

**From:** O'Donnell, Kevin  
**To:** [Acosta, Kayla](#)  
**Cc:** [Mallick.Parvez@epa.gov](mailto:Mallick.Parvez@epa.gov); [Hendrickson, Christopher](#); [Blandin, Norva](#); [Treloar, James](#); [Wolfe, Todd](#); [Davis, Jeffrey](#); [Gambino, Danielle](#); [Noonan, Patrick](#)  
**Subject:** RE: Stericycle Miami EPA ID FL0000702985 - Exit Interview  
**Date:** Thursday, August 16, 2018 10:51:50 AM  
**Attachments:** [image038.png](#)

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Below you will find photos of the improvements we made in the Miami Ten Day Facility. All other improvements and items that need to be addressed will be completed and provided prior to the deadline date. Thank you

1. We Painted the containment barrier for bulk liquids to add a layer of safety for our warehouse team
2. We added signage to our bulk liquids containment area as well as the staging areas in our warehouse
3. We painted stop lines at all of our dock doors so our drivers have a better reference point when backing in.
4. Added proper spacing between all waste being staged on the floor.
5. We designated areas for supplies so we will not have supplies comingling with waste.

Before



After

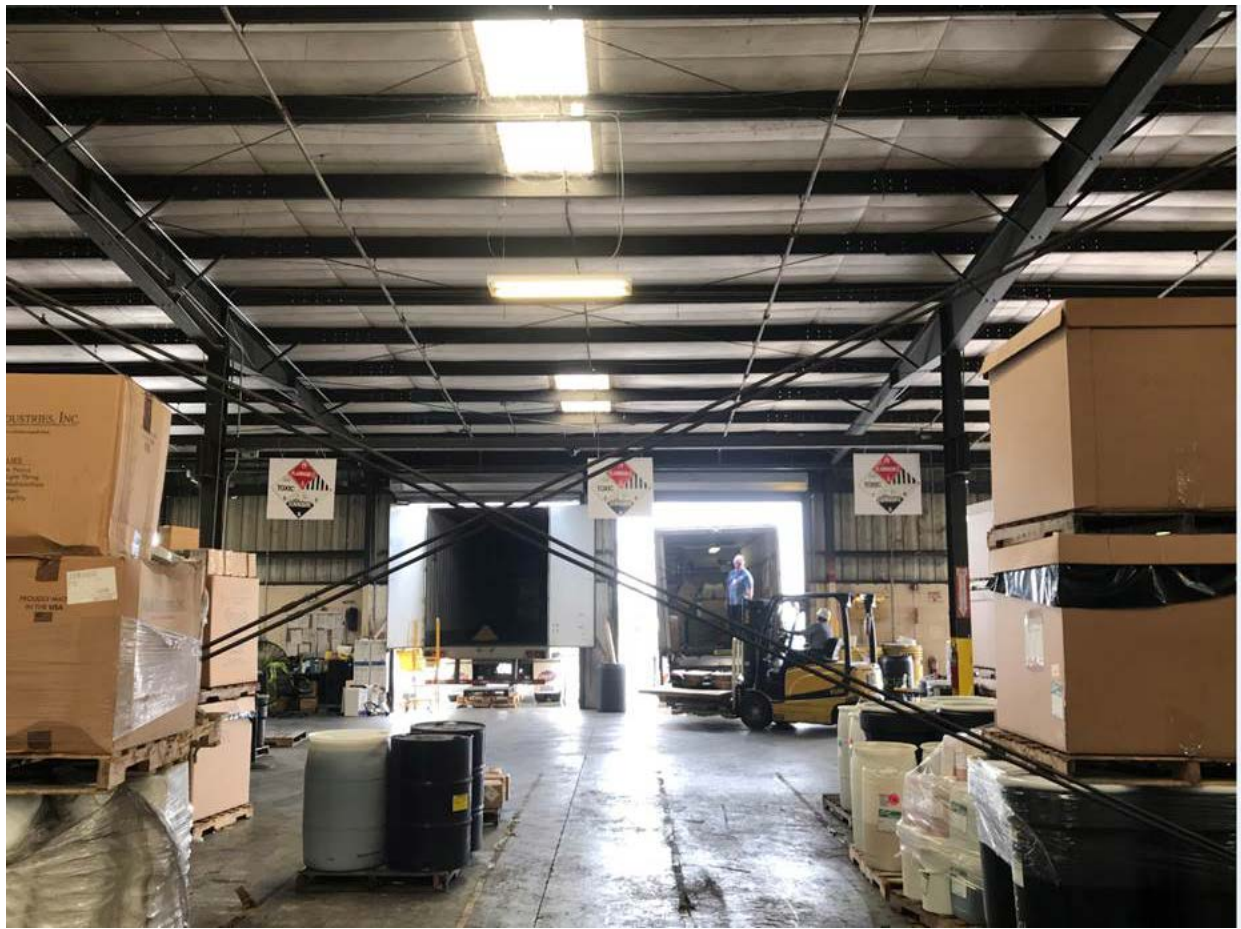


Before

After



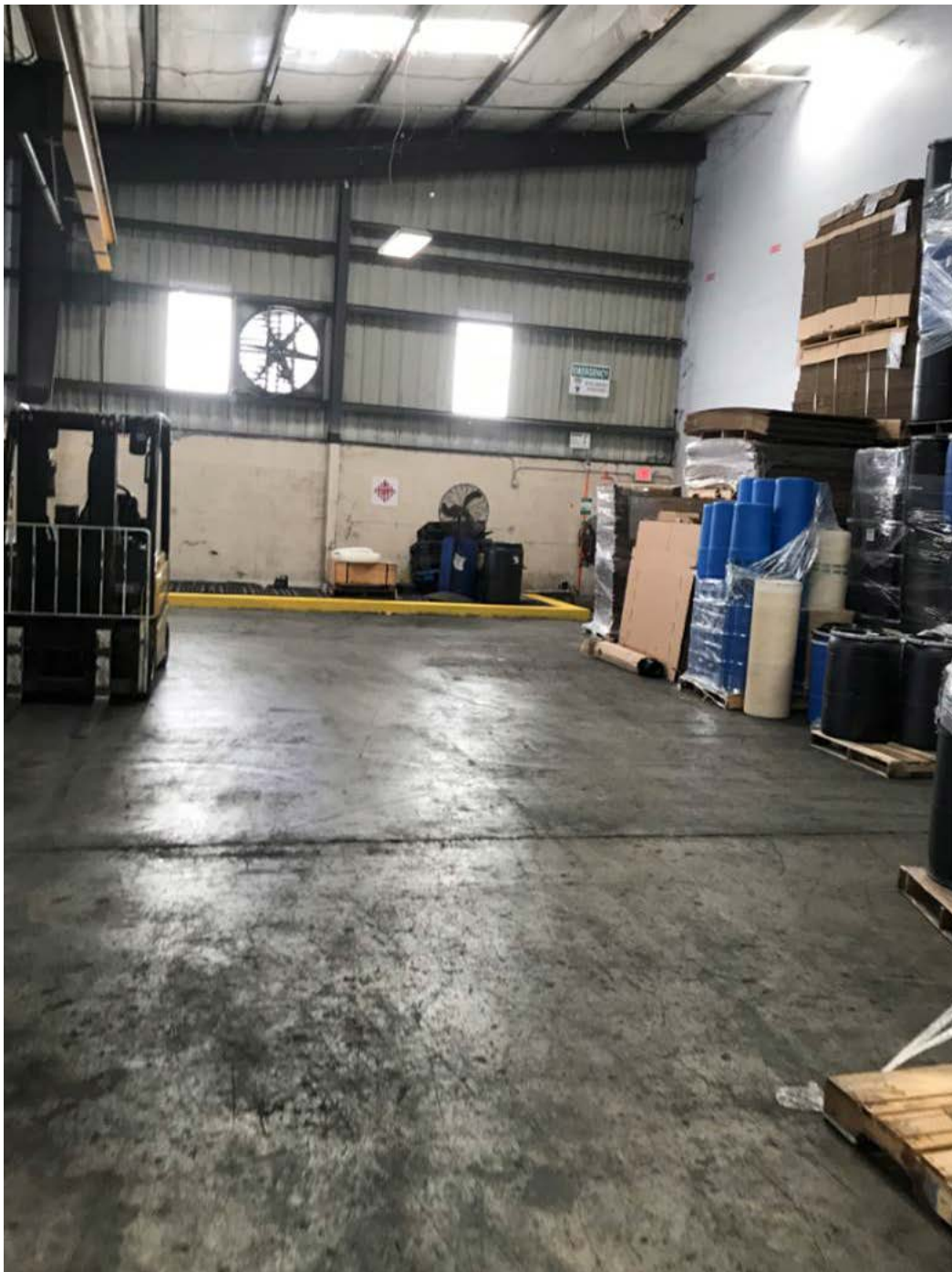














**From:** Acosta, Kayla [mailto:Kayla.Acosta@FloridaDEP.gov]

**Sent:** Monday, August 13, 2018 11:19 AM

**To:** O'Donnell, Kevin

**Cc:** Mallick.Parvez@epa.gov; Hendrickson, Christopher; Blandin, Norva; Treloar, James; Wolfe, Todd; Davis, Jeffrey; Gambino, Danielle

**Subject:** RE: Stericycle Miami EPA ID FL0000702985 - Exit Interview

Mr. O'Donnell,

As per our phone conversation, I am requesting Used Oil shipment records only. The Hazardous Waste manifest records were already reviewed the day of the inspection. If you have any additional questions please let me know.

Best Regards,

**Kayla M. Acosta**  
**Environmental Specialist I**  
Florida Department of Environmental Protection  
Southeast District - West Palm Beach  
3301 Gun Club Road, MSC 7210-1  
West Palm Beach, FL 33406  
[Kayla.Acosta@floridadep.gov](mailto:Kayla.Acosta@floridadep.gov)  
Office: 561.681.6636





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**From:** O'Donnell, Kevin [<mailto:KODonnell@STERICYCLE.com>]

