



DELIVERY VIA EMAIL

July 10, 2023

Florida DEP
Hazardous Waste Permitting Section
2600 Blair Stone Road, Mail Station 4550
Tallahassee, FL 32399-2400

RE: F.A.C Chapter 62-730 Permit Renewal Application for Triumvirate Environmental Services, Inc.
Response to Partial Request for Information (RAI) from FDEP Letter Dated May 23, 2023
EPA ID#: FLD980559728
Current Permit #: 26916-009-HO

Dear Robert Cook,

Triumvirate Environmental Services, Inc. (Triumvirate) operates a hazardous waste storage facility located at 10100 Rocket Blvd, Orlando, FL 32824 in Orange County. The current operating permit, Permit No. 26916-009-HO, was issued on October 17, 2018, and expires on November 6, 2023. A permit renewal application was submitted to FDEP via email to FDEP representatives on May 1, 2023.

On May 23, 2023, Triumvirate received a partial Request for Information (RAI) letter from FDEP that outlined additional information needed to complete the permit application. Triumvirate was requested to amend the permit application to include an application for a construction permit. An additional construction permit application fee of \$5,000 was also requested. The following items have been included in the response to the partial RAI:

1. Additional Permit Renewal Fee Check for \$5,000

An additional \$5,000 check for the construction permit fee has been mailed to the Florida DEP, Hazardous Waste Permitting Section, 2600 Blair Stone Road, Mail Station 4550, Tallahassee, FL 32399-2400. A copy of the check and the associated cover letter have been provided as part of this RAI response.

2. Permit Renewal Certifications – DEP Form 62-730.900(2)(d)

DEP Form 62-730.900(2)(d) has been recertified for the partial RAI response. It is included as Revision 1.

3. Application for a Hazardous Waste Permit, Part I – General (DEP Form 62-730.900(2)(a))

DEP Form 62-730.900(2)(a) has been included as “Attachment I.1: DEP Form 62-730.900(2)(a), Revision 1”. The application form has been updated to include Construction Permit as a type of application in Section A.2.

4. DEP Form 62-730.900(2)(c) - Information Regarding Potential Releases from Solid Waste

DEP Form 62-730.900(2)(c) has been included as “Attachment II.P.1: DEP Form 62-730.900(2)(c), Revision 0”. No changes were made to this form from the original submittal.

Only pertinent sections of the permit renewal application have been included in this response to the RAI. Any section that has been updated from the original submittal is marked as Revision 1.

If you have any questions or require additional information regarding this response to the RAI, please do not hesitate to contact me directly by phone or email.

Sincerely,



Justin Hartshorn, CHMM, CPEA
Corporate Environmental Compliance | Triumvirate Environmental, Inc.
200 Inner Belt Road, Somerville, MA 02143
Office: 617-715-8902 | Mobile: 304-373-4989
jhartshorn@triumvirate.com | www.triumvirate.com

CC: Michell Smith, FDEP
 Daniel Hall, FDEP
 Brian Bastek, EPA Region 4
 Kevin Coulon, Triumvirate General Manager Southeast Region
 David LaBelle, VP EHS
 Tim Mooney, Triumvirate Chief Operating Officer

Construction Permit Fee

Check for \$5,000



June 20, 2023

Florida DEP
Hazardous Waste Permitting Section
2600 Blair Stone Road, Mail Station 4550
Tallahassee, FL 32399-2400

RE: F.A.C Chapter 62-730 Permit Renewal Application for Triumvirate Environmental Services, Inc.
Application Fee Payment of \$5,000 per Partial RAI on May 23, 2023
EPA ID#: FLD980559728
Current Permit #: 26916-009-HO

To Whom it May Concern,

Triumvirate Environmental Services, Inc. (Triumvirate) operates a hazardous waste storage facility located at 10100 Rocket Blvd, Orlando, FL 32824 in Orange County. The current operating permit, Permit No. 26916-009-HO, was issued on October 17, 2018, and expires on November 6, 2023. A permit renewal application was submitted on May 1, 2023. The permit renewal application fee of \$10,000 was paid with check number 030629.

