



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Stericycle Specialty Waste Solutions Inc
On-Site Inspection Start Date: 10/29/2013 **On-Site Inspection End Date:** 10/29/2013
ME ID#: 56404 **EPA ID#:** FLR000006353
Facility Street Address: 314 W Landstreet Rd # B, Orlando, Florida 32824-7803
Contact Mailing Address: 314 Landstreet Rd # B, Orlando, Florida 32824
County Name: Orange **Contact Phone:** (407) 855-0141

NOTIFIED AS:

LQG (>1000 kg/month)
Transporter
Transfer Facility
Used Oil

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: John White, Environmental Specialist
Other Participants: Raj Singh, Facility Manager; Rich Challenger, Regional Operations Director; Janine Kraemer, Environmental Consultant

LATITUDE / LONGITUDE: Lat 28° 26' 8.1123" / Long 81° 22' 50.7241"

SIC CODE: 4789 - Trans. & utilities - transportation services, nec

TYPE OF OWNERSHIP: Private

Introduction:

On October 29, 2013 John White and Janine Kraemer, Florida Department of Environmental Protection (FDEP), accompanied by Raj Singh, Facility Manager; and Rich Challenger, Regional Operations Manager, Stericycle Specialty Waste Solutions, Inc. (Stericycle), inspected the facility for compliance with state and federal hazardous waste and used oil regulations.

Stericycle employs eighteen people, five days a week. The facility is connected to a septic system and Orange County potable water system. Stericycle has operated from this location since May 31, 2009, when they purchased the business from Environmental Enterprises of Florida. The property is owned by Dr. Robert Baker, 424 Riverside Drive, Battle Creek, Michigan 49015.

Stericycle's status as a Hazardous Waste Transporter/Transfer facility and as a Universal Waste Transporter and Handler was approved in February 2010. Stericycle's status as a used oil and used oil filter transporter was approved in March 2010. The facility is current on their registrations.

In addition to pharmaceutical waste managed under the Universal Pharmaceutical Waste (UPW) Rule, Stericycle manages electronic wastes, non-hazardous pharmaceutical wastes, and household hazardous waste. Stericycle is also authorized by the State to manage Conditionally Exempt Small Quantity Generator (CESQG) hazardous waste. This allows longer time limits for storage on site. Stericycle has also notified as a Large Quantity Generator of hazardous waste.

INSPECTION HISTORY

Stericycle was inspected on March 1, 2011 by the Department. The facility was not in compliance

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and was cited for causing hazardous waste to be transported to a facility not permitted to accept hazardous waste for disposal and transporting hazardous waste without a manifest. The case was settled through issuance of a Consent Order and payment of \$4,760.00 in civil penalties and administrative costs.

Process Description:

The facility is comprised of a single building with offices in front and a storage warehouse behind the offices. The warehouse is segregated into distance staging areas. There is a fenced in area for DEA regulated pharmaceutical waste, to control access, and floor space that has been designated for specific waste types. At the time of the inspection the warehouse had one row for CESQG waste, three rows for universal waste, four rows for universal pharmaceutical waste, two rows for 10-day waste, one row for used oil, and seven rows for non-hazardous waste (Figure 2).

This Stericycle facility is mainly focused on servicing the medical industry by transporting non-hazardous waste and pharmaceuticals. Prior to picking up hazardous waste, generators submit a waste profile to Stericycle. Stericycle submits the profile to the appropriate disposal facility for approval. If the disposal facility is willing to accept the waste, Stericycle provides the generator with a description of the waste and an acceptance letter. Stericycle then schedules a date and time for transport. The waste is transported to Stericycle's facility and stored on-site, in a trailer or warehouse, for no more than 10 days.

Each trailer can store a maximum of ninety 55-gallon drums. Trailers (Figures 3 and 4) are stored on a sloped concrete slab that has a six inch high concrete curb around three side of the pad. Wastes stored in trailers loaded in accordance with DOT regulations described in 40 CFR 263.10 are not required to meet the aisle space requirement described in 40 CFR 265.35.

INSPECTION NARRATIVE

Wastes entering the 10-day area of the warehouse are off-loaded and placed in a check-in area to verify the condition and quantity of containers. Containers in good condition are reloaded onto trailers. Containers that are not in good condition are replaced and the containers are then reloaded onto trailers. Hazardous waste pharmaceuticals are labeled as universal pharmaceutical waste.

At the time of the inspection the following containers were being stored in the warehouse:

- Twenty-one 4-liter containers of photographic waste
- Four 55-gallon drums of non-hazardous waste, paraffin and tissue
- Eight 55-gallon drums of crushed fluorescent bulbs
- Seven boxes of fluorescent bulbs
- One 55-gallon drum of x-ray film
- One 5-gallon pail of mercury containing devices
- Two pallets of shrink wrapped boxes of fluorescent bulbs
- Six pallets of shrink wrapped black bins of Universal Pharmaceutical Waste (UPW) (Figure 1)
- Five 55-gallon drums of used oil filters
- One 55-gallon drum of used oil
- One 30-gallon drum of used oil filters
- One 30-gallon drum of used oil
- Two 5-gallon containers of used oil
- Seven rows of 55-gallon drums non-hazardous waste

All of the containers were properly labeled and dated. The used oil was in secondary containment. Nothing was being stored in the 10-day transfer waste rows.

