

Florida Department of

#### **Environmental Protection**

## **Hazardous Waste Inspection Report**

### **FACILITY INFORMATION:**

Facility Name:Advance Medical Sanitation IncOn-Site Inspection Start Date:12/17/2020On-Site Inspection End Date:12/17/2020ME ID#:132214EPA ID#:Facility Street Address:3387 NW 151st Ter, Miami Gardens, Florida 33054Contact Mailing Address:3387 NW 151st Ter, Opa Locka, Florida 33054-2462County Name:Miami-DadeContact Phone:(954) 447-8999

NOTIFIED AS: Non-Handler, Pharmaceuticals Healthcare

#### WASTE ACTIVITIES:

**Generator:** Non-Handler **Hazardous Waste Pharmaceuticals:** Pharmaceutical Activities: Healthcare Facility

#### **INSPECTION TYPE:**

Routine Inspection for Hazardous Waste Transporter Facility

#### **INSPECTION PARTICIPANTS:**

Principal Inspector:Jared T Heyns, InspectorOther Participants:Carmen Ramdon, Assistant Manager

# LATITUDE / LONGITUDE: Lat 25° 54' 44.2404" / Long 80° 15' 24.1272"

NAIC: 562211 - Hazardous Waste Treatment and Disposal

#### TYPE OF OWNERSHIP: Private

#### Introduction:

On December 17, 2020 (12/17/2020), Jared Heyns with the Florida Department of Environmental Protection (FDEP) conducted a routine Compliance Evaluation Inspection at Advance Medical Sanitation, Inc. (Advance), located at 3387 NW 151st Terrace in Miami Gardens. Advance 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, adopted and incorporated by reference in Rule 62-730, Florida Administrative Code (F.A.C.).

The inspector was escorted around the facility by Carmen Ramdon, Assistant Manager. Upon arrival at the facility the inspector presented their credentials and explained the purpose of the inspection.

Advance occupies 3,900 square feet and is connected to public water and sewer. Advance has been operating at its current location since 2010 and employs 4 staff. The facility operates normal weekday hours.

Notification History:

Advance initially notified with the Department as a Transporter of hazardous waste on 08/19/2018. The facility was assigned the EPA Identification (EPAID) Number FLR000230144.

Inspection History: The facility was never previously inspected by the Department.

Safety boots and a face mask were the only Personal Protective Equipment (PPE) required to enter the facility.

#### **Process Description:**

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Advance Medical Sanitation, Inc. (Advance) provides biomedical waste disposal services from a wide cross section of biomedical waste generators to include physicians, dentists, dialysis centers, acute and Long Term Care facilities, laboratories, tattoo shops, veterinary clinics, home health care agencies, and other medical facilities. While this facility has chosen to maintain the notification and registration to operate as a Hazardous Waste (HW) Transporter, they have yet to transport HW since beginning operation.

Advance primarily transports biomedical waste and conducts trauma site clean-up. The facility has plans to expand its business operations and begin conducting HW pick-ups at some point in the future.

Verbal compliance assistance was offered during and after the inspection via email follow-up and phone calls. Mr. David Ramdon (President and CEO) will notify the Department when Advance plans to begin picking up HW shipments and the Department advised about the requirements to become a HW Transfer facility. Though Advance does not plan to store HW on-site greater than 24 hours, they may notify as a Transfer facility to allow for operational flexibility to store up to ten days.

The Department inspector observed no HW on-site during the inspection.

#### **Records Review**

While this facility has not conducted any HW Transporter operations, they maintain all required Transporter documentation on-site and all required records were readily available for review.

Advance is aware of the requirement to maintain manifest records for a minimum of three years. All biomedical waste pick-ups are currently tracked via bills-of-lading and are stored on-site indefinitely.

#### **Contingency Plan:**

The facility maintains a full contingency plan that includes emergency contact information, an evacuation map, emergency response and preparedness procedures, and emergency equipment descriptions and locations. The most recent revision occurred in 2020.

#### Preparedness and Prevention:

Spill kits, eye wash and shower stations, fire alarms, and fire extinguishers are available on-site.

#### Training:

The facility conducts annual hazardous waste training to all staff in contact with hazardous materials and hazardous wastes. This training includes understanding and recognition of hazardous wastes and Hazardous Communication (HAZCOM) training. Mr. David Ramdon received the most recent round of training on 08/18/2020.

Transport fleet:

- 2014 Dodge Ram Van
- 2014 Chevy Express Van
- 2015 Isuzu NPR Truck

All three vehicles maintain insurance up-to-date and have only conducted biomedical pick-ups since becoming operational.

#### Liability insurance plan:

The plan policy #EV20182793-03 is insured by Capitol Specialty Insurance Corporation and expires on 08/19/2021. The Department inspector observed no lapse in insurance at any point in the last three years.

#### **PHOTO ATTACHMENTS:**

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# Front of facility



# **Conclusion:**

Advance was inspected as a HW Transporter and was found to be in-compliance at the time of the inspection.

#### 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 infe	ormational purposes only.
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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)	1		
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)	1		
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) Exemption Type - Tolling Agreement Exemption Type - VSQG Bill-of-Lading	1		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	1		+
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	1		
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)	1		-
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)	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)	1		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	1		
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)	1		
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)	1		
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)	1		
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)	1		
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)	1		

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				1
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)	1		
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)	1		
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)	1		
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)	1		
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)	1		
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 recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1)	1		
	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)			
6.28	Quantity of waste accepted	1		
	All DOT-required shipping information			
	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)	1		
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)	1		
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)	1		
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	1		
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)	1		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	1	1	

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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.

Jared T Heyns	Inspector		
Principal Investigator Name	Principal Investigator Title		
A H	DEP	01/15/2021	
Principal Investigator Signature	Organization	Date	
Carmen Ramdon	Assistant Manager		
Representative Name	Representative Title		
	Advance Medical Sanitation		
	Inc.		
	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:Alannah B IrwinInspection Approval Date:

01/15/2021