



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

FACILITY INFORMATION:

Facility Name: Stericycle Specialty Waste Solutions Inc

On-Site Inspection Start Date: 12/14/2017 **On-Site Inspection End Date:** 12/14/2017

ME ID#: 56404 **EPA ID#:** FLR000006353

Facility Street Address: 314 W Landstreet Rd #B, Orlando, FL 32824-7803

Contact Mailing Address: 314 W Landstreet Rd # B, Orlando, FL 32824-7803

County Name: Orange

NOTIFIED AS:

LQG (>1000 kg/month)

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector

Other Participants: Parvez Mallick, Inspector; Velter Anderson, Facility Manager

LATITUDE / LONGITUDE: Lat 28° 26' 8.1123" / Long 81° 22' 50.7241"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

On December 14, 2107, John White, Florida Department of Environmental Protection, and Parvez Mallick, U.S. Environmental Protection Agency, accompanied by Velter Anderson III, Stericycle Environmental Solutions Facility Manager, inspected Stericycle Specialty Waste Solutions, Inc. for compliance with state and federal hazardous waste transporter requirements.

Stericycle Specialty Waste Solutions, Inc. has operated from this location since May 31, 2009, when they purchased the business from Environmental Enterprises of Florida. The property is owned by Dr. Robert Baker, 424 Riverside Drive, Battle Creek, Michigan 49015.

Stericycle Specialty Waste Solutions, Inc.'s registration as a Hazardous Waste Transporter/Transfer facility, a Used Oil Transporter/Transfer facility, a Used Oil Filter Transporter/Transfer facility, and a Universal Waste Transporter/Transfer facility is current. In addition to pharmaceutical waste managed under the Universal Pharmaceutical Waste (UPW) Rule, Stericycle Specialty Waste Solutions, Inc. manages electronic wastes and non-hazardous pharmaceutical wastes.

Stericycle Specialty Waste Solutions, Inc. is also authorized by the State to manage Conditionally Exempt Small Quantity Generator (CESQG) hazardous waste. This allows longer time limits for storage on site. Stericycle Specialty Waste Solutions, Inc. has also notified as a Large Quantity Generator of hazardous waste, a Large Quantity Handler of Universal Waste, and an importer of hazardous waste.

The facility has twelve employees working at this location and operates twenty-six trucks from this location. The facility is located on two acres of land and is connected to the City of Orlando sewer and water services.

INSPECTION HISTORY

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The facility was last inspected on October 26, 2016 for compliance with state and federal hazardous waste transporter requirements and no violations were found at that time.

Process Description:

The facility is comprised of a 100,000-square foot building with offices in front and a storage warehouse behind the offices. The warehouse is segregated into distinct staging areas. There is a fenced in area for DEA regulated pharmaceutical waste (Figure 2), to control access, and floor space that has been designated for specific waste types. At the time of the inspection the warehouse had one row for CESQG waste, two rows for universal waste, four rows for universal pharmaceutical waste, one row for 10-day waste, and five rows for used oil and non-hazardous waste.

This facility is mainly focused on servicing the medical industry by transporting non-hazardous waste and pharmaceuticals. Prior to picking up hazardous waste, generators submit a waste profile to Stericycle Specialty Waste Solutions, Inc. Stericycle Specialty Waste Solutions, Inc. submits the profile to the appropriate disposal facility for approval. If the disposal facility is willing to accept the waste, Stericycle Specialty Waste Solutions, Inc. provides the generator with a description of the waste and an acceptance letter. Stericycle Specialty Waste Solutions, Inc. then schedules a date and time for transport. The waste is transported to Stericycle Specialty Waste Solutions, Inc.'s facility and stored on-site, in a trailer or warehouse, for no more than 10 days.

Each trailer can store a maximum of ninety 55-gallon drums. Trailers are stored on a sloped concrete slab that has a six-inch high concrete curb around three sides of the pad. Wastes stored in trailers loaded in accordance with DOT regulations described in 40 CFR 263.10 are not required to meet the aisle space requirement described in 40 CFR 265.35.

INSPECTION NARRATIVE

Wastes entering the 10-day area of the warehouse are off-loaded and placed in a check-in area to verify the condition and quantity of containers. Containers in good condition are reloaded onto trailers for shipment to destination facilities. Containers that are not in good condition are replaced and the containers are then reloaded onto trailers.

Wastes being accepted into the warehouse, such as CESQG waste, universal pharmaceutical waste and non-hazardous wastes are inspected and stored in the appropriate area. Hazardous waste pharmaceuticals are labeled as universal pharmaceutical waste when they enter the warehouse but are relabeled "Hazardous Waste" for shipment off-site.

In the row identified for CESQG waste (Figure 1) were the following: a pallet of small, black containers storing hazardous waste pharmaceuticals with the waste codes D001 (ignitable) and D009 (mercury); a 5-gallon container of sodium hydroxide and two 5-gallon containers of sodium thiosulfate; and a pallet storing four 15-gallon containers, two 18-gallon containers, and two 5-gallon containers of waste with the waste codes D001 (ignitable) and D005 (barium). All containers were closed and labeled "Hazardous Waste."

There were two rows identified as containing universal waste (Figure 3); however, one row contained six 55-gallon drums of non-hazardous sewage sediment from cruise ships. The second row contained the following: a gaylord box of consumer electronics; nine boxes of batteries; one 55-gallon drum of toner cartridges; one 55-gallon drum of lamp ballasts; one 5-gallon container of electronic waste; three boxes of universal waste lamps; one 55-gallon drum of crushed universal waste lamps; and an additional four containers of universal waste. All containers were closed and properly labeled.

