

**RCRA FACILITY ASSESSMENT REPORT**  
**FOR**  
**TRIUMVIRATE ENVIRONMENTAL (ARIZONA), INC.**  
**HAZARDOUS WASTE MANAGEMENT FACILITY**  
**73 South Commerce Drive**  
**Casa Grande, AZ 85193**  
**EPA ID NUMBER: AZR 000 526 772**

**(Revised 04-06-2024)**

PREPARED BY:

Arizona Department of Environmental Quality  
Waste Programs Division  
Solid /Hazardous Waste Section  
Hazardous Waste Permits and Support Unit



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## EXECUTIVE SUMMARY

The Arizona Department of Environmental Quality is the primary oversight agency for implementing the U.S. Environmental Protection Agency's (EPA) RCRA program and many of the Hazardous and Solid Waste Amendments (HWSA) requirements. In addition, ADEQ monitors compliance with state-specific environmental requirements regarding air emissions, sanitary, and other treatment systems.

On December 16, 2022, Triumvirate Environmental (Arizona), Inc. (TEI) submitted a hazardous waste permit application for the operation of a commercial waste management and recycling facility located on approximately 25 acres of land in the Central Arizona Commerce Park (zoned for heavy industrial use) in Casa Grande that includes a private rail spur. Hazardous and non-hazardous solid wastes will be received and shipped by highway and rail. The permitted hazardous waste management activities would include container storage, tank storage, and tank treatment. Although the facility will manage various types of hazardous and non-hazardous wastes, it will not accept radioactive nor explosive materials. Upon approval of its permit application, TEI would be classified as a hazardous waste treatment, storage or disposal facility (TSDF). In addition, TEI has indicated that the facility will be classified as a large quantity generator (LQG) of hazardous waste.

The TEI site consists of 25 acres and is located at 73 South Commerce Drive, Casa Grande, Arizona. Non-hazardous waste processing operations are 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.

ADEQ is required to conduct a RCRA Facility Assessment (RFA) on any hazardous waste management facility seeking a TSDF permit. The RFA is designed to identify any areas that historically have had the potential to release to the environment (any media) either solid waste, hazardous waste, or hazardous waste constituents. Areas that have the potential to release solid waste, hazardous waste, and hazardous waste constituents are identified as either solid waste management units (SWMU) or Areas of Concern (AOC).

SWMUs are defined as any discernable waste management unit at a RCRA facility from which hazardous wastes or constituents might migrate, irrespective of whether the unit was intended for management of solid and/or hazardous waste. SWMUs include those units defined as "regulated units" under RCRA, as well as other units which EPA has generally exempted from standards applicable to hazardous waste management units, such as recycling units and wastewater treatment units, and areas contaminated by routine, systematic, and deliberate discharges from process areas. For the purpose of this assessment, AOCs are defined as: 1) hazardous material product storage units or areas; 2) one-time hazardous material product spill events; and 3) hazardous material units or areas where waste management may have occurred and where the potential for release may have existed, but where insufficient evidence was found during the preliminary file review and the visual site inspection (VSI) to verify the existence of a definable SWMU.

This RFA report presents the results of ADEQ's review of the Part A and B permit application and VSI for the site. Facility construction has begun at the site, with completion of the administration building, truck weighing station, covered non-hazardous waste processing building, and security fencing with four gates. There have been no previous solid waste/hazardous waste operating units on site. TEI is a new facility established on former farmland, with no historic SWMUs present. However, due to the limited construction currently in place, non-hazardous waste SWMUs were observed during the site inspection. None of the newly-established SWMUs were observed to have any releases of waste, nor was there any indication of past releases from SWMUs on site. Document reviews (including a Phase I Environmental Site Assessment and aerial photographs) have shown no evidence of past releases, suspected releases, or any recognized environmental conditions at the site. As a result, no follow-up site inspections nor sampling visits are required.

## 1.0 INTRODUCTION

This document has been prepared by ADEQ in accordance with the guidelines provided by EPA's "RCRA Facility Assessment Guidance" document (EPA/530-86-053). Completion of an RFA Report (to assess releases from past or current SWMUs/AOCs) by ADEQ is one of the conditions required prior to issuing a permit.