On May 23, 2023, the FDEP provided a Partial Request for Additional Information (RAI) to Triumvirate. The RAI included a request for an additional \$5,000 permit application fee due to construction activities proposed at the site. An additional \$5,000 has been paid by check number 031182 and is included with this letter.

If you have any questions or require additional information regarding this permit renewal application fee payment, please do not hesitate to contact me at the information shown in the signature block below.

Sincerely,

A handwritten signature in blue ink, appearing to read "R Barry".

Richard Barry
Vice President, Environmental, Health & Safety | Triumvirate Environmental, Inc.
200 Inner Belt Road, Somerville, MA 02143
Office: 617-715-8919 | Mobile: 617-799-2511
rbarry@triumvirate.com | www.triumvirate.com

CC: Michell Smith, FDEP Hazardous Waste Program & Permitting
Robert Cook, FDEP Hazardous Waste Program & Permitting
Kevin Coulon, Triumvirate General Manager Southeast Region
Tim Mooney, Triumvirate Chief Operating Officer

Hartshorn, Justin T

From: UPS <pkginfo@ups.com>
Sent: Thursday, June 22, 2023 9:58 AM
To: Hartshorn, Justin T
Subject: UPS Delivery Notification, Tracking Number 1Z75R82R0196059113

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.



Your package has been delivered.

Delivery Date: Thursday, 06/22/2023
Delivery Time: 9:52 AM

At the request of Anonymous, this notice is to confirm that the following shipment has been delivered.

Shipment Details

| | |
|----------------------------|------------------------------------|
| Tracking Number: | 1Z75R82R0196059113 |
| Ship To: | TALLAHASSEE, FL 32399 US |
| UPS Service: | UPS NEXT DAY AIR |
| Number of Packages: | 1 |
| Shipment Type: | Letter |

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Permit Renewal Certifications

DEP Form 62-730.900(2)(d)

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**APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT
CERTIFICATION
TO BE COMPLETED BY ALL APPLICANTS**

Signature and Certification

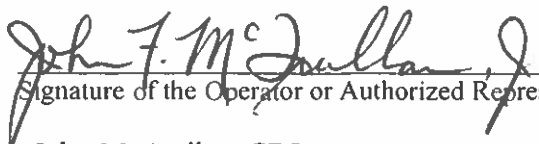
Facility Name Triumvirate Environmental Services, Inc.

EPA/DEP I.D. No. FLD980559728

The following certifications must be included with the submittal of an application for a hazardous waste authorization. The certifications must be signed by the owner of a sole proprietorship; or by a general partner of a partnership; or by a principal executive officer of at least the level of vice president of a corporation or business association, or by a duly authorized representative of that person. If the same person is a facility operator, facility owner, and real property owner, that person can cross out and initial the signature blocks under "1. Facility Operator" and "2. Facility Owner," and add the words "Facility Owner and Operator" at the line "Signature of the Land Owner or Authorized Representative."

1. Facility Operator

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, and all rules of the Department of Environmental Protection. It is understood that the permit is only transferable in accordance with Chapter 62-730, Florida Administrative Code (F.A.C.), and, if granted a permit, the Department of Environmental Protection will be notified prior to the sale or legal transfer of the permitted facility.


Signature of the Operator or Authorized Representative*

John McQuillan, CEO
Name and Title (Please type or print)

Date 7/10/2023 E-mail address jmcquillan@triumvirate.com

Telephone (617) 628-8098

* Attach a letter of authorization

| | |
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2. Facility Owner

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, operate, or conduct remedial activities at a hazardous waste management facility on the property as described. As owner of the facility, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, and all rules of the Department of Environmental Protection.

John F. McQuillan, J.
 Signature of the Facility Owner or Authorized Representative*

John McQuillan, CEO
 Name and Title (Please type or print)

Date 7/10/2023 E-mail address jmcquillan@triumvirate.com

Telephone (617) 628-8098

*** Attach a letter of authorization**

3. Land Owner

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit for the construction, operation, postclosure or corrective actions of a hazardous waste management facility on the property as described. For hazardous waste facilities that close with waste in place, I further understand that I am responsible for providing the notice in the deed to the property required by 40 CFR 264.119 and 265.119, as adopted by reference in Chapter 62-730, F.A.C.

