

NOTICE OF POTENTIAL HAZARDOUS WASTE NON-COMPLIANCE – Page 1 of 2

FACILITY NAME Stericycle Specialty Waste Solutions		TYPE OF INSPECTION: CAV: <input type="checkbox"/> CEI: <input checked="" type="checkbox"/> CI: <input type="checkbox"/> OTHER: <input type="checkbox"/>	
ADDRESS 8505 NW 74th St		CITY Miami	STATE FL
EPA ID NUMBER FL0000702985		DATE OF INSPECTION 08/08/18	ZIP CODE 33166
FOLLOW UP CAV INSPECTION WITHIN 120 DAYS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		PAGE 1	OF 2

A hazardous waste/used oil compliance inspection was made this date, under the authority of Section 403.091, Florida Statutes (F.S.), to determine your facility's compliance with Chapter 403, F.S. and Chapters 62-730 and 62-710, Florida Administrative Code (F.A.C.). Provisions of Title 40 Code of Federal Regulations (C.F.R.) Parts 260 through 268 and 279, which are cited on this form, have been adopted by reference as the state hazardous waste and used oil rules in Chapter 62-730 and 62-710, F.A.C. The following 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 which exist at the time of this inspection.**

GENERAL REQUIREMENTS:

- Failure to ensure delivery of HW to proper HW facility § 261.5
- Failure to provide hazardous waste determination § 262.11
- Failure to notify as generator § 262.12
- Failure to use a manifest or reclamation agreement § 262.20
- Failure to provide personnel training § 265.16, 262.34
- Evidence of release(s) of waste § 265.31
- Facility exceeds 90/180 day time limit § 262.34

CONTAINER MANAGEMENT:

- Unlabeled containers § 262.34
- Undated containers § 262.34
- Leaking or bulging containers § 262.34
- Open containers § 265.173
- Inadequate aisle space § 62-730.160

RECORDKEEPING REQUIREMENTS:

- Manifests § 262.40, § 262.44
- Training records § 262.34
- Contingency Plan § 262.34
- Weekly Inspection records § 62-730.160
- Information not posted by phone § 262.34
- Authorities not notified § 262.37

USED OIL VIOLATIONS:

- Failure to label containers § 279.22
- Failure to respond to releases § 279.22
- Failure to document used oil disposal § 279.10

MATERIALS PROVIDED to assist in accomplishing corrective actions

- | | | |
|--|---|---|
| <input type="checkbox"/> DEP Small Quantity Generator Handbook | <input type="checkbox"/> EPA <i>Managing Used Oil</i> | <input type="checkbox"/> Mercury Lamp Recyclers |
| <input type="checkbox"/> EPA <i>Understanding the Hazardous Waste Rules</i> | <input type="checkbox"/> Environmental Yellow Pages | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> EPA <i>Notification of Regulated Waste Activity</i> | <input type="checkbox"/> List of HW/Used Oil Transporters | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Florida Automotive Recyclers Handbook | <input type="checkbox"/> Antifreeze Recycling Vendors | <input type="checkbox"/> Other _____ |

Florida Fact Sheets

- | | |
|--|---------------------------------------|
| <input type="checkbox"/> Antifreeze for Recycling / Waste Antifreeze | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Summary of Hazardous Waste Regulations | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Summary of Used Oil/Used Oil Filter Regulations | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Other: _____ | <input type="checkbox"/> Other: _____ |

HAZARDOUS WASTE INSPECTION EXIT INTERVIEW SUMMARY, NOTICE OF POTENTIAL VIOLATIONS
Page 2 of 2

ITEMS REQUESTED OR RECOMMENDATIONS BY THE "INSPECTOR":

- Please provide the following:
- (1) Biennial Report 2018
 - (2) UO Shipment Records for last (3) years
 - (3) Weekly container inspections
 - (4) Contingency Plan (5) Arrangements w/ local Authorities
- Corrective Actions
- Ask Space
 - ~~Evac. Map~~ Evac. Map: Hw staging Area must be identified
 - (10) day Hw transfer, facility max 10-days Not registered
 - Close Open containers (Maintain Closed Containers) UO.
 - Some containers of UPW were found to be mixed with bio-hazardous waste
 - Weekly container logs missing information.

OWNER/OPERATOR COMMENTS:

The owner/operator is hereby requested to submit in writing, within 14 days of this inspection, 1) a description of all corrective actions taken, 2) a schedule for completion of corrective actions to be taken and 3) a description of efforts to prevent recurrence of the above items to the person signing as "INSPECTOR", Florida Department of Environmental Protection, 400 North Congress Avenue, Suite 200, West Palm Beach, FL 33401. The actions taken within ___ days of this notice will be considered in determining whether enforcement, including the assessment of penalties, should be initiated.