An RFA report is an assessment of a facility's releases and potential releases from any SWMUs on site, based on a VSI and review of pertinent information from the facility's Part A and Part B permit application. This report is organized in five main sections. The executive summary provides an overview of the report and its conclusions. Section 1 begins with an introduction to the requirement of an RFA and the purpose and scope of the report. Section 2 provides a general description of facility operations and processes. Section 3 details the visual site inspection, including background information, identification of SWMUs, and conclusions. Section 4 summarizes the conclusions and recommendation of the RFA. Appendix A is provided for the VSI photographic log.

### 1.1 Purpose and Scope

The purpose of this RFA is to identify all SWMUs/AOCs at the facility and determine whether there have been releases or suspected releases from them requiring additional investigation. Authority was provided to the EPA by the RCRA Hazardous and Solid Waste Amendments (HSWA) in 1984. EPA delegated the Corrective Action Program to ADEQ on January 22, 1993. State authority for corrective action is provided by Arizona Statute A.R.S. §49-922 et seq.

The first step in the RFA process is to conduct a preliminary review (PR). The PR includes a detailed review of the facility files, the permit application, inspection reports, other pertinent documentation and discussions with regulatory agency and facility staff. Additional components of an RFA include a VSI to verify the records review and determine the need for any additional inspection activity which might require a sampling visit (SV) to complete the RFA.

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units" under RCRA, as well as other units which EPA has generally exempted from standards applicable to hazardous waste management units, such as recycling units and wastewater treatment units, and areas contaminated by routine, systematic, and deliberate discharges from process areas. For the purpose of this assessment, AOCs are defined as: 1) hazardous material product storage units or areas; 2) one-time hazardous material product spill events; and 3) hazardous material units or areas where waste management may have occurred and where the potential for release may have existed, but where insufficient evidence was found during the PR file review and the VSI to verify the existence of a definable SWMU.

## 2.0 FACILITY DESCRIPTION

TEI is a privately held environmental services company providing hazardous and non-hazardous waste management services, including recycling, treatment and landfill options for its customers. The facility encompasses approximately 25 acres of land in the Central Arizona Commerce Park (CAZCP) in Casa Grande which is zoned I-2 for heavy industrial use. CAZCP is located in the southwestern portion of Casa Grande in Pinal County. The areas immediately surrounding CAZCP are in agricultural use interspersed with industrial facilities. No portion of the facility will be located on Tribal Land. Prior to construction of the facility, the lot was barren, with previous use of the land for farming. The property and its surrounding area is zoned I-2 for heavy industrial use and the Pinal County Assessor website identifies the site parcel number as 503-48-1010. No SWMUs were observed during a review of historical aerial photos taken of the site since 1985.



Figure 1: Aerial Photo of Facility Location – Lots highlighted in red

TEI's solid and hazardous waste management operations 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 dump trucks for transportation;
- Bulking of hazardous and non-hazardous waste into containers such as drums, tote tanks, containers, tanker trucks, and railroad tank cars for transportation;
- Treatment of hazardous and non-hazardous waste. Hazardous waste treatment activities consist of fuel blending, pH Neutralization, chemical oxidation, chemical reduction, stabilization, and solidification;
- 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

Related activities that will be performed at the facility include:

- Brokering of wastes to third party treatment, storage, and disposal facilities;
- Unpacking and repackaging of laboratory chemicals;

- Ten-day transfer of hazardous and non-hazardous waste; and,
- Large quantity generator activities not subject to RCRA permitting.

The facility includes its own private rail spur, allowing wastes to be shipped and received by highway and rail. Although the facility will receive a broad range of hazardous wastes, it will not accept radioactive (mixed) or reactive hazardous wastes that are classified as explosive materials.

The hazardous waste management, treatment, and processing activities/units that require permitting under RCRA will include:

- Waste storage in containers;
- Waste storage in tanks;
- Fuel blending in tanks;
- Waste neutralization in tanks;
- Waste stabilization in tanks; and,
- Chemical oxidation in tanks.