**Sent:** Monday, August 13, 2018 10:23 AM

**To:** Acosta, Kayla <[Kayla.Acosta@FloridaDEP.gov](mailto:Kayla.Acosta@FloridaDEP.gov)>

**Cc:** [Mallick.Parvez@epa.gov](mailto:Mallick.Parvez@epa.gov); Hendrickson, Christopher <[Christopher.Hendrickson@STERICYCLE.com](mailto:Christopher.Hendrickson@STERICYCLE.com)>; Blandin, Norva <[Norva.Blandin@FloridaDEP.gov](mailto:Norva.Blandin@FloridaDEP.gov)>; Treloar, James <[James.Treloar@STERICYCLE.com](mailto:James.Treloar@STERICYCLE.com)>; Wolfe, Todd <[Todd.Wolfe@STERICYCLE.com](mailto:Todd.Wolfe@STERICYCLE.com)>; Davis, Jeffrey <[Jeffrey.Davis@STERICYCLE.com](mailto:Jeffrey.Davis@STERICYCLE.com)>; Gambino, Danielle <[Danielle.Gambino@STERICYCLE.com](mailto:Danielle.Gambino@STERICYCLE.com)>

**Subject:** RE: Stericycle Miami EPA ID FL0000702985 - Exit Interview

One of our team members is gathering and organizing all of the shipment records you requested. When she has all of this information together in one digital folder, how would you like to receive it? A thumb drive? This will be too much information to email. Thank you

---

**From:** Acosta, Kayla [<mailto:Kayla.Acosta@FloridaDEP.gov>]

**Sent:** Monday, August 13, 2018 8:13 AM

**To:** O'Donnell, Kevin

**Cc:** [Mallick.Parvez@epa.gov](mailto:Mallick.Parvez@epa.gov); Hendrickson, Christopher; Blandin, Norva; Treloar, James; Wolfe, Todd; Davis, Jeffrey; Gambino, Danielle

**Subject:** RE: Stericycle Miami EPA ID FL0000702985 - Exit Interview

Good morning Mr. O'Donnell,

That is great to hear. Thank you for the update.

Best Regards,



**Kayla M. Acosta**

**Environmental Specialist I**

Florida Department of Environmental Protection

Southeast District – West Palm Beach

3301 Gun Club Road, MSC 7210-1

West Palm Beach, FL 33406

[Kayla.Acosta@floridadep.gov](mailto:Kayla.Acosta@floridadep.gov)

Office: 561.681.6636

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**From:** O'Donnell, Kevin [<mailto:KODonnell@STERICYCLE.com>]

**Sent:** Friday, August 10, 2018 3:25 PM

**To:** Acosta, Kayla <[Kayla.Acosta@FloridaDEP.gov](mailto:Kayla.Acosta@FloridaDEP.gov)>

**Cc:** [Mallick.Parvez@epa.gov](mailto:Mallick.Parvez@epa.gov); Hendrickson, Christopher <[Christopher.Hendrickson@STERICYCLE.com](mailto:Christopher.Hendrickson@STERICYCLE.com)>; Blandin, Norva <[Norva.Blandin@FloridaDEP.gov](mailto:Norva.Blandin@FloridaDEP.gov)>; Treloar, James <[James.Treloar@STERICYCLE.com](mailto:James.Treloar@STERICYCLE.com)>; Wolfe, Todd <[Todd.Wolfe@STERICYCLE.com](mailto:Todd.Wolfe@STERICYCLE.com)>; Davis, Jeffrey <[Jeffrey.Davis@STERICYCLE.com](mailto:Jeffrey.Davis@STERICYCLE.com)>; Gambino, Danielle <[Danielle.Gambino@STERICYCLE.com](mailto:Danielle.Gambino@STERICYCLE.com)>

**Subject:** RE: Stericycle Miami EPA ID FL0000702985 - Exit Interview

Thanks Kayla, we have already started on making the improvements and putting documentation together. We will start sending updates at the beginning of next week on our progress. Have a great weekend.

