



**DELIVERY VIA EMAIL**

**September 1, 2023**

Florida Department of Environmental Protection (FDEP)  
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 First Request for Information (RAI) from FDEP Letter Dated July 14, 2023  
EPA ID#: FLD980559728  
Current Permit #: 26916-009-HO

Dear Mr. 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. Triumvirate responded to the Partial RAI on July 10, 2023, through a letter sent by email.

On July 14, 2023, Triumvirate received a First Request for Information (RAI) letter from FDEP. The following items were noted in the First RAI; Triumvirate's response follows each item:

**FDEP 1<sup>st</sup> RAI General Comment Item #1**

*[xx/384] indicates the page of the .pdf.*

**Triumvirate Response to Item #1:**

Triumvirate understands and acknowledges this comment. The number denoted in brackets is reference to the permit application PDF submitted to FDEP denoted as "Revision 0; Revision Date May 1, 2023".

**FDEP 1<sup>st</sup> RAI General Comment Item #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.*

### **Triumvirate Response to Item #2:**

Finalized detail drawings and specifications of the flammable material storage units will not be available until a purchase order (PO) has been initiated with the flammable material storage unit vendor. Triumvirate requests the ability to hold PO issuance until FDEP approves the general concept and location of the flammable storage units. A drawing has been provided in [Attachment A](#) of this response letter to better demonstrate the size, location, and secondary containment plan for the flammable material storage unit area.

Preliminary specification sheets from the flammable material storage unit vendor have also been provided in [Attachment A](#) to show the preliminary design of each unit. The preliminary design documents have been reviewed by the Fire Department and they have given verbal approval that they agree with the flammable material storage unit plan; however, they are unwilling to put anything in writing ahead of the City building department's approval.

If the flammable material storage unit plan is approved by FDEP, Triumvirate will be able to move forward with the purchase of the units and obtain official drawings and specification sheets from contractors. Any drawings, specifications, and calculations related to the flammable material storage units, and the associated secondary containment concrete base, will be provided to FDEP prior to construction.

### **FDEP 1<sup>st</sup> RAI General Comment Item #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?*

### **Triumvirate Response to Item #3:**

Triumvirate commonly receives small, inner containers inside of a larger container. For example, small 1-gallon size sealed containers of solids may arrive at the site inside of a 55-gallon drum. In this example, Triumvirate is proposing to open the 55-gallon container, remove the small, 1-gallon size containers, and place them into a DOT approved cubic yard box or roll-off container. During this process, the smaller containers will not be opened to expose their contents. The smaller containers will remain closed during the consolidation process.

### **FDEP 1<sup>st</sup> RAI General Comment Item #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.*

### **Triumvirate Response to Item #4:**

Triumvirate understands and acknowledges this comment. Triumvirate will adhere to applicable Transfer Facility Requirements.

### **FDEP 1<sup>st</sup> RAI General Comment Item #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.”*

### **Triumvirate Response to Item #5:**

In Permit 26916-009-HO, the facility storage layout is shown in Attachment B “Layout of Facility Hazardous Waste Management Areas”. In this drawing, the Northwest Sub-Unit is described as having only non-hazardous material. Triumvirate was operating according to this drawing and only storing non-hazardous material in this sub-unit. The drawings of this area provided in the permit application submitted May 1, 2023, have removed the non-hazardous description from the Northwest Sub-Unit.

### **FDEP 1<sup>st</sup> RAI General Comment Item #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.*

### **Triumvirate Response to Item #6:**

Thank you for this clarification. The issue of storing non-hazardous waste in the hazardous waste areas is due to the language included with current Solid Waste Permit #0288830-006-SO. Triumvirate is in the process of submitting a permit renewal and modification for the site’s Solid Waste Permit. The renewal and modification application will clarify where non-hazardous solid waste can be stored.

### **FDEP 1<sup>st</sup> RAI General Comment Item #7**

*[2/384] Cover Letter & Outline, #10: The text states “The hazardous waste permit currently allows us to unpack containers from labpacks & repack 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.*

**Triumvirate Response to Item #7:**

Labpacks are discussed in the Waste Analysis Plan (WAP) (Revision 3, dated April 23, 2018) on Page 19 in Section 10.0 Titled “Labpacks”. This section discusses packaging and repackaging of labpack containers.

