



July 15, 2011

VIA ELECTRONIC DELIVERY

John White
Hazardous Waste Section, Central District
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

**RE: STERICYCLE SPECIALTY WASTE SOLUTIONS
WARNING LETTER (OWL-HW-11-013)
HAZARDOUS WASTE FACILITY ID# FLR000006353**

Dear Mr. White

On June 29, 2011, you hosted a meeting with Florida Department of Environmental Protection (FLDEP), Orange County Environmental Protection Division, and Stericycle Specialty Waste Solutions, Inc. (SSWSI) regarding a warning letter from the Florida Department of Environmental Protection’s Central District received June 3, 2011, The letter was addressed to Mr. Raj Singh (Facility Manager) and originated from Vivian F. Garfein (Director, Central District).

During the meeting you provided a list of pharmaceuticals you identified from two Quarantine logs from Physician Sales and Service that you presumed to be hazardous waste shipped to the Stericycle Apopka facility. The Quarantine logs were related to two waste shipments by Stericycle. The FLDEP reviewed the Quarantine logs, and compared the records and the paperwork from SSWSI’s waste shipment, and was attempting to identify the ultimate disposition of the following items. I will address the results of the disposal method, characterization/analysis, or status each line below:

Dates in 11/2/2010-11/28/2010

Product	QTY	Disposition/characterization
Ethyl Chloride Med 3.5OZ	2	Manifest 007639329JJK
Ethyl Chloride Med 3.5OZ	2	Manifest 007639329JJK
Ethyl Chloride Med 3.5OZ	1	Manifest 007639329JJK
Fluvirin SRY 2010/2011	3	Item not presented to SSWSI for shipment
Fluvirin SRY 2010/2011	4	Item not presented to SSWSI for shipment
Tetanus Tox PF SDV 10X.5ML	1	Item not presented to SSWSI for shipment
Barium Sulf Wld Banana 450ML	2	Non-Hazardous TCLP Results for Ba 3.8 mg/l
Barium Sulf Wld Berry 450ML	1	Non-Hazardous TCLP Results

for Ba 3.8 mg/l

Ethyl Chloride Med 3.5OZ	5	Manifest 007639329JJK
Ethyl Chloride Med 3.5OZ	1	Manifest 007639329JJK
Ethyl Chloride Med 3.5OZ	1	Manifest 007639329JJK
Ethyl Chloride Med 3.5OZ	1	Manifest 007639329JJK
Ethyl Chloride Med 3.5OZ	1	Manifest 007639329JJK
Glycopyrrolat .2MG/ML 20ML	3	Non-Hazardous pH tested >2.2
Ketorolac 60MG/2ML 2ML	1	Non-Hazardous aqueous solution with <24% alcohol

Dates in 12/25/2010-12/26/2010

Product	QTY	Disposition/characterization
Ethyl Chloride Fine 3.5OZ	2	Manifest 007639413JJK
Ethyl Chloride MedStrm 3.5OZ	2	Manifest 007639413JJK
Ethyl Chloride MedStrm 3.5OZ	2	Manifest 007639413JJK
Ethyl Chloride Mist 3.5OZ	1	Manifest 007639413JJK
Ethyl Chloride Mist 3.5OZ	1	Manifest 007639413JJK
Ethyl Chloride Mist 3.5OZ	1	Manifest 007639413JJK
Glycopyrrolat .2MG/ML 20ML	2	Non-Hazardous pH tested >2.2
Glycopyrrolat .2MG/ML 20ML	2	Non-Hazardous pH tested >2.2
Histofreezer 36-72KT-2/5ML	1	Item not presented to SSWSI for shipment
Ketorolac 30MG/ML 1ML	1	Non-Hazardous aqueous solution with <24% alcohol
Ketorolac 60MG/2ML 2ML	5	Non-Hazardous aqueous solution with <24% alcohol
Tetanus Tox PF SDV 10X.5ML	1	Item not presented to SSWSI for shipment
Ethyl Chloride MedStrm 3.5OZ	1	Manifest 007639413JJK
Ethyl Chloride MedStrm 3.5OZ	1	Manifest 007639413JJK
Nitrolingual Pumpspray 4.9GM	1	Manifest 007639413JJK
Nitrolingual Pumpspray 4.9GM	1	Listed as F003 instead of D001
Nitrolingual Pumpspray 4.9GM	1	Manifest 007639413JJK
Nitrolingual Pumpspray 4.9GM	1	Listed as F003 instead of D001
Nitrolingual Pumpspray 4.9GM	1	Manifest 007639413JJK
Nitrolingual Pumpspray 4.9GM	1	Listed as F003 instead of D001
Decavac Tetanus	1	Item not presented to SSWSI for shipment
Dexameth 4 MG/ML 1 ML	1	Non-Hazardous aqueous solution with <24% alcohol
Dexameth 4 MG/ML 1 ML	7	Non-Hazardous aqueous solution with <24% alcohol
Dexameth 4 MG/ML 1 ML	1	Non-Hazardous aqueous solution with <24% alcohol
Dexameth 4 MG/ML 1 ML	11	Non-Hazardous aqueous solution with <24% alcohol
Ethyl Chloride Fine 3.5OZ	3	Manifest 007639413JJK
Ethyl Chloride MedStrm 3.5OZ	1	Manifest 007639413JJK
Ethyl Chloride Mist 3.5OZ	2	Manifest 007639413JJK
Fluvirin 5ML 2010/2011	16	Item not presented to SSWSI for shipment

