

**TRIUMVIRATE ENVIRONMENTAL (ARIZONA), INC.  
HAZARDOUS WASTE STORAGE AND TREATMENT PERMIT  
EPA I.D. NO. AZR 000 526 772  
73 S. COMMERCE DRIVE  
CASA GRANDE, ARIZONA**

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**LTF ID #97251**

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This fact sheet was prepared in accordance with the Arizona Administrative Code (A.A.C.) R18-8-271.E(e) and R18-8-271.G. A fact sheet must accompany every Arizona Hazardous Waste Management Act (AHWMA) draft permit that the Arizona Department of Environmental Quality (ADEQ) has prepared that either raises major issues or involves a new facility. All references to the A.A.C. hereafter refer to the A.A.C. R18-8-260 et. seq., as amended in Supplement 23-1, effective March 31, 2023, which incorporates and/or modifies parts of Title 40 Code of Federal Regulations (CFR) Parts 260 et. seq.

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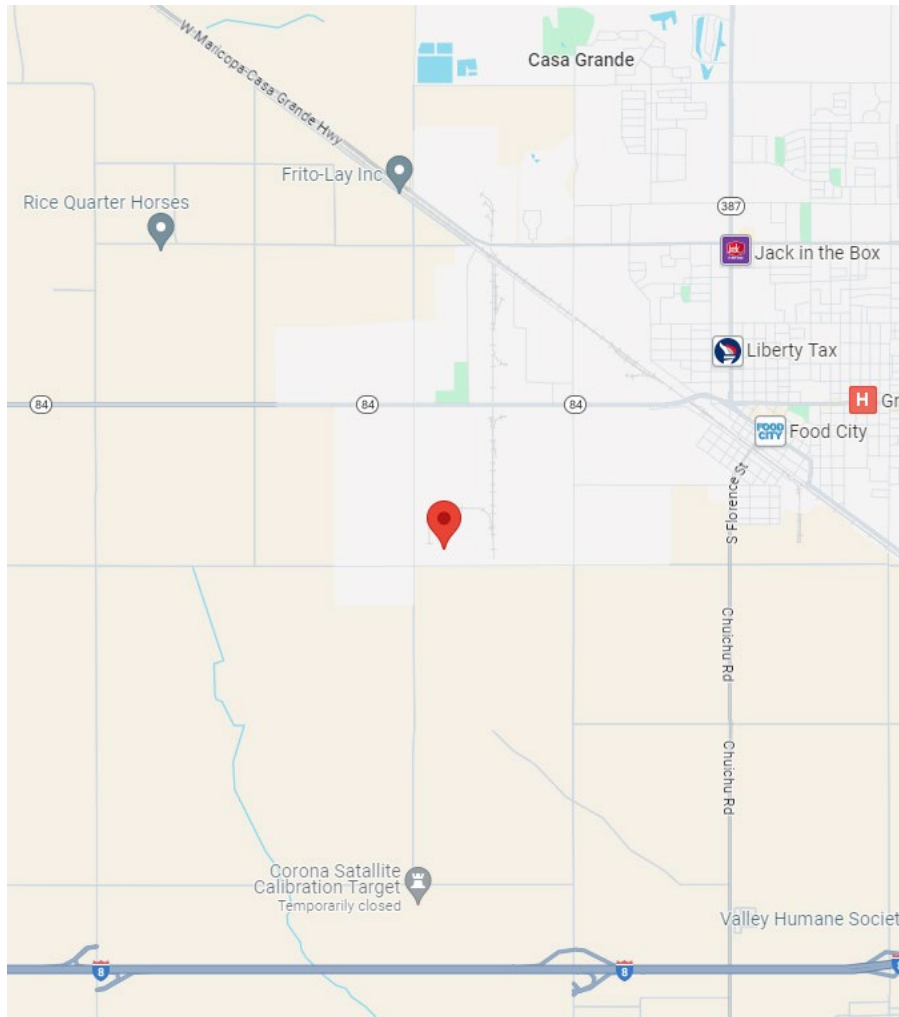
The Arizona Department of Environmental Quality (ADEQ) has prepared a draft hazardous waste permit for Triumvirate Environmental (Arizona), Inc (“Triumvirate” or “TEI”). The draft permit proposes to allow Triumvirate to operate a new hazardous waste treatment and storage facility located at 73 Commerce Drive, Casa Grande, Pinal County, Arizona for 10 years. No hazardous waste landfills, waste piles, surface impoundments, and land treatment units are to be constructed at the facility.

