

## Thursby, Kim

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**From:** Hartshorn, Justin T <jhartshorn@triumvirate.com>  
**Sent:** Tuesday, June 13, 2023 8:11 AM  
**To:** Cook, Robert; Barry, Richard M; Epost HWRS  
**Cc:** Thursby, Kim  
**Subject:** RE: Still Need Response  
**Attachments:** RE: Triumvirate Environmental Services, Inc;FLD98559728; Partial RAI for Permit Application Renewal dated May 1, 2023

### EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Good Morning Bob,

Yes, we received the letter and are working on the response. I initially responded that the letter was received on May 23, 2023, via the attached email but just realized I did not add the epost\_hwrs email address.

The check request is being processed now; I'm just waiting for it to be issue by accounting. Once I have the check, we'll submit our official response.

Regards,

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**Justin Hartshorn, CHMM, CPEA**  
**Corporate Environmental Compliance Auditor | Triumvirate Environmental, Inc.**  
200 Inner Belt Road, Somerville, MA 02143  
Office: 617-715-8902 | Mobile: 304-373-4989  
[jhartshorn@triumvirate.com](mailto:jhartshorn@triumvirate.com) | [www.triumvirate.com](http://www.triumvirate.com)

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**From:** Cook, Robert <Robert.Cook@dep.state.fl.us>  
**Sent:** Tuesday, June 13, 2023 8:00 AM  
**To:** Barry, Richard M <rbarry@triumvirate.com>; Hartshorn, Justin T <jhartshorn@triumvirate.com>  
**Cc:** Thursby, Kim <Kim.Thursby@FloridaDEP.gov>  
**Subject:** FW: Still Need Response  
**Importance:** High

This message was sent from outside the company. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Good morning Gentlemen,

Questions are being asked if this was received?

Thank you for your help,  
Bob

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**From:** Thursby, Kim <[Kim.Thursby@FloridaDEP.gov](mailto:Kim.Thursby@FloridaDEP.gov)>  
**Sent:** Tuesday, June 13, 2023 7:33 AM  
**To:** Cook, Robert <[Robert.Cook@dep.state.fl.us](mailto:Robert.Cook@dep.state.fl.us)>

**Subject:** Still Need Response

**Importance:** High

Good Morning Bob,

I have not received response from your facility Triumvirate document that was sent out on June 5, 2023. I have attached pdf that was sent out through e post email. Can you please check to see if the e post email was received? Let me know if you have any questions or comments.

Thanks,  
Kim

Kim Thursby

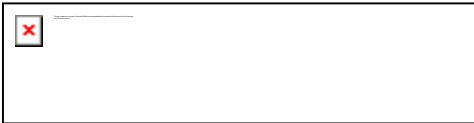
Department of Environmental Protection

2600 Blair Stone Road

Tallahassee, Florida 32399-2400

Mail Station 4560

Direct with voice mail (850) 245-8792





# FLORIDA DEPARTMENT OF Environmental Protection

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

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

June 5, 2023

Mr. Randy Troy, ETSC  
President and Co-Owner  
Triumvirate Environmental Services, Inc.  
10100 Rocket Blvd  
Orlando, Florida 32824

RTroy@Triumvirate.com

Re: **Request for Additional Information (RAI)**  
Triumvirate Environmental Services, Inc.  
EPA ID Number: FLD98559728  
Current Operating Permit: 26916-009-HO  
DEP Application Number: 26916-010-HO  
Orange County – Hazardous Waste

Dear Mr. Troy,

Thank you for your revised application for an Operating Permit Renewal for the above referenced Facility. A Department staff review of the application submitted on May 1, 2023, indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220, Florida Administrative Code (F.A.C.) and Chapter 403.722, Florida Statutes (F.S.), all processing of the application is suspended when a permit application is deemed incomplete. Please provide the information in the attached document and refer to this correspondence in your response.

In order for the Department to continue processing your application, please submit the information requested as soon as possible and refer to this correspondence in your response. The response must be signed, sealed, and dated by a registered Florida Professional Engineer. The Department must receive a response within 60 days of the date of this letter, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to subsection 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.

Please submit the response by August 4, 2023 or 60 days from the date of this request in electronic format to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [robert.cook@floridadep.gov](mailto:robert.cook@floridadep.gov). If the

Mr. Randy Troy

June 5, 2023

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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/FOLDER>. After posting the document, send an e-mail to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [robert.cook@floridadep.gov](mailto:robert.cook@floridadep.gov), alerting us that it has been posted.

If you have any questions, please contact Robert Cook by telephone at (850) 245-8771 or by email at [robert.cook@floridadep.gov](mailto:robert.cook@floridadep.gov).

Sincerely,



Michell Mason Smith, Environmental Administrator  
Hazardous Waste Program & Permitting

Attached: List of Requested Information

cc (w/ Attachment):

Brian Bastek, EPA Region 4, [bastek.brian@epa.gov](mailto:bastek.brian@epa.gov)

Carlos Merizalde, EPA Region 4, [merizalde.carlos@epa.gov](mailto:merizalde.carlos@epa.gov)

Edgar Echevarria, DEP Headquarters, [edgar.echevarria@floridadep.gov](mailto:edgar.echevarria@floridadep.gov)

Daniel Hall, Central District - [Daniel.K.Hall@FloridaDEP.gov](mailto:Daniel.K.Hall@FloridaDEP.gov)

Triumvirate Environmental Services, Inc.

