



# FLORIDA DEPARTMENT OF Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

September 19, 2023

Ms. Tina Kenny, General Manager  
Universal Waste Management, LLC  
4459 Industrial Park Road  
Green Cove Springs, FL 32043  
[tina.kenny@mybiowaste.com](mailto:tina.kenny@mybiowaste.com)

Re: **Universal Waste Management, LLC**  
**EPA/DEP ID: FLR000173252**  
**Clay County – Hazardous Waste**

Dear Ms. Kenny:

Department personnel conducted a compliance inspection of the above-referenced facility on April 4, 2023. Based on the information provided during and following the inspection, the facility was determined to be in compliance. A copy of the inspection report is attached for your records.

The Department appreciates your compliance efforts. Should you have any questions or comments, please contact Cheryl Mitchell at (904) 256-1620 or via e-mail at [cheryl.l.mitchell@floridadep.gov](mailto:cheryl.l.mitchell@floridadep.gov).

Sincerely,

A handwritten signature in blue ink that reads "Joni Petry".

Joni Petry  
Environmental Administrator

Enclosure: Inspection Report

cc: DEP internal: Joni Petry, Matt Kershner, Bonnie Bradshaw, Cheryl L. Mitchell, DEP\_NED



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

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**FACILITY INFORMATION:**

**Facility Name:** Universal Waste Management LLC

**On-Site Inspection Start Date:** 04/04/2023

**On-Site Inspection End Date:** 04/04/2023

**ME ID#:** 97639

**EPA ID#:** FLR000173252

**Facility Street Address:** 4459 Industrial Park Rd, Green Cove Springs, Florida 32043-8243

**Contact Mailing Address:** 4459 Industrial Park Rd #2, Green Cove Springs, Florida 32043

**County Name:** Clay

**Contact Phone:** (904) 469-6246

**NOTIFIED AS:**

Non-Handler, Transporter

**WASTE ACTIVITIES:**

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

**INSPECTION TYPE:**

Routine Inspection for Hazardous Waste Transporter Facility

Routine Inspection for Non-Handler Facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Cheryl L Mitchell, Inspector

Other Participants: Jason Kenny, President

**LATITUDE / LONGITUDE:** Lat 29° 56' 51.0655" / Long 81° 41' 29.9338"

**NAIC:** 562112 - Hazardous Waste Collection

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Universal Waste Management, LLC (UWM, the facility) was inspected on April 4, 2023, and a records review was conducted on April 13, 2023. The facility was previously inspected by the Department's Hazardous Waste Program on April 10, 2019. UWM renewed its annual registration as a Hazardous Waste Transporter and Non-Handler of hazardous waste (NHR) in October 2022. Mr. Jason Kenny (President) was present during the inspection on April 4, and Ms. Tina Kenny (General Manager) was present during the records review on April 13.

UWM provides collection and transportation services for medical offices for biomedical waste, non-hazardous trace chemotherapy waste, and expired/excess non-hazardous pharmaceutical waste. UWM also provides thermal treatment services for biomedical waste and recently added mobile document shredding services for its customers. UWM has operated at this location for approximately five years. The facility is connected to city water and sewer. UWM has five employees and operates Monday through Friday from 9:00 AM to 5:00 PM. The facility consists of a Warehouse and Waste Staging Area.

**Process Description:**

**HAZARDOUS WASTE TRANSPORTER**

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UWM previously operated as a Universal Pharmaceutical Waste (UPW) Transporter. Because the UPW regulations were repealed by the Department in August 2019, and the new federal regulations for Hazardous Waste Pharmaceuticals (HWP) were adopted, UWM made changes to the container labels and inventory logs it provides its customers to remove references to UPW and add Non-Hazardous Pharmaceutical Waste to the label (Photo 1). Ms. Kenny stated that UWM only transports non-hazardous pharmaceutical waste. UWM notified as a Hazardous Waste Transporter in May 2017 to be able to provide this service to its customers in the future, if its operations changed. UWM is reminded that because it is not a registered Hazardous Waste Transfer Facility, any hazardous waste transported back to the facility cannot be stored at the facility for more than 24-hours.

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UWM has two lift gate box trucks and leases one box trailer for transportation services. The facility's vehicles are maintained off-site by a third-party vendor.

UWM provides its customers with 8-gallon, rigid white plastic 'glue-top' containers for the non-hazardous pharmaceutical waste (See Photo 1). Customers maintain an inventory log of all waste pharmaceuticals placed into the container that includes the customer name, address, quantity and type of pharmaceutical, date the waste was placed in the container, and signature and title of the person responsible for logging the entry. Prior to pick-up, the customer seals the container, attaches a copy of the inventory log to the outside of the container, and provides a copy to the driver. UWM does not open or inspect the contents of the container prior to transportation.

## WAREHOUSE

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The Warehouse includes administrative offices and a single large bay with three roll-up doors. This building is used to store equipment, empty waste collection containers and supplies. The box trucks return to the facility where the containers of biomedical waste are transferred inside the warehouse to be thermally treated. This process is performed under a Florida Department of Health permit. The bins of non-hazardous trace chemotherapy waste are transferred into bulk 1 cubic-yard (CY) triwall containers, and the bins of non-hazardous pharmaceutical waste are stacked on a pallet and shrink-wrapped for shipping. At the time of the inspection there were approximately 15 bins stacked on one pallet (Photo 2). Once full, the triwalls and the pallets are then transferred into the box trailer located in the Waste Staging Area described below.

## WASTE STAGING AREA

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This area is located to the south of the Warehouse. At the time of the inspection the box trailer contained five triwalls of trace chemotherapy waste (Photo 3). UWM transports the non-hazardous trace chemotherapy waste and non-hazardous pharmaceutical waste to Covanta Environmental Solutions, a solid waste permitted waste-to-energy facility that operates as Lake County Resource Recovery (FLD984258731) and is located in Okahumpka, Florida which is within, and inspected by the Department's Central District.

## SECURITY

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The facility is surrounded by a chain link fence topped with barbed wire (Photo 4). It appeared to be in good condition. The facility has two access gates. Primary access is through a main entrance gate on the north side of the property. That gate is kept open during business hours when UWM employees are on-site. The second gate on the east side of the property is used for trailer access and is kept locked except during use. Both gates are manually locked at night.

## RECORDS REVIEW

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UWM is currently operating as a non-handler of hazardous waste and is registered as a HW Transporter. Records reviewed included the HW Transporter and insurance liability certificates which were current. Pharmaceutical waste inventory logs, shipping documents and certificates of destruction were also reviewed. UWM had not transported any hazardous waste in the previous three years. Records reviewed appeared to be in order unless otherwise described herein.

## PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Photo 4



Inspection Date: 04/04/2023

**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: 04/04/2023

**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

Cheryl L Mitchell  
Principal Investigator Name

Inspector  
Principal Investigator Title

  
Principal Investigator Signature

DEP  
Organization

08/16/2023  
Date

Jason Kenny  
Representative Name

President  
Representative Title

Universal Waste Management,  
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: Cheryl L Mitchell

Inspection Approval Date: 08/16/2023