**A. FACILITY DESCRIPTION**

**General Layout of the Facility**

TEI is a domestic for-profit corporation, Arizona Corporation Commission Entity ID number 23121484. They provide commercial hazardous and non-hazardous waste management and recycling services.

The facility is located on approximately 25 acres of land in the Central Arizona Commerce Park (CAZCP) in Casa Grande, Pinal County, Arizona that includes a private rail spur, enabling wastes to be shipped and received by highway and rail. Both hazardous and non-hazardous waste will be managed at the facility.



*Figure 1 Facility Location*

The facility's address is 73 S. Commerce Drive, Casa Grande, Arizona 85193. A rail spur extends east to west along the facility's northern boundary and curves to the south along the western boundary. TEI currently operates as a processor of non-hazardous solid waste, and functions as a solid waste transfer station, registered with ADEQ. The solid waste processing operations are primarily located in the northeast quadrant of the facility, while hazardous treatment and storage operations will be located in the northwest quadrant. Administrative offices supporting all operations are located in the southeast quadrant of the facility. A facility site location map is shown in Figure 1 and a site plan of the proposed facility is shown in Figure 2.

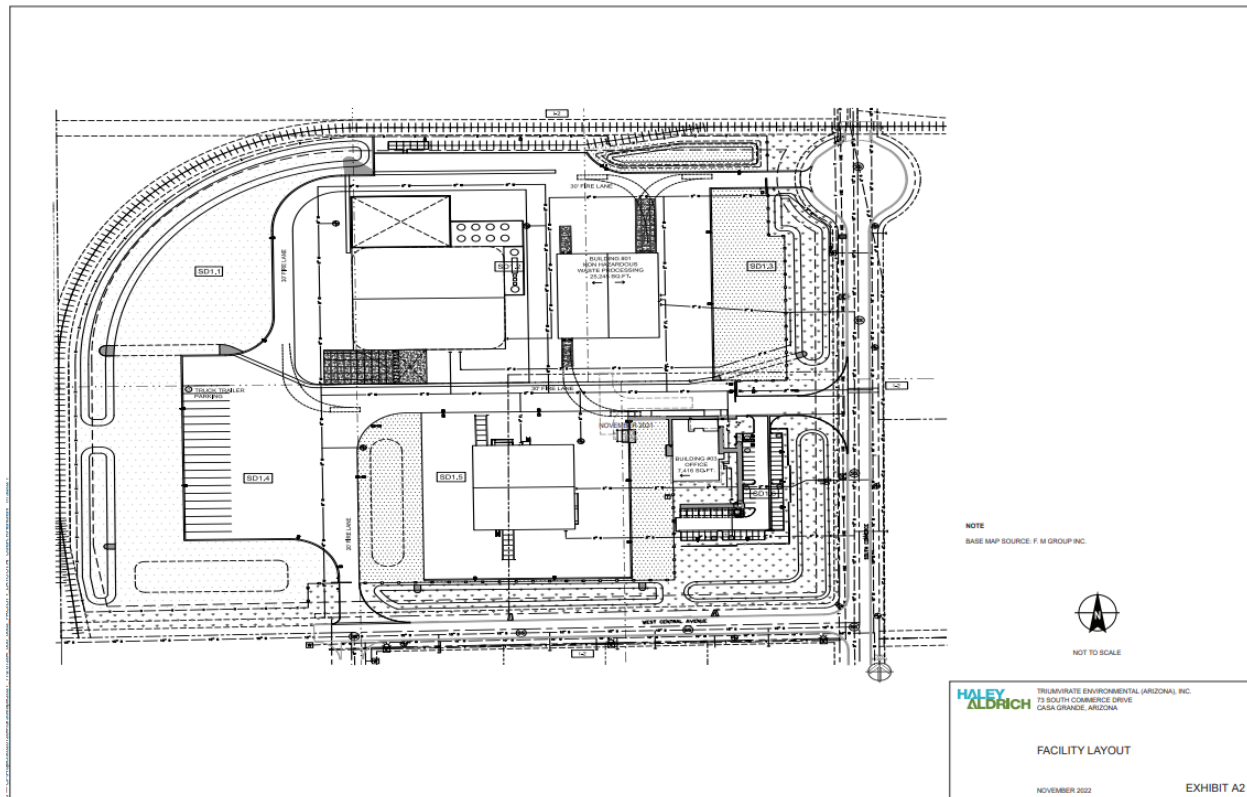


Figure 2 Facility Site Plan

The hazardous waste management and processing building will be approximately 50,000 square feet in size and will include container storage areas as well as a tank treatment area. TEI proposed to use this building for hazardous waste storage and treatment as follows:

