



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

FACILITY INFORMATION:

Facility Name: Healthcare Environmental Services LLC
On-Site Inspection Start Date: 08/19/2020 **On-Site Inspection End Date:** 08/19/2020
ME ID#: 141125 **EPA ID#:** FLR000234641
Facility Street Address: 8496 NW 61st St, Miami, Florida 33166-3338
Contact Mailing Address: 8496 NW 61st St, Miami, Florida 33166
County Name: Miami-Dade **Contact Phone:** (305) 436-0422

NOTIFIED AS:

Non-Handler

WASTE ACTIVITIES:

Generator: Non-Handler **Transporter:** Commercial Waste

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Romina J Lancellotti, Inspector
Other Participants: Jorge Bohorquez, President

LATITUDE / LONGITUDE: Lat 25° 49' 42.5136" / Long 80° 20' 4.5996"

NAIC: 562111 - Solid Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On August 19, 2020 (08/19/2020), Romina Lancellotti with the Florida Department of Environmental Protection (FDEP) conducted a routine Compliance Evaluation Inspection (CEI) at Healthcare Environmental Services LLC. (hereinafter HES or facility), located at 8496 NW 61th street, Miami, FL 33166. HES was inspected to determine the facility's compliance with the state and Federal hazardous waste regulations described in Title 40, Code of Federal Regulations (CFR) Parts 260-268, 273 adopted and incorporated by reference in Rule 62-730, 737 Florida Administrative Code (F.A.C.).

The inspector was escorted around the facility by Jorge Bohorquez, President. Upon arrival at the facility the inspector presented her credentials and explained the purpose of the inspection.

HES occupies 3,000 square feet and is connected to public water and sewer of Miami City. HES has been operating at its current location since 06/01/2020 and employs 9 staff. The facility operates from 8:30 am to 5:00 pm.

Notification History:

HES initially notified with the Department as a Hazardous Waste Transporter on 03/25/2020. The facility was assigned the EPA Identification (EPAID) Number FLR000234641.

Inspection History:

The facility was never inspected by the Department.

Personal Protective Equipment (PPE) was not required to enter the facility. Department personnel were equipped with steel-toed boots.

Process Description:

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HES operates as a hazardous waste pharmaceutical waste transporter facility. The facility consists of offices and a warehouse that is used as storage and garage.

HES is a facility that picks up biomedical and hazardous waste pharmaceuticals from healthcare facilities such as nursing homes, clinics, home health service agencies, and home patients. HES transfers containers of biomedical waste from their trucks.

The facility does not store hazardous waste pharmaceuticals onsite, nor will do in the future. Waste is picked up from healthcare facilities and it is taken directly to Triumvirate, a hazardous waste transfer facility.

During the inspection, the inspector walked through the office and no hazardous waste or hazardous waste pharmaceuticals were observed at the facility during the inspection.

The facility leases four full-service trucks and owns two trucks. Maintenance for the trucks is performed offsite by a third party. No used oil used oil filters, aerosol cans, universal waste were observed onsite during the inspection.

Records Review

A) Manifest records- Receiving and shipping records were available for review at time of inspection. HES collects hazardous waste from healthcare facilities Miami-Dade counties as a transporter 1, then the waste is transported by Triumvirate Environmental Services, LLC. (EPA ID FLD980559728) to its final destination at Triumvirate Environmental Services, Inc. (EPA ID FLD980559728), located at 10100 Rocket Blvd., Orlando, FL 32824. All manifests provided by HES showed that the transporter held the waste less than 24 hours and that the company has the signed return final copy for the manifests. Based on record review, it was confirmed that HES does not operate as a hazardous waste transfer facility.

In addition, based on waste manifests provided to the Department, the hazardous waste pharmaceuticals generators where waste is collected from by HES, are very small quantity generators (VSQG). Most of these VSQG are not registered and do not have an EPA ID, therefore, item 1 on the Uniform Hazardous Waste Manifests, include the acronym "CESQG" (Conditionally Exempt Small Quantity Generator) and not an EPA ID.

HES transports hazardous waste pharmaceuticals, which are supported by waste profiles and are written under item 13 in the EPA Form 8700-22 with the words "PHARMS," according to 40 CFR 266.508(a)(2)(ii).