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**From:** Acosta, Kayla [<mailto:Kayla.Acosta@FloridaDEP.gov>]

**Sent:** Friday, August 10, 2018 2:32 PM

**To:** O'Donnell, Kevin

**Cc:** [Mallick.Parvez@epa.gov](mailto:Mallick.Parvez@epa.gov); Hendrickson, Christopher; Blandin, Norva

**Subject:** RE: Stericycle Miami EPA ID FL0000702985 - Exit Interview

Good afternoon Mr. O'Donnell,

As mentioned, I am providing you a typed version and follow-up Exit Interview. A final inspection report will follow. On Wednesday August 08, 2018, the Florida Department of Environmental Protection and the Environmental Protection Agency conducted a joint Compliance Evaluation Inspection at your facility. The following is a list of items that are requested or recommended by the inspectors:

- Container Management. The facility keeps records of weekly Hazardous Waste container inspections; however the number of containers were not

being documented and inadequate aisle space was observed during the inspection and not documented. Please use the template provided and submit to the Department a scanned copy of the weekly container log after 2-4 weeks of documentation.

- In addition, please submit a photo demonstrating adequate aisle space for hazardous waste containers.
- Contingency Plan. The contingency plan includes an Evacuation Plan and diagrams of the facility; however the diagrams are missing the locations of the hazardous waste staging area. Please include an updated diagram with the locations of the hazardous waste staging areas. Please submit a scanned copy or photo of the revised diagrams.
- The notification letter to local authorities on page 13 of the contingency plan lists the contact of a former employee who no longer works for the company. The notification letters to local authorities will need to be updated and resubmitted to local authorities listed on page 12 along with a copy of the contingency plan and the revised diagrams within the Evacuation Plan.
  - Please send me a scanned copy of the updated notification to local authorities with certified mail receipts once they are sent.
- Universal Waste Management. Two containers of Universal Waste Batteries were observed to be open. Please ensure that all containers remain closed at all times, unless you are adding/ removing from the container.
- A Hazardous Waste Transfer Facility that stores waste for more than 10 days is subject to the permitting requirements for a hazardous waste storage facility. It was observed through the record review of the hazardous waste manifests that hazardous waste was being stored at your facility for more than 10 days without a permit.
- During the inspection, it was observed that Universal Pharmaceutical Waste (UPW) was being commingled with biomedical waste within the same container. UPW and biomedical waste are subject to separate rules and regulations and cannot be comingled and placed into the same container.

Please submit any requested documentation or photos within **14 days**. Please contact me with any questions. The Department will be in contact with you if any additional items are needed and send you the final inspection report once it is complete.

Best Regards,



**Kayla M. Acosta**  
**Environmental Specialist I**  
Florida Department of Environmental Protection  
Southeast District – West Palm Beach  
3301 Gun Club Road, MSC 7210-1  
West Palm Beach, FL 33406  
[Kayla.Acosta@floridadep.gov](mailto:Kayla.Acosta@floridadep.gov)  
Office: 561.681.6636

---

**From:** Acosta, Kayla

**Sent:** Friday, August 10, 2018 10:16 AM

**To:** 'KODonnell@STERICYCLE.com' <[KODonnell@STERICYCLE.com](mailto:KODonnell@STERICYCLE.com)>

**Cc:** [Mallick.Parvez@epa.gov](mailto:Mallick.Parvez@epa.gov); 'Christopher.Hendrickson@STERICYCLE.com' <[Christopher.Hendrickson@STERICYCLE.com](mailto:Christopher.Hendrickson@STERICYCLE.com)>; Blandin, Norva <[Norva.Blandin@FloridaDEP.gov](mailto:Norva.Blandin@FloridaDEP.gov)>

**Subject:** Stericycle Miami EPA ID FL0000702985 - Exit Interview

Good morning Mr. O'Donnell,

Thank you for assisting us in the compliance evaluation inspection on 08/08/18. I will provide you a typed version of the exit interview document later today. If you have any additional questions or concerns please feel free to contact me.

Best Regards,



**Kayla M. Acosta**  
**Environmental Specialist I**  
Florida Department of Environmental Protection  
Southeast District – West Palm Beach  
3301 Gun Club Road, MSC 7210-1  
West Palm Beach, FL 33406  
[Kayla.Acosta@floridadep.gov](mailto:Kayla.Acosta@floridadep.gov)  
Office: 561.681.6636

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# Class Attendance Sign-In

Course Title: Container Inspections

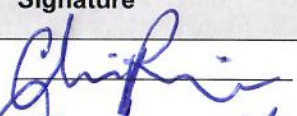


Class Date/Time:


08/20/2018 7:00 AM - 8:00 AM

Instructor: Davis, Jeffrey

Location: Miami

# Students: 1

Student Name	Department	Employee Number	Signature	Time-In	Absent/Reason
Richards Jr, Christopher	503265	0045294		9:00 AM	
Andrew Heslop					
Jarsh Mann				9:00	

  
Instructor's Signature  
Sunday, August 19, 2018, 4:20 PM

## Hazardous Waste Container Inspection Log

[illegible]

62-730.160 F.A.C.

(5) Generators of hazardous waste who accumulate hazardous waste on-site under 40 CFR 262.34 [as adopted in subsection 62-730.160(1), F.A.C.], shall maintain written documentation of the inspections required under 40 CFR Part 265 [as adopted in subsection 62-730.180(2), F.A.C.]. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

## Hazardous Waste Container Inspection Log

[illegible]

## 62-730.160 F.A.C.

(5) Generators of hazardous waste who accumulate hazardous waste on-site under 40 CFR 262.34 [as adopted in subsection 62-730.160(1), F.A.C.], shall maintain written documentation of the inspections required under 40 CFR Part 265 [as adopted in subsection 62-730.180(2), F.A.C.]. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.



## Hazardous Waste Container Inspection Log

[illegible]

62-730.160 F.A.C.

(5) Generators of hazardous waste who accumulate hazardous waste on-site under 40 CFR 262.34 [as adopted in subsection 62-730.160(1), F.A.C.], shall maintain written documentation of the inspections required under 40 CFR Part 265 [as adopted in subsection 62-730.180(2), F.A.C.]. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

## **1. Container Inspections**

### **1.1. Introduction:**

1.1.1. This procedure is an addendum to the ESOL Transfer Facility SOP Section 8 (Inspections).

1.1.2. At least weekly, all container storage areas must be inspected to identify problems in time to correct them before they harm human health or the environment. These inspections are in addition to required verifications performed when inbound containers are unloaded for temporary storage and outbound containers are loaded for off-site transportation.

### **1.2. Remedial Actions:**

Any nonconforming containers found must be corrected immediately. Any corrective action that cannot be completed before the end of the operating day must be brought to the attention of the supervisor or designate.

### **1.3. Inspection Items**

#### **1.3.1. Aisle Spacing:**

Aisle spacing must be maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation. Adequate aisle space must be maintained between containers to properly check for leaks, deterioration and labeling.

#### **1.3.2. Container Closure:**

All containers must remain closed except in response to spill clean-ups or approved waste consolidation activities. Containers shall be checked for proper closure as per manufacturer's instructions and corrected using appropriate tools (torque wrench, bung wrench, etc.)

**1.3.3. Impaired Containers:**

The operator must review all containers for leaks and deterioration caused by corrosion or other factors. Corrective action requires transferring the hazardous waste to another compatible container in good condition. All required markings and labels must be affixed to the new container. Ensure proper closure of the new container. All spills must be cleaned up and placed in a compatible container and labeled/marked appropriately as generated waste.

