



Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

**Facility Name:** B & D Biomedical Waste Services

**On-Site Inspection Start Date:** 04/19/2011      **On-Site Inspection End Date:** 04/19/2011

**ME ID#:** 94190      **EPA ID#:** FLR000166686

**Facility Street Address:** 2401 NW 16th Blvd, Okeechobee, Florida 34972-2010

**Contact Mailing Address:** 2401 NW 16th Blvd, Okeechobee, Florida 34972-2010

**County Name:** Okeechobee      **Contact Phone:** (863) 763-3259

**NOTIFIED AS:**

CESQG (<100 kg/month)

Transporter

**INSPECTION TYPE:**

Routine Inspection for CESQG (<100 kg/month) facility

Routine Inspection for Hazardous Waste Transporter facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Kathy R. Winston, Inspector

Other Participants: Jeff Davis, Director of Operations

**LATITUDE / LONGITUDE:** Lat 27° 15' 41.4648" / Long 80° 51' 11.484"

**SIC CODE:** 4953 - Trans. & utilities - refuse systems

**TYPE OF OWNERSHIP:** Private

**Introduction:**

B & D Biomedical Waste Services (BD) is a supplier of medical waste disposal products and services to medical and dental offices, hospitals, and many other local medical facilities. This commercial waste treatment facility located in a 4,000 square foot building in Okeechobee, Florida has a capacity to process up to 12 tons of biomedical waste per day using autoclave technology. In May of 2010, BD began operating as a hazardous waste transporter and a Universal Pharmaceutical Waste (UPW) transporter. BD has six employees and is connected to city water and sewer.

**Process Description:**

The facility itself consists of one large warehouse with a small office area and one side room that houses the boiler and generator for the autoclave. The company has a small box truck and a small van being used for pickups at this time. They have a third large box truck parked in the rear of the facility that has not yet been utilized.

BD is not a hazardous waste transfer facility; therefore, there were no onsite hazardous waste management issues to observe. The warehouse area was full of large rolling carts full of red bag material staged for autoclaving. Once a cart has been autoclaved, the cart is taken outside and the bags are transferred to a 20 yard rolloff, on the north side of the building, which goes to the Okeechobee landfill.

Also, on the north side of the building, was a concrete pad where the 50 gallon rolling containers that are supplied to BD's customers for consolidating their red bag waste are rinsed out before being returned for reuse. The concrete pad had a trench around the entire pad except for one corner that had a gap that allowed rinsewater to flow off the pad and impact the soil in that area. On another corner of the pad, adjacent to the building, was a raised sewer discharge outlet. The inspector requested that the gap in the trench be closed and the rinsewater be directed to the

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sewer system.

## Record Review

All of BD's registration and insurance paperwork appeared to be in order. The facility representatives produced a manifest from the only pick up of hazardous waste that had been performed by the facility. The manifest indicated BD as both the generator and the transporter, which was not correct. The inspector explained the proper way to fill out manifests to avoid becoming responsible for another parties waste generation.

**New Potential Violations and Areas of Concern:****CESQG Checklist - 40 CFR 261.5**

Type: Area Of Concern  
 Rule: 261.5  
 Question Number: 7.30  
 Question: Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste?  
 Explanation: Facility has concrete pad along side the building where they rinse out their rolling containers before returning them to their customers. Runoff from this pad was being allowed to flow to bare ground in the NW corner of the pad.  
 Corrective Action: Please block off the gap in the trench on NW corner of pad and direct runoff from pad to sewer connection in SW corner.

**Transporters Checklist**

Type: Violation  
 Rule: 263.20  
 Question Number: 1.40  
 Question: Do the manifests contain at least:  
 Explanation: Facility has only made one pickup of hazardous waste since beginning operations; however, on the manifest issued for that pickup they have themselves as the generator.  
 Corrective Action: Please get acknowledgment from your TSD that you have informed them of the manifest discrepancy and reissue the manifest with correct EPA ID number of generator (if they have one) and the correct generator information in section #2 of the manifest. Also, provide generator with corrected manifest.