**FDEP 1<sup>st</sup> RAI General Comment Item #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.*

**Triumvirate Response to Item #8:**

John McQuillan is the owner of Triumvirate Environmental Services, Inc. Part I – General, Item A.10 has been updated as requested and the revised DEP Form 62-730.900(2)(a) is provided as Revision Number 2 in [Attachment B](#) of this response letter.

**FDEP 1<sup>st</sup> RAI General Comment Item #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.*

**Triumvirate Response to Item #9:**

The sentence “Once approved & the operations commence proper equipment will be purchased” was added in error. Triumvirate requests that this sentence be removed from consideration in the application as it is not pertinent to the context of the paragraph.

**FDEP 1<sup>st</sup> RAI General Comment Item #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 prefabricated flammable storage units discussed in the previous section. Consolidation of flammable liquids & solids is proposed to occur in this area.”*

**Triumvirate Response to Item #10:**

The existing permit indicates that flammable material consolidation is approved but is contingent on the appropriate NFPA upgrades to the building. Instead of having upgrades done to the building itself, we are proposing the addition of Flammable Material Storage Units located outside of the existing building. The sentence “Consolidation of flammable liquids & solids is proposed to occur in this area” is referring to the new Flammable Material Storage Units area described in “[116/384] F. Areas & Materials Presenting Potential Hazards, 4. Flammable Material Storage Units”. It was not intended to suggest that flammable liquids and solids are proposed to be consolidated in the Consolidation and Stabilization Area within the existing building.

**FDEP 1<sup>st</sup> RAI General Comment Item #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.*

**Triumvirate Response to Item #11:**

Triumvirate submitted a Partial RAI response on July 10, 2023, that addressed the construction permit issue and provided the additional construction fee payment.

In the May 1, 2023, permit application submittal, Triumvirate provided Attachment I.A “Siting Evaluation (Revision # 0; Revision Date: May 1, 2023)” to clarify how the permit application and modifications do not trigger the Siting Requirements under 403.7211. In the Partial RAI letter from FDEP on May 23, 2023, the FDEP stated on Page 1 of 2 that “*Note, the Department has reviewed Attachment I.A. of the Permit Renewal Application dated May 1, 2023, and has determined the proposed activities are in compliance with the siting criteria of 403.7211, F.S.*”.

**FDEP 1<sup>st</sup> RAI General Comment Item #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.*

**Triumvirate Response to Item #12:**

A forklift will not fit in the minimum 2 foot aisle space. This space is provided to allow for the inspection of containers and to allow for room to identify the source of a leaking container or to identify a potentially damaged container. If a damaged or leaking container were identified on the furthest pallet, a forklift would be used to relocate the pallets in the row until the damaged container could be accessed for a full spill response.

**FDEP 1<sup>st</sup> RAI General Comment Item #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.*

**Triumvirate Response to Item #13:**

Triumvirate submitted a Partial RAI response on July 10, 2023, that addressed the construction permit issue and provided the additional construction fee payment.

In the May 1, 2023, permit application submittal, Triumvirate provided Attachment I.A “Siting Evaluation (Revision # 0; Revision Date: May 1, 2023)” to clarify how the permit application and modifications do not trigger the Siting Requirements under 403.7211. In the Partial RAI letter from FDEP on May 23, 2023, the FDEP stated on Page 1 of 2 that “*Note, the Department has reviewed Attachment I.A. of the Permit Renewal Application dated May 1, 2023, and has determined the proposed activities are in compliance with the siting criteria of 403.7211, F.S.*”.

**FDEP 1<sup>st</sup> RAI General Comment Item #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 X 5.40 gallon/pallet = 16.20 gallon”. How is that value derived? Actual testing?*

**Triumvirate Response to Item #14:**

The value used for the volume displacement of a pallet was taken from historical values used in previous permit renewal applications. Current Triumvirate personnel have not been able to find the origin of this value; however, Triumvirate has recalculated the volume of containment that would be displaced by a standard wooden pallet and has verified the 5.4 gallon/pallet value. A summary of the calculations used for this determination are shown in [Attachment C](#) of this response letter.

**FDEP 1<sup>st</sup> RAI General Comment Item #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.*

**Triumvirate Response to Item #15:**

Thank you for this clarification. Triumvirate would like to retract the proposal for the bermed area. This was a misunderstanding related to the storage ability for this area. No berm is needed, and the Stabilization and Consolidation Area will remain as it is currently.

This response is being submitting prior to September 12, 2023, or 60 days from the date of the 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).