**1.3.4. Container Markings and Labels:**

All containers must be reviewed to ensure proper DOT markings (proper shipping information) and waste labels (hazardous, nonhazardous, infectious, accumulation start date) are affixed and visible at all times

**1.3.5. Spill Control Equipment:**

Ensure spill control equipment as stated in the contingency plan is available at designated locations. Replenish consumables where required.

**1.4. Recordkeeping**

1.4.1. The 'Hazardous Waste Container Inspection Log' must be completed in its entirety to document weekly container inspections by the supervisor or designate.

1.4.2. The inspection log shall be retained for 3 years and be readily available for inspection.



# Hazardous Waste Container Inspection Log

[illegible]

62-730.160 F.A.C.

(5) Generators of hazardous waste who accumulate hazardous waste on-site under 40 CFR 262.34 [as adopted in subsection 62-730.160(1), F.A.C.], shall maintain written documentation of the inspections required under 40 CFR Part 265 [as adopted in subsection 62-730.180(2), F.A.C.]. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

## **Contingency Plan for SSWSI 10-day Hazardous Waste Transfer Facility**

**8505 Northwest 74<sup>th</sup> Street**

**Miami, Florida 33166**

This contingency plan is intended to be implemented and to provide information to employees and emergency coordinators in the event of imminent or actual emergency. Employees need to be trained as to the specific duties that will be assigned to them in an emergency and where to locate emergency equipment and information. Proper knowledge and training will minimize hazards to human health or the environment from fire, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

This plan will be reviewed and amended as necessary if the applicable regulations are revised, the plan is used in an emergency or imminent emergency and found to be inadequate, the operations of the facility change, the type or location of emergency equipment changes, the list of emergency coordinators changes, or biennially if not utilized.

Copies of the plan will be kept in the office, the power units of vehicles based at the facility, and electronically with the facility Environmental, Safety, and Health Manager. Copies will be provided to all entities listed in Section 8) Distribution List.

The plan is separated into sections to assist in rapid location of information:

- |                        |                                    |
|------------------------|------------------------------------|
| 1) Summary Description | 4) Evacuation Plan                 |
| 2) Employee actions    | a) Evacuation Route Diagrams       |
| a) Spill               | 5) Local Authorities               |
| b) Fire                | a) Letter Seeking Agreements       |
| c) Explosion           | b) Letter Documenting Arrangements |
| d) Hurricane           | 6) Emergency Coordinators          |
| 3) Emergency Equipment | 7) Reporting Requirements          |
|                        | 8) Distribution List               |

### **Revision History**

Original Plan: October 17, 2012

Revision 1: December 5, 2012

Added incident reporting information, flammable/ignitable storage and return to operations review

Revision 2: August 27, 2014 – Amended Emergency Coordinators

Revision 3: January 20, 2017 – Amended Emergency Coordinators

Revision 4: August 01, 2018 – Amended Emergency Coordinators

## **1. Summary Description**

The facility has a cyclone fence preventing unauthorized access along the entire perimeter. An electronic controlled access gate will allow vehicle traffic. The gate will have signs mounted with “Danger—Unauthorized Personnel Keep Out” and “Peligro: Personal No Autorizado No Entre” printed on them. Should any man gates be created they will have similar signage.

Areas where trailers or straight trucks containing hazardous waste will be parked have an impervious surface that is surrounded by a roll over berm or curb designed to contain any liquid that could be spilled.

The facility will be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. The facility is intended to manage sealed containers on trailers that are staged on a cement pad or within the confines of the warehouse. The potential for fires, reactions, and releases will be minimized through inspection of containers as they are received and or transferred.

Hazardous waste will be placed inside of a building that is equipped with sprinklers in compliance with NFPA 13. All stored ignitable and reactive wastes will a minimum of 50 feet from exterior property boundaries.

The office is equipped with telephones capable of reaching external assistance. The office has direct line of sight of all areas where hazardous waste will present. The facility is small enough that any area that has hazardous waste is close enough to the telephone that voice and/or visual signals can be used to relay information to an individual on the telephone with emergency personnel.

A spill pallet will be located near the overhead dock doors so as to provide easy access to any of the trucks or trailers containing hazardous waste. The spill pallet will be equipped with drums containing oil absorbent material and other inert absorbent materials such as vermiculite. The spill pallet will also have a spark resistant, shovel, broom, and dust pan. The spill pallet will also have a container of absorbent “socks” or similar items to assist in preventing liquid spills from leaving the building or vehicle. If no extra drums are available the drum storing the oil absorbent or vermiculite will be utilized to package the spilled waste and debris. All hazardous waste spills will be managed as hazardous waste and labeled accordingly.

Waste will be loaded in accordance with DOT regulations described in 40 CFR 263.10 [as adopted by reference in subsection 62-730.170(1), F.A.C.] to prevent any incompatible waste from contacting other wastes. In all cases waste will be managed prevent damaging containers and containers will be inspected for potential ruptures or leaks. Over pack drums will be on-site in the unlikely event that a container is identified with a leak or potential leak.

It is not possible to have a usable repository of MSDS and emergency response information as the facility inventory is intended to be dynamic and short lived. Therefore each employee will be issued the current Emergency Response Guidebook (ERG) and trained on the usage of the



## Contingency Plan for SSWSI Miami Area 51

ERG. Manifests with waste description(s) including UN Number, ERG Guidebook Number, and other emergency information will be located in the tractor to which the trailer is attached, in a folder in the rear of the trailer containing the waste, or in the office.

### 2. Employee Actions

In no circumstance should an employee put themselves in danger. Therefore it is imperative to assess the situation as rapidly and as accurately as possible. Never attempt to act in any emergency situation without first alerting an Emergency Coordinator, Supervisor, or Outside Emergency Responder. This will prevent an employee from being injured with no help in route.

It is required that employees will don normal PPE for their job duties and will follow PPE Guidelines when working with Hazardous wastes. Most duties require gloves and duties with caustics or a risk of splash require eye protection.

The first duty of employees is to remain safe and report the emergency to the Emergency Coordinator. The Emergency Coordinator will provide instructions on how to proceed if different than described for each emergency procedure below.

#### Information for the Emergency Coordinators

- ❖ Injuries
- ❖ Product name of material spilled
- ❖ Profile number, RCRA Waste Code(s), DOT Classification
- ❖ Generator Name
- ❖ Amount of Spill
- ❖ Cause of Spill (leaking container, defective valve, etc.)
- ❖ Exact Date, time, and location of incident
- ❖ Recommendations for equipment needed to clean up spill and repair damage

The Emergency Coordinator will immediately identify the character, exact source, amount, and a real extent of any released materials. The Emergency Coordinator may do this by observation or review of SSWSI records and manifests, and if necessary by chemical analyses. With the release information the Emergency Coordinator will assess possible hazards to human health, the environment, the facility, and other materials on-site. The assessment will consider both direct and indirect effects of the release, fire, explosion, or other emergency events. Consideration will be given to the effects of any toxic, irritating, or asphyxiating gases that could be generated and the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat induced explosions.