Fluvirin 5ML 2010/2011	1	Item not presented to SSWSI for shipment
Fluvirin SRY 2010/2011	10	Item not presented to SSWSI for shipment
Fluvirin SRY 2010/2011	2	Item not presented to SSWSI for shipment
Fluvirin SRY 2010/2011	12	Item not presented to SSWSI for shipment
Fluvirin SRY 2010/2011	5	Item not presented to SSWSI for shipment
Histofreezer 170ML 2/5MM MIX	1	Item not presented to SSWSI for shipment
Ketorolac 30MG/ML 1ML	1	Non-Hazardous aqueous solution with <24% alcohol
Ketorolac 60MG/2ML 2ML	1	Non-Hazardous aqueous solution with <24% alcohol
Nitrolingual Pumpspray 4.9GM	1	Manifest 007639413JJK Listed as F003 instead of D001
Phenytoin Sod 50MG/ML VL	1	Item not presented to SSWSI for shipment
Silvadene Crm 20GM	3	Item not presented to SSWSI for shipment
Tetanus Tox PF SDV 10X.5ML	2	Item not presented to SSWSI for shipment
Topex Anesth Spy Cherry 2OZ	1	Item not presented to SSWSI for shipment

All of the items presented to SSWSI for destruction were shipped to an appropriately permitted disposal facility. Stericycle suggests that Physician Sales and Service provided DEP with Quarantine logs without adequate explanation on the process for creating and using these logs. A quarantine log is used to remove items from a distributor's inventory available for shipment. A quarantine log is not a waste inventory, and Physician Sales and Service did not present these logs to SSWSI as an inventory of the items presented for waste shipment. Stericycle reviewed quarantine logs to assist in the segregation of waste but did not rely on the quarantine log to create manifests or packing lists. The purpose of the quarantine log is not to create a waste log but rather an inventory of materials that are not available for distribution. The items on a quarantine log may be shipped for destruction, returned to the manufacturer for credit, held for sample retention or similar activities, or returned to distribution inventory.

SSWSI would be presented with product and a quarantine log but SSWSI did not reconcile the quarantine log with the waste shipment. SSWSI would create packing lists from only the items presented for destruction. A number of items on the quarantine log that DEP was provided were simply not in the destruction shipment. A number of items on the list provided by DEP are not characteristic waste and therefore not hazardous. If these items were present in the shipment they would not have been identified on a packing list as they are not hazardous waste.

Historically, SSWSI has been presented with items identified by FLDEP as hazardous waste on the quarantine logs. Although these items (Fluvirin, and etc.) were not shipped on this occasion, when these items were presented previously SSWSI documented them on a packing list and they were manifested appropriately and disposed of as hazardous waste.

SSWSI has begun reconciling quarantine lists to inventory of items presented for destruction and has found repeated instances of discrepancies. As recently as June 2011, quarantine lists were provided with items not present. On June 7, 2011, a quarantine list was provided that listed 456

items. A line by line reconciliation revealed that only 157 items were presented for shipment (34%). On June 24, 2011, a quarantine list with 190 items was presented of which 186 items were present (97.8%).

Frequently, if not every occasion, the quarantine log did not match the material presented for destruction. Close inspection of the December list provided by DEP shows that more Ethyl Chloride was shipped on the packing list than presented on the quarantine log. SSWSI has never solely relied upon the quarantine log to segregate and manifest waste. SSWSI creates a waste inventory of hazardous waste in lieu of the quarantine log when shipping waste.

In conclusion, Stericycle Specialty Waste Solutions, Inc. believes that all hazardous waste SSWSI transported was shipped to facilities permitted to accept hazardous waste and that no hazardous waste was shipped to Stericycle's Keene Road incineration facility in Apopka, Florida. SSWSI will continue to be diligent in preventing the improper management of hazardous and other wastes.

Thank you for your time and attention, and if additional information is required, please feel free to contact Mr. Raj Singh at (407) 855-0141 via email rsingh@stericycle.com or me at (770) 891-2531 via email at tmccaustland@stericycle.com.

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