From: Stark, Justin

To: <u>dcollins@trilogymedwaste.com</u>

Cc: Irwin, Alannah; Chad Plata; mmcgann@trilogymedwaste.com

**Subject:** Exit Interview - Trilogy MedWaste Southeast Llc (EPA ID: FLR000230888)

Date: Wednesday, February 17, 2021 3:52:00 PM

Attachments: image001.png

8700-12FL 2019 Form.pdf

Instructions for Preparing the 8700-12FL.pdf

## Good afternoon Andrew,

This email serves as an exit interview for the compliance evaluation Inspection conducted on Wednesday, February 17, 2021 by the Florida Department of Environmental Protection ("Department") to determine compliance with federal and state regulations for hazardous waste.

Please provide the following corrective actions:

- Please register this location as a Hazardous Waste Transporter using the 8700-12FL. Please ensure the St. Lucie location does not transport any Hazardous Waste until the facility receives approval from the Departments Division of Waste Management [62-730.150(2)(a) F.A.C.]. I have attached the 8700-12FL with instructions for your reference. Please contact me if you have any questions. Please be advised each EPA ID number in the State of Florida is site specific, therefore, if transportation operations is occurring at the St. Lucie location, the site needs to be approved as a hazardous waste transporter and the St. Lucie EPA ID number shall be included on either Line 6 or 7 of the hazardous waste manifests. Lastly, please ensure Orlando facility's EPA ID number is only used if transportation is occurring from that location. The Department observed Orlando's EPA ID number used for the St. Lucie location.
- Please ensure the "PHARMS: codes is included on each future hazardous waste manifest that accompanies hazardous waste pharmaceuticals [40 CFR part 263.20]. Please provide the next two shipments of hazardous waste pharmaceuticals using the "PHARMS" code.
- Please provide manifests from 2019 to 2021, these manifests should include the final copy from the designated facility as well [40 CFR part 263.22(a)]. Due to the expected file size, please upload the manifests into our FTP. I have provided info for this below.

Follow the first 4 steps on the guidance document <a href="here">here</a>. Once on the pub folder, scroll down to "incoming," then select "Southeast-District," then "Waste," and create a folder and insert the file. Once completed, send us the internet link that shows up in this website: <a href="http://ftp.dep.state.fl.us/pub/incoming/Southeast-District/Waste/">http://ftp.dep.state.fl.us/pub/incoming/Southeast-District/Waste/</a>. If you do not get this to work, you may either send them individually or submit a hard copy.

Please provide the following records:

- Training records for staff onsite were provided during the inspection. May you please provide the course material for the Departments review?

Thanks again Andrew for your time during the Departments CEI.

Please provide the above by (3/5/2021). If you have any questions or concerns, please do not hesitate to contact me.

Regards,

Justin Stark Environmental Specialist II



Florida Department of Environmental Protection Compliance Assurance Program Hazardous Waste and Solid Waste Southeast District Justin.Stark@floridadep.gov Office: 561.681.6648