

Eckoff, Michael

From: leslie@medigreenwaste.com
Sent: Thursday, April 28, 2022 1:38 PM
To: Eckoff, Michael
Subject: RE: Medigreen Waste Services LLC - RCRA inspection - March 30, 2022

EXTERNAL MESSAGE

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Michael,

Thank you so very much for all of the information!

Hope you have a wonderful day!
-Leslie



Leslie Valverde ▪ Director ▪ PO Box 403 ▪ Goldenrod, FL 32733 ▪ 407.641.6822 (o) ▪ 407.641.9171 (f) ▪ www.medigreenwaste.com ▪ leslie@mgwaste.com ▪ ¡Hablamos Español!

From: Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>
Sent: Thursday, April 28, 2022 1:01 PM
To: leslie@medigreenwaste.com
Subject: RE: Medigreen Waste Services LLC - RCRA inspection - March 30, 2022

Hi Leslie,

I have sent my report to my manager for approval so you will receive a copy soon.

Certainly. So if a facility is a very small quantity generator of hazardous waste they can manage their hazardous waste pharmaceuticals under the requirements of 40 CFR 262.14 (See 40 CFR 266.501(a)).

If a very small quantity generator of hazardous waste chooses to manage their hazardous waste pharmaceuticals as hazardous waste pharmaceuticals they must follow the requirements in 40 CFR 266.501(b).

If your customers are a small quantity generator of hazardous waste or a large quantity generator of hazardous waste and meet the definition of a healthcare facility they must opt into 40 CFR Part 266 Subpart P for managing their hazardous waste pharmaceuticals (See 40 CFR 266.501(d)).

If you or any of your customers have any questions regarding hazardous waste pharmaceuticals please let me know.

Thank you,
Michael

From: leslie@medigreenwaste.com <leslie@medigreenwaste.com>
Sent: Thursday, April 28, 2022 12:29 PM
To: Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>
Subject: RE: Medigreen Waste Services LLC - RCRA inspection - March 30, 2022

EXTERNAL MESSAGE

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Good afternoon Mr. Eckoff,

Thank you so much for the information. I greatly appreciate it.

Also, do you happen to have an inspection report for your Medigreen visit that I could have for our records?

Lastly, per your guidance, we have been educating customers of the requirement of notifying EPA that they are a healthcare facility should they want to dispose of pharmaceutical waste using the PHARMS code. However, we have received push back since they fall back on the volume per month threshold for needing an EPA ID. Would you be able to provide where in the rule they can find this notification requirement?

Cordially,
Leslie



Leslie Valverde ▪ Director ▪ PO Box 403 ▪ Goldenrod, FL 32733 ▪ 407.641.6822 (o) ▪ 407.641.9171 (f) ▪ www.medigreenwaste.com ▪
leslie@mgwaste.com ¡Hablamos Español!

From: Eckoff, Michael <Michael.Eckoff@FloridaDEP.gov>
Sent: Thursday, April 28, 2022 10:22 AM
To: leslie@mgwaste.com
Subject: Medigreen Waste Services LLC - RCRA inspection - March 30, 2022

Good morning Ms. Valverde,

I apologize for not getting this to you sooner. As promised during the inspection, the five hazardous waste pharmaceuticals that are also DEA controlled substances are:

Name of Drug	Other Name(s)	Medical Uses	RCRA HW Code
Chloral; chloral hydrate	Acetaldehyde, trichloro-; Aquachloral, Notec, Somnote, Supprettes	Sedative	D034 Toxic
Fentanyl sublingual spray	Subsys	Analgesic	D001 Ignitable
Phenobarbital	Bellergal-S, Donnatal, Luminal	Anticonvulsant	D001 Ignitable
Testosterone gels / solutions	Androgel, Axiron, Fortesta, Testim	Hormone	D001 Ignitable
Valium injectable gel	Diazepam, Diastat	Anti-anxiety	D001 Ignitable



Michael Eckoff

Environmental Consultant
Compliance Assurance Program
Central District
michael.eckoff@floridadep.gov
Office: 407.897.4308



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