



FLORIDA DEPARTMENT OF Environmental Protection

Central District Office
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

October 26, 2023

John F. McQuillan, Jr., Manager
Triumvirate Environmental Services, Inc.
200 Inner Belt Road
Somerville, Massachusetts 02143
jmcquillan@triumvirate.com


Re: Triumvirate Environmental Services, Inc.
HW Facility ID #FLD980559728
Orange County

Dear Mr. McQuillan:

Department personnel conducted an inspection of the above-referenced facility on September 12, 2023. Based on the information provided during the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records, and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Michael Eckoff at 407-897-4308 or via e-mail at michael.eckoff@FloridaDEP.gov.

Sincerely,


Viviana Useche, Environmental Manager
Central District
Florida Department of Environmental Protection

Enclosure: Inspection Report



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Triumvirate Environmental Services Inc

On-Site Inspection Start Date: 09/12/2023

On-Site Inspection End Date: 09/12/2023

ME ID#: 10046

EPA ID#: FLD980559728

Facility Street Address: 10100 Rocket Blvd, Orlando, Florida 32824-8565

Contact Mailing Address: 10100 Rocket Blvd, Orlando, Florida 32824-8565

County Name: Orange

Contact Phone: (407) 859-4441

NOTIFIED AS:

LQG (>1000 kg/month), Pharmaceuticals Healthcare, TSD Facility, Transfer Facility, Transporter, Used Oil

WASTE ACTIVITIES:

Generator: LQG **Other Status:** Offsite Waste Received **Transporter:** Own Waste, Commercial Waste, Transfer Facility **TSD:** Treater, Disposer, Storer, Operating Commercial TSD **Used Oil:** On-Spec, Off-Spec, Oil Filters **Other:** Transport, Recognized Trader Exporter, SLAB Exporter **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** 5000 kg or more; Large Quantity Handler (LQH)

Hazardous Waste Pharmaceuticals:

Pharmaceutical Activities: Healthcare Facility

INSPECTION TYPE:

Routine Inspection for TSD Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Michael Eckoff, Inspector

Other Participants: Mike Cutshall, Facility Supervisor, John Keating, Facility Operations Manager, Kevin Coulon, General Manager, Southeast Division

LATITUDE / LONGITUDE: Lat 28° 25' 5.8132" / Long 81° 23' 10.5985"

NAIC: 562111 - Solid Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On September 12, 2023, Michael Eckoff, Florida Department of Environmental Protection (FDEP or Department), accompanied by Mike Cutshall, John Keating, and Kevin Coulon, Triumvirate Environmental Services, Inc. (TES or Facility), inspected TES for compliance with permit number 26916-009-HO. The permit was issued October 17, 2018 and expires November 6, 2023. The permit renewal application was received May 1, 2023 and is currently under review by the Department.

The facility most recently notified the Department on February 10, 2023 as a large quantity generator of hazardous waste, a large quantity handler of universal waste batteries, pesticides, lamps, and mercury containing devices, a hazardous waste pharmaceuticals - healthcare facility, a recognized trader exporter, an exporter of spent lead-acid batteries, off-site waste received, an operating commercial treatment, storage, and disposal facility, petroleum contact water management, a transporter of hazardous waste, a registered used oil transporter, transfer facility, and marketer, a used oil filter transporter and transfer facility, a transporter and transfer facility of universal waste lamps and mercury containing devices. TES originally received EPA ID FLD980559728 on October 14, 2011.

TES has 22 employees at this location and operates Monday through Friday, 6:30 am to 5:00 pm. The facility

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operates three Class B box trucks, one rental box truck, two tractors, and one Class C box truck.

INSPECTION HISTORY: (past five years)

TES was last inspected on April 6, 2021 and was in compliance at that time.

TES was inspected on May 20, 2020 and was in compliance at that time.

Process Description:

TES is permitted to store up to 824 55-gallon drums for a total of 41,200 gallons or 224 cubic yards of hazardous waste in the Container Storage Unit. The Container Storage Unit consists of the Container Storage Building, Waste Consolidation Area, and Waste Stabilization Area. The Container Storage Building sub-units consist of the South Sub-Unit, the East Sub-Unit, and the Northwest Sub-Unit. The South Sub-Unit is for storage of Acidic, Toxic, and Non-Hazardous wastes. The East Sub-Unit is for storage of Alkaline, Toxic, Universal, and Non-Hazardous wastes. The Northwest Sub-Unit is for storage of Non-Hazardous wastes. Any 10-day transfer facility waste or non-hazardous waste managed in the container storage unit must be counted toward the total volume in storage.

TES accepts hazardous waste from generators using TES's own transportation services as well as other registered hazardous waste transporters. Generators serviced by TES are those that generate hazardous waste that is exclusive of explosive or radioactive waste. Hazardous waste accepted by the facility is stored in its warehouse for up to a year before being shipped to an off-site treatment or disposal facility.

Hazardous wastes and non-hazardous solid wastes are segregated at the facility according to compatibility groups as outlined in the permit. Storage areas have secondary containment to minimize and prevent possible releases to the environment. TES uses a bar-coding system for containers stored in the permitted storage area to ensure the waste is staged in an area with compatible waste.

On the west side of the facility is a loading dock that serves as a loading area for container trucks. Containers destined for temporary storage, either in the 10-day transfer area or in the permitted drum storage area are offloaded upon arrival. Vehicles with incoming shipments of permitted waste are unloaded within 3 consecutive working days of the vehicle's arrival. Containers destined for shipment off-site are loaded into trailers based on D.O.T. compatibility requirements. Vehicles containing outgoing shipments of waste from the permitted storage area are moved off-site within 5 consecutive working days of the first container being placed on the vehicle.

