

**United States Environmental Protection Agency  
Region 4, Atlanta, Georgia  
Compliance Evaluation Inspection Report**

**1) INSPECTOR AND AUTHOR OF REPORT**

Parvez Mallick  
Environmental Engineer  
Hazardous Waste Enforcement and Compliance Section  
Enforcement and Compliance Branch  
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**2) FACILITY INFORMATION**

Stericycle Specialty Waste Solutions, Inc.  
314 W Landstreet Rd # B  
Orlando, Florida 32824  
Orange County

Phone: (407) 855-0141  
EPA ID No.: FLR000006353  
Latitude/Longitude: Lat 28° 26' 8.1123" / Long 81° 22' 50.7241"  
SIC Code: 4212 - Transportation & Utilities – local trucking, without storage  
NAICS Number: 562111 & 562112 – Solid and hazardous waste collection  
Website: <http://www.stericycleenvironmental.com>

**3) RESPONSIBLE OFFICIALS**

Velver Anderson III, Facility Manager, Stericycle Specialty Waste Solutions Inc.

**4) INSPECTION PARTICIPANTS**

Velver Anderson III, Facility Manager, Stericycle Specialty Waste Solutions, Inc.  
John White, Florida Department of Environmental Protection  
Parvez Mallick, U.S. EPA Region 4

**5) DATE OF INSPECTION**

December 14, 2017, 9:45 a.m.

**RECEIVED**

**JAN 29 2018**

**DEP Central Dist.**

6) **APPLICABLE REGULATIONS**

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 *et seq.*, and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (F.A.C.), Chapters 62-710, 62-730 and 62-750.

7) **PURPOSE OF COMPLIANCE EVALUATION INSPECTION**

On December 14, 2017, the U.S. Environmental Protection Agency, Region 4 inspector, Parvez Mallick, accompanied by Florida Department of Environmental Protection (FDEP) inspector, John White, arrived at Stericycle Specialty Waste Solutions, Inc. (hereinafter Stericycle or the facility) to inspect the facility to determine its compliance status with both RCRA and the State of Florida hazardous waste regulations. This was an EPA lead compliance evaluation inspection (CEI). Stericycle was represented by Mr. Velder Anderson III, Facility Manager, of Stericycle. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed.

8) **FACILITY DESCRIPTION**

Stericycle has operated from this location since May 31, 2009, when the facility purchased the business from Environmental Enterprises of Florida. The property is owned by Dr. Robert Baker, 424 Riverside Drive, Battle Creek, Michigan 49015. The facility is on two acres and comprised of one building, approximately 100,000 square feet. The facility is a Client Service Center: serve as 10-day Truck-to-Truck Transfer; Transportation & Disposal; Lab pack, House-hold Hazardous Waste services, Remediation, and Emergency Response. The facility operates 26 trucks from this location. The facility employs 12 people with operating hours from 8 a.m. to 5 p.m., Monday to Friday, for office personnel and in two shifts from 6 a.m. to 11 p.m., Monday to Sunday, for waste pick-up personnel. The facility is connected to the City of Orlando sewer and water services.

The facility most recently notified FDEP on March 1, 2017, 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. The facility originally received EPA ID FLR000006353 on November 4, 2010. In addition to pharmaceutical waste managed under the Florida's Universal Pharmaceutical Waste (UPW) Rule, Stericycle Specialty Waste Solutions, Inc. manages electronic wastes and non-hazardous pharmaceutical wastes.

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, a large quantity handler of universal waste, and an importer of hazardous waste.

9) **INSPECTION HISTORY**

Stericycle was last inspected by the FDEP on October 26, 2016, and no violations were cited at that time.

10) **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 (Appendix A - Picture #1). At the time of the inspection the warehouse had one row for CESQG waste, two rows for universal waste, four rows for universal pharmaceutical waste, one row for 10-day waste, and five 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. 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 90 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 C.F.R. § 263.10 are not required to meet the aisle space requirement described in 40 C.F.R. § 265.35.

11) **INSPECTION FINDINGS**

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.

Wastes being accepted into the warehouse, such as CESQG waste, universal pharmaceutical waste and non-hazardous wastes are inspected and stored in the appropriate area. Hazardous waste pharmaceuticals are labeled as universal pharmaceutical waste when they enter the warehouse but are relabeled "Hazardous Waste" for shipment off-site.

The inspectors identified the following wastes in the designated CESQG row (Pictures #2-4):

- A pallet of small, black containers storing hazardous waste pharmaceuticals with the waste codes D001 (ignitable) and D009 (mercury);
- A 5-gallon container of sodium hydroxide and two 5-gallon containers of sodium thiosulfate; and
- A pallet storing four 15-gallon containers, two 18-gallon containers, and two 5-gallon containers of waste with the waste codes D001 (ignitable) and D005 (barium).