**Summary of Potential Violations and Areas of Concern:**Potential Violations

Rule Number	Area	Date Cited	Explanation
Transporters Checklist 263.20		04/19/2011	Facility has only made one pickup of hazardous waste since beginning operations; however, on the manifest issued for that pickup they have themselves as the generator.

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Areas of Concern

<b>Rule Number</b>	<b>Area</b>	<b>Date Cited</b>	<b>Explanation</b>
CESQG Checklist - 40 CFR 261.5 261.5		04/19/2011	Facility has concrete pad along side the building where they rinse out their rolling containers before returning them to their customers. Runoff from this pad was being allowed to flow to bare ground in the NW corner of the pad.

**Conclusion:**

Conclusion

The facility was not in compliance at the time of the inspection. The facility was given 14 days to return to compliance.

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**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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kathy R. Winston  
\_\_\_\_\_  
**PRINCIPAL INSPECTOR NAME**

Inspector  
\_\_\_\_\_  
**PRINCIPAL INSPECTOR TITLE**

  
\_\_\_\_\_  
**PRINCIPAL INSPECTOR SIGNATURE**

4/18/2011  
\_\_\_\_\_  
**DATE**

Jeff Davis  
\_\_\_\_\_  
**REPRESENTATIVE NAME**

Director of Operations  
\_\_\_\_\_  
**REPRESENTATIVE TITLE**

NO SIGNATURE  
\_\_\_\_\_  
**REPRESENTATIVE SIGNATURE**

B & D Biomedical Waste Services  
\_\_\_\_\_  
**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.

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**CESQG Checklist - 40 CFR 261.5**

Standards for Conditionally Exempt Small Quantity Generators		Potential Violation or AOC cited
7.1	Did the facility conduct a waste determination on all wastes generated?	
7.10	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? And less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes?	
7.20	Has the facility obtained an EPA ID #? (not required for CESQGs)	
7.30	Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste?	✓
7.40	Is the facility disposing of hazardous waste by mixing with used oil?	
7.50	Can the facility document proper disposal through written receipts or records?	
7.51	Does the written documentation include names and addresses of the generator and the TSD, the type and amount of hazardous waste delivered, and the date of shipment?	
7.52	Is written documentation retained for 3 years?	
7.60	Are any hazardous wastes treated or disposed of on site?  If yes, describe in Narrative	
7.70	Are there any unpermitted discharges of other wastes to the environment?	

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**Transporters Checklist**

Transporter Requirements (40 CFR 263)		Potential Violation or AOC cited								
1.10	Do vehicles transporting hazardous waste have the appropriate placards?									
1.20	Does transporter have an EPA identification number?									
1.30	Does the transporter use manifest system as required by 263.20?									
1.40	Do the manifests contain at least: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>Name, address, and EPA ID of transporter?</td> </tr> <tr> <td>Name, address, and EPA ID code of generator?</td> </tr> <tr> <td>Name, address, identification code of designated permitted facility?</td> </tr> <tr> <td>Corresponding manifest document number?</td> </tr> <tr> <td>Description and quantity of each hazardous waste?</td> </tr> <tr> <td>Signature of subsequent transporters?</td> </tr> <tr> <td>Signatures signifying proper delivery or reasons why delivery could not be certified?</td> </tr> <tr> <td>EPA waste codes?</td> </tr> </table>	Name, address, and EPA ID of transporter?	Name, address, and EPA ID code of generator?	Name, address, identification code of designated permitted facility?	Corresponding manifest document number?	Description and quantity of each hazardous waste?	Signature of subsequent transporters?	Signatures signifying proper delivery or reasons why delivery could not be certified?	EPA waste codes?	✓
Name, address, and EPA ID of transporter?										
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Corresponding manifest document number?										
Description and quantity of each hazardous waste?										
Signature of subsequent transporters?										
Signatures signifying proper delivery or reasons why delivery could not be certified?										
EPA waste codes?										
1.50	International shipments:									
1.60	Record of date waste left U.S.?									
1.70	Presence of one signed copy in records?									
1.80	Signed copy of manifest returned to the generator?									
1.90	Copy of the manifest given to a U.S. Customs official at the point of departure from the United States?									
1.100	For SQG waste:									
1.110	Is waste transported according to reclamation agreement?									
1.120	Is following information recorded on a shipping paper: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>Name, address, and EPA ID of waste generator.</td> </tr> <tr> <td>Quantity of waste accepted.</td> </tr> <tr> <td>DOT - required shipping info.</td> </tr> <tr> <td>Date waste is accepted</td> </tr> </table>	Name, address, and EPA ID of waste generator.	Quantity of waste accepted.	DOT - required shipping info.	Date waste is accepted					
Name, address, and EPA ID of waste generator.										
Quantity of waste accepted.										
DOT - required shipping info.										
Date waste is accepted										
1.130	Does transporter carry this shipping paper during transport?									
1.140	Are records maintained for three years after termination or expiration of reclamation agreement?									
1.150	Are copies of the manifest retained for 3 years?									
1.160	Is there evidence of discharge of hazardous waste?									
1.170	Has transporter demonstrated the financial responsibility required under 62-730.170(2)									
1.180	Does the transporter verify financial responsibility with the Department annually?									