Only pertinent sections of the permit renewal application have been included in this response to the first RAI. Any section that has been updated from the original submittal is marked as “Revision 2”.

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,



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**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](mailto:jhartshorn@triumvirate.com) | [www.triumvirate.com](http://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

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,



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**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](mailto:jhartshorn@triumvirate.com) | [www.triumvirate.com](http://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

**Florida Professional Engineer Certification:**

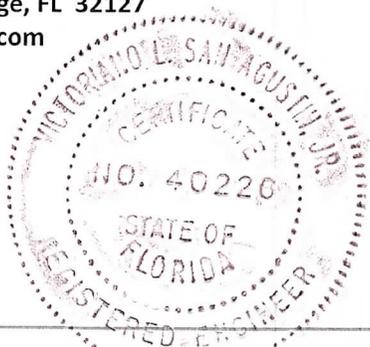
This is to certify that the engineering features of this response to FDEP's 7/14/2023 RAI have been designed or examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Florida Department of Environmental Protection.

 8-31-23  
\_\_\_\_\_  
Date

Victoriano L. San Agustin, Jr.  
Florida Professional Engineer No. 40226

M&D Environmental Services, LLC.  
5896 Azalea Street, Port Orange, FL 32127  
E-mail: [vsanagustin@mdenv.com](mailto:vsanagustin@mdenv.com)  
Telephone (813)842-5520

(PLEASE AFFIX SEAL)



## Attachment A: Response to FDEP 1<sup>st</sup> RAI General Comment Item #2



Total New Concrete Area Below Flammable Storage Units = 72 ft x 62 ft = 4,464 ft<sup>2</sup> (with a 2" curb around the perimeter)

Total Concrete Secondary Containment Area = 4,464 ft<sup>2</sup> x 2 inches = 744 ft<sup>3</sup> (5,565 gallons)

Each flammable storage unit has its own internal secondary containment sump:

- 42' x 8' Unit = 80 drum capacity (4,400 gal) with 1,243 gal secondary containment sump
- 26.5' x 8' Unit = 40 drum capacity (2,200 gal) with 757 gal secondary containment sump

A blind sump will be installed at the corner of the containment pad to allow for pumping of collected water. The pad will be sloped to the sump for proper drainage.

Preliminary specification sheets for the flammable material storage units are provided on the following page.