EPA ID Number: FLD980559728

DEP Application Number.: 26916-010-HO

**General Comments:**

1. [xx/384] indicates the page of the .pdf.
2. [1/384] Cover Letter & Outline, #1: Prior to commencement of construction of the secondary containment, concrete, etc. for the flammable units, additional information will be needed. Triumvirate will submit to the Department design drawings, figures & calculations & specifics of the new construction.
3. [1/384] Cover Letter & Outline, #2: The text states, "Smaller containers of flammable solids would be consolidated into larger containers just outside of the flammable storage units to allow forklift usage." Are the smaller containers going to be consolidated as in their present status, into a larger container such as a roll off box? Or, are the smaller containers going to be first unpacked, then re-packaged into a larger container?
4. [2/384] Cover Letter & Outline, # 3&4: Triumvirate will need to ensure that Transfer Facility Requirements are adhered to in any aspect that may apply.
5. [2/384] Cover Letter & Outline, # 5: The text states "hazardous waste & non-hazardous waste to be stored in the Northwest sub-unit within the Container Storage Area. The current permit language denotes this area as non-hazardous waste only." Where in the current permit is that stated? The current permit gives Triumvirate the option to store non-hazardous waste within the same area as hazardous. If Triumvirate does choose that option, then the non-hazardous waste volume included is summed up with the hazardous waste as specified in part a) shown below. The current permit states in Part II Subpart B.2-"Container Storage Unit #5 "The Permittee may store non-hazardous materials in the Container Storage Area provided that the Permittee complies with the requirements of 40 CFR 264.175 and:
  - a. The volume of non-hazardous materials is included in the total volume of waste allowable in the regulated storage area. The Permittee maintains the required aisle spacing in the storage area for both the regulated and non-hazardous materials."
6. [2/384] Cover Letter & Outline, #8: General comment. Triumvirate proposes in multiple locations that "a modification to the existing permit language so non-hazardous waste does not count against our hazardous waste limit. The language in the existing hazardous waste permit requires us to store non-hazardous solid waste inside the permitted hazardous waste storage areas." The permit does not require non-hazardous it to be stored with hazardous waste. Triumvirate may store the non-hazardous volumes in a totally separate location away from the restricted areas that do contain the hazardous waste.
7. [2/384] Cover Letter & Outline, #10: The text states "The hazardous waste permit currently allows us to unpack containers from labpacks & repackage them into an outer container for outbound shipment". The Department is unable to locate this reference in the current permit. Please clarify where in the current permit this information is located. Additionally, see comment #3.

8. [23/384] Part I-General, A10: Has corporate name, not person. It is the person who signed section of Facility Operator. Facility Operator signature is John McQuillan, CEO.
9. [73/384] Part II-4.c.1-Consolidation/Stabilization Operations: The text states "Once approved & the operations commence proper equipment will be purchased." Confusing statement, vague. What equipment? Please explain in more detail.
10. [116/384] F. Areas & Materials Presenting Potential Hazards, 2. Consolidation & Stabilization Area: The text states "These upgrades will be in the form of the three pre-fabricated flammable storage units discussed in the previous section. Consolidation of flammable liquids & solids is proposed to occur in this area."
11. [133/384] 4. Flammable Material Storage Units (Proposed): The text refers to "Three, pre-fabricated flammable storage units are being proposed as part of this permit application". In order for these pre-fabricated units and the secondary containment associated with these buildings to be considered part of this permit application, modify your current application to reflect the fact that it is a Construction Permit Application.
12. [135/384] 9. Required Aisle Space: The text states "The rows are spaced at least two feet apart from each other. Inspections conducted in the unit ensures that aisle spaces are maintained unobstructed for movement of personnel and equipment." The Northwest and East Subunits have the minimum aisle space at 2+ feet per the scale shown in Figure I.D.1. What equipment does fit within the minimum aisle space? Forklifts? If not, does the entire row of pallets need to be removed to reach the furthest pallet? A few sentences explanation would help clarify.
13. [244/384] II.B.1 Secondary Containment System: "Three, pre-fabricated flammable storage units are being proposed as part of this permit application". In order for these pre-fabricated units and the secondary containment associated with these buildings to be considered part of this permit application, modify your current application to reflect the fact that it is a Construction Permit Application.
14. [246/384 & 326-327/384]: Contingency Plan, Figure I.D.1, Existing Container Storage Layout; The figures show the three sections of the Northwest Subunit 101-105, East Subunit 201-210 & South Subunit 301-306 sections. Please explain the "volume displacement of 3 pallets:  $3 \times 5.40 \text{ gallon/pallet} = 16.20 \text{ gallon}$ ". How is that value derived? Actual testing?
15. [248/384] Attachment II.B Container Management, Containment Volume 4 (Stabilization & Consolidation Area): The text refers to "As noted in Modification #7 on the Cover Letter & Outline, Triumvirate proposes to berm off the top section of the Stabilization & Consolidation Area as shown in Figure II.A.5-1 "Modified Facility Site Plan". This would reduce the total volume of the hazardous waste storage area for the Stabilization & Consolidation Area noted above by approximately one-third." If this is not a completed item when the renewal permit is issued, then Triumvirate will be required to submit a permit modification with a new as-built figure of the changes that were accomplished.