If in his assessment of the emergency event the Emergency Coordinator determines that evacuation of local areas may be advisable, he will immediately notify appropriate local

## Contingency Plan for SSWSI Miami Area 51

authorities. The Emergency Coordinator will be available to assist appropriate officials with evacuation planning.

The Emergency Coordinator will also follow the reporting requirements outlined in section 6.

During an emergency the Emergency coordinator will take all reasonable measures necessary to ensure that fires, explosions, or releases do not occur, recur, or spread. These measures could include stopping processes, traffic, and operations. Additionally containers will be isolated or removed to prevent further involvement of the emergency event.

Should the Emergency Coordinator deem it safe to do so the Emergency Coordinator will assign duties as described on the following pages.

### **Spill**

Alert other personnel of the size and location of the spill.

Assess the size and content of the spill.

For toxic materials don appropriate respiratory equipment.

For Flammable spills ensure that all ignition sources are removed.

If the spill is from a leaking container or other source that is continuing to release material attempt to stop the leak by shutting off valves, up righting containers, or other appropriate means.

Prevent the spill from traveling beyond containment. Protect down slope area first, followed by sensitive areas such as drains, ditches, and other areas where the spill may enter waterways or leave the facility.

Utilize the spill “socks” from the spill pallet to surround the spill. If the spill is very large utilize surrounding earth to prevent runoff.

Once the spill is contained begin the cleanup process. Utilize the inert absorbent material to solidify liquids. Use the spark resistant shovel, broom, and dust pan to clean all spilled material and absorbent and place into a container. Use an appropriate container compatible with the waste. Label the container appropriately for the waste that was spilled. All hazardous waste and debris from a spill of hazardous waste is hazardous waste and must be managed as such.

### **Driver Responsibilities**

Keep unauthorized persons away from spilled materials. Remain with the vehicle and advise pedestrians and motorists of the potential danger. If you are unable, ask someone to notify the local police and fire departments.

## Contingency Plan for SSWSI Miami Area 51

Contact the emergency coordinators at SSWSI as soon as possible. The list of Emergency Coordinators is in Section 6.

Set up warning devices surrounding the vehicle. When police or fire department arrives, request the area to be blocked off to both pedestrian and vehicle traffic to prevent any injury or damage.

Follow procedures listed above for spill containment and clean up.

### **Fire**

Alert other personnel of the size and location of the fire.

Assess the size of the fire and if not caught in the initial phases proceed with the evacuation plan.

If possible to do so without risk of injury attempt to extinguish the fire with the appropriate fire suppression equipment. Class ABC Fire extinguishers are present and can be used on fires not involving metals.

Do use the PASS technique as described in Fire Extinguisher training

Do **NOT** attempt to extinguish a fire:

- That has become too large for a single extinguisher

- Places the fire between you and safe egress

- If you cannot see your safe egress

- Involves toxics for which you do not have the appropriate respirator

- Without alerting others

- With an inappropriate extinguisher

If the fire cannot be extinguished proceed with the evacuation plan.

Once the fire has been extinguished ensure that there are no “Hot” spots or materials that may catch on fire. Proceed with the spill response as described above.

### **Explosion**

Alert outside emergency personnel. Alert non-emergency coordinators to proceed with the evacuation plan.

It is imperative that extreme caution be utilized in assessing emergencies involving an explosion.



## Contingency Plan for SSWSI Miami Area 51

Assess the surroundings for the cause of the explosion. Looking specifically for situations where another explosion is imminent or possible. If it is safe to do so remove ignition sources or other causes of explosion.

If there are no signs of further imminent explosions proceed with spill response and/or fire response as described above.

### Hurricane

Fortunately there is ample warning for hurricanes so it is possible to have a Standard Operating Procedure. Refer to SSWSI OP-201 Hurricane Preparedness.

### Return to Operations

When the emergency response and clean up have been completed all equipment used must be decontaminated. All wash waters and disposable cleaning materials need to be contained and packaged as the same waste category as the waste involved in the emergency and destroyed in accordance with the regulations for that class of waste.

Prior to restarting operations all emergency supplies must replenished, replaced, or refurbished. The contingency plan shall be reviewed and revised if necessary to address the emergency and to prevent re-occurrence of that event.

## 3. Emergency Equipment

### Driver Emergency Bag

- Gloves
- Goggles/safety glasses
- Boots
- Hard hat
- Rubber Shovel
- Respirator (Full Face)
- DOT Emergency Response Guidebook
- Skin and eye neutralization solution
- First Aid Kit

### On Site in Warehouse

66 Automatic Sprinkler heads

## Contingency Plan for SSWSI Miami Area 51

- 10 10 pound dry chemical Fire extinguishers Class ABC
- 1 A spill pallet will be located on the cement pad in the transfer trailer spill pallet containing:
  - a. one 55 gallon Y rated drum containing oil absorbent material (Oil sorb or similar)
  - b. one 55 gallon Y rated drum containing spill “sock” to prevent liquid from flowing off of pad
  - c. one 55 gallon Y rated drum containing inert absorbent material (vermiculite or similar)
  - d. One container with chemical resistant gloves, goggles, face shield, chemical resistant apron, coated one time use chemical resistant coveralls and foot covers
  - e. one spark resistant broom
  - f. one spark resistant dust pan
  - g. one spark resistant shovel

### On Site in Office (Mobile)

- Telephone capable of summoning outside resources
- 2 10 pound dry chemical Fire extinguishers Class ABC
- Respirators and cartridges appropriate for solvents, acids, and caustics
- Extra spill pads and PPE

Prior to restarting operations all emergency supplies must replenished, replaced, or refurbished.

### **Emergency Equipment Capabilities**

Sprinkler system is equipped with 2” feeder pipes and ½” brass fusible link pendants. The sprinkler system passed a pressure test with 90 PSI of pressure before the test, 60 PSI of residual pressure and a static pressure of 75 PSI. The total number of sprinkler heads in the area is 66 which meets NFPA 13 requirement for coverage per square foot.

General requirements to code:

- 1. The system has a hydraulic plate.
- 2. The system standpipe is accessible.
- 3. There is a minimum of 18” clearance between the top of the storage and the sprinkler deflector.

Alarm requirements to code:

- 1. The water flow alarm has passed test.
- 2. The supervisory signal has passed test.

Fire department requirements to code:

## Contingency Plan for SSWSI Miami Area 51

1. The FDC identification signs are in place.
2. The FDC are visible and accessible.
3. The FDC caps are in place.
4. The FDC couplings and swivels are not damaged and rotate smoothly.

Control valve requirements to code:

1. All system control valves are accessible in the open position and locked.
2. The control valves are equipped with sealed tamper switches.
3. All valves are identified with a sign.

Sprinkler requirements to code:

1. Stocks of sprinklers are available on site.
2. There is a copy of NFPA available.
3. Sprinklers are less than 50 years old.
4. All quick response sprinklers in service are less than 20 years old.
5. All sprinklers are free of paint, corrosion or physical damage.
6. All pipes are free of mechanical damage and are not leaking.

