

From: [Kyle Little](#)
To: [White, John](#)
Subject: RE: Scheduled RCRA Inspection of Daniels Sharpsmart - Orlando
Date: Thursday, May 14, 2020 1:16:55 PM
Attachments: [Closure Plan.pdf](#)
[Daniels Sharpsmart Inc. Orlando HW Contingency Plan Aug 2019.pdf](#)
[10 - day transfer manifest log.pdf](#)
Importance: High

Hey John,

I hope you are really great. Below is a summarized list of items you had requested, in conjunction with the attached documents. Should you have any questions or need anything further please let me know. Thank you and have a nice day.

1. **Closure Plan** – Attached. This closure plan was submitted with the initial application documents to the FLDEP for permit issuance. Requested changes completed.
2. **Contingency Plan** – Attached. The contingency plan that was initially submitted was the operational contingency plan, should operations be interrupted as a result of various factors (e.g. storm, natural disaster, etc.). Attached is the Daniels EPA Contingency Plan.
3. **Facility Map** – Initial *“Review of the facility map provided found it meets the requirements identified in F.A.C. 62-730.171(3)(a)7”*
4. **10 – day transfer manifest log (logs from when the facility began operating as a 10-day transfer facility to present)** – Attached
5. **Personnel training** – Initial *“Review of personnel training documentation provided, as required by F.A.C. 62-730.171(4)(a), found no issues”*
6. **Manifests for hazardous waste shipments from all AdventHealth facilities in Florida from August 16, 2019 to April 1, 2020** – Due to the size of the file and quantity of documents, I am sending these to you Via Microsoft OneDrive. You will get an email, then you will need to log in (if you do not have an account it is a very simple & quick process). You can then view and download the documents. I hope this is ok with you.

Best regards,

Kyle Little

Compliance & Safety Manager

Daniels Health | USA

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From: White, John <John.White@dep.state.fl.us>

Sent: Monday, May 4, 2020 6:00 AM

To: Kyle Little <KLittle@danielshealth.com>

Subject: RE: Scheduled RCRA Inspection of Daniels Sharpsmart - Orlando

Kyle,

When you re-submit the information requested below please submit the complete 10-day log from when the facility began operating as a 10-day transfer facility to present.

Thank you,

John



John White
Environmental Consultant
Compliance Assurance Program
Central District
john.white@floridadep.gov
Office: 407.897.4305

From: Kyle Little <KLittle@danielshealth.com>

Sent: Wednesday, April 29, 2020 1:11 PM

To: White, John <John.White@dep.state.fl.us>

Subject: RE: Scheduled RCRA Inspection of Daniels Sharpsmart - Orlando

Hey John

I hope your well. I do have a response for all of the comments below and will compile the documentation and forward it to you asap. I did overlook the request at the bottom of the initial email for copies of the manifests (focusing on items 1 – 5 only), I apologize, our admin team is on it and will forward the documents to you shortly. Thank you sir.

Best regards,

Kyle Little

Compliance & Safety Manager

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From: White, John <John.White@dep.state.fl.us>

Sent: Wednesday, April 29, 2020 6:46 AM

To: Kyle Little <KLittle@danielshealth.com>

Cc: Alan Larosee <ALarosee@danielshealth.com>; Rothenberger, Miranda <Miranda.Rothenberger@FloridaDEP.gov>; Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>; Hall, Daniel K. <Daniel.K.Hall@FloridaDEP.gov>

Subject: RE: Scheduled RCRA Inspection of Daniels Sharpsmart - Orlando

Kyle,

I have had an opportunity to review the documents provided on April 7, 2020. Below are my comments regarding the information provided.

1. In accordance with F.A.C. 62-730.171(3)(a)5, a closure plan is required for the 10-day hazardous waste transfer facility demonstrating that the transfer facility will be closed in a manner which satisfies the closure performance, notification, and decontamination standards of 40 C.F.R. 265.111, 265.112, 265.114 and 265.115.

The closure plan provided appears to meet the requirements identified in F.A.C. 62-730.171(3)(a)5 but requires revisions. Following review of the closure plan, the Department has the following comments:

- On page 2 of 5 of the closure plan, under the section titled "Notification and Schedule for Closure," the last sentence reads "If the facility permit is modified, this plan will also be amended to reflect those modifications as appropriate in accordance with 40 CFR 265.112©." The facility is not operating under a permit. Daniel's Sharpsmart is operating under a registration. Also, the copyright symbol should be corrected to read "(c)."
- On page 3 of 5 of the closure plan, under the section titled "Removal of Waste," the first sentence reads "All stored hazardous wastes will be removed from the permitted unit..." The words "permitted unit" should be replaced with "10-day transfer facility area."
- On page 4 of 5, under the section titled "Sampling Procedure," please include analyses for volatile organic compounds and semi-volatile organic compounds unless proof can be provided that those compounds have not been transported and stored on site.
- On page 4 of 5, under the section titled "Facility Closure Schedule," under item 2. there is a typographical error. The word "there" should be replaced with "of their."