Transfer Facility Requirements (62-730.171)		Potential Violation or AOC cited
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Transfer Facility Requirements (62-730.171)		Potential Violation or AOC cited		
1.190	Does transporter comply with 10 day storage limit for transfer facilities?			
1.200	Is the hazardous waste packaged according to 262.30?			
1.210	General Facility Standards (265 Subpart B)			
1.220	Security			
1.230	Is the facility security system adequate to minimize unauthorized entry?			
1.240	Are signs posted and legible for 25 feet?			
1.250	Inspection Requirement			
1.260	Does the facility have a copy of the Inspection Plan?			
1.270	Does the facility have completed inspection logs?			
1.280	Were the deficiencies corrected in a timely manner?			
1.290	Are the inspection logs maintained at the facility for 3 years?			
1.300	Personnel Training			
1.310	Do facility personnel complete hazardous waste training? <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">Is training on the job?</td> </tr> <tr> <td style="padding: 2px;">Is training in the classroom?</td> </tr> </table>	Is training on the job?	Is training in the classroom?	
Is training on the job?				
Is training in the classroom?				
1.330	Do laborers who handle hazardous waste complete training? <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">Is training on the job?</td> </tr> <tr> <td style="padding: 2px;">Is training in the classroom?</td> </tr> </table>	Is training on the job?	Is training in the classroom?	
Is training on the job?				
Is training in the classroom?				
1.360	Does training include emergency response procedures, inspection procedures, and operation of hazardous waste handling equipment?			
1.370	How often is training reviewed?			
1.390	Does the facility have personnel training records including job title, description of position, and description of employee's training?			
1.400	Is training successfully completed within 6 months of hiring/transfer to HW position?			
1.401	Are records maintained for current employees until closure of the facility?			
1.410	Are records for former employees kept for a minimum of three years from date the employee last worked at the facility?			
1.420	Ignitable, Reactive, or Incompatible Waste			
1.430	Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat?			
1.440	Are "No Smoking" signs posted in the area?			
1.450	Preparedness and Prevention (265 Subpart C)			
1.460	Is there evidence of fire, explosion or contamination of the environment?			
1.470	Is the facility equipped with (265.32 - required equipment):			
1.480	Internal communications or alarm system? Is it easily accessible in case of emergency?			
1.490	Telephone or two-way radio to call emergency response personnel?			
1.500	Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?			

