

**From:** [Kraemer, Janine](#)  
**To:** [Kraemer, Janine](#); [Scheel, Wade](#)  
**Cc:** [Singh, Raj](#); [Challenger, Rich](#); [McCaustland, TJ](#); [White, John](#); [Wurgler, Ryan](#); [Miller, Randy J.](#)  
**Subject:** RE: Corrective actions  
**Date:** Tuesday, December 10, 2013 2:01:16 PM  
**Attachments:** [image001.png](#)

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I spoke to our Office of General Counsel by phone today and got concurrence on the Central District's interpretation of the box trucks acting as unregistered transfer facilities. As indicated in previous emails, we believe that Stericycle is in violation of 62-730.171(2) F.A.C. Transfer facilities are defined as storage for more than 24 hours but less than 10 days. The box trucks are being used to store hazardous waste through the week and on weekends before bringing it to the Orlando facility. As you know the State is allowed to be more stringent than the Federal rules.

I am leaving the agency tomorrow but John White will be assuming as responsibility as case manager. Please direct any further questions concerning this inspection to him at [John.White@dep.state.fl.us](mailto:John.White@dep.state.fl.us) or by phone at 407-897-4305. We hope to receive a revised standard operating procedure for transporting in box trucks by the end of the year.

Thank you for your cooperation,  
Janine Kraemer, CHMM  
Environmental Consultant  
Florida Department of Environmental Protection  
Central District  
3319 Maguire Blvd, Suite 232  
Orlando FL 32803  
O: 407-897-4303  
F: 850-412-0488  
Office Hours: Monday-Thursday 7:30-5:00, Friday 7:00-11:00

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**From:** Kraemer, Janine  
**Sent:** Monday, December 09, 2013 1:48 PM  
**To:** 'Scheel, Wade'  
**Cc:** Singh, Raj; Challenger, Rich; McCaustland, TJ; White, John; Wurgler, Ryan  
**Subject:** RE: Corrective actions

I have sent your response to our attorney in Tallahassee. In the mean time I thought I would include the rule we spoke about by phone:  
62-730.171(2) F.A.C. A transfer facility used for storage of hazardous waste for more than 24 hours but 10 days or less shall comply with the following requirements as adopted by reference in subsection 62-730.180(2), F.A.C.

HAVE A GREAT DAY!

Janine Kraemer, CHMM

Environmental Consultant

Florida Department of Environmental Protection

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**From:** Scheel, Wade [<mailto:WScheel@STERICYCLE.com>]

**Sent:** Monday, December 09, 2013 11:08 AM

**To:** Kraemer, Janine

**Cc:** Singh, Raj; Challenger, Rich; McCaustland, TJ; White, John; Wurgler, Ryan

**Subject:** FW: Corrective actions

Hello Janine,

Please find Stericycle's response to your request for more information regarding our position on storing hazardous waste on box trucks.

I am available to answer any questions you have on this response.

Thank you.

**Wade Scheel**

Director of Environmental Safety & Health



612-285-9865 • Fax: 612-285-9000 • Toll-Free: 877-927-8311 • Cell: 612-590-5039

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**From:** Kraemer, Janine [<mailto:Janine.Kraemer@dep.state.fl.us>]

**Sent:** Monday, November 25, 2013 09:14 AM

**To:** Singh, Raj

**Cc:** White, John <[John.White@dep.state.fl.us](mailto:John.White@dep.state.fl.us)>

**Subject:** Corrective actions

I got the corrective action for the imported hazardous waste but still need a revised procedure or guidance document that supports Stericycle's position on storing hazardous waste on the box trucks. The Department would like to have

corrective actions completed prior to issuance of reports these days, so I need a response. Oh and as a side note, I'm leaving the Department Dec. 11 and I'd like to get the report issued and cased closed before I leave (no pressure).

HAVE A GREAT DAY!

Janine Kraemer, CHMM

Environmental Consultant

Florida Department of Environmental Protection

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