



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Stericycle Specialty Waste Solutions Inc
On-Site Inspection Start Date: 09/04/2015 **On-Site Inspection End Date:** 09/04/2015
ME ID#: 50192 **EPA ID#:** FL0000702985
Facility Street Address: 8505 NW 74th St, Miami, Florida 33166-2327
Contact Mailing Address: 8505 NW 74th St, Miami, Florida 33166
County Name: Miami-Dade **Contact Phone:**

NOTIFIED AS:

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

INSPECTION TYPE:

Routine Inspection for Transporter facility
Routine Inspection for LQG (>1000 kg/month) facility
Routine Inspection for Used Oil Transporter facility
Routine Inspection for Universal Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Magdalena Gierczak, Inspector
Other Participants: Jason Gross, Facility Manager

LATITUDE / LONGITUDE: Lat 25° 50' 27.0" / Long 80° 20' 4.0"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

A routine compliance evaluation inspection (CEI) was conducted at Stericycle Specialty Waste Solutions, Inc. (SSWSI).

The facility operates as a hazardous and biomedical waste transporter.

The facility is located in an 8-acre industrial complex occupying one 3000 sf unit of the building and its adjacent fenced parking lot. SSWSI's trucks are parked in the back (north) section of the complex's parking lot. SSWSI uses city utilities (sewer and water).

The business currently employs about 15-25 workers and has been operating at current location since 2012.

NOTIFICATION HISTORY:

- Facility notified as LQG, UW (Batteries, Pesticides, Lamps, Devices), LQH, Pharmaceuticals, Importer, Person authorized to accept Conditionally Exempt Waste, Universal Pharmaceutical Transporter, UW Lamp Transporter, UW Device Transporter, UW Lamp Transfer Facility, UW Device Transfer Facility, UW Lamp SQH, UW Device SQH, HWT, HW Transfer Facility, UOT, UO Transfer Facility, UOFT, and UOF Transfer Facility on:
- 2015.07.09
- 2015.03.26
- 2014.07.25

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- 2014.02.25
- 2013.07.15
- 2013.03.29
- 2012.12.10

- Facility notified as Transporter of Universal Waste Lamps and Devices, Transfer Facility for Universal Waste Lamps, Transfer Facility for Universal Waste Devices, Small Quantity Handler Facility for Universal Waste Lamps and Devices on:

- 2015.02.13
- 2014.01.28
- 2013.02.21
- 2012.10.17

INSPECTION HISTORY:

- Current facility has never been previously inspected by the Department.
- 2011.04.28 - A "Closed Site Visit" inspection was performed by the Department for previous site occupant and generator, Hesco Sales Hi Rise, Inc.

VIOLATIONS HISTORY:

- No violations were reported by the Department to date of inspection

Process Description:

Stericycle Specialty Waste Solutions, Inc. operates as a used oil & filter, hazardous, universal and biomedical waste transport, transfer and management service and transfer facility.

Facility notified as LQG (see above) in case of a large contract or emergency cleanup but currently does not generate LQG amounts of wastes.

Used oil and filters are transferred to Veolia, Allworth or CBI.

At time of inspection hazardous waste stored at the facility was observed properly closed, labeled and dated. Hazardous and petroleum waste drums were stored indoors, within bermed cemented secondary containment areas.

Universal Pharmaceutical Waste (UPW) streams are managed separately from hazardous waste streams. The waste streams currently generated consist of returned/expired medications managed through reverse distribution. Facility also manages 10% formalin waste (managed as Non-RCRA regulated waste). UPW waste streams are stored separately with formalin being stored indoors, within bermed cemented secondary containment area and medications being stored indoors, in a cemented and chain-link fenced "cage" monitored with a CCTV.

Inbound shipments of UPW are received using Bills of Lading prepared by SSWSI. SSWSI uses a generic DOT shipping description: Waste Medicine, or NON-RCRA Regulated Waste. All waste streams are sorted and separated at Point of Generation (POG) by the generator and received by SSWSI as separated UPW wastes and biomedical wastes. Stored containers were observed to be labeled as Universal Pharmaceutical. Various accumulation start dates were observed. The UPW received includes pre-sorted and labeled medications. Outbound UPW containers are stretch-wrapped to pallets, labeled, and dated. The accumulation dates are the dates SSWSI received the UPW. No outbound pallets of UPW were ready for shipping or review at time of inspection. The record review of DOT shipping documents included codes such as: Waste Medicine, Toxic, NOS. The storage area was clean and about 10% full with containers lined up along the walls and sufficient aisle space between containers.