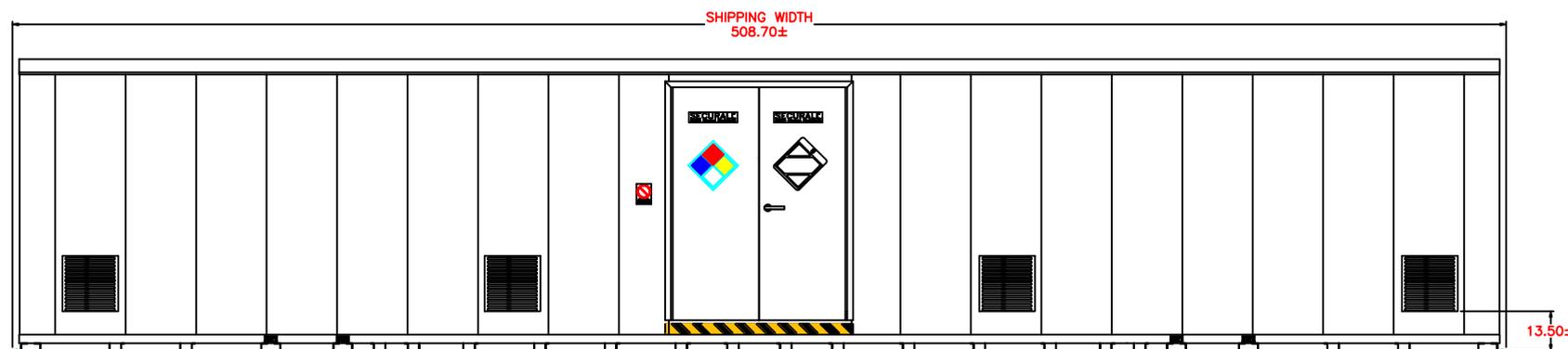
# 80 Drum Unit



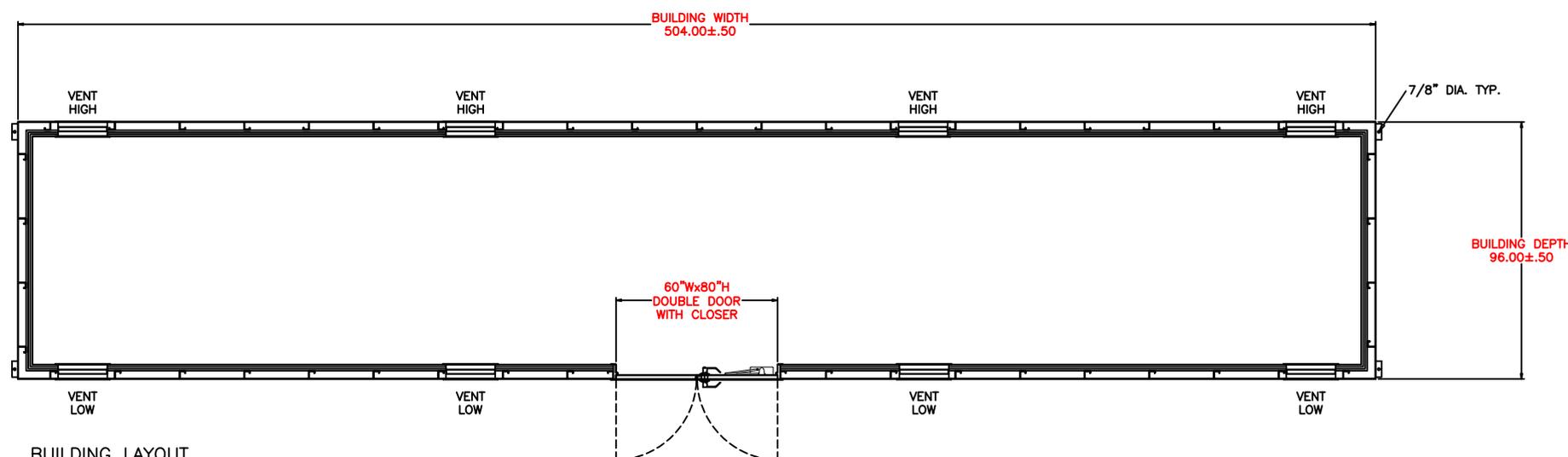
www.cplabsafety.com



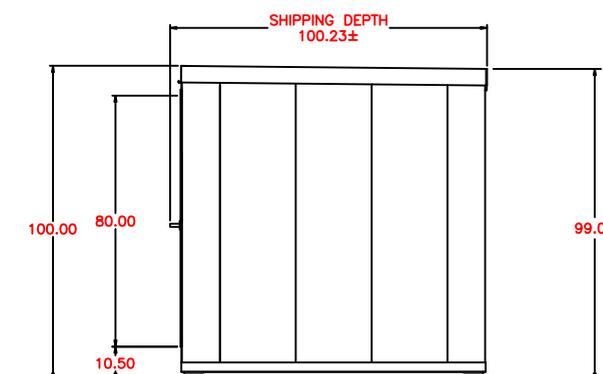
Factory Mutual Approved  
NO CHANGES ARE TO BE MADE  
WITHOUT NOTIFICATION TO AND  
APPROVAL FROM FACTORY MUTUAL  
RESEARCH CORPORATION



FRONT ELEVATION



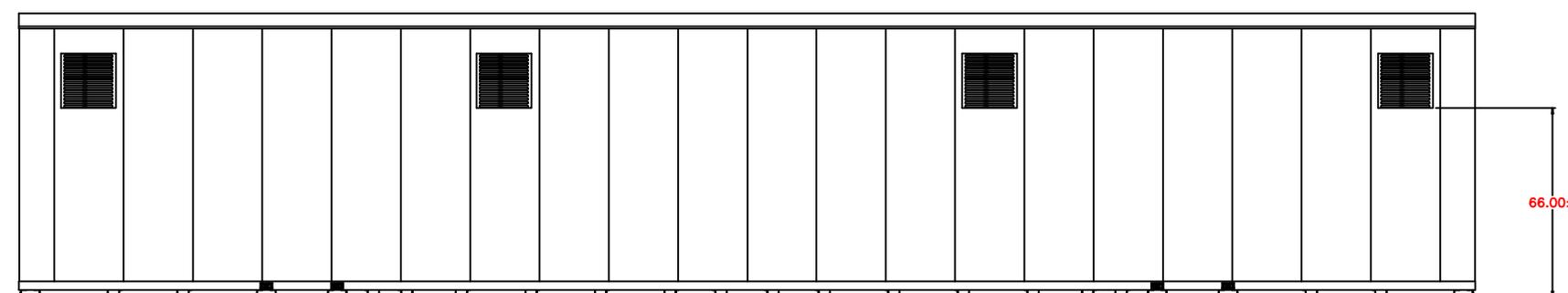
BUILDING LAYOUT



RIGHT ELEVATION

SHIPPING INFORMATION

SHIPPING DIMENSIONS: 8'4"H x 42'6"W x 8'6"D  
SHIPPING WEIGHT: 27,106 LBS.