### 3.0 VISUAL SITE INSPECTION

ADEQ is required to conduct a RCRA Facility Assessment (RFA) on any hazardous waste management facility seeking a TSDF permit. The RFA is designed to identify any areas that historically have had the potential to release to the environment (any media) either solid waste, hazardous waste, or hazardous waste constituents. Areas that have the potential to release solid waste, hazardous waste, and hazardous waste constituents are identified as either solid waste management units (SWMU) or Areas of Concern (AOC).

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On January 29, 2024, ADEQ conducted a visual site inspection at the TEI facility in Casa Grande as a requirement in the development of the RCRA Facility Assessment (RFA) report. The inspection focused on the identification of SWMUs at the facility.

Facility construction had already begun to provide for the operation of certain non-hazardous facility operations, with completion of the administration building, truck weighing station, covered non-hazardous waste processing area, and security fencing with four gates. Because TEI is a new facility established on barren property (formerly farmland), there are no historic

SWMUs at the site. However, due to the recent and limited construction currently in place, newly-established SWMUs were observed during the site inspection.

None of the SWMUs were observed to have any releases of waste, nor were there any indications of past releases from any AOCs (e.g., illegal dumping) on site. No hazardous waste was observed.

A Phase I Environmental Site Assessment was completed in October 2006, with the intent to identify any recognized environmental conditions in connection with the property. No impacts to the site from adjoining land uses were identified, nor was any evidence discovered of known or suspected environmental conditions associated with the site property. Aerial photographs showed the site area to be farmland as of 2006, and perhaps as late as 2010/11.

#### 4.0 SOLID WASTE MANAGEMENT UNITS

To date, TEI has not reported any release of solid or hazardous waste from the facility. No incidents of hazardous materials or hazardous wastes (e.g., fires, explosions, or releases requiring any State or local emergency response agencies) have been reported.

##### 4.1 SWMU No. 1 – Non-Hazardous Waste Processing Building

###### *Description:*

The Non-Hazardous Waste Processing Building is identified on the 2022 Hazardous Waste Permit Application in Attachment N 1.3. It is currently being used as a central location for receipt and export of solid waste. The structure is approximately 70' by 90' feet in size. Figure 1 shows the location of the building on the property. Photos 14 through 21 show the current operations which include storage of solid waste and solidification of solid waste. The interior of the building has a concrete base.

###### *Wastes Managed*

The Non-Hazardous Waste Processing Building has not yet managed any hazardous wastes and will not in the future. Solid Wastes have been received for consolidation and disposal.

###### *Status:*

The Non-Hazardous Waste Processing Building currently manages solid wastes. Upon permit issuance the Building will continue its current operation.

###### *Release History:*

There is no history of release of solid wastes at this SWMU. No spills have been reported by TEI.

##### 4.2 SWMU2 - Municipal Waste Dumpster

###### *Description:*

The Municipal Waste Dumpster is identified on the 2022 Hazardous Waste Permit Application in Attachment N 1.3. It is currently being used as intended for municipal solid waste. Figure 1 shows the location of the area on the property. Photo 2 shows the current operation.

### *Wastes Managed*

The Municipal Waste Dumpster will not manage any hazardous waste. Municipal Solid Wastes are currently being collected in this area for transport to disposal.

### *Status:*

It currently manages solid wastes. Upon permit issuance it will continue its current operation.

### *Release History:*

There is no history of release of solid wastes at this SWMU. No spills have been reported by TEI.

## 4.3 SWMU3 – 10 Day Transfer Area and Truck Parking

### *Description:*

The 10 Day Transfer Area and Truck Parking is identified on the 2022 Hazardous Waste Permit Application in Attachment N 1.3. It is currently being used as for truck parking and transfer of solid wastes and recyclable materials. Figure 1 shows the location of the area on the property. Photos 8 and 9 show the current operations.