The UPW is shipped to a Veolia disposal facility in Port Arthur Texas (EPA ID#: TXD000838896).

Non-hazardous 10% formalin solution is picked up in 55-gal drums from hospitals and laboratories and stored in the SSWSI facility. Prior to shipping the waste is stretch-wrapped to pallets, labeled, and dated. The accumulation dates are the dates SSWSI received the formalin. No outbound pallets of UPW were ready for shipping or review at time of inspection. The record review of DOT shipping

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documents were marked as "Waste 10% Formalin. Non-RCRA Regulated". The storage area was clean and about 90% full with containers lined up in three rows with sufficient aisle space between containers.

Universal waste lamps were observed properly stored and labeled indoors. Lamps are managed by CBI.

SSWSI's trucks were observed to have proper DOT-required placards, halogen testing, and fire and spill kits.

The following records were reviewed and appeared to be in compliance:

- Manifests, service and waste tracking records
- Proof of insurance
- Training records
- Contingency and closure plans
- Proof of emergency arrangements with local authorities
- Emergency numbers posted

Conclusion:

No violations were observed at time of inspection.

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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.

Magdalena Gierczak _____

Inspector _____

PRINCIPAL INSPECTOR NAME

PRINCIPAL INSPECTOR TITLE



10/2/2015 _____

PRINCIPAL INSPECTOR SIGNATURE

DATE

Supervisor: Karen Kantor

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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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: <div style="border: 1px solid black; padding: 2px;">Name, address, and EPA ID of transporter?</div> <div style="border: 1px solid black; padding: 2px;">Name, address, and EPA ID code of generator?</div> <div style="border: 1px solid black; padding: 2px;">Name, address, identification code of designated permitted facility?</div> <div style="border: 1px solid black; padding: 2px;">Corresponding manifest document number?</div> <div style="border: 1px solid black; padding: 2px;">Description and quantity of each hazardous waste?</div> <div style="border: 1px solid black; padding: 2px;">Signature of subsequent transporters?</div> <div style="border: 1px solid black; padding: 2px;">Signatures signifying proper delivery or reasons why delivery could not be certified?</div> <div style="border: 1px solid black; padding: 2px;">EPA waste codes?</div>	
1.50	International shipments:	
1.60	Record of date waste left U.S.? <div style="border: 1px solid black; padding: 2px;">Sign and date manifest in the international shipments block to indicate the date that the shipment left the United States;</div>	
1.70	Presence of one signed copy in records? <div style="border: 1px solid black; padding: 2px;">Retain one copy in accordance with 263.22(d);</div>	
1.80	Signed copy of manifest returned to the generator? <div style="border: 1px solid black; padding: 2px;">Return a signed copy of the manifest to the generator; and</div>	
1.90	Copy of the manifest given to a U.S. Customs official at the point of departure from the United States? <div style="border: 1px solid black; padding: 2px;">Give a copy of the manifest to a U.S. Customs official at the point of departure from the United States</div>	
1.100	For SQG waste:	
1.110	Is waste transported according to reclamation agreement?	
1.120	Is following information recorded on a shipping paper: <div style="border: 1px solid black; padding: 2px;">Name, address, and EPA ID of waste generator.</div> <div style="border: 1px solid black; padding: 2px;">Quantity of waste accepted.</div> <div style="border: 1px solid black; padding: 2px;">DOT - required shipping info.</div> <div style="border: 1px solid black; padding: 2px;">Date waste is accepted</div>	
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?	

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Transporter Requirements (40 CFR 263)		Potential Violation or AOC cited
1.181	Are the inspection logs maintained at facility for 3 years?	
1.182	Is the facilities security system adequate to minimize unauthorized entry?	
1.183	Were the deficiencies corrected in a timely manner?	
1.184	Are signs posted and legible for 25 feet?	

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? Is training on the job? Is training in the classroom?	
1.330	Do laborers who handle hazardous waste complete training? 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?	