All containers were closed and labeled "Hazardous Waste."

There were two rows identified as containing universal waste (Picture #5); however, one row contained six 55-gallon drums of non-hazardous sewage sediment from cruise ships. The second row contained the following: a gaylord box of consumer electronics; nine boxes of batteries; one 55-gallon drum of toner cartridges; one 55-gallon drum of lamp ballasts; one 5-gallon container of electronic waste; three boxes of universal waste lamps; one 55-gallon drum of crushed universal waste lamps; and an additional four containers of universal waste. All containers were closed and properly labeled.

The inspectors identified the following waste containers in the used oil (Picture #5) designated row:

- Three 55-gallon drums of used oil staged on containment pallets. The containers were closed and properly labeled; and
- There were also five 55-gallon drums of oily scrap metal staged between the oil drums and the adjacent universal pharmaceutical waste containers.

The inspectors identified the following waste containers in the four universal pharmaceutical waste (Picture #6) rows:

- The first row contained a pallet with 18-gallon containers labeled “Universal Pharmaceutical Waste” and “Flammable/Toxic;”
- The second row contained five pallets of 5- to 18-gallon containers of universal pharmaceutical waste;
- The third row contained four pallets of 5- to 18-gallon containers of universal pharmaceutical waste. All containers were closed and properly labeled; and
- The fourth row contained 24 55-gallon drums labeled “Hazardous Waste.” EPA waste codes identified were D004 (arsenic), U002 (acetone), U010 (mitomycin C), and U015 (azaserine).

All containers were closed and labeled “Hazardous Waste.”

The inspectors identified the following waste containers in the 10-Day Transfer Waste Check-in rows (Picture #7):

- Two 55-gallon drums of waste tetrachloroethylene;
- One 55-gallon drum of toluene di-isocyanate; and
- One 15-gallon container of reagent waste.

All containers were closed and labeled “Hazardous Waste.”

The inspectors identified the following Maritime waste containers in the five Non-Hazardous waste rows (Pictures #8-10):

- One row contained two 275-gallon totes and two 55-gallon drums of cooking grease;
- The second row contained 16 55-gallon drums of oily plastic wastes;
- The third row contained 16 55-gallon drums of waste based paints;
- The fourth row contained 30 55-gallon drums of economizer wash water, crushed glass and oily wastes; and
- The fifth row contained approximately 19 55-gallon drums and six 5 to 15-gallon containers of buffered formalin.

All containers were closed and labeled.

Adjacent to the maritime waste was a 30-cubic yard roll-off container of oily wastes such as rags and absorbents (Picture #11).

Emergency equipment in the warehouse consists 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.

As noted in prior FDEP inspection reports, FDEP 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. The inspectors advised that, in accordance with 40 C.F.R. § 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 the containment pad being loaded for shipment to off-site destination facilities. Two empty drum trailers were also in the area.

### **Records Review**

The inspectors reviewed manifests, weekly inspections, training records, contingency plan, and position descriptions. Review of hazardous waste manifests for 2016 and 2017 found no violations.

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. Training records are 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.

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.

12) **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 and no violations were observed at that time.

13) **SIGNED**



for

Parvez Mallick  
Inspector and Author of Report  
Hazardous Waste Enforcement and Compliance Section



Date

14) **CONCURRENCE AND APPROVAL**



Alan Annicella, Chief  
Hazardous Waste Enforcement and Compliance Section  
Enforcement and Compliance Branch



