



Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

REQUEST FOR ADDITIONAL INFORMATION

June 14, 2018

Richard M. Barry
200 Inner Belt Road
Somerville, MA. 02143
rbarry@triumvirate.com

Re: First Request for Additional Information (RAI)
Orange County – Hazardous Waste
Facility Name: Triumvirate Environmental, Inc.
Facility ID: FLD 980 559 728
DEP Application No.: 26916-009-HO

Dear Mr. Barry,

Thank you for your application for an Operating Permit for the above referenced Facility. The Department has assigned DEP Application No. 269-HO-009 to the application. A Department staff review of the application and supporting documentation submitted on May 7, 2018, indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, July 16, 2018, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 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. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to Robert.Cook@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/> [name of folder]. After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to Robert.Cook@floridadep.gov, alerting us that it has been posted.

Richard M. Barry
Page 2 of 4
June 14, 2018

If you have any questions, please contact Robert Cook by telephone at 850-245-8771 or by e-mail at Robert.Cook@floridadep.gov.

Sincerely,

A handwritten signature in cursive script that reads "Bryan Baker".

Bryan Baker, P.G.
Environmental Administrator
Florida Department of Environmental Protection

cc:

Brian Bastek, USEPA Region 4, bastek.brian@epa.gov
Carlos Merizalde, USEPA Region 4, merizalde.carlos@epa.gov
John White, DEP Central District, john.white@floridadep.gov
Michael Eckoff, DEP Central District, Michael.Eckoff@dep.state.fl.us
Kevin Coulon, Triumvirate, kcoulon@triumvirate.com
John McQuillan, Triumvirate, jmcquillan@triumvirate.com
Victor San Agustin, FECC, vsanagustin@feccorporation.com.

Attachment: List of Requested Information

Facility Name: Triumvirate Environmental, Inc.
Facility ID: FLD 980 559 728
DEP Application No.: 269-HO-009

1. Part I.A.1: The type of unit is not provided under "Treatment".
2. Part I.A.: The revision number should have been "0" for the initial renewal. Ensure that your revised application is identified as Revision 1.
3. Part I.A.16 indicates a 100-year lease but also indicates that the lease expires on May 1, 2020. The 2013 application indicated an expiration date of 9/30/2020. Please address this inconsistency.
4. Part I.B.3: There are ten existing permits and registrations that are expired. Please insert the new expiration dates for each permit or registration that has been renewed.
5. Part II.A. General 1.(1): The Figure II.A.2 Boundary and Topographic Survey map is illegible. Although the scale bar is on the figure, there are no distances defined on the scale bar. A legible figure must be submitted.
6. Application Part I – General Information, D. Operating Information, Page 3, Facility Operations: The application states: "This permit allows the facility to store up to 824 55-gallon containers in the container storage unit, and to consolidate waste with other compatible wastes." This statement needs to specify the total volume of waste across the property, not just the volume stored in the container storage unit or consolidation area. Please consider something to the effect: "This permit allows the facility to store up to 824 55-gallon drums for a total of 41,200 gallons, or 224 cubic-yards, in the container storage unit, and to consolidate waste with other compatible wastes." For the purposes of the volume calculation the liquid volume equivalent of 1 gallon to 0.004951 cubic yards will be used. This volume includes all hazardous wastes stored on the property.
7. Application Part I – General Information, D. Operating Information, Page 4, Inspection and Testing of Incoming Wastes: Second paragraph in the section has an apparent typographical error in the second sentence: "Results from the inspection and testing of waste are entered into an electronic data base."
8. Application Part I – General Information, D. Operating Information, Page 5, Waste Receipt and Distribution: Second paragraph states "Containers holding transfer facility waste can be distinguished from those holding permitted waste because all waste that is permitted or terminated at Triumvirate Environmental Services, Inc. receives a barcode label. Transfer waste does not receive a barcode label." The facility needs to provide for some type of physical separation of transfer waste and permitted waste. Just saying permitted waste has a barcode and transfer waste does not is not acceptable. Separation methods can be simple physical measures such as movable floor markers denoting an area of the storage facility that will be used for temporary storage of transfer waste.
9. Application Part II.A.7 Manifest System Recording Keeping and Reporting, Revision 3: Date: 4/24/18, Part II.A.7, Page: 2A-15 (no real page #): Section title has a typographical error. It should read "Application Part II.A.7 Manifest System **Record** Keeping and Reporting".

10. Application Part II.A.7 Manifest System Recording Keeping and Reporting, Revision 3: Date: 4/24/18, Part II.A.7, Page: 2A-15 (no real page #): Second paragraph of section 7.0 Transfer Facility, last sentence reads “When waste is placed inside the facility it is clearly separated from permitted waste and segregated to clearly identify it as 10-day transfer waste.” The facility provides no indication on how the transfer waste is “clearly” separated from permitted waste.
11. Application Part II.A.7 Manifest System Recording Keeping and Reporting, Revision 3: Date: 4/24/18, Part II.A.7, Page: 2A-15 (no real page #): Last inset sentence before Section 8.0 reads “Transfer facility drums will be placed on the dock or transfer trailers.” This does not match operation descriptions in other parts of the document that indicate transfer waste may also be stored in the warehouse.
12. Part II.A.4.b Contingency Plan, Page 15: Under Item (b) Prevent hazards in unloading operations the two sentences appear to contain grammatical errors and are unclear. Please consider the following correction:
“In any operation at the facility, including unloading operations, only facility ~~staffs~~ staff that are trained in the unique hazards of the facility can conduct work. All personnel working in the facility receive an extensive two-part training that is outlined in the training program.”
13. Waste Analysis Plan Section 8.2 On Specification Used Oil, 2A-13/2AWP, Page 17: Is Triumvirate Environmental Services, Inc. indicating through this section that it will be operating as a used oil marketer?
14. Waste Analysis Plan Section 13.0 Sampling Methods, Initial Analysis of Untreated Waste: 2A-13/2AWP, Page 23: The paragraph reads: “The composite sample will be analyzed for TCLP metals in order to determine the initial metals’ concentrations prior to treatment. Wastes that fail to meet UTS for constituents other than the RCRA metals (D004-D008, D010-D011) and mercury will not be eligible for treatment. ”If Triumvirate Environmental Services, Inc. is only sampling the waste for TCLP metals than how can it fail to meet UTS for constituents other than RCRA metals. Please note the range “D004-D008, D010-D011” only excludes D009, Mercury. However, mercury is included separately without a waste code reference in the same sentence. If Triumvirate Environmental Services, Inc. means to include all inorganic constituents identified in 40 CFR 268.48 please make this clear.