



FLORIDA DEPARTMENT OF Environmental Protection

Central District Office
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

April 6, 2022

Chad Plata, Director of Compliance, ES&H
Trilogy MedWaste Southeast LLC
10805 Southport Dr, Ste 1
Orlando, Florida 32824
cplata@Trilogymedwaste.com

Re: Trilogy MedWaste Southeast LLC
HW Facility ID # FLR000230839
Orange County

Dear Mr. Plata:

Department personnel conducted an inspection of the above-referenced facility on February 24, 2022. Based on the information provided during and after the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Miranda Rothenberger at 407-897-4301 or via e-mail at Miranda.Rothenberger@FloridaDEP.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel K. Hall".

Daniel K. Hall, Environmental Manager
Central District
Florida Department of Environmental Protection

Enclosure: February 24, 2022 Inspection Report

cc: Javier Saldana, Trilogy MedWaste, jsaldana@Trilogymedwaste.com
Miranda Rothenberger, FDEP



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

FACILITY INFORMATION:

Facility Name: Trilogy MedWaste Southeast LLC
On-Site Inspection Start Date: 02/24/2022 **On-Site Inspection End Date:** 02/24/2022
ME ID#: 132837 **EPA ID#:** FLR000230839
Facility Street Address: 10805 Southport Dr Ste 1, Orlando, Florida 32824-7000
Contact Mailing Address: PO Box 550569, Houston, Texas 77255
County Name: Orange **Contact Phone:** (713) 205-7233

NOTIFIED AS:

Non-Handler, Transfer Facility, Transporter

WASTE ACTIVITIES:

Generator: Non-Handler **Transporter:** Own Waste, Commercial Waste, Transfer Facility **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** 5000 kg or more; Large Quantity Handler (LQH)

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Miranda Rothenberger, Inspector
Other Participants: Jay Buscampbell, Transportation Manager; Javier Saldana, Plant Manager

LATITUDE / LONGITUDE: Lat 28° 24' 36.2592" / Long 81° 22' 11.6004"

NAIC: 562111 - Solid Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On February 24, 2022, Miranda Rothenberger, Florida Department of Environmental Protection (FDEP or Department) inspected Trilogy MedWaste Southeast LLC (Trilogy or Facility) for compliance with state and federal hazardous waste regulations. The facility was represented by Jay Buscampbell, Transportation Manager, and Javier Saldana, Plant Manager.

Trilogy MedWaste Southeast has been located at 10805 Southport Drive, Orlando, Orange County, Florida, since June 2019. The facility operates 5:30 AM to 7:00 PM, Monday through Friday, and has 12 on site employees and 13 drivers.

On February 12, 2019, the facility notified as a very small quantity generator of hazardous waste, a universal waste handler, a universal waste mercury lamp and device transporter, and a universal pharmaceutical waste transporter. The facility was issued EPA identification number FLR000230839. On February 22, 2021 the facility notified the state as a Transporter of Universal Waste Lamps and Devices, Transfer Facility for Universal Waste Lamps, Transfer Facility for Universal Waste Devices, Small Quantity Handler Facility for Universal Waste Lamps and Devices, and a Hazardous Waste Transporter.

Inspection History (5-years)

Trilogy was inspected for compliance with state and federal hazardous waste regulations on July 27, 2020 and was found to be in compliance.

Process Description:

Trilogy MedWaste Southeast LLC Inspection Report

Inspection Date: 02/24/2022

The facility is contained within one warehouse that has a working floor, six truck bays, and private office space. The 10-day storage facility is located in the warehouse and has a retractable door. Waste is shipped from this location every week on Fridays with an average of 14 pallets per shipment. This area is also used for empty container storage and universal waste accumulation. At the time of the inspection the following waste containers were present:

- Eight 18-gallon containers labelled hazardous waste pharmaceuticals toxic and flammable
- Four pallets with 24 containers each (96 total) of various sizes, shrink wrapped together, with visible labels marked hazardous waste pharmaceuticals toxic and flammable
- Two cubic yard boxes labelled hazardous waste pharmaceuticals toxic and flammable

In the universal waste accumulation and storage area the following waste containers were present:

- Two cubic yard boxes of e-waste
- One pallet of e-waste
- Twenty-three 5-gallon containers labelled universal waste batteries
- Six 55-gallon containers labelled universal waste batteries

No lamps were present during the inspection. All containers in the 10-day transfer area were closed, properly labelled, and in good condition.

The rest of the warehouse is occupied by empty container storage, unloading areas, and container washing. The facility also manages biomedical waste and containers are washed on site prior to re-distribution.

Records

A contingency plan was maintained on site dated May 2020 and was found to be in compliance. Wilson Esteves, Facility Manager, was listed as an emergency coordinator, and Jeff Simcox, District Manager, was listed as an alternate contact. Emergency response operations are contracted through US Ecology. Local authority notifications were requested electronically on March 24, 2022. Chad Plata, Director of Compliance, provided a copy of an email sent to the Orlando Fire Department on September 8, 2020. Mr. Plata's notes also reflect phone calls to Diana Castaneva, Orland Health and Medical Pavilion August 9, 2020 and the Orlando Police Department on September 17, 2020. Following communication with the facility, email notification was sent to the Orlando Police Department on March 30, 2022.

Training records were reviewed and found to be in compliance. Mr. Saldana was trained through the Environmental Resource Center (ECT) on hazardous waste management on August 23, 2021. Mr. Esteves was trained through ECT on hazardous waste management on July 21, 2021. Mr. Buscampbell was trained through ECT on hazardous waste management on September 8, 2021. Mr. Esteves and Ferdinand Medina, Driver, received internal DOT Training on December 15, 2020. Manuel Mijangos, Driver, received internal DOT training on February 4, 2022.

The 10-day transfer facility did not become active until September 2021. Weekly inspections of the area were reviewed from September 2021 through February 2022 and were found to be in compliance. Monthly inspections of the area were also reviewed and found to be in compliance.

The insurance certificate submitted with the facility's 2021 notification expired on January 1, 2022. A new insurance certificate, valid through January 1, 2023, was retained on site.

Hazardous waste receiving manifests were requested electronically on March 24, 2022 and provided on March 28, 2022. A review of manifest from September 2021 through February 2022 found them to be in compliance. The 10-day log of waste stored on site was reviewed during the inspection and found to be in compliance.

Conclusion:

Trilogy MedWaste Southeast LLC was inspected on February 24, 2022, for compliance with state and federal hazardous waste regulations and was found to be in compliance.

Inspection Date: 02/24/2022

1.0: Pre-Inspection 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.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11			✓

Inspection Date: 02/24/2022

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

Miranda Rothenberger	Inspector	
Principal Investigator Name	Principal Investigator Title	
	DEP	04/04/2022
Principal Investigator Signature	Organization	Date
Jay Buscampbell	Transportation Manager	
Representative Name	Representative Title	
	Trilogy MedWaste Southeast LLC	
	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.

Javier Saldana	Plant Manager
Representative Name	Representative Title
	Trilogy MedWaste Southeast LLC
	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:	Daniel K. Hall	Inspection Approval Date:	04/04/2022
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