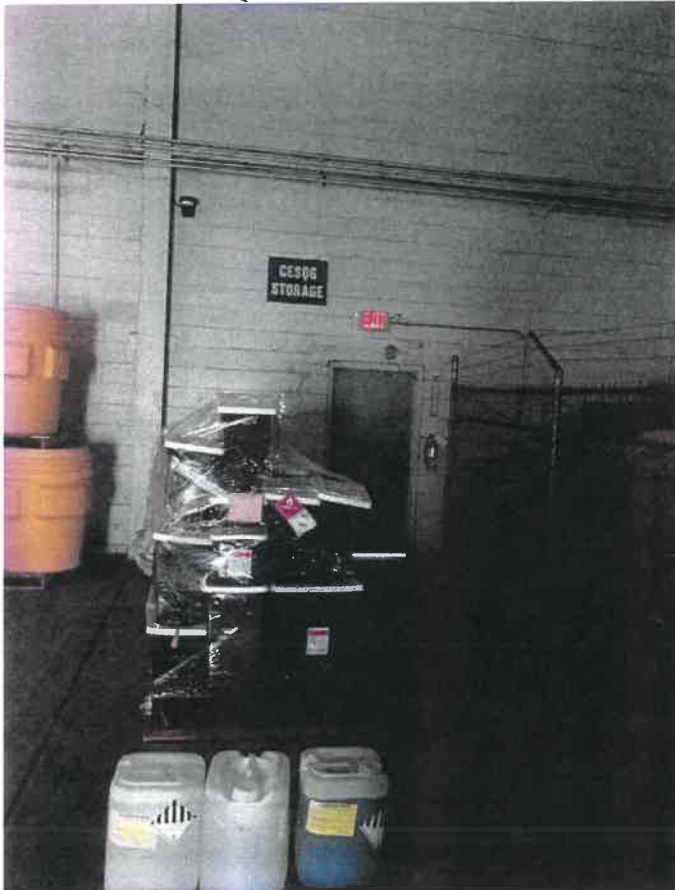
Date

## Appendix A – Inspection Pictures

Picture #1 - DEA wastes locked up in a fenced in area.



Picture #2 – CESQG wastes row next to the DEA regulated waste.





Picture #3 – CESQG wastes next to the DEA regulated waste.

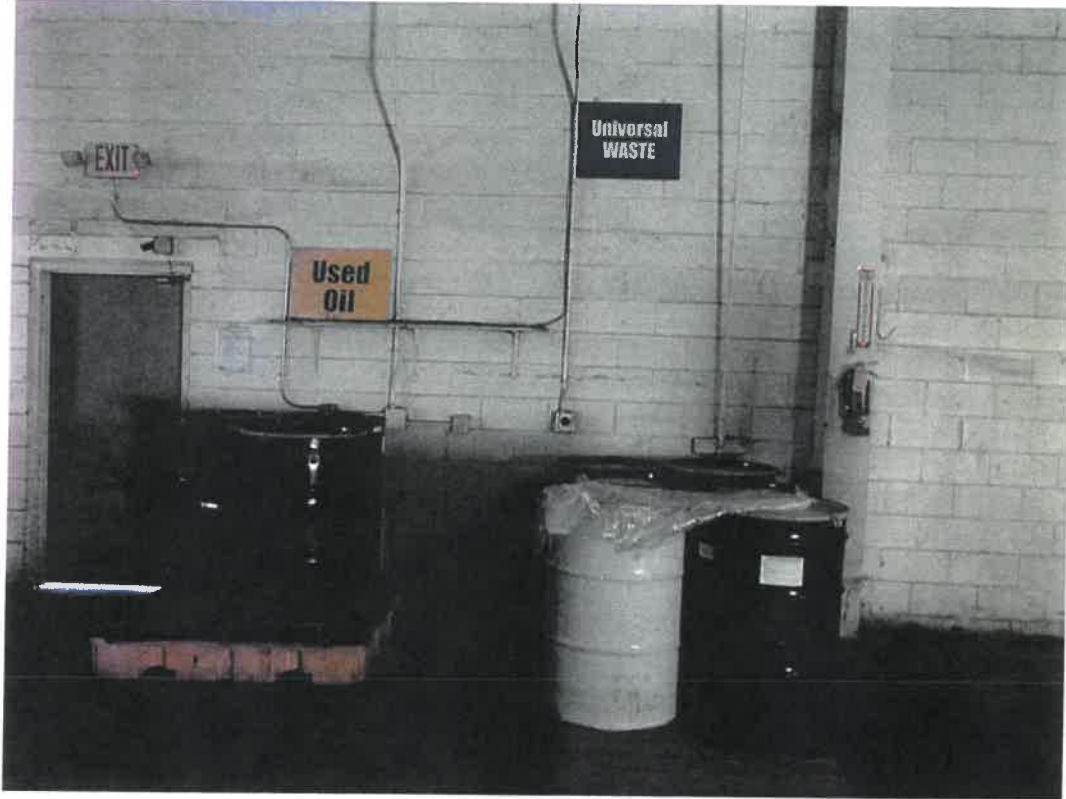


Picture #4 – CESQG wastes.





Picture #5 – Universal waste and used oil rows.



Picture #6 – Universal pharmaceutical waste rows.



Picture #7 – 10-day transfer waste rows.



Picture #8 – Non-hazardous waste containers.



Picture #9 – Containers of non-hazardous wastes.



Picture #10 – Containers of non-hazardous wastes.



Picture #11 – 30-cubic yard of oily rags roll-off container.

