



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

FACILITY INFORMATION:

Facility Name: Triumvirate Environmental Services Inc

On-Site Inspection Start Date: 05/29/2024

On-Site Inspection End Date: 05/29/2024

ME ID#: 50649

EPA ID#: FLD981018773

Facility Street Address: 3670 SW 47th Ave, Davie, Florida 33314

Contact Mailing Address: 3701 SW 47th Ave Ste 109, Davie, Florida 33314-2830

County Name: Broward

Contact Phone: (407) 859-4441

NOTIFIED AS:

Transfer Facility, Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Own Waste, Commercial Waste, Transfer Facility **TSD:** Operating Non-Commercial TSD **Used Oil:** On-Spec, Off-Spec, Oil Filters, Processor, Collection Center (Commercial) **Other:** Transport **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate /Accumulate:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Transport:** Batteries, Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Batteries, Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

INSPECTION TYPE:

Routine Inspection for Used Oil Processor Facility
Routine Inspection for Hazardous Waste Transporter Facility
Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Universal Waste Transporter Facility
Routine Inspection for Transfer Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kaitlyn Taylor, Environmental Consultant

Other Participants: Shelby Luong, Environmental Specialist II, John Lennon, General Manager, Randy Troy, EHS Manager, Ryan Mohansingh, Senior Operations Manager

LATITUDE / LONGITUDE: Lat 26° 4' 37.4777" / Long 80° 12' 33.4891"

NAIC: 562111 - Solid Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On May 29, 2024, Kaitlyn Taylor with the Florida Department of Environmental Protection (FDEP) conducted a compliance evaluation inspection at Triumvirate Environmental Services Inc (hereinafter TES or facility) located at 3670 SW 47th Ave, Davie, FL 33314. TES was inspected to determine the facility's compliance with the state and Federal hazardous waste regulations described in Title 40, Code of Federal Regulations (CFR) Parts 260-268, 273, and 279, adopted and incorporated by reference in Rule 62-710 and 62-730 Florida Administrative Code (F.A.C.). The inspector was accompanied by Shelby Luong with the FDEP.

The inspectors were escorted around the facility by John Lennon, General Manager, Randy Troy, EHS Manager, and Ryan Mohansingh, Senior operations Manager. Upon arrival at the facility, the inspectors presented their credentials and explained the purpose of the inspection.

TES occupies 2.47 acres and is connected to the city water and sewer. TES has been operating at its current location since 1985 and employs 20 staff. The facility operates 7am-4pm Monday through Friday.

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Notification History:

TES currently operates as a Used Oil and Material Processing Facility under permit numbers 77390-013-HO and 77390-014-SO. These permits were issued on 01/23/2023 and expire on 11/19/2027.

TES initially notified with the FDEP as a Small Quantity Generator (SQG) of hazardous waste on 04/07/1995. The facility was assigned the EPA Identification (EPAID) Number FLD981018773. The facility most recently notified as a Very Small Quantity Generator (VSQG) of hazardous waste; a transporter and large quantity handler of Universal Waste; a hazardous waste transporter and transfer facility; a used oil transporter, transfer facility, and processor; and a used oil filter transporter and transfer facility on 02/20/2024.

Inspection History:

- 10/20/2022: The facility was inspected by the Department and was found to be in compliance.
- 03/18/2021: The facility was inspected by the Department and was found to be out of compliance for accepting hazardous waste from a generator without the correct manifest documentation. A return to compliance letter was sent on 04/26/2021.

Hard hats, steel-toed boots, glasses, and masks were the only Personal Protective Equipment (PPE) required to enter the facility.

Process Description:

Triumvirate Environmental Services is authorized to process used oil, oily wastewater, oily solid waste, and used oil filters, and to collect petroleum contact water (PCW). The facility consists of 20 tanks and is permitted to store and use a total of 352,925-gallons of used oil in aboveground tanks and containers.

The facility consists of two tank farms, a pump station, non-hazardous waste storage and roll-off, and a warehouse transfer station/storage.

Tank Farms:

The facility has two tank farms within secondary containment that have the capacity to hold 20,000-gallons and 100,000-gallons.

Inspectors observed the following tanks:

- Tank 1 is an overflow tank for used oil/oily water.
- Tanks 2-6, 8-17 are for used oil/oily water.
- Tanks 18 and 20 are out of service.
- Tank 21 is used to collect non-hazardous wastewater, which is then filtered, heated for oil water separation, and transferred to an offsite industrial wastewater pre-treatment facility for treatment and disposal.
- Tanks 7 and 22 are used oil process tanks. This process occurs by heating the waste to 200 Degrees and adding a demulsifier to separate the oil and water. The water is transferred to the oily water tank for disposal and the oil is transferred to the finished product tank.

No discrepancies were observed.

Pump Station:

The pump station is located next to the tank farm. This area is where pump trucks connect to pump used oil and oily water into the tanks. Inspectors observed 5-gallon buckets used to collect oily solids from the pump trucks. The oily solids are disposed of in the facility's roll-off for Processed Solid Waste (PSW). No discrepancies were observed.