- Rooms 102, 103, 105, 106, 120, 121, and 124 are TEI's proposed indoor, hazardous waste container storage areas. Drums and totes will be used to store wastes in these rooms. Individual areas and rooms will be provided for:
  - Flammable/combustible wastes [Rooms 102/124].
  - Toxic and highly toxics wastes [Room 103].
  - Corrosive wastes [Room 105].
  - Reactive wastes [Room 106].
  - Water reactive wastes [Room 121].
  - Pyrophoric wastes [Room 120].
- Semi-Outdoor areas under canopy are Storage Area 126 and Canopy Area 127 which store compressed gas cylinders and bulk solids, respectively.
- Area 107 is indoors and will be house two 80 cubic yard tanks designated for treatment, specifically stabilization of wastes.
- A five-bay, truck loading dock permitted for the storage of liquid hazardous wastes [Area 100].
- Two indoor waste processing areas that will have no storage [Areas H-3/H-4].

- One waste container repacking area equipped with five fume hoods and no storage [Areas 115-119].

Outside of this building TEI proposed the following:

- An outdoor tank farm containing eight vertical aboveground tanks to be used for fuel blending of flammable and combustible liquids [Area 128].
- An outdoor tank farm containing two vertical aboveground storage tanks for storage of corrosive wastes [Area 125].
- A railcar unloading storage and processing area [Railcar Area].

A site plan of the hazardous waste management and processing building (and exterior features) is presented in Figure 3.