John F. McQuillan, J.
 Signature of the Land Owner or Authorized Representative*

John McQuillan, CEO
 Name and Title (Please type or print)

Date 7/10/2023 E-mail address jmcquillan@triumvirate.com

Telephone (617) 628-8098

*** Attach a letter of authorization**

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4. Professional Engineer Registered in Florida

Complete this certification when required to do so by Chapter 471, F.S., or when not exempted by Rule 62-730.220(9), F.A.C.

This is to certify that the engineering features of this hazardous waste management facility have been designed or examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgement, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

Victoriano L. San Agustin, Jr.
Signature

Victoriano L. San Agustin, Jr.
Name (please type)

Florida Registration Number 40226

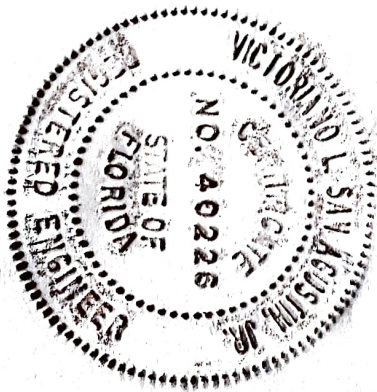
Mailing Address 5896 Azalea Street
Street or P.O. Box

Port Orange FL 32127
City State Zip

Date 6-29-2023 E-mail address vsanagustin@mdenv.com

Telephone (813) 842-5520

(PLEASE AFFIX SEAL)



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5. Professional Geologist Registered in Florida

Complete this certification when required to do so by Chapter 492, F.S., or when not exempted by Rule 62-730.220(10), F.A.C.

This is to certify that the interpretations of geology at this hazardous waste management facility have been examined by me, and the interpretations conform to sound geological principles. In my professional judgement, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and the rules of the Department of Environmental Protection.

Signature

James Golden, P.G.
Name (please type)

Florida Registration Number 0945

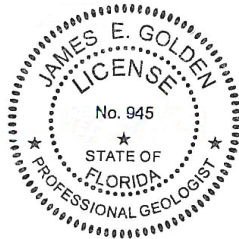
Mailing Address 6140 Edgewater Drive, Suite F
Street or P.O. Box

Orlando, Fl 32810
City State Zip

Date 6/29/2023 E-mail address jimgolden@grovescientific.com

Telephone (407) 298-2282

(PLEASE AFFIX SEAL)



Attachment I.1:
Application for a
Hazardous Waste Permit
Part I – General

DEP Form 62-730.900(2)(a)

**APPLICATION FOR A HAZARDOUS WASTE PERMIT
PART I – GENERAL
TO BE COMPLETED BY ALL APPLICANTS**

Please Type or Print

A. General Information [40 CFR Part 270.13 (a)]

1. Type of Facility in accordance with Part 270.13(a)

TREATMENT

- Tanks Piles Surface Impoundment
 Incineration Containment Building
 Boiler / Industrial Furnace Type of Unit _____
 Miscellaneous Unit Type of Unit _____

STORAGE

- Containers Tanks Piles
 Surface Impoundment Containment Building
 Miscellaneous Unit Type of Unit _____

DISPOSAL

- Landfill Land Treatment Surface Impoundment
 Miscellaneous Units Type of Unit _____

2. Type of application [40 CFR Part 270.13 (a)]:

- Construction Permit
 Operation Permit
 Construction & Operation Permit
 Research, Development & Demonstration (RD&D) Permit
 Postclosure Permit
 Clean Closure Plan
 Subpart H Remedial Action Plan
 Corrective Action

3. Revision Number: 1

4. Date Current Operation Began, or is expected to begin: 01 / 01 / 1985

5. Facility Name [40 CFR Part 270.13 (b)] Triumvirate Environmental Services, Inc.

6. EPA/DEP I.D. No. FLD 980 559 728

7. Facility Location or Street Address [40 CFR Part 270.13 (b)] 10100 Rocket Blvd, Orlando, FL 32824

8. Facility Mailing Address 10100 Rocket Blvd

Street or P.O. Box

 Orlando FL 32824

City State Zip

9. Contact Person Kevin Coulon Telephone (407) 859-4441

Title General Manager - Southeast Region

Mailing Address 10100 Rocket Blvd

Street or P.O. Box

 Orlando FL 32824

City State Zip

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Contact E-mail kcoulon@triumvirate.com