No 10-day transfer facility waste was on-site at the time of the inspection. Two trucks were parked at the loading dock, one was being loaded with hazardous waste pharmaceuticals and the other with hazardous waste lab packs. Loading of the trucks began on September 11, 2023. Two trucks containing 10-day transfer waste arrived at the facility on September 11, 2023. Two trucks containing non-hazardous waste were loaded on September 7, 2023 and will be leaving the facility on September 14, 2023.

A spill kit and an emergency equipment cabinet were located on the loading dock. The emergency equipment cabinet was sealed and dated 8/14/2023, the date of the last inspection. The equipment cabinet is inspected monthly to verify its contents.

On the loading dock were approximately 229 waste containers either off-loaded from arriving trucks or awaiting loading on trucks for off-site shipment. The arriving waste will be inspected, compared to the manifest(s) and profiles, and moved into the storage area. Four containers have been identified as rejects and must be returned to the generator. Staged adjacent to the loading dock was a 30-cubic yard container of non-hazardous solid waste destined for Wheelabrator South Broward, a municipal waste-to-energy facility located in South Florida.

Adjacent to the loading dock is a two-compartment tank. The used oil portion of the tank has a 15,000-gallon capacity. The Jet-A fuel portion of the tank has a 7,000-gallon capacity.

Inside the warehouse containers are separated by compatibility groups into rows along the north wall, east wall,

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and south wall. Rows along the north wall are numbered from 101 to 105. Rows along the east wall are numbered from 201 to 210. Rows along the south wall are numbered from 301 to 306. The south, east, and north storage units are permitted to store 144, 240, and 440 55-gallon drums, or the equivalent drum volume, respectively. Spill control equipment consists of absorbents, shovels, brooms and dust pans. Fire extinguishers are available throughout the facility.

The facility is permitted to store up to 824 55-gallon drums, equivalent to 41,200 gallons or 224 cubic-yards of hazardous waste. Based on the inventory log and the inspection of the facility as itemized below, TES was storing the equivalent of approximately 203 cubic yards of waste on-site.

Rows 101 to 105 contained approximately 110 containers of varying sizes, and pallets of non-hazardous solid waste. One pallet in Row 102 was positioned such that the label was not facing out. One 55-gallon drum of hazardous waste located in Row 104.

NOTE: The pallet was immediately repositioned so the label faced out.

The middle of the warehouse was being used to store containers that are either going to be consolidated, shipped off-site, or put into one of the rows. In this area were approximately 134 containers of varying size of hazardous waste and non-hazardous waste.

Rows 201 to 210 contained approximately 252 containers of varying sizes, and pallets of toxic and corrosive hazardous waste and non-hazardous waste.

Rows 301 to 304 were not inspected.

Rows 305 and 306 contained approximately 77 containers of varying sizes of corrosive hazardous waste.

Outside the north end of the property was storage of trailers. Trailers either contained supplies or were empty.

Inspection of the Consolidation and Waste Stabilization Area found the facility has not performed stabilization of metal bearing waste since 2015. The area is currently being used for repacking hazardous waste into lab packs or loose packs and for storage of non-hazardous waste. Wastes in the area included 40 containers of hazardous waste chemotherapy waste, non-hazardous waste debris, and non-hazardous waste medicine, eight containers of non-hazardous waste empty hydrofluoric acid containers, 45 containers of non-hazardous waste oily water, buffered formalin, DAB solution, and sodium bicarbonate, 17 containers, cubic yard bags, or intermediate bulk containers of hazardous waste nicotine water and non-hazardous waste oily rags, graphite powder, degreaser, DAB solution, sludge, and zinc sulfate water, and 13 containers of non-hazardous waste ethanol/water, zinc sulfate water, and ammonium citrate.

RECORDS REVIEW:

A copy of the RCRA permit and application are on site and available for review.

A copy of the current inventory for wastes stored on-site was available for review. Based on the information provided and inspection of the facility, the volume of waste stored on-site is below the permitted limit. No containers have been stored on-site for greater than one year.

Review of the contingency plan found the plan was last reviewed on August 29, 2023 and was up to date. No issues were found.

Randy Troy, EHS & Transportation Compliance Specialist, joined the inspection.

Documentation of required training provided to staff during 2022 and 2023 was provided in an email on September 13, 2023. RCRA Hazardous Waste Training was last completed in August 2023. No issues were

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noted with the training documentation.

The job title/job description for each employee was available for review.

Documentation of weekly inspections for the warehouse and loading dock was provided in an email on September 12, 2023. Review of the weekly inspections found no issues.

Documentation of monthly inspections of emergency equipment was provided in an email on September 12, 2023. Review of the monthly inspections found no issues.

Review of financial responsibility for 2023 was found to be in compliance.

Conclusion:

Triumvirate Environmental Services, Inc. was inspected as a treatment, storage, and disposal facility and no potential violations were noted at that time.

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1.0: Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Michael Eckoff
Principal Investigator Name

Inspector
Principal Investigator Title

Michael Eckoff
Principal Investigator Signature

DEP 10/25/2023
Organization **Date**

Mike Cutshall
Representative Name

Facility Supervisor
Representative Title
 Triumvirate Environmental
 Services, Inc.
Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

John Keating
Representative Name

Facility Operations Manager
Representative Title
 Triumvirate Environmental
 Services, Inc.
Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Kevin Coulon
Representative Name

General Manager, Southeast
 Division
Representative Title
 Triumvirate Environmental
 Services, Inc.
Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:

Approver: Viviana Useche

Inspection Approval Date: 10/25/2023