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Transfer Facility Requirements (62-730.171)		Potential Violation or AOC cited
1.500	<p>Is this equipment tested to assure its proper operation?</p> <p>How many times per year?</p>	
1.510	<p>Water of adequate volume for hoses, sprinklers or water spray system?</p> <p>Describe source of water.</p> <p>Indicate flow rate and/or pressure and storage capacity, if applicable.</p>	
1.520	<p>Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between barrels to check for leakage, corrosion and proper labeling, etc.)</p>	
1.530	<p>Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.)</p>	
1.540	<p>In the case that more than one police or fire department might respond, is there a designated primary authority?</p> <p>If yes, indicate primary authority Is the fire department a city or volunteer fire department?</p>	
1.550	<p>Does the owner/operator have phone number of and agreements with state emergency response teams, emergency response contractors and equipment suppliers?</p> <p>Are they readily available to the emergency coordinator?</p>	
1.560	<p>Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility?</p> <p>If no, has the owner/operator attempted to do this?</p>	
1.570	<p>If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record?</p>	
1.580	<p>Contingency Plan and Emergency Procedures (265 Subpart D)</p>	
1.590	<p>Does the facility have a contingency plan?</p>	
1.600	<p>Is it at the facility and easily available?</p>	
1.610	<p>Is the contingency plan a revised SPCC Plan</p>	
1.620	<p>Does the plan include:</p> <p>Action personnel will take?</p> <p>Evacuation routes?</p> <p>Emergency Equipment?</p>	
1.660	<p>Is the emergency equipment properly inspected and maintained?</p>	
1.670	<p>Is there an emergency coordinator on site or within short driving distance of the plant at all times?</p>	
1.680	<p>Who is the emergency coordinator?</p>	
1.690	<p>Has the facility supplied local police and fire departments with a copy of the contingency plan?</p>	
1.700	<p>Has the facility supplied DEP with a copy of the Contingency Plan?</p>	
1.710	<p>Container Storage Checklist (Subpart I - Use and Management of Containers 265.170)</p>	
1.720	<p>Are the containers in good condition? (check for leaks, corrosion, bulges, etc.)</p>	
1.730	<p>If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?</p>	
1.740	<p>Is the waste compatible with the containers and/or its liner?</p>	
1.750	<p>Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak?</p>	
1.760	<p>Are each of the containers inspected at least weekly?</p>	



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Transfer Facility Requirements (62-730.171)		Potential Violation or AOC cited
1.760		
1.770	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line?	
1.780	Are incompatible wastes stored in the same containers?	
1.790	Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance?	
1.800	Does facility have a written closure plan satisfying requirements of closure performance, notification, and decontamination standards of 40 CFR 265.111, 265.112(c), 265.114, 265.115? Has the facility supplied DEP with a copy of the plan?	
1.810	Is hazardous waste that is stored in containers or vehicles stored on a man made surface which is capable of preventing spills or releases to the ground?	
1.820	Is a written log maintained for all waste entering or leaving the transfer facility?	
1.830	Does the log contain: Generators' names? Manifest numbers? Dates when waste enters and leaves facility?	
1.840	Has the facility notified the department on Form 62-730.900(6) (Transfer facility notification form)?	
1.850	Does the transfer facility have an EPA ID number?	

Unregulated Wastes (Household/Conditionally Exempt/Small Quantity Generator Wastes)		Potential Violation or AOC cited
1.860	Does the transporter have documentation that this waste was generated by an unregulated source? If yes, complete the applicable Generator or Small Quantity Generator checklist. If no, is the transporter assuming responsibility as the generator of this waste?	
1.890	If no, the inspector should inform the transporter that he will be held responsible as the generator of the waste and will be reinspected to ensure that the applicable requirements are being satisfied. A follow-up inspection should be scheduled as follows: 90 days after initial inspection if the quantity of "unregulated" wastes on site exceed 1000 kg. 180 days after initial inspection if the quantity of "unregulated" wastes on site are less than 1000 kg.	
1.900	Does the transporter mix/consolidate hazardous wastes of different DOT shipping descriptions 263.10(c)(2)? If yes, complete the Generator checklist.	

Land Disposal Restrictions		Potential Violation or AOC cited
1.910	Does the transporter manage restricted (land ban) wastes? If yes, check appropriate box(es). California List F--- List Solvents First Third Second Third Third Third Soil and Debris	

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Land Disposal Restrictions	Potential Violation or AOC cited
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