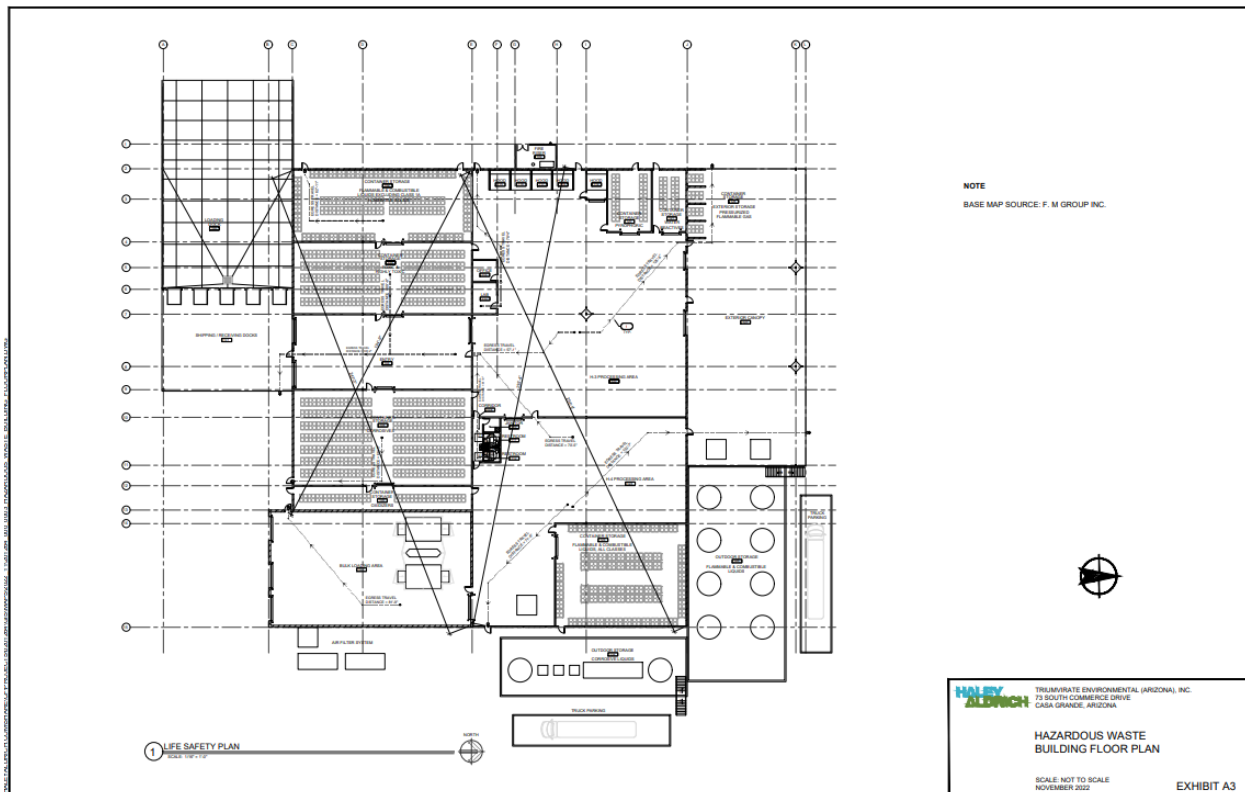


Figure 3 Hazardous Waste Management & Processing Building

### **General Description of Waste Management Activities**

Hazardous waste management capabilities of the facility will include:

- Storage of hazardous and non-hazardous wastes in containers and tanks;
- Consolidation of hazardous and non-hazardous wastes into containers, including bulk and non-bulk containers, roll off boxes, and railcars for transportation;
- Bulking of hazardous and non-hazardous waste into containers such as drums, totes, tanks,

tanker trucks, and railroad tank cars for transportation;

- Treatment of hazardous and non-hazardous waste. Hazardous waste treatment activities consist of fuel blending and stabilization;
- Bulking of organic liquids in preparation for shipment to permitted facilities for use as supplemental fuel; and,
- Shipping of hazardous and non-hazardous wastes in various vehicles including but not limited to vans, roll-off boxes, dump trucks, tanker trucks, and on the rail by boxcars, flat cars, and tankers.

The hazardous waste storage, treatment, and processing activities/units to be permitted include:

- Waste storage in containers;
- Waste storage in tanks;
- Fuel blending in tanks;
- Waste stabilization in tanks (Microencapsulation)
- **Note:** No hazardous waste landfills, waste piles, surface impoundments, and land treatment units will be constructed at the facility.

#### Hazardous Waste Treatment Activities

The following treatment activities will be subject to the hazardous waste permit.

- **Fuel blending** – This activity consists of combining compatible hazardous wastes having appropriate organic content to create a fuel used to fire high-heat furnaces. The blending process will ensure that the BTU content, halogens, metals, and moisture meet the fuel specifications of the facility using the hazardous waste fuel. The eight storage tanks in the tank farm located on the north side of the waste management and processing building will be used for fuel blending activities.
- **Stabilization** - This process results in the reduction of the mobility (or leachability) of hazardous components within a hazardous waste matrix. Stabilization is accomplished by inducing a chemical reaction between the hazardous components and one or more reagents, such as cement, cement kiln dust, lime, fly ash or other pozzolanic materials. Typical materials to be stabilized include inorganic wastewater treatment sludges, media with metals, contaminated soils, sand blast grit, incinerator ash, incinerator slag, emissions control dust and debris.

#### Related Waste Management Activities Not Subject to Hazardous Waste Treatment and Storage Requirements in the Permit

- 10-day Transfer Facility - The facility may allow hazardous waste transporters to temporarily hold containerized waste on-site without a storage permit for 10 days or less, provided the waste is manifested and maintained in U.S. DOT specification containers and does not list TEI as the destination facility. TEI has a specific loading dock designated as a 10-day Area and containers held here may not be moved into any permitted storage units.