REAR ELEVATION

COLOR: GRAY (STANDARD COLOR UNLESS OTHERWISE NOTED)

Model 8000	All Models	Non-Rated	FR2	FR4
Exterior Dimensions	100Hx504Wx96D	---	---	---
55 gal Drum Capacity	80	---	---	---
Interior Dimensions	---	87.5Hx498Wx90D	85.25Hx493.5Wx85.5D	84.5Hx492Wx84D
Interior Area	---	311.25	293	287
Sump Capacity (gal)	---	1243	1243	1243

## CAUTION

By signing the "Approval" box, you the customer are approving the production specifications and the notes shown below. The products will be built in accordance with this drawing and invoiced as such. Deviations will be addressed in a revised drawing.

IMPORTANT NOTES:

- All standard electrical is 120/240 volts, if installed.
- Location and quantity of devices, fixtures and conduit may vary based on product manufacturer's installation instructions, customer's requirements, electrician's recommendations and authority having jurisdiction.
- Revisions to customer drawings may result in increased engineering fees. Please consult with your sales representative for details.
- By signing this document you are accepting the possibility that State Design Certification may be required for your building and assume responsibility that you, the customer, will be invoiced accordingly if it is required.

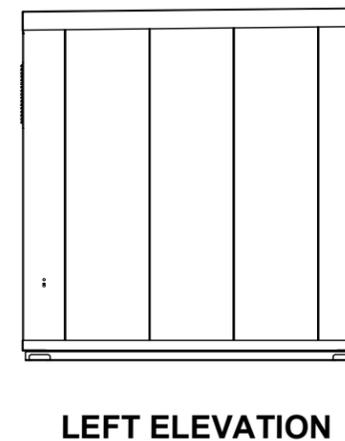
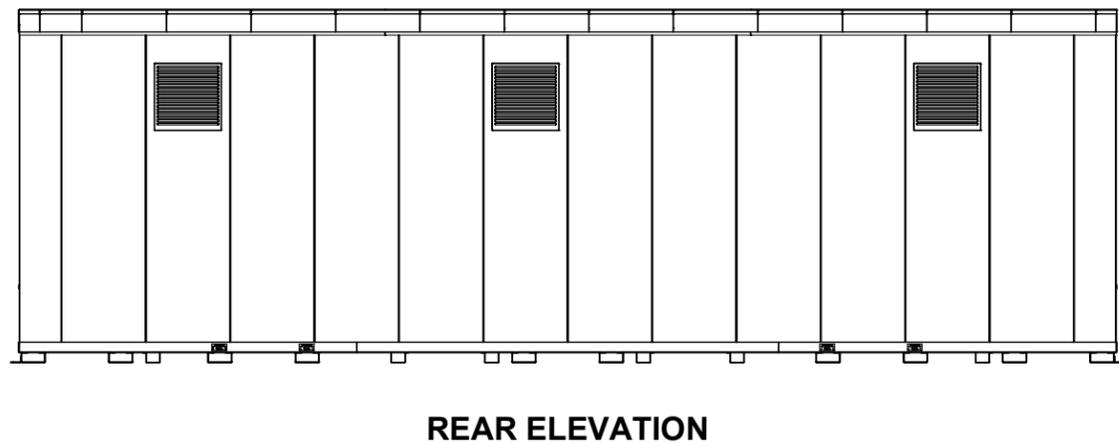
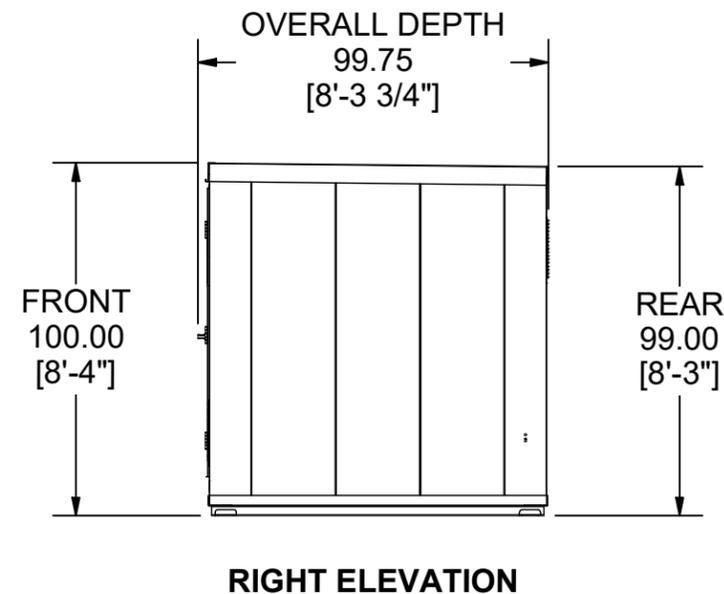
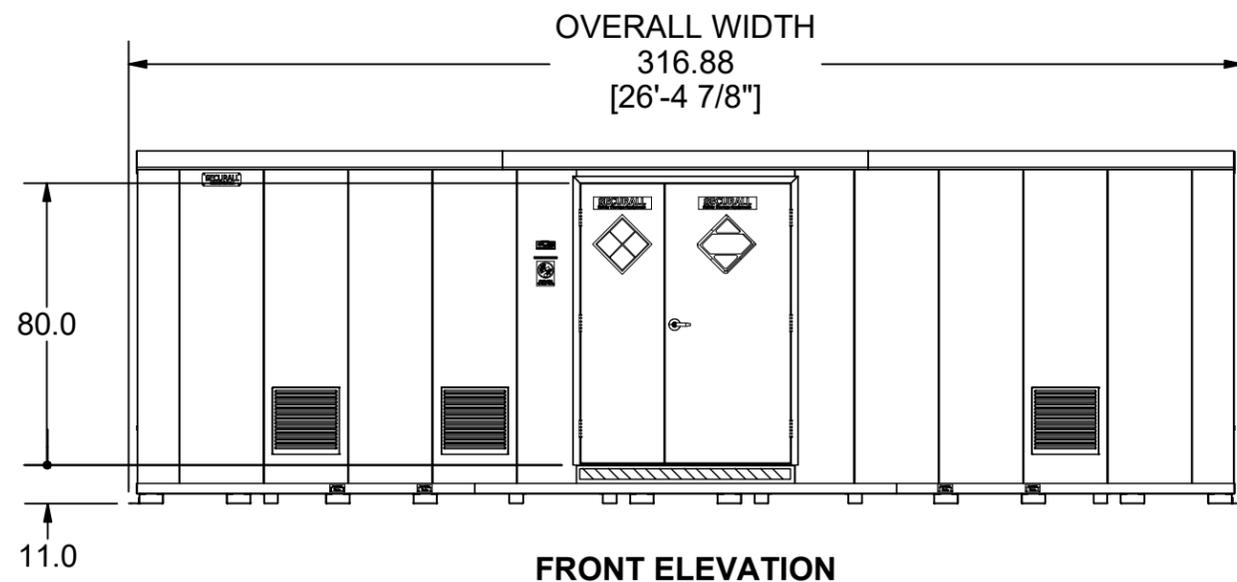
DEALER / CONTRACTOR APPROVAL

SIGNATURE \_\_\_\_\_  
PRINT NAME \_\_\_\_\_  
DATE \_\_\_\_\_

END USER APPROVAL

SIGNATURE \_\_\_\_\_  
PRINT NAME \_\_\_\_\_  
DATE \_\_\_\_\_

# 40 Drum Unit



STAMP(S) IF APPLICABLE:

SITE LOCATION:

MODEL: B4800FR4  
COLOR: BGRAY  
FIRE RATING: 4 HRS

**QTY.**

EXTERIOR DIMENSIONS (INCHES)	100H x 312W x 96D
INTERIOR AREA (SQ. FT.)	174.75
SUMP CAPACITY (GALLONS)	757
SHIPPING DIMENSIONS: 8'-4"H x 26'-4 7/8"W x 8'-3 3/4"D	
SHIPPING WEIGHT: 20,285 LBS	

## CAUTION

A&A/Securall has made every attempt to interpret the specifications of your Purchase Order, as reflected in this drawing. By signing the "Approval" box, you the customer are approving the production specifications and the notes shown below. The products will be built in accordance with this drawing and invoiced as such. Deviations will be addressed in a revised drawing.

