From: Knauss, Elizabeth
To: "Josh Bowles"; garcia.javier@epa.gov
Subject: RE: Compliance
Date: Tuesday, June 26, 2018 5:00:00 PM
Attachments: LQG ContingencyPlanGuidance11-18-04b.pdf
Sample Emergency Arrangements letter 2007A.doc
Container Inspection Log.doc
LQG 2018 w definition of solid waste.doc

Hi, Josh - Thank you for the update.

To follow up on my inspection,

Has Stericycle previously picked up any waste from you? If so please provide a copy of the disposal manifests and land disposal restriction notices to us.

If not, please provide us with your anticipated next pickup date and a copy of the shipping record after the next pickup.

In addition, although you have notified as a large quantity hazardous waste generator, you are not in compliance with most of the applicable regulations. We adopted an update to these rules, which will be published very shortly. Most of our current guidance for hazardous waste generators references the older rule numbers, however I have attached a draft inspection checklist that outlines the primary requirements and the federal rule numbers we adopted effective last week. The requirements are the same, it is mainly the rule numbers that have changed.

In addition, I have attached some older guidance on drafting a contingency plan, notifying local emergency response authorities and a container inspection log that complies with Florida's recordkeeping requirement for weekly hazardous waste container inspections.

The new federal rules can be read at this link:

https://www.ecfr.gov/cgi-bin/text-idx?SID=b1c19cf73f80d9b6fe7eb97d38c74bab&mc=true&node=pt40.28.262&rgn=div5

I will be working on your report this week, so any additional information you can provide will be appreciated.

Sincerely,

Elizabeth Knauss
Environmental Consultant
Southwest District
Florida Department of Environmental Protection
813/470-5902

-----Original Message-----
From: Josh Bowles [mailto:josh@lizardjuice.com]
Sent: Friday, June 22, 2018 3:57 PM
To: Knauss, Elizabeth <Elizabeth.Knauss@dep.state.fl.us>; garcia.javier@epa.gov
Subject: Compliance

Elizabeth/Javier,

I wanted to update you on the actions we've taken since our meeting yesterday:

1. Contacted Stericycle and increased our waste container from our current 15 gallon drum to two 55 gallon drums. Pick ups are scheduled (no request needed) for once every 90 days unless needed sooner.

2. Confirmed that Stericycle handles all of my reporting requirements as part of the contract.

3. Discussed with stericycle documentation requirements during waste pick up and confirmed that a follow up email with documentation will be received after the waste is processed.

4. Accessed the online training portal provided by stericycle, www.mystericycle.com, to assist in meeting compliance for all in-house training, planning and reporting requirements.

5. Designated an employee in charge of hazardous waste materials. Held a training meeting will all other pertinent employees to go over proper cleaning and disposal procedures for nicotine (liquid disposal, cleaning containers, container disposal).

In addition to these first steps, I want to assure you that I will work diligently to take the necessary actions to ensure we are in full compliance and to remain there from this point forward. Please let me know if there is anything else I need to provide you at this point in time. Also, any resources you can provide me to assist in our compliance efforts would be greatly appreciated.

Sincerely,

Josh Bowles

Lizard Juice, VP

813.777.7041