## Site History

Prior to TEI operations under the proposed permit, the site has been used for farmland. CAZCP is located in the southwestern portion of Casa Grande in Pinal County, and the areas immediately surrounding CAZCP are identified as agricultural use interspersed with industrial facilities. No portion of the Facility will be located on Tribal Land.

## Solid Waste Notification

The facility currently operates as a solid waste transfer station. ADEQ approved TEI's registration for Self-Certification as a Solid Waste Transfer Facility on May 28, 2021. The Self Certification submittal stated that TEI's facility would receive up to 500 tons per day of solid waste.

## Hazardous Waste Notifications

TEI submitted its initial application for a hazardous waste permit to ADEQ on December 15, 2022. Notifications were then sent to the City of Casa Grande and Pinal County (for information purposes) as required by Arizona Revised Statutes (A.R.S.) §49-111 on December 28, 2022.

## Other Regulatory Permits

The following environmental permits have been identified by the Applicant as future or current permits for its operations:

- Class II Air Quality Permit - Pinal County Air Quality Control District (PCAQCD)
- Arizona Pollutant Discharge Elimination System (AZPDES) Construction General Permit (CGP) for Stormwater - ADEQ
- AZPDES Industrial Stormwater Multi-Sector General Permit (MSGP) - ADEQ
- Zero Discharge Permit (or Industrial User Permit) - City of Casa Grande Department of Public Works
- Conditional Use Permit (for a medical, solid, and hazardous waste facility) - City of Casa Grande Planning and Zoning Commission
- Hazardous Materials Storage Permit (for the storage of flammable, corrosive, and reactive materials) - City of Casa Grande Fire Department
- Multi-Sector General Permit (MSGP) – No Discharge Certificate (NDC), Certificate Number 99801. The Certificate is for Sector K1 – Hazardous Waste Treatment, Storage, or Disposal Facilities, and was issued on August 3, 2023.

## Inspection History

### Hazardous Waste Program

As a proposed facility, no hazardous waste inspections have taken place to date.

### Solid Waste Program

- April 11, 2021 - Following its Solid Waste Notification to ADEQ the site was inspected by ADEQ's Solid Waste program. No construction was underway at the time, and the facility was deemed to be in compliance with the solid waste rules.
- March 7, 2024 – A routine solid waste compliance inspection was performed by ADEQ.

The facility was deemed to be in compliance with solid waste requirements and no violations were issued.

**B. TYPE AND QUANTITY OF HAZARDOUS WASTES MANAGED**

Types of Hazardous Wastes (40 CFR § 261, Subpart C & D)

The facility will accept a wide variety of liquid and solid wastes from via commercial hazardous waste transporters or by its own transportation fleet. Only wastes authorized in accordance with its Part A Permit Application, EPA Form 8700-23 will be accepted. General descriptions of these wastes are provided below. Wastes not accepted at the facility include radioactive wastes and explosives.

Typical wastes will include acids, alkalines, flammable items, organic wastes, oxidizers, pesticides and materials that may undergo rapid chemical reactions (reactives). Wastes that will not be accepted at the facility are radioactive wastes, explosives, biohazardous medical wastes, and polychlorinated biphenyls (PCBs). More specific information on the waste types (and waste codes) and storage areas can be found in the draft Permit in Section III (Container Storage) and draft Permit Section IV (Tank Storage and Treatment).

TEI operations may generate hazardous and non-hazardous wastes for consolidation on-site and shipped off-site via commercial transporters or by using its own transportation fleet to off-site permitted treatment, storage or disposal facilities. The wastes generated at TEI may consist of laboratory sample residues and empty containers that the facility has used; clean-up residues and wash waters from the facility; and contaminated personal protective equipment.

Quantity of Hazardous Wastes

The maximum inventory of wastes is shown in Table 1 below.