IF YOU HAVE QUESTIONS, contact: Hayla Acosta at (561) 681-6600.

"INSPECTOR" (signature): [Signature] Date: 8/8/18

The undersigned person hereby acknowledges that he/she received a copy of this notice and has read and understands the same.

SIGNATURE: <u>Kevin O'Donnell</u>	PRINTED NAME: <u>KEVIN O'DONNELL</u>
TITLE: <u>REGIONAL OPERATIONS MANAGER</u>	DATE: <u>8-8-2018</u>

From: [Acosta, Kayla](#)
To: ["KODonnell@STERICYCLE.com"](mailto:KODonnell@STERICYCLE.com)
Cc: Mallick.Parvez@epa.gov; ["Christopher.Hendrickson@STERICYCLE.com"](mailto:Christopher.Hendrickson@STERICYCLE.com); [Blandin, Norva](#)
Subject: RE: Stericycle Miami EPA ID FL0000702985 - Exit Interview
Date: Friday, August 10, 2018 2:32:00 PM
Attachments: [image001.png](#)

Good afternoon Mr. O'Donnell,

As mentioned, I am providing you a typed version and follow-up Exit Interview. A final inspection report will follow. On Wednesday August 08, 2018, the Florida Department of Environmental Protection and the Environmental Protection Agency conducted a joint Compliance Evaluation Inspection at your facility. The following is a list of items that are requested or recommended by the inspectors:

- Container Management. The facility keeps records of weekly Hazardous Waste container inspections; however the number of containers were not being documented and inadequate aisle space was observed during the inspection and not documented. Please use the template provided and submit to the Department a scanned copy of the weekly container log after 2-4 weeks of documentation.
 - In addition, please submit a photo demonstrating adequate aisle space for hazardous waste containers.
- Contingency Plan. The contingency plan includes an Evacuation Plan and diagrams of the facility; however the diagrams are missing the locations of the hazardous waste staging area. Please include an updated diagram with the locations of the hazardous waste staging areas. Please submit a scanned copy or photo of the revised diagrams.
- The notification letter to local authorities on page 13 of the contingency plan lists the contact of a former employee who no longer works for the company. The notification letters to local authorities will need to be updated and resubmitted to local authorities listed on page 12 along with a copy of the contingency plan and the revised diagrams within the Evacuation Plan.
 - Please send me a scanned copy of the updated notification to local authorities with certified mail receipts once they are sent.
- Universal Waste Management. Two containers of Universal Waste Batteries were observed to be open. Please ensure that all containers remain closed at all times, unless you are adding/removing from the container.
- A Hazardous Waste Transfer Facility that stores waste for more than 10 days is subject to the permitting requirements for a hazardous waste storage facility. It was observed through the record review of the hazardous waste manifests that hazardous waste was being stored at your facility for more than 10 days without a permit.
- During the inspection, it was observed that Universal Pharmaceutical Waste (UPW) was being

commingled with biomedical waste within the same container. UPW and biomedical waste are subject to separate rules and regulations and cannot be comingled and placed into the same container.

Please submit any requested documentation or photos within **14 days**. Please contact me with any questions. The Department will be in contact with you if any additional items are needed and send you the final inspection report once it is complete.

Best Regards,



Kayla M. Acosta

Environmental Specialist I

Florida Department of Environmental Protection

Southeast District - West Palm Beach

3301 Gun Club Road, MSC 7210-1

West Palm Beach, FL 33406

Kayla.Acosta@floridadep.gov

Office: 561.681.6636

From: Acosta, Kayla

Sent: Friday, August 10, 2018 10:16 AM

To: 'KODonnell@STERICYCLE.com' <KODonnell@STERICYCLE.com>

Cc: Mallick.Parvez@epa.gov; 'Christopher.Hendrickson@STERICYCLE.com' <Christopher.Hendrickson@STERICYCLE.com>; Blandin, Norva <Norva.Blandin@FloridaDEP.gov>

Subject: Stericycle Miami EPA ID FL0000702985 - Exit Interview

Good morning Mr. O'Donnell,

Thank you for assisting us in the compliance evaluation inspection on 08/08/18. I will provide you a typed version of the exit interview document later today. If you have any additional questions or concerns please feel free to contact me.

Best Regards,



Kayla M. Acosta

Environmental Specialist I

Florida Department of Environmental Protection

Southeast District - West Palm Beach

3301 Gun Club Road, MSC 7210-1

West Palm Beach, FL 33406

Kayla.Acosta@floridadep.gov

Office: 561.681.6636