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Transfer Facility Requirements (62-730.171)		Potential Violation or AOC cited
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? Is this equipment tested to assure its proper operation? How many times per year?	
1.510	Water of adequate volume for hoses, sprinklers or water spray system? Describe source of water. Indicate flow rate and/or pressure and storage capacity, if applicable.	
1.520	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.)	
1.530	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.)	
1.540	In the case that more than one police or fire department might respond, is there a designated primary authority? If yes, indicate primary authority Is the fire department a city or volunteer fire department?	
1.550	Does the owner/operator have phone number of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? Are they readily available to the emergency coordinator?	
1.560	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? If no, has the owner/operator attempted to do this?	
1.570	If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record?	
1.580	Contingency Plan and Emergency Procedures (265 Subpart D)	
1.590	Does the facility have a contingency plan?	
1.600	Is it at the facility and easily available?	
1.610	Is the contingency plan a revised SPCC Plan	
1.620	Does the plan include: Action personnel will take? Evacuation routes? Emergency Equipment?	
1.660	Is the emergency equipment properly inspected and maintained?	
1.670	Is there an emergency coordinator on site or within short driving distance of the plant at all times?	
1.680	Who is the emergency coordinator?	
1.690	Has the facility supplied local police and fire departments with a copy of the contingency plan?	

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Transfer Facility Requirements (62-730.171)		Potential Violation or AOC cited
1.690		
1.700	Has the facility supplied DEP with a copy of the Contingency Plan?	
1.710	Container Storage Checklist (Subpart I - Use and Management of Containers 265.170)	
1.720	Are the containers in good condition? (check for leaks, corrosion, bulges, etc.)	
1.730	If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?	
1.740	Is the waste compatible with the containers and/or its liner?	
1.750	Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak?	
1.760	Are each of the containers inspected at least weekly?	
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.	

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Land Disposal Restrictions		Potential Violation or AOC cited						
1.910	<p>Does the transporter manage restricted (land ban) wastes? If yes, check appropriate box(es).</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">California List</td> </tr> <tr> <td style="padding: 2px;">F--- List Solvents</td> </tr> <tr> <td style="padding: 2px;">First Third</td> </tr> <tr> <td style="padding: 2px;">Second Third</td> </tr> <tr> <td style="padding: 2px;">Third Third</td> </tr> <tr> <td style="padding: 2px;">Soil and Debris</td> </tr> </table>	California List	F--- List Solvents	First Third	Second Third	Third Third	Soil and Debris	
California List								
F--- List Solvents								
First Third								
Second Third								
Third Third								
Soil and Debris								

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Used Oil Transporter

40 CFR279 Subpart E --Transporter Standards		Potential Violation or AOC cited			
29.10	Is the facility exempt under any of the following? <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">On site transport?</td> </tr> <tr> <td style="padding: 2px;">Generator transporting < 55 g /time to a collection center?</td> </tr> <tr> <td style="padding: 2px;">Transporter of < 55 g /time from generator to aggregation point owned by same generator?</td> </tr> </table>	On site transport?	Generator transporting < 55 g /time to a collection center?	Transporter of < 55 g /time from generator to aggregation point owned by same generator?	
On site transport?					
Generator transporting < 55 g /time to a collection center?					
Transporter of < 55 g /time from generator to aggregation point owned by same generator?					
29.20	If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 261.7 after HW shipments? (If not, the used oil must be managed as hazardous).				
29.30	Does the transporter process used oil beyond what would be considered incidental to transport?				
29.40	If 'yes' are they in compliance with 279 Subpart F?				
29.50	Has the facility notified of used oil activities? Check EPA form 8700-12.				
29.60	Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID numbers?				
29.70	Does the transporter comply with DOT requirements?				
29.80	If any oil is discharged during transport, does the transporter:				
29.90	Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable?				
29.100	Report to DOT in writing per 49 CFR 171.16?				
29.110	Clean up any discharges until the discharge poses no threat?				
29.120	Does the facility also transport used oil filters?				
29.130	If so, are the filters stored in above ground containers which are:				
29.140	In good condition?				
29.150	Closed or otherwise protected from weather?				
29.160	Labeled "Used Oil Filters"?				
29.170	Stored on an oil impervious surface?				

Transporter Recordkeeping -279.46		Potential Violation or AOC cited
29.180	Do used oil acceptance records include:	
29.190	Name & Address of facility providing the oil for transport?	
29.200	EPA ID # of oil provider?	
29.210	Quantity of oil shipped?	
29.220	Date of acceptance?	
29.230	Signature of oil provider, dated upon receipt?	
29.240	Do used oil delivery records include:	
29.250	Name & Address of receiving facility or transporter?	
29.260	EPA ID # of receiving facility or transporter?	

