



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

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**FACILITY INFORMATION:**

**Facility Name:** Stericycle Specialty Waste Solutions Inc  
**On-Site Inspection Start Date:** 10/26/2016      **On-Site Inspection End Date:** 10/26/2016  
**ME ID#:** 56404      **EPA ID#:** FLR000006353  
**Facility Street Address:** 314 W Landstreet Rd # B, Orlando, FL 32824-7803  
**Contact Mailing Address:** 314 B Landstreet Rd, Orlando, FL 32824  
**County Name:** ORANGE      **Contact Phone:** (407) 855-0141

**NOTIFIED AS:**

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

**INSPECTION TYPE:**

Routine Inspection for Hazardous Waste Transporter facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Michael Eckoff, Inspector  
**Other Participants:** John White, Environmental Consultant; Vелver Anderson III, Facility Manager

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

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

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On October 26, 2016, Michael Eckoff and John White, Florida Department of Environmental Protection, accompanied by Vелver Anderson III, Stericycle Environmental Solutions, inspected Stericycle Specialty Waste Solutions, Inc. for compliance with state and federal hazardous waste transporter requirements.

Stericycle Specialty Waste Solutions, Inc. 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 Specialty Waste Solutions, Inc.'s registration as a Hazardous Waste Transporter/Transfer facility, a Used Oil Transporter/Transfer facility, a Used Oil Filter Transporter/Transfer facility, and a Universal Waste Transporter/Transfer facility is current. In addition to pharmaceutical waste managed under the Universal Pharmaceutical Waste (UPW) Rule, Stericycle Specialty Waste Solutions, Inc. manages electronic wastes and non-hazardous pharmaceutical wastes.

Stericycle Specialty Waste Solutions, Inc. 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 Specialty Waste Solutions, Inc. has also notified as a Large Quantity Generator of hazardous waste, a Large Quantity Handler of Universal Waste, and an importer of hazardous waste.

**INSPECTION HISTORY**

The facility has not been inspected within the past five years for compliance with state and federal hazardous waste transporter requirements.

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### 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 distinct 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, five rows for universal waste, eight rows for universal pharmaceutical waste, two rows for 10-day waste, and nine rows for used oil and non-hazardous waste.

This 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 Specialty Waste Solutions, Inc. Stericycle Specialty Waste Solutions, Inc. submits the profile to the appropriate disposal facility for approval. If the disposal facility is willing to accept the waste, Stericycle Specialty Waste Solutions, Inc. provides the generator with a description of the waste and an acceptance letter. Stericycle Specialty Waste Solutions, Inc. then schedules a date and time for transport. The waste is transported to Stericycle Specialty Waste Solutions, Inc.'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 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 waste types were being stored in the warehouse:

CESQG waste - lab packs and developer waste

Universal Waste - batteries and mercury lamps

Universal Pharmaceutical Waste

10-day Transfer facility - used mercury lamps, non-hazardous refrigerant oil, non-hazardous economizer wash water, and non-hazardous paint related material

Non-hazardous waste - used oil, latex paint, wastewater, oily waste-debris, photo waste solids, formalin with tissue, and a roll-off container of debris

All of the containers were properly labeled and closed.

In the check-in area were containers of universal pharmaceutical waste, non-hazardous waste, and hazardous waste. After check-in, the hazardous waste will be put on a trailer for shipment.

As a reminder, the Department previously 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.

Located outside the warehouse were four trailers located on containment pads, three contained 10-day transfer waste and one was empty. A box truck and four trailers were parked at bays in the warehouse. The box truck was empty and the trailers were being loaded with non-hazardous waste. Two other trailers were located near the warehouse and contained supplies. Pallets of drums and containers of various wastes were located just outside the warehouse. Mr. Anderson stated the waste was just off-loaded and waiting to be moved inside the warehouse for check-in.

Along the fence line at the south end of the property was 17 trailers and a box truck, of which eleven trailers and the box truck were empty, five trailers contained supplies, and one trailer contained electronic waste.

Empty drums were stored outside awaiting shipment for either reconditioning or recycling as scrap metal.

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Emergency equipment in the warehouse consisted of two safety shower/eye wash stations, one located mid-way through the warehouse and the other on the south end of the warehouse, fire extinguishers located throughout the warehouse, and a layout of the facility at exit doors. The extinguishers are checked monthly by facility personnel and annually by an outside source.

Supply storage was located near a bay door in the warehouse.

Outside and behind the office was a box truck and a green-colored metal tank. The box truck contained tools/equipment and Mr. Anderson stated the tank was empty.

#### RECORDS REVIEW

Records reviewed included manifests, weekly inspections, training records, contingency plan, and position descriptions.

Stericycle Specialty Waste Solutions, Inc. 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. Training was most recently conducted in April 2016 and records were also available for employees who have separated from the company within the past three years. Position descriptions are kept by group. Each group designation has specific safety and training requirements that have been identified. The group ties back to the position description maintained by human resources.

The current contingency plan is identified as Revision 1, dated December 8, 2015. Mr. Anderson is identified as the emergency coordinator. Matt Mulligan is identified as the secondary emergency coordinator. The contingency plan was sent to local authorities.

The 10-day log recording information from in-coming manifests, as required by F.A.C. 62-730.171(6), is maintained as an electronic record. The log tracks in-coming and out-going shipments by month and by destination facility. Only one issue was noted during a review of the log, a date was entered incorrectly indicating the facility had exceeded the 10-day storage limit when it had not. This issue was identified to staff responsible for maintaining the record.

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 are sent to the Stericycle Specialty Waste Solutions, Inc.'s non-hazardous waste incinerator in Apopka, Florida. Non-hazardous medical waste is shipped to Sunbelt Medical Services, Inc., located in Sardis, Georgia. Hazardous waste pharmaceuticals are sent to Veolia, Port Arthur, Texas. Hazardous waste is sent to Stericycle Specialty Waste Solutions, Inc., Indianapolis, Indiana.

Manifests were reviewed from 2015 and 2016 and found to be in compliance.

#### Conclusion:

Stericycle Specialty Waste Solutions, Inc. 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 and no violations were cited at that time.

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**1.0 - Pre-Inspection Checklist**

## Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✓		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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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.

Michael Eckoff  
**PRINCIPAL INSPECTOR NAME**

Inspector  
**PRINCIPAL INSPECTOR TITLE**

*Michael Eckoff*

**PRINCIPAL INSPECTOR SIGNATURE**

DEP  
**ORGANIZATION** 12/14/2016  
**DATE**

John White  
**Inspector NAME**

Environmental Consultant  
**Inspector TITLE**

FDEP - Central District  
**ORGANIZATION**

Velver Anderson III  
**Representative NAME**

Facility Manager  
**Representative TITLE**

Stricycle Environmental Solutions  
**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.

**Report Approvers:**

**Approver:** Sirena Davila

**Inspection Approval Date:** 12/14/2016