

White, John

From: Scheel, Wade <WScheel@STERICYCLE.com>
Sent: Tuesday, December 31, 2013 3:42 PM
To: White, John
Cc: Miller, Randy J.; Singh, Raj; Challenger, Rich; McCaustland, TJ; Wurgler, Ryan
Subject: RE: Corrective actions
Attachments: TP-404 Transportation Routing Policy - final.pdf

Hello John,

Attached is the Transportation Policy we have developed to address the DEP's concerns. Please review this policy, and let me know if you have any questions or additional concerns.

Currently, all Stericycle vehicles, drivers, and operations managing hazardous waste in Florida are compliant with this policy.

We believe this will satisfy the DEP's request for additional information following the inspection of our Orlando facility on October 29, 2013.

Thank you for your consideration of this information. Please contact me if you need anything else from us.

Regards,

Wade Scheel

Director of Environmental Safety & Health



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

Stericycle • 2850 100th Court NE • Blaine, MN 55449 • www.stericycle.com

From: White, John [mailto:John.White@dep.state.fl.us]
Sent: Monday, December 23, 2013 6:22 AM
To: Scheel, Wade
Cc: Miller, Randy J.; Singh, Raj; Challenger, Rich; McCaustland, TJ; Wurgler, Ryan
Subject: RE: Corrective actions

Mr. Scheel,

Thank you. I appreciate your assistance with this.

John

John White
Environmental Specialist
john.white@dep.state.fl.us
Phone: (407)897-4305
Fax: (850)412-0488

From: Scheel, Wade [<mailto:WScheel@STERICYCLE.com>]
Sent: Friday, December 20, 2013 5:28 PM
To: White, John
Cc: Miller, Randy J.; Singh, Raj; Challenger, Rich; McCaustland, TJ; Wurgler, Ryan
Subject: FW: Corrective actions

Hello John,

Although Stericycle believes we are abiding by all the DOT and EPA requirements regarding transportation and storage of hazardous waste, we understand the DEP's concern, and agree to follow the requirements of 62-730.171(2) F.A.C.

We are currently reviewing the final revisions to our transportation SOP, which will follow the DEP's hazardous waste storage and transfer facility requirements, and expect to send our SOP to you before the end of the year.

Please contact me if you have any questions regarding this matter.

Thank you.

Wade Scheel
Director of Environmental Safety & Health



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From: Kraemer, Janine [<mailto:Janine.Kraemer@dep.state.fl.us>]
Sent: Tuesday, December 10, 2013 1:01 PM
To: Kraemer, Janine; Scheel, Wade
Cc: Singh, Raj; Challenger, Rich; McCaustland, TJ; White, John; Wurgler, Ryan; Miller, Randy J.
Subject: RE: Corrective actions

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 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

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
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

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



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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>
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

Central District

3319 Maguire Blvd, Suite 232

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Stericycle, Inc. Policy Manual		Number:	TP 404		
Subject:	Florida Transportation Routing Policy	Effective:	December 2013		
Originator:	Environmental Safety and Health	Supersedes:	New		
Applies To:	All Stericycle Locations in Florida	Page:	1	Of	2

1.0 PURPOSE

This document establishes procedures for routine scheduling of client pickups of materials and wastes.

This document is intended to establish policies, programs, and procedures to ensure compliance with regulations and permits. If any section/statement conflicts with regulations or permits that section/statement is void and adherence to the actions defined by regulation and/or permit is required.

2.0 SCOPE

This policy applies to all Stericycle locations and includes drivers, processing, warehouse, and office personnel operating in Florida.

3.0 REFERENCES

- 3.1 TP-402 CSA Driver Safety Handbook.
- 3.2 FMCSA-Federal Motor Carrier Safety Administration
- 3.3 Stericycle, Inc. policies as referenced throughout this document.
- 3.4 62-730.171(2) F.A.C.

4.0 DEFINITIONS

- 4.1 Terminology and definitions used throughout this policy are consistent with federal, state and local rules and regulations including at a minimum DOT and/or OSHA.

5.0 EQUIPMENT/MATERIAL –

- 5.1 Vehicles utilizing US DOT Permits 01348411 and 01306409

6.0 SAFETY EQUIPMENT –

- 6.1 As referenced in TP-402 CSA Driver Safety Handbook

7.0 PROCEDURES

- 7.1 Safety and Compliance Orientation
 - 7.1.1 Routers/schedulers will be trained on the materials in the CSA Driver Safety Handbook.
 - 7.1.2 Routers/schedulers will be trained on the Hours of Service and other pertinent Regulations as stipulated in the FMCSA regulations 49 CFR §40, §300-§399, and §571.
 - 7.1.3 Routers/schedulers will be trained on the regulations pertaining to the types of shipments that are scheduled them including state regulations for the areas of their responsibility, including 62-730.171(2) F.A.C.



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- 7.2 Routers/schedulers will utilize geographic routing to maximize the efficiency of the vehicles during multiple pick up routes.
 - 7.2.1 Miles driven and hours driven will be minimized by scheduling routes in a linear progression, without retracing the route, consistent with client demands.
 - 7.2.2 Routes will be planned to minimize overnight parking.
 - 7.2.2.1 Routes requiring overnight parking will include a proper safe haven for the materials or wastes transported.
- 7.3 Routers/schedulers will not schedule 34 hour restarts in locations that are not permitted to have hazardous materials or waste for 34 hours or more.
 - 7.3.1 Routes will be planned to end work weeks with vehicles being unloaded or parked at a permitted facility or transfer station.
 - 7.3.2 Vehicles with hazardous waste will not be parked for more than 24 hours, unless at a permitted facility or transfer station.
- 7.4 Drivers will adhere to the pre-planned routes provided by the Routers/schedulers.
 - 7.4.1 Any delays, mechanical issues, accidents or etc. that would require a deviation from the planned route or schedule will be immediately communicated to the driver's supervisor and router/scheduler.
 - 7.4.2 Drivers will be rerouted as necessary following the procedures above.
 - 7.4.3 If necessary, a replacement driver or vehicle will be dispatched to complete the original or replacement route.