**Table 1. Maximum Inventory of Wastes**

Room	Waste Description	Number of 55 Gallon Drums
102	Flammable & Combustible Solids	8
102	Flammable & Combustible Liquids	568
103	Toxic/Highly Toxic Solids	360
103	Toxic/Highly Toxic Liquids	360
105	Corrosive Solids	504
105	Corrosive Liquids	504
106	Reactive and Organic Peroxide Solids	72
106	Reactive and Organic Peroxide Liquids	72
120	Pyrophoric Solids	24
120	Pyrophoric Liquids	24

121	Water Reactive Solids	32
121	Water Reactive Liquids	32
124	Flammable & Combustible Solids	296
124	Flammable & Combustible Liquids	296
<b>Maximum Container Inventory</b>		<b>3,152</b>
Area	Waste Description	Number of Cylinders
126	Flammable Compressed Gas	<b>75</b>
Tank Number	Waste Description	Gallons
101	Flammable & Combustible Liquids	17,680
102	Flammable & Combustible Liquids	17,680
103	Flammable & Combustible Liquids	17,680
104	Flammable & Combustible Liquids	17,680
105	Flammable & Combustible Liquids	17,680
106	Flammable & Combustible Liquids	17,680
107	Flammable & Combustible Liquids	17,680
108	Flammable & Combustible Liquids	17,680
Loading Dock 100	Flammable & Combustible Liquids	(4 x 5,200-gallon vacuum trucks)
<b>Maximum Inventory of Bulk Flammable &amp; Combustible Liquids</b>		<b>162,240</b>
Tank Number	Waste Description	Gallons
201	Acid Waste	18,000
202	Caustic Waste	18,000
<b>Maximum Inventory of Bulk Corrosive Liquids</b>		<b>36,000</b>
Tank Number	Waste Description	Cubic Yards
301	Hazardous Waste Solids	80
302	Hazardous Waste Solids	80
Exterior Canopied Area 127	Hazardous Waste Solids	240
<b>Maximum Inventory of Bulk Solids</b>		<b>400 cubic yards</b>

*C. SUMMARY OF BASIS FOR DRAFT PERMIT CONDITIONS*

The draft permit authorizes the treatment and storage of hazardous waste in tanks and containers for a period of up to one year. The draft permit has a term of 10 years. At the end of the term, TEI may apply for renewal in order to continue facility operations.

The draft permit consists of five parts and eleven attachments. All conditions are based on the Hazardous Waste Storage Facility Part B Permit Application dated December 15, 2022, with additional information and revisions provided by the applicant through the April 6, 2024.

Permit Part I contains general permit conditions. These conditions are required by A.A.C. R18-8-270.A and L, as well as 40 CFR 270.30.

Permit Part II contains general facility conditions. These conditions are required by A.A.C. R18-8-264.A and 40 CFR 270.32.



Permit Part III contains specific conditions related to container storage areas, workstations, and container management. These conditions are required by A.A.C. R18-8-264.A (40 CFR 264, Subparts I and CC)

Permit Part IV contains specific conditions related to the tank storage areas, tank controls, and management of the tanks and tank areas. These conditions are required by A.A.C. R18-8-264.A (40 CFR 264, Subparts J, BB, and CC).

Permit Part V contains conditions regarding corrective action for Solid Waste Management Units (SWMUs), including a Schedule of Compliance. Corrective action is authorized by the Arizona Revised Statutes §49-922.B and Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments. The regulatory basis for corrective action can be found in A.A.C. R18-8-264.A and 40 CFR 264.101.

#### Permit Attachments

- Attachment A – Facility Description
- Attachment B – Waste Analysis Plan
- Attachment C – Process Information
- Attachment D – Air Emissions Information
- Attachment E – Procedures to Prevent Hazards
- Attachment F – Contingency Plan
- Attachment G – Training Plan
- Attachment H – Closure Plan
- Attachment I – Recordkeeping and Reporting
- Attachment J – Arizona Administrative Code
- Attachment K – Corrective Action

#### Director-Established Permit Conditions

As required by A.A.C. R18-8-270.A, M, N, and O (40 CFR 270.32(b)(2)), the Director has established site-specific permit conditions as necessary to conform with state and federal rules and regulations. These conditions, known as Omnibus Conditions are terms and conditions that are deemed necessary in order to protect human health and the environment. The Omnibus Provisions in the Permit are as follows:

*II.I.5 - List of Learning Sites* - TEI must maintain a contact list of K-12 public and private schools within 1.0 mile of the facility, and provide the list to the fire department when requested and when the emergency provisions of the Contingency Plan are implemented by TEI.