10. Operator Name [40 CFR Part 270.13 (d)] Triumvirate Environmental Services, Inc.

Telephone (407) 859-4441

Mailing Address 10100 Rocket Blvd

| | | | |
|----------------|--------------------|--------------|--|
| | Street or P.O. Box | | |
| <u>Orlando</u> | <u>FL</u> | <u>32824</u> | |
| City | State | Zip | |

Operator E-mail jmcquillan@triumvirate.com

11. Facility owner's name [40 CFR Part 270.13 (e)] Triumvirate Environmental Services, Inc.

Telephone (407) 859-4441

Mailing address 10100 Rocket Blvd

| | | | |
|----------------|--------------------|--------------|--|
| | Street or P.O. Box | | |
| <u>Orlando</u> | <u>FL</u> | <u>32824</u> | |
| City | State | Zip | |

E-mail address jmcquillan@triumvirate.com

12. Legal structure [40 CFR Part 270.13 (d)]

- Corporation
 Non-profit corporation
 Partnership
 Individual
 Local government
 State government
 Federal government
 Other

13. If an individual, partnership, or business is operating under an assumed name, specify the county and state where the name is registered.

County Not applicable State Not applicable

14. If the legal structure is a corporation, indicate the state of incorporation.

State of Incorporation Florida

15. If the legal structure is an individual or partnership, list the owners.

Name _____

Address _____
Street or P.O. Box City State Zip

Name _____

Address _____
Street or P.O. Box City State Zip

16. Site Ownership Status

Owned To be purchased To be leased years

Presently leased; the expiration date of the lease is / / .

| | |
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If leased, indicate land owner's name. Rockett Boulevard Properties LLC

Address 200 Inner Belt Road Somerville MA 02143
 Street or P.O. Box City State Zip

E-mail address jmcquillan@triumvirate.com

17. Name of Engineer Victor San Agustin Registration No. 40226

Address 5896 Azalea Street Port Orange FL 32127
 Street or P.O. Box City State Zip

Associated with: M&D Industrial Services, Inc.

18. Is the facility located on Tribal land [40 CFR Part 270.13 (f)]? Yes No

19. Existing or pending environmental permits (attach a separate sheet, if necessary):
 [40 CFR Part 270.13 (k)]

| NAME OF PERMIT | AGENCY | PERMIT NUMBER | DATE ISSUED | EXPIRATION DATE |
|--|--------|---------------|-------------|-----------------|
| See Exhibit I.A.1 "Site Permit List" in Supporting Attachments | | | | |
| | | | | |
| | | | | |
| | | | | |

B. Site Information [40 CFR Part 270.13 (b)]

1. The facility is located in Orange county.

The nearest community to the facility is Taft.

Latitude 28° 25' 04" N Longitude 81° 23' 10" W

Method and datum Google Earth, WGS84

2. The area of the facility site is 6.123 acres.

3. Attach a scale drawing and photographs of the facility showing the location of all past, present, and future treatment, storage and disposal areas. Include photographs and the locations of all Solid Waste Management Units and Areas of Concern. Also, show the hazardous wastes traffic pattern including estimated volume and control [40 CFR Part 270.13 (h)].

4. Attach a topographic map which shows all the features indicated in the instructions for this part.

5. Is the facility located in a 100-year flood plain? Yes No

6. The facility complies with the wellhead protection requirements of Chapter 62-521, F.A.C.

Yes No

C. Land Use Information

- The present zoning of the site is Industrial (IND-4).
- If a zoning change is needed, what should the new zoning be? Not applicable.

