



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

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**FACILITY INFORMATION:**

**Facility Name:** Daniels Sharpsmart Inc  
**On-Site Inspection Start Date:** 09/13/2018      **On-Site Inspection End Date:** 09/13/2018  
**ME ID#:** 38737      **EPA ID#:** FLD984171850  
**Facility Street Address:** 10705 Rocket Blvd Ste 111, Orlando, FL 32824-8500  
**Contact Mailing Address:** 111 W Jackson Blvd Ste 1900, Chicago, IL 60604  
**County Name:** Orange      **Contact Phone:** (773) 449-9843

**NOTIFIED AS:**

Non-Handler  
Transporter

**INSPECTION TYPE:**

Routine Inspection for Transporter facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Edward Rysak, Inspector  
Other Participants: Kaelyn Malone, Inspector; Walter Adams, General Manager

**LATITUDE / LONGITUDE:** Lat 28° 24' 38.8187" / Long 81° 23' 24.045"

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

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On 09/13/2018, Edward Rysak and Kaelyn Malone, Florida Department of Environmental Protection (FDEP, Department), accompanied by Walter Adams, General Manager, inspected Daniels Sharpsmart Inc for compliance with state and federal hazardous waste and universal waste regulations. The facility originally notified the Department of its waste activities and was issued EPA ID FLD984171850 on 11/30/2012. The facility most recently re-notified of its waste activities and the same EPA ID number was re-issued on 03/05/2018.

The facility has been at this location since March 2010 and currently employs only two workers that are involved with the universal pharmaceutical waste handling process. Plant operating hours are 4:00 am – 9:00 pm, Monday through Friday. The facility is closed on weekends. The facility is connected to the municipal wastewater collection and potable water systems. The property is owned by SBJ RESCH, located at 2900 East 7th Ave, Ste 200, Tampa, FL 33605.

**INSPECTION HISTORY**

The facility was most recently inspected by the Department for compliance with state and federal hazardous waste and universal waste regulations on 12/14/2012. No violations were noted during this inspection.

**Process Description:**

Daniels Sharpsmart is a biomedical waste management facility which also conducts universal pharmaceutical waste (UPW) transfer and transportation services. The facility takes in UPW from medical facilities, repackages the UPW, and transports it to a treatment facility for incineration. All incoming biomedical and UPW wastes are sorted immediately upon entering the facility and managed in separate areas. A digital inventory system is used for tracking both biomedical and UPW wastes. A scale is used to keep track of the total volume of wastes passing through the facility. Only biomedical and UPW wastes are managed at the facility as of the date of the inspection.

Biomedical waste and UPW are brought to the facility in either disposable containers or lined reusable

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containers. The liners are thick, transparent plastic bags. The bags are tied/sealed closed with a zip tie and removed from the containers. If the bags' contents appear to have any liquid components, the bags and all contents are placed into 55-gallon poly drums. If the bags' contents are solid only, the bags and all contents are placed into lined, triple-walled cubic yard fiberboard boxes. The drums and cubic yard boxes are labeled with a start date of waste accumulation, the words "universal pharmaceutical waste," DOT hazard indication placards, and secured to pallets for shipment offsite. No issues were noted with any of the containers in the UPW waste accumulation area.

According to Mr. Adams, the contents of the liner bags are not removed and the bags are not opened once they are sealed and removed from their original reusable waste containers. The reusable containers are wiped down with bleach and/or a biocide disinfectant and the wipes are packaged with the UPW for disposal. The disinfectants being used at the time of inspection had a pH of 2.4 – 2.7 standard units and 11.4 standard units according to the products' safety data sheets, which were available onsite for review during the inspection. Disposable containers and their contents are simply logged, weighed, labeled, then stacked and secured on pallets to be sent offsite for incineration similar to the reusable container packaging process.

## RECORDS

Logs of the inventory system for tracking the total waste transfer volume are maintained onsite and were available for review. Uniform hazardous waste manifests were also available for review and no issues were noted. The facility's waste transporter is Freehold Cartage and the destination facility is Heritage Thermal Services, Inc, located at 1250 Saint George Street, Unit 1, East Liverpool, OH 43920-3461, as of the date of the inspection. The facility's annual universal waste handler registration was most recently issued on 02/16/2018 and a copy was on display at the facility. Employee universal waste training documentation was also available for review.

## Conclusion:

Daniels Sharpsmart was inspected as a transporter and as a Large Quantity Handler (LQH) of universal pharmaceutical waste and was in compliance at the time of inspection.

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**6.0 - Transporters 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.

**Note: Checklist items with shaded boxes are for informational purposes only.**

Item No.	Transporter Requirements	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)	✓		
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1)  <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)			✓
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)			✓
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)			✓
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	Rail Transporters	Yes	No	N/A
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓

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Item No.	Water (Bulk) Transporters	Yes	No	N/A
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓
Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalculation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> The date the waste is accepted	✓		
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)(a)? 62-730.150(2)(a)	✓		
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)	✓		

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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.

Edward Rysak	Inspector
<b>Principal Inspector Name</b>	<b>Principal Inspector Title</b>

<i>E. Rysak</i>	DEP	10/12/2018
<b>Principal Inspector Signature</b>	<b>Organization</b>	<b>Date</b>

Kaelyn Malone	Inspector
<b>Inspector Name</b>	<b>Inspector Title</b>

DEP
<b>Organization</b>

Walter Adams	General Manager
<b>Representative Name</b>	<b>Representative Title</b>

Daniel's Sharpsmart Inc
<b>Organization</b>

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:**

<b>Approver:</b> <u>David Smicherko</u>	<b>Inspection Approval Date:</b> <u>10/12/2018</u>
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