*II.L.5 – Submittal of Cost Revisions* – The draft Permit requires TEI to submit to ADEQ all updates to their closure cost estimates within 30 days of the revision. To keep the Permit current, the submittal is made as a Class 1 Permit Modification Request (C1 PMR). C1 PMRs increase

environmental protectiveness because such submittals are reviewed for technical soundness and completeness. Upon approval these changes become enforceable components of the Permit.

*II.M – Financial Assurance for Facility Closure* – The draft Permit requires TEI to submit to ADEQ all updates to their financial assurance mechanisms for closure. ADEQ believes C1 PMRs increase environmental protectiveness because the submittals are reviewed for technical soundness and completeness. Upon approval these changes become enforceable components of the Permit.

*II.N – Liability Requirements* – The draft Permit requires TEI to submit to ADEQ all updates to their financial assurance mechanisms for liability. ADEQ believes C1 PMRs increase environmental protectiveness because the submittals are reviewed for technical soundness and completeness. Upon approval these changes become enforceable components of the Permit.

*II.R - Transportation Routes for Hazardous Waste Shipments* – The draft Permit requires TEI to instruct each hazardous waste transporter to avoid, as much as is practicable, the use of any routes that pass through residential areas or that pass by schools.

*II.S. – Schedule of Compliance Permit Conditions* – The draft Permit includes a Schedule of Compliance, with five permit conditions:

- The Permittee must update the financial assurance (FA) mechanism for closure within sixty days of the first receipt of hazardous waste. Financial assurance for closure is required to provide for the costs of closure of the facility in the event that the permittee is no longer financially viable. In accordance with the hazardous waste requirements, the permit application includes those details concerning the type of mechanism, the terms for the mechanism, the financial institution that has prepared the mechanism, and the amount of FA that the mechanism will assure when issued. These details have been incorporated into the draft Permit in Permit Attachment H. The FA mechanism is effective not later than sixty days before the facility receives its first shipment of hazardous waste for storage. The draft Permit requires the Permittee to update the Permit with the final issued mechanism at that time. The final issued mechanism therefore becomes an enforceable component of the Permit;
- The Permittee must update its financial assurance (FA) mechanism for liability coverage within sixty days of the first receipt of hazardous waste. Liability coverage is required to cover accidental occurrences that happen at the facility. Coverage for accidental occurrences are specified as one million per incident, with an annual aggregate of two million dollars. In accordance with the hazardous waste requirements, the permit application provides details concerning the type of mechanism for liability coverage, the terms for the mechanism, the financial institution that has prepared the mechanism, and the amount of FA that the mechanism will assure when issued. These details have been incorporated into the draft Permit in Permit Attachment H. Coverage begins not later than sixty days before the facility receives its first shipment of hazardous waste for storage. The draft Permit requires the Permittee to update the Permit with the final, issued mechanism

at that time. The final issued mechanism therefore becomes an enforceable component of the Permit;

- The Permittee must update the Permit upon completion of construction of each container storage area (CSA) and tank installation. Draft design specifications have been included in Permit Attachment C. The draft Permit requires the Permittee to construct the CSAs in accordance with these specifications, and to follow a written schedule for the construction. In addition, within sixty days of the completion of construction, the Permittee must submit as-built diagrams of the CSAs and tank farms. The Permit specifies that hazardous waste may not be stored on the new CSAs or in the tanks until ADEQ approves the as-built diagrams.
- Within sixty days of Permit Issuance, the Permittee must update the Permit to include a detailed list of the equipment that they will use in order to comply with the organic air emissions standards. The equipment list will include vents, valves, and other equipment used to handle organic hazardous waste, as well as the instruments that will be used to measure for organic air emissions at containers and at equipment handling organic waste. The detailed list of equipment will be incorporated into the Permit. The list will be updated as necessary whenever any of the equipment are replaced or modified. Manufacturer's calibration instructions, if available, must also be included in the Permit for the instruments that are used to measure for organic air emissions.
- TEI must prepare an SOP to manage precipitation that has collected in its outdoor secondary containment areas. The SOP must meet ADEQ's guidelines for precipitation management as found in Permit Attachment C. Precipitation must be characterized, managed in containers and tanks, and properly disposed of off-site;
- Within sixty days of Permit Issuance, Permittee must update Permit Attachment F to include an accurate list of persons authorized to act as an Emergency Coordinator.
- TEI must notify ADEQ of the date of first receipt of hazardous waste. The report must be submitted within three days of the first receipt of hazardous waste