The Department reviewed the property boundaries on Orange County's Property Appraiser's website. It appears that the west wall of the warehouse is within 30 feet of the property line. Please be advised that, in accordance with 40 CFR 265.176, ignitable hazardous waste must be stored at least 50 feet away from the property line, so special storage considerations must be made when storing ignitable waste on site.

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Stericycle personnel indicated that they may start bulking 5-gallon containers of photographic waste into 55-gallon drums in the near future.

Located outside the warehouse were four trailers containing 10-day transfer waste. Box trucks transport hazardous waste from various sources and place it on these trailers. Some box truck drivers choose to consolidate some of the smaller containers in 55-gallon drums as lab packs, while others shrink wrap the pallet with smaller boxes. It is driver discretion as to whether or not to consolidate the smaller containers into a drum.

The first trailer contained hazardous waste from retail stores. The second and third trailers contained hazardous waste from the medical industry, including universal pharmaceutical waste. One of the trailers had evidence of a broken fluorescent bulb. Please be advised that broken fluorescent bulbs should be immediately cleaned up and managed properly.

The last trailer contained waste from a hospital in Bermuda. The waste included hazardous waste pharmaceuticals mixed with bio-medical waste. Stericycle had notified EPA Region 4 of their intent to import hazardous waste in July and August 2013. The waste is destined for Veolia in Texas for incineration.

All of the containers in all four trailers were labeled and dated properly. Two trailers on the south end of the property also contained 10-day transfer waste. These trailers were not inspected because they were scheduled to be transported that day.

Stericycle no longer has an above ground storage tank for used oil located near the south end of the warehouse.

RECORDS REVIEW

Records reviewed included manifests, weekly inspections, training records, contingency plan, and position descriptions from 2012-2013. Stericycle inspects the entire warehouse, including the Conditionally Exempt Small Generator waste, weekly. The weekly inspections were in compliance. Training records and position descriptions are kept electronically and were in compliance. Used oil and hazardous waste training were most recently conducted April 2013. The contingency plan was in compliance and most recently revised in 2010.

Notification of local authorities were reviewed during the last inspection; however, the revised emergency contact information needed to be forwarded to local authorities. Stericycle completed this action on December 3, 2013.

A copy of the Closure Plan required under Chapter 62-730.171(3)(a)(5) was available for review and was complete and the content acceptable.

Non-hazardous liquid waste, used oil, and used oil filters are shipped to Aqua Clean, Lakeland, Florida. Electronic waste is shipped to Quicksilver Recycling Services, Tampa, Florida, and AERC, Melbourne, Florida. Non-hazardous pharmaceuticals and bio-medical waste are sent to the Stericycle non-hazardous waste incinerator in Apopka, Florida. Hazardous waste pharmaceuticals are sent to Veolia, Port Arthur, Texas. Hazardous waste is sent to Stericycle Specialty Waste Solutions, Indianapolis, Indiana.

The facility tracks the 10 day time limit for storage of hazardous waste by placing manifests in a bin on the wall that contains information on date-in, date-out, and destination facility. Also, a record of manifests is kept electronically to track the 10 day time limit.

Manifests were found to be in compliance. Inspectors requested the corresponding documentation for the two trailers that were not inspected due to their impending transportation. During the review of the manifests and manifest summary sheets, inspectors noticed that waste was taking up

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to 10 days to arrive at the Stericycle facility. Mr. Singh explained that box trucks pick up waste until the truck is full at which time the driver brings the box truck to the facility. In order to get a full load, the hazardous waste may stay on the truck for several days; however, this eliminates the number of trips to the Orlando facility. During this storage period, Mr. Singh was unsure of the location of the box trucks. Records reviewed indicated hazardous waste was being held over the weekend, making this storage for longer than 24 hours but less than 10 days meeting the definition of a transfer facility. Transfer facilities are required to notify the Department [62-730.171(2)(a) F.A.C.].

In a response to the Department, dated December 31, 2013, Stericycle provided an updated operating procedure, effective December 2013, designed to ensure no waste would be stored for greater than 24 hours at any place but a permitted hazardous waste storage facility or a registered 10-day transfer facility.

New Potential Violations and Areas of Concern:

Violations

Type: Violation

Rule: 62-730.171(2)

Explanation: 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. Specifically, Stericycle was storing hazardous waste on box trucks for longer than 24 hours without notifying the Department as a transfer facility.

Corrective Action: Stericycle shall immediately cease storing hazardous waste on box trucks for longer than 24 hours. In a response to the Department, dated 12/31/2013, Stericycle provided an updated operating procedure designed to meet this requirement.

PHOTO ATTACHMENTS:

1. Universal Pharmaceutical Waste



2. Warehouse



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3. Trailers storing hazardous waste



4. Trailers storing hazardous waste



Conclusion:

Stericycle was inspected as a Large Quantity Generator; 10-day Transfer facility; Universal Waste Handler; and a used oil, used oil filter, universal waste, and hazardous waste transporter. The facility was not in compliance at the time of the inspection. Corrective actions were discussed with Raj Singh and Rich Challenger prior to leaving the facility and the facility has provided corrective actions indicating no further action is required.

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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.

John White
PRINCIPAL INSPECTOR NAME

Environmental Specialist
PRINCIPAL INSPECTOR TITLE

FDEP
ORGANIZATION

Supervisor: Aaron Watkins

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.