**IMPORTANT NOTES:**

1. All standard electrical is 120/240 volts, if installed.
2. Location and quantity of devices, fixtures and conduit may vary based on product manufacturer's installation instructions, customer's requirements, electrician's recommendations and authority having jurisdiction.
3. Revisions to customer drawings may result in increased engineering fees. Please consult with your sales representative for details.
4. By signing this document you are accepting the possibility that State Design Certification may be required for your building and assume responsibility that you, the customer, will be invoiced accordingly if it is required.

DEALER /CONTRACTOR  
APPROVAL

END USER  
APPROVAL

SIGNATURE \_\_\_\_\_

SIGNATURE \_\_\_\_\_

PRINT NAME \_\_\_\_\_

PRINT NAME \_\_\_\_\_

DATE \_\_\_\_\_

DATE \_\_\_\_\_

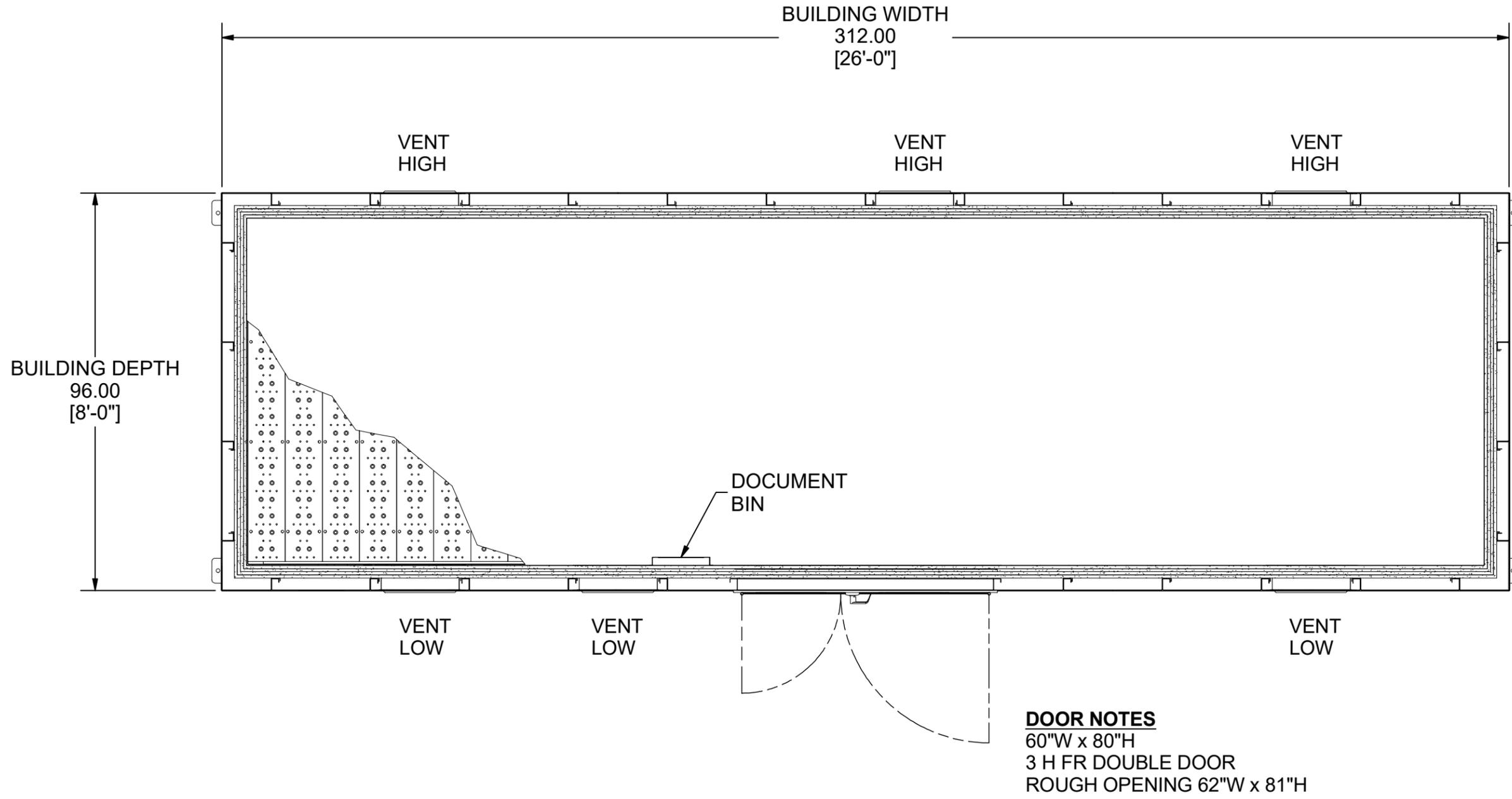
**INCLUDED BUT NOT SHOWN:**

DOOR CLOSER  
FIRE DAMPERS

**40 Drum  
Unit**

STAMP(S) IF APPLICABLE:

SITE LOCATION:



**BUILDING LAYOUT**

**Attachment B: Response to FDEP 1<sup>st</sup> RAI General Comment Item #8**

Revision 2 of DEP Form 62-730.900(2)(a) is provided on the next page. Section Part I – General, A10 has been updated to reflect John McQuillan in the Operator Name field.

**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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Date	09/01/2023
Page	3 of 4

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 Environmental Services, LLC

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  
\_\_\_\_\_

3. 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 C: Response to FDEP 1<sup>st</sup> RAI General Comment Item #14**

