance.

Inspection Date: 11/15/2012

Inspection Date: 11/15/2012

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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kathy R. Winston
PRINCIPAL INSPECTOR NAME

Inspector
PRINCIPAL INSPECTOR TITLE


PRINCIPAL INSPECTOR SIGNATURE

11/21/2012
DATE

Supervisor: Karen Kantor

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.