In a row designated for used oil (Figure 3) were three 55-gallon drums of used oil staged on containment pallets. The containers were closed and properly labeled. There were also five 55-gallon drums of oily scrap metal staged between the oil drums and the adjacent universal pharmaceutical waste containers.

There were four rows of universal pharmaceutical waste (Figures 4, 5 and 6). The first row contained a pallet with 18-gallon containers labeled "Universal Pharmaceutical Waste" and "Flammable/Toxic." The second row contained five pallets of 5 to 18-gallon containers of universal pharmaceutical waste. The third row contained four pallets of 5 to 18-gallon containers of universal pharmaceutical waste. All containers were closed and properly labeled. The fourth row contained twenty-four 55-gallon drums labeled "Hazardous Waste." EPA waste codes identified were D004 (arsenic), U002 (acetone), U010 (Mitomycin C), and U015 (azaserine).

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The 10-day transfer waste check-in row (Figure 7) contained two 55-gallon drums of waste tetrachloroethylene, one 55-gallon drum of toluene di-isocyanate, and one 15-gallon container of reagent waste. All containers were closed and labeled "Hazardous Waste."

There were five rows of non-hazardous maritime waste (Figure 8). One row contained two 275-gallon totes and two 55-gallon drums of cooking grease. The second row contained sixteen 55-gallon drums of oily plastic wastes. The third row contained sixteen 55-gallon drums of waste based paints. The fourth row contained thirty 55-gallon drums of economizer wash water, crushed glass and oily wastes. The fifth row contained approximately nineteen 55-gallon drums and six 5 to 15-gallon containers of buffered formalin.

Adjacent to the maritime waste was a 30-cubic yard roll-off container of oily wastes such as rags and absorbents (Figure 9).

Emergency equipment in the warehouse consists of two safety shower/eye wash stations, one located mid-way through the warehouse and the other on the south end of the warehouse, fire extinguishers located throughout the warehouse, and a layout of the facility at exit doors. The extinguishers are checked monthly by facility personnel and annually by an outside source. Supply storage was located near a bay door in the warehouse.

As noted in prior reports, the Department previously reviewed the property boundaries on Orange County's Property Appraiser's website. It appears that the west wall of the warehouse is within 30 feet of the property line. Please be advised that, in accordance with 40 CFR 265.176, ignitable hazardous waste must be stored at least 50 feet away from the property line, so special storage considerations must be made when storing ignitable waste on site.

Located outside the warehouse were four trailers located on the containment pad being loaded for shipment to off-site destination facilities. Two empty drum trailers were also in the area.

RECORDS REVIEW

Review of hazardous waste manifests for 2017 found no violations.

Stericycle Specialty Waste Solutions, Inc. inspects the entire warehouse, including the Conditionally Exempt Small Generator waste, weekly.

Training records and position descriptions are kept electronically. Training records are available for employees who have separated from the company within the past three years. Position descriptions are kept by group. Each group designation has specific safety and training requirements that have been identified. The group ties back to the position description maintained by human resources.

The current contingency plan is identified as Revision 1, dated December 8, 2015. Mr. Anderson is identified as the emergency coordinator. Matt Mulligan is identified as the secondary emergency coordinator. The contingency plan was sent to local authorities.

The 10-day log recording information from in-coming manifests, as required by F.A.C. 62-730.171(6), is maintained as an electronic record. The log tracks in-coming and out-going shipments by month and by destination facility.

Non-hazardous liquid waste, used oil, and used oil filters are shipped to Aqua Clean, Lakeland, Florida. Electronic waste is shipped to Quicksilver Recycling Services, Tampa, Florida, and AERC, Melbourne, Florida. Non-hazardous pharmaceuticals are sent to the Stericycle Specialty Waste Solutions, Inc.'s non-hazardous waste incinerator in Apopka, Florida. Non-hazardous medical waste is shipped to Sunbelt Medical Services, Inc., located in Sardis, Georgia. Hazardous waste pharmaceuticals are sent to Veolia, Port Arthur, Texas. Hazardous waste is sent to Stericycle Specialty Waste Solutions, Inc., Indianapolis, Indiana.

PHOTO ATTACHMENTS:

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1. CESQG Waste



2. Non-Hazardous Pharmaceutical and DEA Controlled Waste



3. Used Oil and Universal Waste



4. Universal Pharmaceutical Waste



5. Universal Pharmaceutical Waste



6. Universal Pharmaceutical Waste - Hazardous Waste



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7. 10-Day Waste Check-In Area



8. Non-Hazardous Wastes



9. 30-Cubic Yard Roll-Off of Oily Waste



Conclusion:

Stericycle Specialty Waste Solutions, Inc. was inspected as a Large Quantity Generator; 10-day Transfer facility; Universal Waste Handler; and a used oil, used oil filter, universal waste and hazardous waste transporter and no violations were cited at that time.

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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.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
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.

John E. White

Principal Inspector Name

Inspector

Principal Inspector Title

JW

Principal Inspector Signature

DEP

Organization

01/22/2018

Date

Parvez Mallick

Inspector Name

Inspector

Inspector Title

EPA

Organization

Volver Anderson

Representative Name

Facility Manager

Representative Title

Stericycle Specialty Waste

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.

Report Approvers:**Approver:** Christine Daniel**Inspection Approval Date:** 01/22/2018