### *Wastes Managed*

The 10 Day Transfer Area and Truck Parking will only manage 10 day transfer hazardous waste with none of the waste in this area to list TEI's Arizona location as its final destination. Solid Wastes are currently passing through area for transport to disposal.

### *Status:*

It currently manages solid wastes. Upon permit issuance it will continue its current operation as well as manage 10-day transfer hazardous wastes.

### *Release History:*

There is no history of release of solid wastes at this SWMU. No spills have been reported by TEI.

## 4.4 Future SWMUs

All other SWMUs are listed in below and are future SWMUs as they don't currently exist and titles may be subject to change. No releases have been reported or suspected in the areas these SWMUs are planned to be constructed in. These future SWMUs are reported as submitted in the Hazardous Waste Permit Application Attachment N

Below is a list of planned future SWMUs as provided by TEI in their Hazardous Waste Permit Application. As these SWMUs do not exist yet, they are subject to change.

- Room 102 Container Storage
- Room 103 Container Storage
- Room 105 Container Storage
- Room 106 Container Storage
- Room 120 Container Storage
- Room 121 Container Storage

- Room 124 Container Storage
- Hood 115 Container Storage
- Hood 116 Container Storage
- Hood 117 Packing/Depacking
- Hood 118 Packing/Depacking
- Hood 119 Packing/Depacking
- Area 122 Waste Processing
- Area 123 Waste Processing
- Area 126 Exterior Pressurized Gas Storage
- Area 127 Exterior Canopy Area
  - Roll off Staging Area
  - Two Pump Stations
- South of Room 124
  - One Pump Station
- Area 107 Bulk Loading/Stabilization (2 stabilization tanks)
- Loading Dock 100
  - Four loading Bays
  - One Loading/10-day Transfer Bay
- Area 125
  - Corrosive Liquid Storage Tanks (2 tanks)
  - Wastewater Treatment Unit
- East of Area 125
  - Truck Unloading/Parking (one truck)
- Area 128 Flammable Storage/Fuel Blending Tanks (8 tanks)
- North of Area 128
  - Truck Unloading/Parking (one truck)
- Northeast Corner of Facility
  - Railcar Loading/Unloading (4 railcars)
- West Side of Facility
  - Fire Sprinkler Drainage Retention Basin
- Universal Waste Battery Storage Container

Figure 2: Locations of Current Solid Waste Management Units



NOTE  
Base Map Source: F.M. Group Inc.