Excel sheet calculations are provided on the next page.

## Pallet Volume Calculation

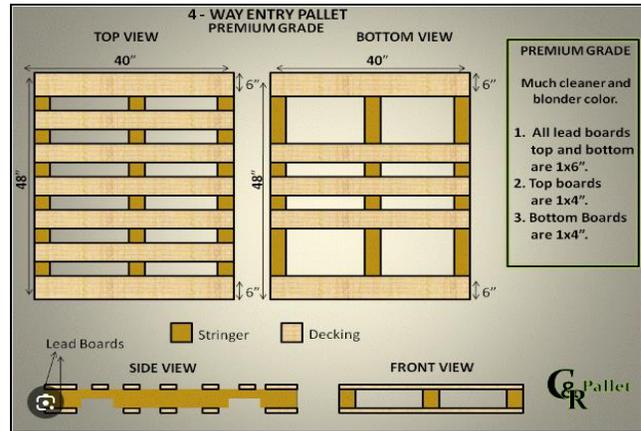
A Standard size wooden pallet was used for the pallet volume calculation. Dimensions are 48" x 40". The spill over height of the secondary containment is 3.5". The top boards are higher than 3.5" from the ground; therefore, the top boards were not used in the volume calculation.

### Pallet Specifications (Standard 48" x 40"):

	Length, in.	Width, in.	Thickness, in.
Lead Boards	40	5.75	0.75
Span Boards	40	3.75	0.75
Stringers	48	3.25	1.5

	Count
Lead Boards	2
Bottom Span Boards	3
Stringers	3

Conversion Factor: 1 cu ft = 7.481 gal	
1 cu ft	
7.481 gal	



Volume of Lead Boards	
Length (L)	3.33 feet
Width (W)	0.48 feet
Height (H)	0.06 feet
Volume per board (L x W x H)	0.10 cu ft
	0.75 gallon
Boards in Containment Area	2
<b>Total Volume of Lead Boards</b>	<b>1.49 gal</b>

Volume of Span Boards	
Length (L)	3.33 feet
Width (W)	0.31 feet
Height (H)	0.06 feet
Volume per board (L x W x H)	0.07 cu ft
	0.49 gallon
Boards in Containment Area	3
<b>Total Volume of Span Boards</b>	<b>1.46 gal</b>

Volume of Stringer Boards	
Length (L)	4.00 feet
Width (W)	0.27 feet
Height (H)	0.13 feet
Volume per board (L x W x H)	0.14 cu ft
	1.01 gallon
<u>Dimension of cutout for forks</u>	
Length	8.00 inches
Width	1.50 inches
Height	1.88 inches
Length	0.67 feet
Width	0.13 feet
Height	0.16 feet
Volume of cutouts	0.01 cu ft
	0.10 gallon
Number of Cutouts	6
Boards in Containment Area	3
<b>Total Volume of Stringer Boards</b>	<b>2.45 gal</b>

<b>Total Volume of Pallet (Lead + Span + Stringer)</b>	<b>5.4 gal</b>
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