B) Liability Insurance- The facility provided the Department a letter of insurance provided and certified by Westchester Surplus Lines Company (Policy Number G27973875005) and supports the use of provision 62-730.170(2)(a) F.A.C. for automobile liability, that includes pollution prevention liability, in the amount of \$5,000,000, expiration date 04/08/21.

C) Employee Training- HES has six drivers and four office employees. On 09/01/2020, HES provided evidence demonstrating that all employees received DOT 172.704 Training & Security Awareness Training on 11/04/2019. Additionally, the facility provided evidence demonstrating that employees received certification DOT HM-126F Security Training & 49 CFR 172.704 Handler & Transporter Requirement, HAZMAT Security Awareness Training HM-232 on 10/25/2019.

The Department of Transportation requires hazardous waste transporters to train, test, certify, and maintain of current training for each of their employees as cited in 49 CFR 171.8 and 172.704.

D) The facility provided a Hazardous Waste Pharmaceutical SOP Response Plan Pertaining Hazardous Waste Pharmaceutical Discharges and Spills, issued on 02/01/2020. The SOP contains Hazardous waste pharmaceutical collection procedures, employee information and training, procedure for pharmaceutical waste spills, emergency responders contact information.

E) Hazardous Waste Transporter Certificate- HES maintains a copy of the approval, issued by FDEP, to transport hazardous waste pharmaceuticals, expiration date 11/30/2021.

On 08/29/2020, HES provided pictures of the front, sides, and back of the company's trucks. This possess biohazard sign, US DOT and Department of Health (DOH) numbers.

PHOTO ATTACHMENTS:

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Front of the Facility



Uniform Hazardous Waste Manifest

HAZARDOUS WASTE MANIFEST		Generator (if known)	014597888 FLE
EPA Form 351 (Rev. 12-16-10)		Emergency Response Phone No.	305-577-4840
1. Generator Name and Facility Name		2. Transporter Name	3. Date of Shipment
Camillus Health Center		Health Care Environmental Service	08/19/2020
4. Disposed Facility Name and Site Address		5. U.S. EPA Region	6. U.S. DOT Hazard Class
18100 Rockwood Boulevard Palmdale, FL 32824		FLR000217641	FLD981018723
7. Facility Phone		8. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number)	9. U.S. DOT Hazard
32824 Tel: 407 859 4441		UN351 Waste Medicines Liquid, Toxic, Acq. W. (Admin, Coumadin)	FLD80554788
10. Containers		11. Total Quantity	12. Unit Weight
No. Type		230 P	lbs
13. Waste Codes			

Training Certificate



Conclusion:

HES was inspected as a transporter of hazardous waste and was found in compliance during the inspection.

HES initially notified the Department as a transporter of universal pharmaceutical waste on 12/08/2015. The facility was assigned the EPA identification (EPAID) Number FLR000217331 for the old address: 8545 NW 68th

Storage and Parking Warehouse



Vehicles



Response Plan



Hazardous Waste Pharmaceuticals SOP
Response Plan Pertaining Hazardous Waste
Pharmaceutical Discharges and Spills

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Street, Miami, FL 33166. However, the facility most recently notified as a transporter of hazardous waste on 03/25/2020 and obtained the EPA ID FLR000234641 for the new address: 8496 NW 61th Street, Miami, FL 33166. The facility began operating the new facility on 06/01/2020 as a transporter of hazardous waste pharmaceuticals.

During the inspection, the inspector visited the old facility and observed that it is being used as storage for biomedical waste. No hazardous waste pharmaceutical was stored in the old or new facility.

The facility hired a hazardous waste transporter and transfer facility on March 1, 2020 and implemented the uniform hazardous waste manifests on 04/08/2020 to comply with the 40 CFR 266 Subpart P regulations, effective 08/20/2019.

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6.0: Transporters 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.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)			✓
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)			✓
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓

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6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

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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

<p>Romina J Lancellotti <hr/> Principal Investigator Name</p> <p> <hr/> Principal Investigator Signature</p>	<p>Inspector <hr/> Principal Investigator Title</p> <p>DEP <hr/> Organization</p> <p>09/21/2020 <hr/> Date</p>
<p>Jorge Bohorquez <hr/> Representative Name</p>	<p>President <hr/> Representative Title</p> <p>Healthcare Environmental Services LLC <hr/> Organization</p>

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:

<p>Approver: Alannah B Irwin <hr/></p>	<p>Inspection Approval Date: 09/21/2020 <hr/></p>
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