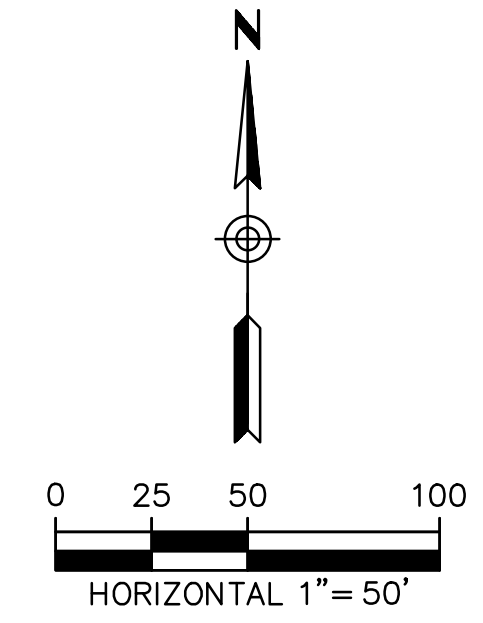
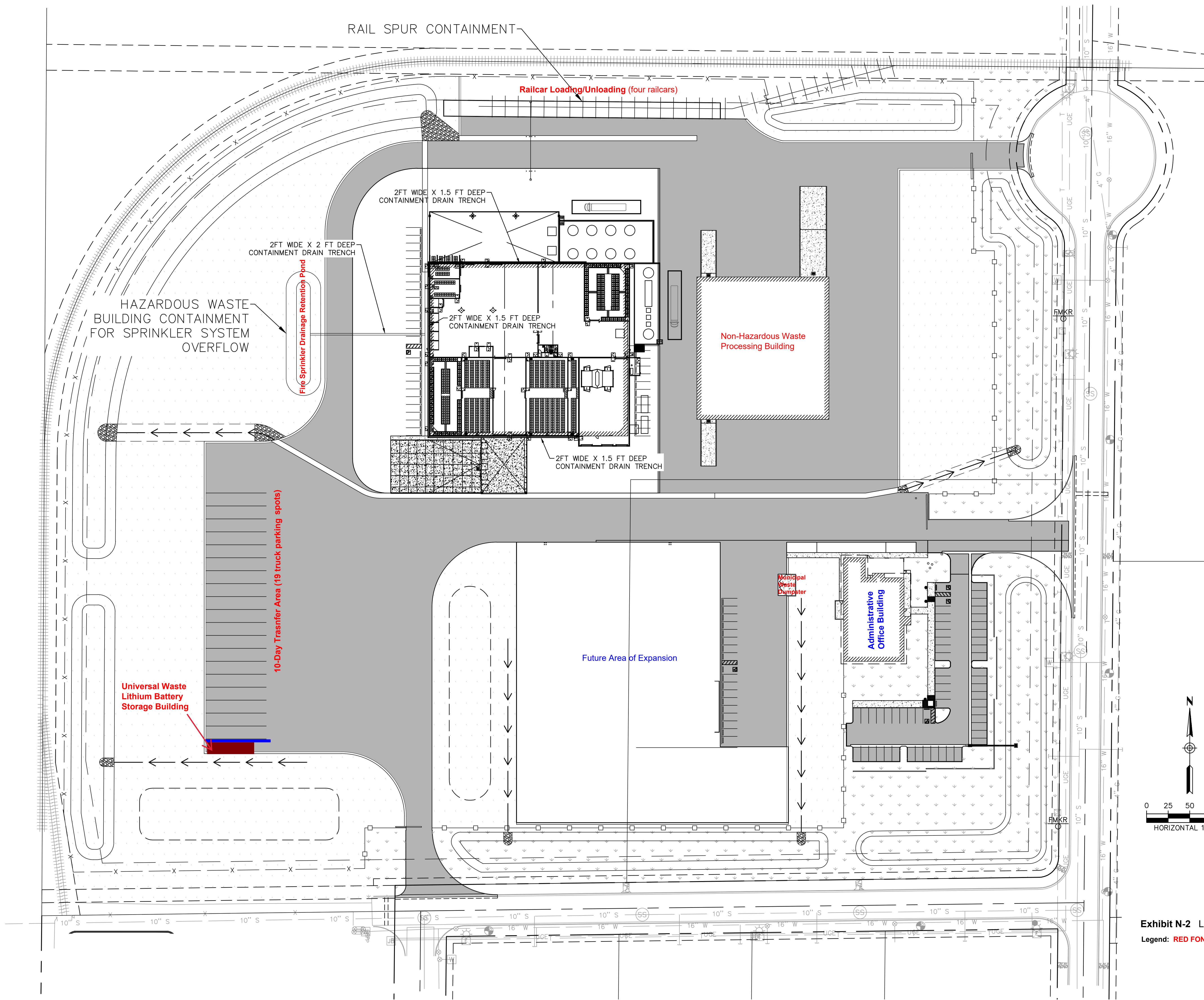


Exhibit N-2 Locations of Other Solid Waste Management Units  
Legend: RED FONT denotes a solid waste management unit



## 5.0 CONCLUSIONS AND RECOMMENDATIONS

A VSI was conducted at the TEI facility in Casa Grande on January 29, 2024 as a prerequisite condition for the RFA report. During the site inspection, several areas were observed with empty containers/pallet storage, as well as non-hazardous waste container storage areas and processing units at the covered non-hazardous waste processing building. None of these newly-established SWMUs were observed to have releases or suspected releases of waste at the site, nor was there any indication of past releases from any SWMUs/AOCs. In addition, document reviews (including a Phase I Environmental Site Assessment) show no evidence of recognized environmental conditions at the site. There have been no previous solid waste/hazardous waste operating units on site. TEI is a new facility established on former farmland, with no historic SWMUs present. Based on the results of document reviews and the site visit, there is no evidence to suggest releases or suspected releases of waste from SWMUs/AOCs have occurred at the site. Therefore, no follow-up site inspections nor sampling visits are required.