2. Review of the document identified as a Contingency Plan, dated January 2020, found the document does not meet any of the requirements for a hazardous waste contingency plan

identified in 40 CFR Part 265 Subpart D. The plan provided appears to be a contingency plan related to business operations, not emergency operations [F.A.C. 62-730.171(3)(a)6 / 40 CFR 265.51(a)]. Please provide a contingency plan developed in accordance with the requirements of 40 CFR Part 265 Subpart D.

3. Review of the facility map provided found it meets the requirements identified in F.A.C. 62-730.171(3)(a)7.
4. Review of the 10-day transfer facility log provided found the log does not meet the requirements of F.A.C. 62-730.171(6). The rule specifically requires the log document the following information:
 - Manifest number for each shipment that enters and leaves the facility, or, for a shipment from a VSQG without a manifest, an identifying number from the shipping document.
 - The date when all hazardous waste enters and leaves the facility.
 - The generator's name and the EPA/DEP identification number. For VSQGs without an EPA/DEP identification number, the record shall include the name and address of the generator.
 - Amounts of hazardous waste and hazardous waste codes associated with each shipment into and out of the facility.

The 10-day log provided includes the following:

- Date the waste was received
- Manifest number for "Heritage" and a manifest number for "Daniels"
- The type of container
- The number of containers
- The volume of waste

Please update the information contained in the 10-day log to also include the following information and resubmit it for review:

- The date the waste left the facility
- The generator's name and EPA/DEP ID number
- The hazardous waste code(s) associated with each shipment

5. Review of personnel training documentation provided, as required by F.A.C. 62-730.171(4)(a), found no issues.

Please submit the corrected documents within 30 days. I am still reviewing hazardous waste manifests for shipments transported by Daniel's SharpSmart.

Thank you

John White
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Central District



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From: Kyle Little <KLittle@danielshealth.com>
Sent: Tuesday, April 7, 2020 2:30 PM
To: White, John <John.White@dep.state.fl.us>
Cc: Alan Larosee <ALarosee@danielshealth.com>
Subject: RE: Scheduled RCRA Inspection of Daniels Sharpsmart - Orlando

Hi John,

I hope you are well and staying safe. As requested, please see attached documents as requested below. Should you have any questions or need anything further at this time, please let me know. Thank you.

Best regards,

Kyle Little

Compliance & Safety Manager

Daniels Health | USA

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From: White, John <John.White@dep.state.fl.us>
Sent: Tuesday, April 7, 2020 7:58 AM
To: Kyle Little <KLittle@danielshealth.com>; Prabjot Khara <PKhara@danielshealth.com>
Cc: Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>; Hall, Daniel K. <Daniel.K.Hall@FloridaDEP.gov>
Subject: Scheduled RCRA Inspection of Daniels Sharpsmart - Orlando

Good Morning,

Due to current health concerns I am notifying you in advance of a planned RCRA compliance evaluation inspection scheduled for Daniels Sharpsmart, Inc. located at 10705 Rocket Blvd, Ste 111,

Orlando, Florida. The inspection is scheduled for Thursday, April 9, 2020. The inspectors will be at your facility at approximately 9:00 AM.

Please take this opportunity to reduce the contact time between our staff by having the following records available for review:

1. A copy of the closure plan required by Florida Administrative Code (F.A.C.) 62-730.171(3)(a)5.
2. A copy of the contingency plan required by F.A.C. 62-730.171(3)(a)6.
3. A map of the transfer facility meeting the requirements of F.A.C. 62-730.171(3)(a)7.
4. The 10-day log meeting the requirements of F.A.C. 62-730.171(6)
5. Documentation of personnel training as required by F.A.C. 62-730.171(4)(a)

Also, please make available for review copies of manifests for hazardous waste shipments from all AdventHealth facilities in Florida from August 16, 2019 to April 1, 2020.

Manifests for other hazardous waste generators may be reviewed at the time of inspection depending upon site specific conditions.

If you have any questions, please contact me a john.white@floridadep.gov.

Thank you,



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