

From: [Kraemer, Janine](#)
To: [White, John](#)
Subject: FW: CESQG
Date: Friday, April 20, 2012 12:23:55 PM
Attachments: [CESQG Application Form-Unprotected v04-04-2012.doc](#)
[Application for CESQG Collection Program Follow Up Questions v 0404-2012.docx](#)
[CESQG Training Presentation.ppt](#)
[Waste Handler Operating Plan SSWSI Orlando 04-04-2012.doc](#)

HAVE A GREAT DAY!
Janine Kraemer, CHMM
Environmental Manager
Solid and Hazardous Waste Programs
Florida Department of Environmental Protection
3319 Maguire Blvd, Suite 232
Orlando FL 32803
O: 407-897-4303
F: 850-412-0488
Office Hours: Monday-Friday 7:30-4:00

From: McCaustland, TJ [mailto:TMcCaustland@STERICYCLE.com]
Sent: Friday, April 20, 2012 12:00 PM
To: Kraemer, Janine
Subject: RE: CESQG

I have everything but the diagram completed.

Is it acceptable to add a container outside for CESQG storage?

I am in Orlando Monday-Wednesday if you would like to meet.

I will have a diagram completed next week.

Let me know if I captured everything we discussed.

T.J. M^c Caustland
Environmental Safety & Health Manager - East Region
Cell: 770-891-2531

From: Kraemer, Janine [mailto:Janine.Kraemer@dep.state.fl.us]
Sent: Friday, April 20, 2012 11:11 AM
To: McCaustland, TJ
Cc: White, John
Subject: RE: CESQG

Just wondering if you had a date in mind when you planned on getting the info

we discussed in March to us.

Thanks,
Janine Kraemer, CHMM
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Please take a few minutes to share your comments on the service you received from the department by clicking on this link [DEP Customer Survey](#).

From: McCaustland, TJ [<mailto:TMcCaustland@STERICYCLE.com>]

Sent: Friday, March 16, 2012 3:36 PM

To: Kraemer, Janine

Cc: Singh, Raj; Challenger, Rich

Subject: CESQG

Thanks for setting up a time to work together on Monday. Raj Singh will be coming as well.

Our interest is to work with you to develop the best plan to manage CESQG and other waste.

I have made some changes to the plan and I will direct you to the section of the plan with information raised in your comments.

- The policy does not address the location for the storage and segregation of the CESQG waste at the facility located at 314-B West Landstreet Rd, Orlando 32824. Please provide a diagram/layout that identifies each area where wastes received from off-site generators may be stored.

Refer to IV.6.b.ii

- B Unload from truck and move to appropriate storage area.
 - i. CESQG wastes must be segregated and
 - ii. CESQG storage area(s) must be clearly identified as CESQG storage

The idea is that CESQG waste could be stored in any one of the lanes in the warehouse. The lanes all have signage as to the appropriate wastes to be stored. This method leaves flexibility to configure waste storage with adequate spacing for proper inspections and etc.

I can provide a diagram and explain in the diagram that each lane will be identified with appropriate signage.

- Although the section titled, "7.0 Procedures" in the policy describes waste characterization, shipment documentation, and a CESQG Application, it does not describe any evaluation by SSWSI staff of the generator facility to

verify the generator status. Additionally, the Department believes the facility's generator status should be reevaluated on an annual basis to verify no change of status.

I added Section II. 3. d. and am soliciting a suggestion to accomplish this without an overburden.

- The policy does not address the time limit that CESQG waste will remain at the facility located at 314-B West Landstreet Rd, Orlando 32824. Due to the volume of waste moving through the facility and the size of the facility, the Department feels CESQG waste should be stored on-site for no longer than 90 days.

Refer to IV.9.c.

- Neither the policy nor the plan address employee training to ensure the proper management of the CESQG waste outlined in the policy. Training should be consistent with the facility's hazardous waste management training for personnel managing transfer waste and include any SSWSI employee evaluating a CESQG facility.

Training is described in Section I. Although not specifically discussed in this document we have a robust training program and documentation procedure. I can add a sentence to discuss the CESQG training if you wish.

- It is not clear in the plan what differentiates "On Site Management" vs On Site Management of CESQG wastes.

I am open to suggestion.

- The plan discusses consolidation but does not provide details of the consolidation process. Please provide the Department with information concerning the types of wastes that will be consolidated and the recordkeeping procedures that will be used to reference the consolidated containers. Also, SSWSI needs to include the procedures that will be used to verify chemical compatibility.

We are currently merging a couple of our bulking consolidating SOPS. We can reference the document in the Operating plan.

- The CESQG application does not clearly indicate on the "Inventory for Waste Disposal", if those quantities are per shipment, per month, annually, etc. It is suggested the application include quantity generated per month to ensure CESQG's document the volume of waste generated.

I added section IV. 2. c. 2

The application is for each shipment and not as an inventory of accumulation. The theory is that there would not be more than one shipment in a month but if there were multiple applications in a month would need to be consolidated for generator status.

T.J. M^c Caustland
Environmental Safety & Health Manager - East Region



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