10 pound dry chemical Fire extinguishers Class ABC are capable of discharging dry chemical powder (usually ammonium dihydrogen phosphate - ADP) a distance of 15-21 feet for 20-22 seconds. These extinguishers are appropriate for Class A –wood, paper, and etc.; Class B-flammable liquid; and Class C-Electrical fires

Oil absorbent material is capable of capturing approximately 50% of its weight in oil with a density of approximately 5.5 pounds per gallon. A 55 gallon drum would hold approximately 300 pounds and be capable of absorbing 150 pounds of hydrocarbon materials or roughly 20 gallons.

Spill sock are hazmat chemical absorbent socks are soft and flexible enough to fit in tight confined spaces and absorb up to 10 time their weight in aggressive or non-aggressive fluids. Non-biodegradable, they can be wrung out for recycling or disposal. Chemical spill absorbent socks absorb oil, waters, acids, bases and many other fluids. A 55 gallon drum would hold approximately 100 pounds and be capable of absorbing 1000 pounds of liquid materials or roughly 125 gallons.

Inert absorbent will not react with most materials and is capable of absorbing 250-500% of its weight in fluids and some solids. A 55 gallon drum would hold approximately 150 pounds and be capable of absorbing at least 375 pounds of liquid material or at least 45 gallons.

Gloves have various capabilities ranging from latex gloves capable of protecting from blood borne pathogens to heavy neoprene capable of protecting from numerous chemicals. Work gloves are also available if necessary to protect chemical gloves while used.

## **Contingency Plan for SSWSI Miami Area 51**

Goggles/safety glasses capable of protecting the eyes of workers from minor liquid splashes, face shield may also be worn to protect from larger splashes.

Boots are capable of protecting workers feet from various hazards including drops of heavy materials.

Hard hat for protecting workers in area where overhead work is performed and falling objects are a possibility.

Rubber Shovel capable of picking up approximately one cubic foot of material and designed to be spark resistant.

Respirator (Full Face) fit to each individual employee with cartridges to protect from particulate, hydrocarbon, and/or acids as necessary.

Skin and eye neutralization solution capable of neutralizing small exposures to acid and caustic.

First Aid Kit with basic first aid supplies including bandages, slings, gauze, etc..  
DOT Emergency Response Guidebook with emergency information for various hazardous materials identified by UN Number. This book also contains emergency response phone numbers.

### **4. Evacuation Plan**

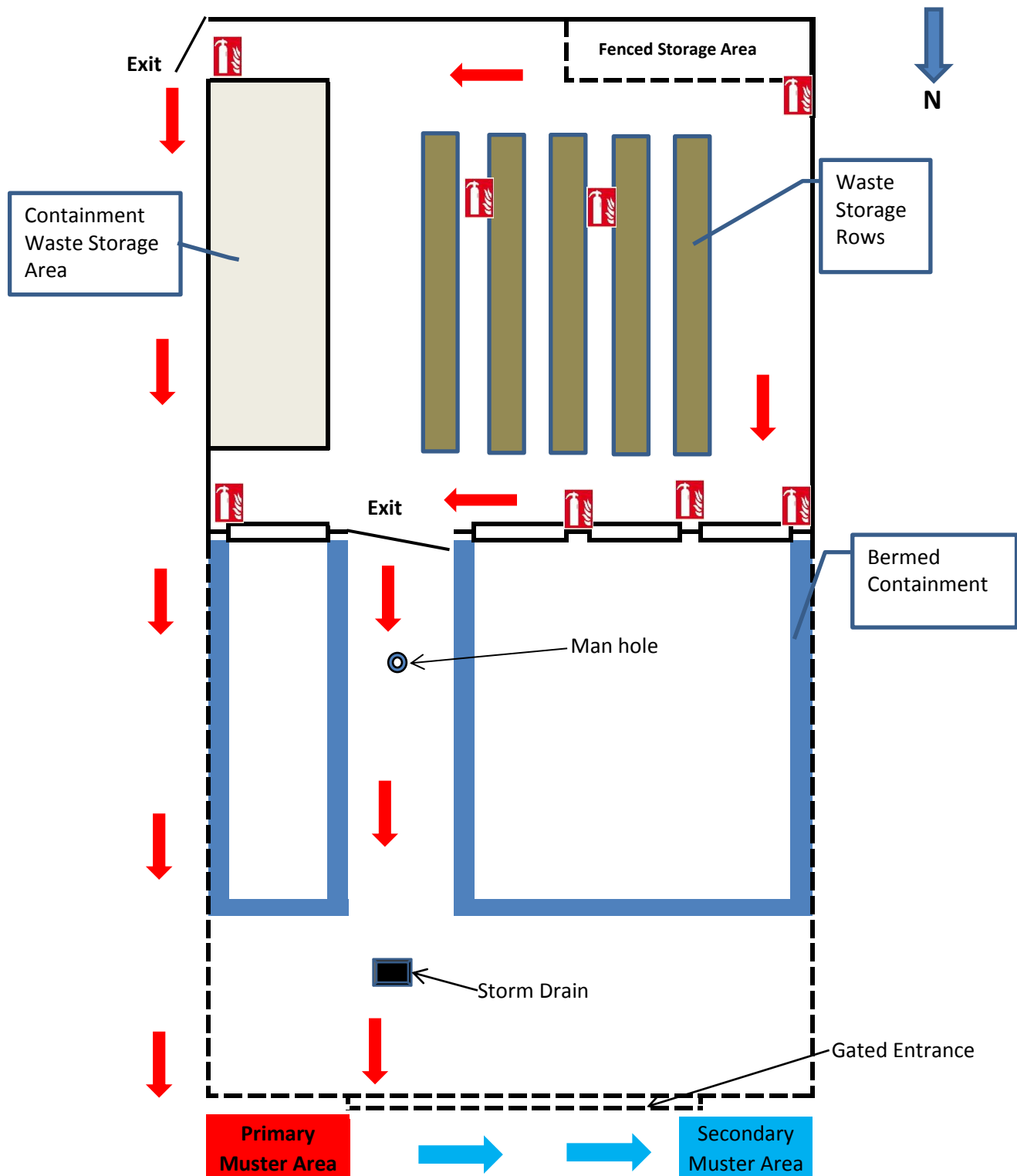
Employees are expected to quickly proceed in an orderly fashion to the Muster Area which is located outside the electric gate on the southeast corner of the property.

In the event winds are from the north and smoke or other gases cause opacity or inhalation hindrance the secondary muster area is located in the northeast corner of the property outside the electronic gate.

