

Thursby, Kim

From: Cook, Robert
Sent: Thursday, July 20, 2023 7:01 AM
To: Thursby, Kim
Cc: Smith, Michell M.
Subject: FW: Triumvirate Environmental Services, Inc.-Orlando;FLD98559728;First Request for Additional Information (RAI)
Attachments: 7-14-23 Triumvirate-Request for Additional Information_RAI.Receipt..pdf

From: Hartshorn, Justin T <jhartshorn@triumvirate.com>
Sent: Friday, July 14, 2023 11:23 AM
To: Epost HWRS <EpostHWRS@dep.state.fl.us>
Cc: Cook, Robert <Robert.Cook@dep.state.fl.us>; Troy,Randy D <rtroy@triumvirate.com>; Coulon, Kevin P <kcoulon@triumvirate.com>; Smith, Michell M. <Michell.M.Smith@FloridaDEP.gov>
Subject: RE: Triumvirate Environmental Services, Inc.-Orlando;FLD98559728;First Request for Additional Information (RAI)

EXTERNAL MESSAGE

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

Thank you. We have received the first request for additional information document.

Regards,

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 | www.triumvirate.com

From: Cook, Robert <Robert.Cook@dep.state.fl.us>
Sent: Friday, July 14, 2023 10:47 AM
To: Hartshorn, Justin T <jhartshorn@triumvirate.com>
Subject: FW: Triumvirate Environmental Services, Inc.-Orlando;FLD98559728;First Request for Additional Information (RAI)

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.

FYI.

From: Thursby, Kim <Kim.Thursby@FloridaDEP.gov>
Sent: Friday, July 14, 2023 9:42 AM
To: 'rtroy@triumvirate.com' <rtroy@triumvirate.com>
Cc: Smith, Michell M. <Michell.M.Smith@FloridaDEP.gov>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; Bastek,

Brian <bastek.brian@epa.gov>; 'Merizalde.carlos@epa.gov' <merizalde.carlos@epa.gov>; Echevarria, Edgar <Edgar.Echevarria@FloridaDEP.gov>; Hall, Daniel K. <Daniel.K.Hall@FloridaDEP.gov>; Cook, Robert <Robert.Cook@dep.state.fl.us>

Subject: Triumvirate Environmental Services, Inc.-Orlando;FLD98559728;First Request for Additional Information (RAI)

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Michell Mason Smith
Environmental Administrator
Hazardous Waste Program & Permitting





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

July 14, 2023

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

RTroy@triumvirate.com

Re: **First 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 September 12, 2023 or 60 days from the date of this request in electronic format to HWPP@dep.state.fl.us, with a copy to robert.cook@floridadep.gov. If the

Mr. Randy Troy
July 14, 2023
Page 2 of 4

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, with a copy to 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.

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
Carlos Merizalde, EPA Region 4, merizalde.carlos@epa.gov
Edgar Echevarria, DEP Headquarters, edgar.echevarria@floridadep.gov
Daniel Hall, Central District - 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 to be considered part of this permit application, Triumvirate is required to submit a Construction Permit Application and to meet the Siting Requirements 403.7211. If not in this application, then those items will be considered in the future after the renewal of this permit application is completed and additional information is submitted by Triumvirate.
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 to be considered part of this permit application, Triumvirate is required to submit a Construction Permit Application and to meet the Siting Requirements 403.7211. If not in this application, then those items will be considered in the future after the renewal of this permit application is completed and additional information is submitted by Triumvirate.
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.