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Transporter Recordkeeping -279.46		Potential Violation or AOC cited
29.260		
29.270	Quantity of oil delivered?	
29.280	Date of delivery?	
29.290	Signature of oil receiver, dated upon receipt?	
29.300	Do the above records also include:	
29.310	State required information on the type of oil?	
29.320	Destination or end use?	
29.330	Does the facility keep records on DEP Form 62-710.901(2) or equivalent?	
29.340	Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year?	
29.350	If not, is the facility an electric utility transporting only self generated used oil for recycling, which is exempt from state registration and reporting requirements?	
29.360	Does the transporter keep copies of the record and reports for three years at the street address of the facility?	

Transporter Certification (62-710 F.A.C.)		Potential Violation or AOC cited
29.370	Is the transporter certified? (local governments, and < 55g/time transporters are exempt)	
29.380	Does the facility maintain training records?	
29.390	Does the facility maintain insurance or financial assurance of \$1,000,000 combined single limit?	
29.400	Is the facility registration form and ID number displayed?	

Transfer Facility Standards -279.45		Potential Violation or AOC cited
29.410	Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F.	
29.420	Is the transfer facility registered per 62-710.500(1)(a) F.A.C?	
29.430	Does the transporter determine whether used oil stored at a transfer facility has total halogen content above or below 1,000 ppm?	
29.440	Is this done by testing?	
29.450	Is this done by process knowledge? Describe basis	
29.460	Are test records or copies of records providing basis for determination kept for 3 years?	
29.470	Have any analyses showed Exceedence of the 1,000 ppm level?	
29.480	If so, was the oil managed as hazardous waste?	
29.490	If not, was the oil exempt? Describe	
29.500	Is used oil stored only in tanks or containers, or units subject to 264 and 265?	

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Transfer Facility Standards -279.45		Potential Violation or AOC cited
29.500		
29.510	If the facility has tanks, do they comply with 62-761 and 62.762 rules?	
29.520	Describe, including number and size of tanks, noting registration numbers if applicable, and compliance status.	
29.530	Is secondary containment provided and adequate?	
29.540	Are containers and tank trailers in good condition and not leaking?	
29.550	Are containers provided with secondary containment with minimum requirements?	
29.560	Is the containment system impervious to oil so as to prevent migration?	
29.570	Are ASTs, UST tank fill lines and containers labeled "used oil"?	
29.580	Are used oil filters generated off-site stored more than 10 days?	
29.590	If so, is the facility a registered used oil filter transfer facility?	
29.600	Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable?	

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Universal Waste Transporter

Universal Waste Transporters - Standards for Handlers - 40 CFR 273 Subpart C & Subpart D	Potential Violation or AOC cited
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Standards for Universal Waste Transporters - 40 CFR 273 Subpart D		Potential Violation or AOC cited
35.10	Has the universal waste transporter notified the Department?	
35.20	Has the universal waste transporter certified that it has employee training procedures in place for the proper handling, emergency response, and containment and cleanup of its spent universal waste lamps or devices?	
35.30	Does the Universal Waste Transporter store waste for longer than 10 days? Note: If yes, the transporter is subject to the small or large handler requirements, as applicable.	
35.40	If yes, does the universal waste transfer facility store 2,000 kg. or greater of universal waste lamps or 100 kg or more of devices in areas other than on the transport vehicle and has the Transfer Facility submitted a one time registration fee of \$1,000?	
35.50	Did the universal waste transfer facility develop and submit to the Department, along with its registration, an operational plan including a description of its general housekeeping measures, employee training program, methods to prevent breakage or releases, and its methods for responding to releases of universal waste lamps or devices or their components?	
35.60	Did the transporter dispose of universal waste?	
35.70	Does the transporter dilute or treat universal waste?	
35.80	Has the transporter responded immediately to contain all releases?	
35.90	Has the transporter sent universal waste only to another universal waste handler, a destination facility, or a foreign destination?	
35.100	If the universal waste transporter transported, at any one time, more than 5000 kilograms of universal pharmaceutical waste or more than one kilogram of p-listed universal pharmaceutical waste, did the transporter comply with the financial responsibility requirements of subsection 62-730.170(2), F.A.C.?	