# **Appendix A**

## **Photograph Log**

- Photo 1: View of East Gate and Trailer Scale
- Photo 2: View of Solid Waste Enclosure for General Facility Trash
- Photo 3: South-facing View of Dirt Lot with a Diesel Fuel Tank in Place for Construction Crew Working.
- Photo 4: Facing East Looking at the South Side of the Facility
- Photo 5: Western View of Future Solid Waste Management Unit (Universal Waste Battery Containers)
- Photo 6: View of Western Buffer Zone (Facing North)
- Photo 7: View of the South Facility Gate
- Photo 8: Active Solid Waste Management Unit - Trailer Parking
- Photo 9: Photo of a Trailer with Empty Totes Destined for Recycling
- Photo 10: North-facing - Retention Pond to be Built in the Curbed Area
- Photo 11: Main Building Loading, Etc. – NE-facing (Stabilization Tanks SE Building)
- Photo 12: East-facing View of Private Rail Tie-in
- Photo 13: View of the East Facility Gate
- Photo 14: South East-facing - Solid Waste Management Unit - Solid Waste Transfer Station Operations Building
- Photo 15: Non-RCRA Solid Waste Management Unit - Empty Containers
- Photo 16: Non-RCRA Solid Waste Management Unit - Hazardous Waste Totes - Facing West
- Photo 17: Solid Waste Management Unit - East-facing Inbound Receiving Area and Outbound Area
- Photo 18: Staging for processing Solid Waste Destined for Solidification Pits
- Photo 19: Solid Waste Management Unit - Solidification Pit
- Photo 20: Solid Waste Management Unit - Solidification Pit
- Photo 21: Solid Waste Transfer Station Operations Building Facing North
- Photo 22: Side of Solid Waste Transfer Station Operations Building Facing West

**Photo 1**  
**View of East Gate and Trailer Scale**



**Photo 2**  
**View of Solid Waste Enclosure for General Facility Trash**





**Photo 3**  
**South-facing View of Dirt Lot with a Diesel Fuel Tank in Place for Construction Crew Working**



**Photo 4**  
**Facing East Looking at the Southside of the Facility**





**Photo 5**  
**Western View of Future Solid Waste Management Unit (Universal Waste Battery Containers)**



**Photo 6**  
**View of Western Buffer Zone (Facing North)**





**Photo 7**  
**View of the South Facility Gate**



**Photo 8**  
**Active Solid Waste Management Unit - Trailer Parking**





**Photo 9**  
**Trailer with Empty Totes Destined for Recycling**



**Photo 10**  
**North-facing - Retention Pond to be Built in the Curbed Area**





**Photo 11**  
**Main Building Loading, Etc. – NE-facing (Stabilization Tanks SE Building)**



**Photo 12**  
**East-facing View of Private Rail Tie-in**





**Photo 13**  
**View of the East Facility Gate**



**Photo 14**  
**South East-facing - Solid Waste Management Unit - Solid Waste Transfer Station**  
**Operations Building**





**Photo 15**  
**Non-RCRA Solid Waste Management Unit - Empty Containers**



**Photo 16**  
**Non-RCRA Solid Waste Management Unit - Hazardous Waste Totes - Facing West**





**Photo 17**  
**Solid Waste Management Unit - East-facing Inbound Receiving Area and Outbound Area**



**Photo 18**  
**Staging for Processing Solid Waste Destined for Solidification Pits**





**Photo 19**  
**Solid Waste Management Unit - Solidification Pit**



**Photo 20**  
**Solid Waste Management Unit - Solidification Pit**





**Photo 21**  
**Solid Waste Transfer Station Operations Building Facing North**



**Photo 22**  
**Side of Solid Waste Transfer Station Operations Building Facing West**