*IV.F.4 – Tank Reinspection* - TEI must re-inspect its tanks at least once every two (2) years following the issuance of the Permit. The inspection report shall be retained in the facility operating record and must be certified by a registered professional engineer of an appropriate discipline. The re-inspection shall be in accordance with API Standard 653 and shall be comprehensive enough to provide a better estimate of tank life and/or when mitigation measures will be required. The inspection frequency may be reduced with the Director's approval based on the recommendations of a professional engineer after sufficient data have been collected and a corrosion rate under typical use has been established.

#### Applicant-Requested Variances

None have been requested by the applicant.

#### D. PUBLIC PARTICIPATION PROCESS - PROCEDURES FOR REACHING A FINAL

### DECISION ON THE PERMIT

The administrative record for the draft permit contains all data submitted by the applicant and is available for public inspection Monday-Friday (excluding state holidays) from 8:30 a.m. through 4:00 p.m. at the ADEQ address given below. To arrange an appointment to review this record at ADEQ, contact the ADEQ Records Center at (602) 771-4380.

As required by A.A.C. R18-8-271.L and 40 CFR §124.13, all persons, including applicants, who believe any condition of the draft Permit or the tentative decision to prepare and issue this draft Permit is inappropriate, must raise all reasonable ascertainable issues and submit all reasonably available arguments and supporting materials by the close of the public comment period. All comments submitted during the public comment period shall discuss the appropriateness of the draft Permit.

Arizona Department of Environmental Quality  
Records Management Center  
1110 West Washington Street, 1<sup>st</sup> Floor  
Phoenix, Arizona 85007  
For appointments call: (602) 771-4380

**The 45-day public comment period will open on April 7, 2024 and will close on May 22, 2024.** During the public comment period, any interested person may submit written comments on the draft permit. These comments and supporting materials must be delivered or postmarked by the last day of the public comment period (i.e. May 22, 2024) to:

Arizona Department of Environmental Quality  
Mary Cottrell, Hazardous Waste Permit Writer  
Hazardous Waste Permits and Support Unit  
1110 West Washington Street  
Phoenix, Arizona 85007

**ADEQ Preferred SmartComment Submission:  
[www.azdeq.commentinput.com?id=RZAec9UKuor](http://www.azdeq.commentinput.com?id=RZAec9UKuor)**

All written comments delivered or postmarked by the last day of the public comment period or submitted via SmartComment will be considered in ADEQ's final determination regarding the draft permit. After all comments have been considered, a final permit decision will be made by the Director. The applicant, each person who has submitted written or oral comments, and each person who has so requested will receive a notice of this final permit decision. This notice shall include reference to procedures for appealing a decision on a draft permit. The final permit decision shall become effective on the date specified in the final permit notice.

At the time that the final decision is made, the Director shall also issue a response to any significant comments. The response to comments shall consider all items as specified in A.A.C. R18-8-271.O and 40 CFR § 124.17. The response to comments shall be made available to the public for review. Any person who desires to be placed on the mailing list for all future permitting activities for this facility or for facilities in a specific geographic area may request so in writing to the above address, pursuant to A.A.C. R18-8-271.I(c)(1)(ix) and 40 CFR § 124.10(c)(1)(ix)(a).

In addition to submitting public comment, any person may request the ADEQ Director to schedule a public hearing. **Written requests for a public hearing must be submitted to ADEQ by no later than close of the comment period, May 22, 2024 and must state the nature of the issues proposed to be raised in the hearing.**

**E. PERSON TO CONTACT FOR ADDITIONAL INFORMATION**

For additional information, please contact Mary Cottrell of the Hazardous Waste Permits & Support Unit of ADEQ at (602) 771-0349 (Phoenix area) or (800) 234-5677, extension 771-0349 (statewide) or at [hazwastepermits@azdeq.gov](mailto:hazwastepermits@azdeq.gov).