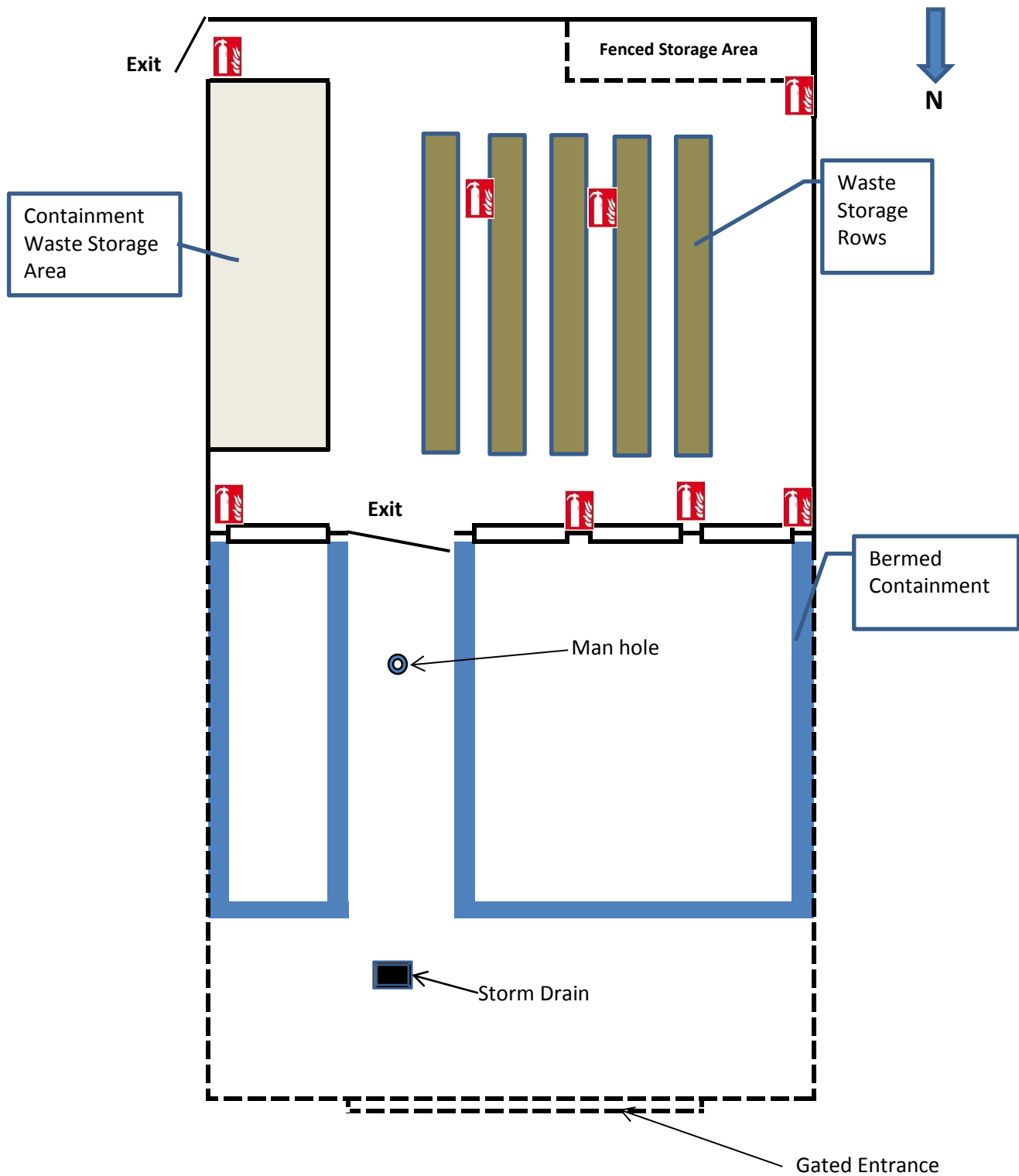
Diagrams of the Evacuation Routes and Emergency Equipment including Portable Fire Extinguishers in the Warehouse and Office areas are on the following pages.



## EMERGENCY EVACUATION AREAS



## EMERGENCY EQUIPMENT LOCATIONS



**5. Local Authorities**

Miami-Dade County Office of Emergency Management  
9300 Northwest 36<sup>th</sup> Street  
Doral, FL 33178-2414  
(305) 468-5400

Miami Dade County Fire Rescue  
9300 NW 41st St  
Doral, FL 33178  
(786) 331-5000

Miami-Dade Police Department  
9105 NW 25 ST  
Doral, FL 33172  
(305) 471-1780

Palm Springs General Hospital  
1475 W 49th St  
Hialeah, FL 33012  
(305) 558-2500

The agencies listed above will be contacted by SSWSI to establish a relationship and an agreement to provide emergency assistance.

The letter and response on the following pages are intended to aide in the establishment of this agreement. All communications with the agencies listed above will be documented in the operations record of the facility

## Contingency Plan for SSWSI Miami Area 51

**Date**

**Address**

**Dear Sir or Madam,**

Stericycle Specialty Waste Solutions, Inc. (SSWSI) is a transporter offering hazardous waste transport services such as hazardous waste, used oil filter, and biomedical services. SSWSI will operate a hazardous waste transfer facility located at 8505 Northwest 74<sup>th</sup> Street, Miami, Dade County, Florida 33166. The facility will not store hazardous waste in excess of ten (10) days. With this letter, SSWSI is submitting to your agency a copy of the facility's Contingency Plan.

This plan is designed to minimize hazards to human health and the environment from fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. SSWSI is submitting it to you to familiarize you with the SSWSI facility, wastes handled and their hazards. The plan identifies where facility personnel normally work, the location of hazards in the facility, and evacuation routes.

Title 40 of the Code of Federal Regulations, Section 264.37, requires SSWSI to obtain an agreement with your agency regarding the implementation of the Contingency Plan and your ability to assist SSWSI within your capabilities in the event of an emergency. Please sign the attached letter of confirmation.

Please feel free to contact me at 305.436.9084 or [JGross@Stericycle.com](mailto:JGross@Stericycle.com) if you have any questions or if you would like to tour the facility to familiarize yourself with the facility.

Sincerely,

Stericycle Specialty Waste Solutions, Inc.

Jason Gross

Operations Manager



## Contingency Plan for SSWSI Miami Area 51

Date

Stericycle Specialty Waste Solutions, Inc.  
8505 NW 74<sup>th</sup> Street  
Miami, FL 33166

Dear Sir,

This is to inform you that this agency has received a copy of the Stericycle Specialty Waste Solutions, Inc. (SSWSI) Contingency Plan. This agency will assist the SSWSI facility within the capabilities of this agency in the event of an emergency.

This agency can offer the following services:

\_\_\_\_\_ Fire Response

\_\_\_\_\_ Medical Services

\_\_\_\_\_ Spill Response

\_\_\_\_\_ Traffic Control

\_\_\_\_\_ Other Services \_\_\_\_\_

Sincerely,

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

## **6. Emergency Coordinators**

The Emergency Coordinators are thoroughly familiar with all aspects of the facilities contingency plan, all operations activities at the SSWSI facility, the location and characteristics of wastes managed the location of all records, and the facility layout.

Following an emergency event activating the contingency plan the Emergency Coordinator is also responsible for the proper management of recovered waste, contaminated soil or other debris, and any contaminated ground or surface water.