D. Operating Information

- Is waste generated on-site? Yes No
- List the NAICS codes (5 to 6 digits) [40 CFR Part 270.13 (c)] 562211 562112

- Use the codes and units provided in the instructions to complete the following table. Specify [40 CFR Part 270.13 (i and j)]:
 - Each process used for treating, storing or disposing of hazardous waste (including design capacities) at the facility, and;
 - The hazardous waste(s) listed or designated in 40 CFR Part 261, including the annual quantities, to be treated, stored, or disposed by each process at the facility.

| PROCESS CODE | PROCESS DESIGN CAPACITY AND UNITS OF MEASURE | HAZARDOUS WASTE CODE | ANNUAL QUANTITY OF HAZARDOUS WASTE AND UNITS OF MEASURE |
|--|--|----------------------|---|
| See attached Table I.D.3 in Part I - General Information | | | |
| | | | |
| | | | |
| | | | |
| | | | |

- A brief description of the facility [40 CFR Part 270.13 (m)]:
See Part I - General Facility Information .
- For hazardous debris, a description of the debris category(ies) and contaminant category(ies) to be treated, stored or disposed of at the facility [40 CFR Part 270.13 (n)]:
See Part I - General Facility Information and Part II - Specific Facility Information.

Attachment II.P:
Solid Waste Management Units
(SWMUs)

DEP Form 62-730.900(2)(c)

P. Information Regarding Potential Releases from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs)

Facility Name Triumvirate Environmental Services, Inc.

EPA/DEP I.D. No. FLD 980 559 728

Facility location Orlando FL
City State

1. Are any of the following (SWMUs or AOCs), existing or closed at your facility?

A SWMU is a discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include all areas at a facility where solid wastes have been routinely and systematically released, as described in the July 27,1990 Federal Register (55 FR 30798). The SWMU list in this form does not include all types of SWMUs. These are examples of the more common types of units. If you have a different type of SWMU, mark "yes" under "other".

AOCs are indiscernible units at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Examples of AOCs include areas where loading and unloading of chemicals may have occurred or an area of contamination with no known source.

Do not include hazardous waste units that are currently being permitted in your Part B Application.

- | | | |
|--------------------------------------|---|--|
| Landfill | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Surface impoundment | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Land farm | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Waste pile | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Incinerator | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Storage tank | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| Container storage area | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Injection wells | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Wastewater treatment units | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Transfer station | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Waste recycling operations | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| Land treatment facility | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Boiler/industrial furnace | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Satellite accumulation areas | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Less than 90-day storage units | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Stormwater retention ponds | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Septic tanks | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Used oil/oil filter collection units | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Aerosol can/drum crushers | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| On-ground areas, pits, ditches | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Other (units not listed above) | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

| | |
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2. For each “yes” answer in one (1.) above, on separate sheet(s) of paper:
 - a. Describe the wastes that were stored, treated or disposed of in each unit, and whether the wastes would be considered hazardous wastes or hazardous constituents under RCRA. (Hazardous wastes are those identified in 40 CFR Part 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.) Include any available data on quantities or volumes of wastes disposed of and the dates of disposal.
 - b. Describe each unit, type of unit including construction details, capacity, dimensions (supply any available drawings), and location at the facility on the topographic map provided under 40 CFR 270.14(b)(19). Provide a site plan, if available, and the dates of operation of the unit [40 CFR 270.14(d)(1)]. If the information has previously been submitted formally to the Department, references to the documents and or summary tables may be submitted to meet this requirement.
 - c. Include a copy of federal, state and local permits or authorizations for SWMUs that may be permitted under other environmental programs.
3. For each unit described in two (2.) above, and for each hazardous waste unit in your Part B application [40 CFR 270.14(d)(2)], on separate sheet(s) of paper, provide available data on all prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring. If the data has previously been submitted formally to the Department, references to the documents and or summary tables may be submitted to meet this requirement. Provide the following information for each SWMU/AOC:
 - a. Date of release
 - b. Estimated or known quantity or volume of waste released
 - c. Location of the release
 - d. Describe the nature of the release (i.e., spill, overflow, ruptured pipe or tank, etc.).
4. Provide, for each unit, all available analytical data that describes the nature and extent of the environmental contamination due to the releases described in three (3.) above, on separate sheet(s) of paper. Focus on the concentrations of hazardous wastes or constituents present in contaminated media (e.g., soil, sediment, surface water and groundwater) [40 CFR 270.14(d)(3)]. If the information has previously been submitted formally to the Department, references to the documents and or summary tables may be submitted to meet this requirement.