

**From:** Winston, Kathy  
**To:** ["Lapic, Kyle A"](#)  
**Subject:** Inspection at Triumvirate Environmental of Florida in Davie on 11/25/2014  
**Date:** Wednesday, February 18, 2015 12:34:00 PM  
**Attachments:** [final kk approved IR.pdf](#)

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The purpose of this email is to acknowledge return to compliance from the Department's inspection on November 25,, 2014 at the above mentioned facility. Attached please find the final report for that inspection. Please feel free to contact me if you have any questions concerning this inspection or any other compliance issue. Thank you for your cooperation in this matter.

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Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

**Facility Name:** Triumvirate Environmental Florida Inc  
**On-Site Inspection Start Date:** 11/25/2014      **On-Site Inspection End Date:** 11/25/2014  
**ME ID#:** 50649      **EPA ID#:** FLD981018773  
**Facility Street Address:** 3670 SW 47th Ave #109, Davie, Florida 33314  
**Contact Mailing Address:** 3670 SW 47th Ave Ste 109, 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 Hazardous Waste Transporter facility  
Routine Inspection for Hazardous Waste Transfer Facility  
Routine Inspection for Universal Waste Transporter facility  
Routine Inspection for Used Oil Processor facility  
Routine Inspection for Used Oil Transfer Facility  
Routine Inspection for Used Oil Generator facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Kathy R. Winston, Inspector  
**Other Participants:** John Lennon, General Facility Manager; Kyle Lopic, Environmental, Transportation, Safety & Compliance

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

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

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Triumvirate Environmental Florida Inc. (TEF), 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 four years; however, the facility itself has been here for approximately fifteen years. There are twenty people employed onsite including the office staff.

The facility's permit was renewed on May 7, 2013 and will expire on November 19, 2017. The facility was also approved for a minor modification on March 2, 2014. The modification involved the closure of tank T11 and the replacement of this tank with an upgraded tank that is designated as T11R. The modified permit will also expire on November 19, 2017

Compliance History - The Department is required to inspect TEF at least every two years. Inspections were conducted in 2012 and before that in 2011. The 2011 resulted in enforcement

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and was settled with a Consent Order that was executed on March 6, 2012. The facility inspection in 2012 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 one of holding tank.

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

Inspection - During the inspection, the inspector observed that the secondary containment for the old heat exchanger tank had an accumulation of precipitation, without a sheen, that could compromise its' ability to provide 110% of the volume of the tank. In the curbed area, where the used oil filters were stored, there were several small puddles of oil on the concrete indicating that some of the containers were now or had been leaking. The inspector also noted in the processing area there was an accumulation of oily water in the secondary containment for the incoming load screening 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 was 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,

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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 e-scrap. The inspector observed a pallet of universal waste lamp boxes, where some of the boxes that were visible, were not properly labeled. The facility representative indicated that the shipment had arrived shrink wrapped and a warehouse worker must have removed the wrapping but forgot to then label each of the separate boxes.

#### Records Review -

The inspector noted during the Contingency Plan review that all required exhibits and facility layouts were in the document. Other records that appeared to be in order included: acceptance and deliveries logs for used oil and hazardous waste, weekly container inspection logs, general facility inspection logs, the closure plan, training records, and manifests.

### New Potential Violations and Areas of Concern:

#### Violations

Type: Violation  
 Rule: 279.52(a)(1)  
 Question Number: 28.210  
 Question: Is the facility maintained and operated to prevent a fire, explosion or planned or unplanned release of used oil to the air, soil, or water which could threaten human health or the environment?  
 Explanation: The secondary containment for the screening area for incoming used oil needs to be cleaned up to avoid any possibility of discharges to the environment.  
 Corrective Action: Please send pictures demonstrating that this containment area has been cleaned up.

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Type: Violation  
 Rule: 62-710.850(5)(b)  
 Question Number: 5.170  
 Question: If so, did the facility stop the release, contain the oil, clean up the release and manage the contaminated material properly and repair or replace the leaking units prior to returning them to service?  
 Explanation: In the area where the facility stores their used oil filters were some small puddles of used oil indicating that, at some point, there had been containers of used oil filters that had leaked.  
 Corrective Action: Please address these areas and provide the Department pictures demonstrating that this area has been cleaned up.

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Type: Violation  
Rule: 62-737.400(5)(b)  
Question Number: 39.40  
Question: Is each lamp or container labeled or marked clearly with either "Spent Mercury Containing Lamps for Recycling", "Universal Waste Mercury Lamps", "Waste Mercury Lamps" or "Used Mercury Lamps"?  
Explanation: There was a pallet of spent fluorescent lamps in the storage building that had originally been shrink wrapped and labeled; however, the shrink wrap had been removed, which resulted in loose boxes that were not labeled.  
Corrective Action: Please properly labeled any of the boxes on this pallet without labels and send pictures demonstrating compliance.

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**Conclusion:**

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

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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. 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  
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**PRINCIPAL INSPECTOR NAME**

Inspector  
\_\_\_\_\_  
**PRINCIPAL INSPECTOR TITLE**

  
\_\_\_\_\_  
**PRINCIPAL INSPECTOR SIGNATURE**

11/26/2014  
\_\_\_\_\_  
**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.