The following Personnel have been authorize by Stericycle Specialty Waste Solutions, Inc. to commit the necessary resources during an emergency, and that at least one coordinator is always on-site or on call and can reach the facility on short notice during an emergency:

### **Primary Emergency Coordinator**

William Gonzalez  
Transportation Manager  
8505 NW 74<sup>th</sup> Street  
Miami, FL 33166  
Office 305.436.9084  
WGonzalez-rms@Stericycle.com  
Home: 786.518.0879

### **Secondary Emergency Coordinator**

Christopher Peter  
Hazardous Waste Specialist  
8505 NW 74<sup>th</sup> Street  
Miami, FL 33166  
Christopher.Peter@Stericycle.com  
Cellular 305-389-9935

### **Regional Operations Manager**

Matt Mulligan  
Regional Operations Manager  
314-B West Landstreet Road  
Orlando, FL 32824  
Mmulligan-rms@Stericycle.com  
Cell: 407.704.9064

### **Compliance Manager**

Jeffrey Davis  
Field Compliance Manager  
SE Region  
6375 NW 84<sup>th</sup> Avenue  
Miami, FL 33166  
Cell: 313.743.3013  
Office: 954.850.5632

## 7. Reporting Requirements

The Emergency Coordinator is expected to evaluate the Emergency, and when SSWSI resources are insufficient, to immediately notify:

**ERTS (Emergency Response Contractor) .....(800) 924-6804**

**State (DEP/District Office) Officials.....**

DCA STATE WARNING POINT .....(850) 413-9911 or (800) 320-0519

National Response Center .....(800) 424-8802

Environmental Administrator, M.S. 4560  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Florida Department of Environmental Protection.....(561) 681-6600  
Southeast District Office  
400 North Congress Avenue  
West Palm Beach, FL 33401

The Emergency Coordinator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator and the Florida Department of Environmental Protection, Hazardous Waste Environmental Coordinator. The report must include:

- (1) Name, address, and telephone number of the owner or operator;
- (2) Name, address, and telephone number of the facility;
- (3) Date, time, and type of incident (e.g., fire, explosion);
- (4) Name and quantity of material(s) involved;
- (5) The extent of injuries, if any;
- (6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- (7) Estimated quantity and disposition of recovered material that resulted from the incident.

Regional Administrator US EPA, Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303

Florida Department of Environmental Protection,

Hazardous Waste Environmental Coordinator  
400 North Congress Avenue, 3<sup>rd</sup> Floor  
Palm Beach Florida 33401

**Transportation Spills/Incidents**

Within fifteen (15) days of any spill, a report must be filed by the Emergency Coordinator, in duplicate form, on Form ES 800.1 and submitted to:

Secretary of Hazardous Materials Regulation Board  
Department of Transportation  
Washington, D.C. 20590.

A copy of the hazardous waste manifest(s) must be attached to this report.



**8. Distribution List**

Facility Manager-3 copies

Environmental Administrator, M.S. 4560  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Florida Department of Environmental Protection  
Southeast District Office  
400 North Congress Avenue  
West Palm Beach, FL 33401  
(561) 681-6600

Miami-Dade County Office of Emergency Management  
9300 Northwest 36<sup>th</sup> Street  
Doral, FL 33178-2414  
(305) 468-5400

Miami-Dade County  
Permitting, Environment and Regulatory Affairs  
Miami-Dade Permitting and Inspection Center  
11805 SW 26 Street  
Miami, Florida 33175-2474

Miami Dade County Fire Rescue  
9300 NW 41st St  
Doral, FL 33178  
(786) 331-5000

Miami-Dade Police Department  
9105 NW 25 ST  
Doral, FL 33172  
(305) 471-1780

Palm Springs General Hospital  
1475 W 49th St  
Hialeah, FL 33012  
(305) 558-2500



# CERTIFICATE OF LIABILITY INSURANCE

 DATE (MM/DD/YYYY)  
 5/31/2018

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT:** If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

<b>PRODUCER</b> Commercial Lines - (305) 443-4886 USI Insurance Services National, Inc. 2601 South Bayshore Drive, Suite 1600 Coconut Grove, FL 33133	<b>CONTACT NAME:</b> Risk Management Department <b>PHONE (A/C, No, Ext):</b> 305.443.4886 <b>FAX (A/C, No):</b> 610.537.2273 <b>E-MAIL ADDRESS:</b> StericycleCerts@usi.com														
<b>INSURED</b> Stericycle, Inc 28161 N Keith Drive Lake Forest, IL 60045	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: left;">INSURER(S) AFFORDING COVERAGE</th> <th style="text-align: left;">NAIC #</th> </tr> <tr> <td>INSURER A: Lexington Insurance Company</td> <td>19437</td> </tr> <tr> <td>INSURER B: Greenwich Insurance Company</td> <td>22322</td> </tr> <tr> <td>INSURER C: Allied World National Assurance Co.</td> <td>10690</td> </tr> <tr> <td>INSURER D: XL Insurance America, Inc.</td> <td>24554</td> </tr> <tr> <td>INSURER E: XL Specialty Insurance Company</td> <td>37885</td> </tr> <tr> <td>INSURER F: Allied World Assurance Co (US)</td> <td>19489</td> </tr> </table>	INSURER(S) AFFORDING COVERAGE	NAIC #	INSURER A: Lexington Insurance Company	19437	INSURER B: Greenwich Insurance Company	22322	INSURER C: Allied World National Assurance Co.	10690	INSURER D: XL Insurance America, Inc.	24554	INSURER E: XL Specialty Insurance Company	37885	INSURER F: Allied World Assurance Co (US)	19489
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**COVERAGES**
**CERTIFICATE NUMBER:** 13088248

**REVISION NUMBER:** See below

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR  GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input checked="" type="checkbox"/> PROJECT <input checked="" type="checkbox"/> LOC OTHER:			EG 1932356	06/01/2018	06/01/2019	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 300,000 MED EXP (Any one person) \$ 25,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000
B	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> PHYSICAL DAM <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> NON-OWNED AUTOS ONLY			RAD943783301 (AOS)  Physical Damage - Self Insured	06/01/2018	06/01/2019	COMBINED SINGLE LIMIT (Ea accident) \$ 5,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
C	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> DED <input type="checkbox"/> RETENTION \$			0305-0836	06/01/2018	06/01/2019	EACH OCCURRENCE \$ 5,000,000 AGGREGATE \$ 5,000,000 \$
D	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N	N/A	RWD943548901 (AOS)	06/01/2018	06/01/2019	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTHER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
E				RWR943549001 (AK & WI)	06/01/2018	06/01/2019	
F	Pollution Legal Liability			0310-7450	06/01/2017	06/01/2020	Per Incident: \$10,000,000 Aggregate: \$10,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Evidence of Coverage

**CERTIFICATE HOLDER**
**CANCELLATION**

 Stericycle, Inc.  
 28161 N Keith Drive  
 Lake Forest, IL 60045

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

The ACORD name and logo are registered marks of ACORD © 1988-2015 ACORD CORPORATION. All rights reserved.

ACORD 25 (2016/03)

(This certificate replaces certificate# 13088244 issued on 5/31/2018)

**Certificate of Insurance (Con't)****OTHER Coverage**

INSR LTR	TYPE OF INSURANCE	ADDL INSR	WVD SUBR	POLICY NUMBER	EFFECTIVE DATE (MM/DD/YY)	EXPIRATION DATE (MM/DD/YY)	LIMIT
F	Contractor's Pollution/E&O			0310-1636	06/01/2018	06/01/2019	Per Incident \$10,000,000 Aggregate \$10,000,000