Non-hazardous Waste Storage and roll-off:

This area is used to store all non-hazardous waste prior to solidification/consolidation in the permitted roll-off. The facility is authorized to store a maximum of 500 55-gallon drums, or equivalent containers, and two cubic yard roll-off containers for consolidation onsite.

Inspectors observed the following:

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- One cubic yard roll-off container labeled "Processed Solid Waste".
- Eight 55-gallon drums of oily solids.

Their PSW is sent to Wheelabrator to whom they have a permit with to consolidate the waste to turn it to energy. Used oil filters are shipped to World Petroleum (EPAIS FLD980709075) or Karmi Environmental LLC (EPAID FLR000000166).

Used oil filters are shipped out once a week and the roll-off is shipped out twice a week. No discrepancies were observed.

Warehouse Transfer Station/Storage:

This area is used to store hazardous waste, universal waste, hazardous waste pharmaceuticals, and biomedical waste. Hazardous waste is shipped out every Tuesday, biomedical waste is shipped out every Thursday, and universal waste is shipped out every other month.

Inspectors observed the following:

- Six containers of flammable hazardous waste.
- Fourteen containers of toxic hazardous waste.
- Approximately 20 containers of biomedical waste.
- Approximately 30 containers of universal waste.

All containers were properly closed and labeled. No discrepancies were observed.

Records Review:

SPCC Plan:

The facilities SPCC plan accurately demonstrates the physical layout of the facility with the location of all used oil storage, a procedure for when discharge occurs, inspection, training and security procedures, and certification by a licensed Professional Engineer [40 CFR 112.7]. The most recent revision occurred in July of 2023.

Contingency Plan:

The facility maintains a full contingency plan that includes emergency contact information, an evacuation map, and emergency response and preparedness procedures [40 CFR 279.52(b)(2)]. The most recent revision occurred on 08/23/2023.

The facility could demonstrate that the appropriate arrangements with the local police, fire department, hospital, and local emergency response agencies have been made [40 CFR 279.52(6)].

Personnel Training:

The facility conducts annual training for all staff according to their job responsibilities. The various trainings include DOT/HazMat, RCRA, Safety and Emergency, and Used Oil Transportation and Management. All records are maintained onsite.

Manifest Records:

The past three years of manifests for hazardous waste generated by the facility and LDRs were available for review. The most recent shipment of hazardous waste occurred on 07/19/2022. The waste was transported by Triumvirate Environmental Services (FLD981018773) and the designated facility was Triumvirate Environmental Services (FLD980559728).

The facility shipped the following:

- 10lbs of Waste Corrosive Liquid, basic, organic (D002).
- 8lbs of Waste Paint (D001).

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- 110lbs of Non-regulated material (sodium acetate, sodium chloride).

Based on the manifest records the facility operates as a VSQG.

Acceptance and delivery records for transportation of all hazardous waste for the past three years were available for review. In order to comply with the 10-day transfer facility storage requirements the facility ships hazardous waste weekly.

Acceptance and delivery records for used oil activities for the past three years were available for review. Records of used oil disposal appropriately demonstrated the name, address and EPAID of the generator, transporter, and receiving facility, the date of shipment, and quantity of used oil acceptance [40 CFR 279.46]. Halogen tests are done in the field when pick-up is in process, the type of test used is the halogen sniffer and 3 ppm standard deviation. On-spec testing is done by Precision Petroleum Lab in Texas, for every 100,000 gallons, a sample is shipped to Texas and a full TCLP and PCB analysis is done on the sample. The testing that they conduct in the field and on-site at Triumvirate is regulatory which ensures more than five percent (5%) water content.

Annual Reports:

The facility's Annual Reports from the last three years were available to the inspectors for review. The most recent Annual Report appeared to be complete and in order.

Financial Assurance:

The facility was able to provide proof of financial assurance and liability Insurance.

Closure Plan:

The closure plan and closure cost estimates for the facility were available online in the Department's Handler database and onsite [62-710.800(5) F.A.C.].

Inspections:

The facility was able to provide drum inventory logs, PSW inspection logs, and tank inspection logs.

PHOTO ATTACHMENTS:

Tank farm



Warehouse transfer station/storage



Conclusion:

Triumvirate Environmental Services Inc was inspected as a Very Small Quantity Generator (VSQG) of hazardous waste; a transporter and large quantity handler of Universal Waste; a hazardous waste transporter and transfer facility; a used oil transporter, transfer facility, and processor; and a used oil filter transporter and transfer facility and was found to be in compliance.

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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	✓		

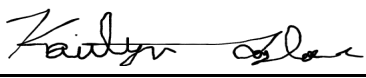
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Signed:

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

Kaitlyn Taylor
Principal Investigator Name

Environmental Consultant
Principal Investigator Title


Principal Investigator Signature

DEP
Organization

07/08/2024
Date

Shelby Luong
Inspector Name

Environmental Specialist II
Inspector Title

DEP
Organization

John Lennon
Representative Name

General Manager
Representative Title

Triumvirate
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.

Randy Troy
Representative Name

EHS Manager
Representative Title

Triumvirate
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.

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Ryan Mohansingh
Representative Name

Senior Operations Manager
Representative Title
Triumvirate
Organization

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Report Approvers:

Approver: Todd A Reinhold

Inspection Approval Date: 07/09/2024