From:
 White, John

 To:
 "McCaustland, TJ"

 Subject:
 RE: Consolidated Waste pick up

 Date:
 Monday, October 22, 2012 9:06:00 AM

 Attachments:
 11567.pdf 13272.pdf

Т.Ј.,

Attached are a couple of guidance documents that both agree transporters can consolidate wastes to facilitate transportation and disposal. Wastes going to the same TSD can be consolidated. You cannot change the destination facility selected by a generator. If the DOT description for the waste has changed, then a new manifest may be required. For small changes, the guidance suggests the manifests can be modified to reflect the changes.

Based on the attached guidance, there is no reason Stericycle cannot combine compatible wastes from multiple generators into one or more containers. You just need to ensure the manifests are maintained in a manner that allows the generators to follow their respective wastes to the end facility. This may include generating a new manifest for the combined wastes and attaching the manifest for wastes containing in that shipment to the document.

If you have any questions please let me known.

Thank you,

John

John White Environmental Specialist Hazardous Waste Program john.white@dep.state.fl.us Phone: (407)897-4305 Fax: (850)412-0488

From: McCaustland, TJ [mailto:TMcCaustland@STERICYCLE.com] Sent: Tuesday, October 16, 2012 3:56 PM To: White, John Subject: Consolidated Waste pick up

John,

Thanks for calling back it was good to talk with you again.

As I said we are picking up waste from numerous generators (mostly retail outlets). We currently

build boxes at every stop for every waste stream. Most of the items that we are picking up are consumer commodities that are expired or damaged.

The usual pick has one or two items per waste stream so a box is built shipped hundreds of miles and burned with minimal amounts of waste. We are looking for a method where we could stop at each generator and use a consolidated container for each waste stream. The wastes would be compatible but the generators would be different.

You had mentioned that there may be a way to consolidate the wastes and create a consolidated manifest with potentially SSWSI becoming the generator.

Any guidance you could provide would be greatly appreciated.

Thanks for your time

T.J. M^c Caustland

Environmental Safety & Health Manager - East Region



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