



FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

Central District Office
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

November 10, 2021

Matt Mulligan, Facility Manager
Clean Earth Specialty Waste Solutions, Inc
314 B W Landstreet Rd
Orlando, Florida 32824
mmulligan@harsco.com

Re: Cleanearth Specialty Waste Solutions Inc
HW Facility ID #FLR000006353
Orange County

Dear Mr. Mulligan:

Department personnel conducted an inspection of the above-referenced facility on August 18, 2021. Based on the information provided during and after the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records, and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Miranda Rothenberger at 407-897-4301 or via e-mail at Miranda.Rothenberger@FloridaDEP.gov.

Sincerely,

A handwritten signature in black ink that reads "Daniel K. Hall".

Daniel K. Hall, Manager
Central District
Florida Department of Environmental Protection

Enclosure: August 18, 2021 Inspection Report

cc: T.J. McCaustland, TMcCaustland@Harsco.com
Miranda Rothenberger, FDEP



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

FACILITY INFORMATION:

Facility Name: Cleaneath Specialty Waste Soutlions Inc
On-Site Inspection Start Date: 08/18/2021 **On-Site Inspection End Date:** 08/18/2021
ME ID#: 56404 **EPA ID#:** FLR000006353
Facility Street Address: 314 W Landstreet Rd #B, Orlando, Florida 32824-7803
Contact Mailing Address: 314B Landstreet Rd, Orlando, Florida 32824
County Name: Orange **Contact Phone:** (407) 855-0141

NOTIFIED AS:

Transfer Facility, Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Other Status:** Household Hazardous Waste + Very SQG **Transporter:** Commercial Waste, Transfer Facility **Used Oil:** Oil Filters **Other:** Person Authorized to Mange Very Small Quantity Waste Generated at Other Facilities **Universal Waste: Indicate types of UW generated and/or accumulated at the facility: Generate/Accumulate:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Transport:** Batteries, Pesticides **Transfer Facility:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** 5000 kg or more; Large Quantity Handler (LQH)

INSPECTION TYPE:

Routine Inspection for Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Miranda Rothenberger, Inspector
Mackenzie Black, Inspector; Aaron Cayson, Field Manager; Jason Gross, Field
Other Participants: Supervisor

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

NAIC: 562112 - Hazardous Waste Collection

TYPE OF OWNERSHIP: Private

Introduction:

On August 18, 2021, Miranda Rothenberger and Mackenzie Black, Florida Department of Environmental Protection (FDEP or Department) inspected Cleaneath Specialty Waste Solutions Inc (Cleaneath or Facility) for compliance with state and federal hazardous waste regulations. The facility was represented by Aaron Cayson, Field Manager, and Jason Gross, Field Supervisor. Warehouse hours are from 6:00 am to 6:00 pm Monday – Friday and office hours are from 8:00 am – 4:30 pm Monday – Friday. There are 12 employees and 26 vehicles on site for business operations. No fueling or maintenance activities on the vehicles takes place on site.

The facility has operated as Cleaneath at this location since April 4, 2020. Previously the facility was registered as Stericycle Specialty Waste Solutions Inc. The property is owned by Dr. Robert Baker, 424 Riverside Drive, Battle Creek, Michigan 49015. The facility most recently notified the state of hazardous waste activities on February 25, 2021 and maintains EPA identification number FLR000006353.

Cleaneath'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.

Inspection History (5 years)

Cleanearth Specialty Waste Solutions Inc Inspection Report

Inspection Date: 08/18/2021

The facility was last inspected as Stericycle Specialty Waste Solutions Inc on December 14, 2017 for compliance with state and federal hazardous waste transporter requirements and was found to be in compliance.

The facility was inspected as Stericycle Specialty Waste Solutions Inc on October 26, 2016 for compliance with state and federal hazardous waste transporter requirements and was found to be in compliance.

Process Description:

The facility is comprised of a 100,000-square foot 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 non-hazardous and hazardous waste pharmaceuticals and floor space that has been designated for specific waste types. At the time of the inspection the warehouse had rows for 10-day waste, universal waste (UW), used oil, and non-hazardous waste as well as a staging area and an unloading area.

Prior to picking up hazardous waste, generators submit a waste profile to Cleanearth. The facility then submits the profile to the appropriate disposal facility for approval. If the disposal facility is willing to accept the waste, Cleanearth provides the generator with a description of the waste and an acceptance letter. Cleanearth then schedules a date and time for transport. The waste is transported to Cleanearth'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 sides 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.

At the time of the inspection the following containers were present in the pharmaceutical's storage area:

- Twenty-one boxes of various sizes
- Ten 55-gallon containers
- Two pallets with nine containers, each, grouped together with plastic wrap
- One pallet with six containers grouped together with plastic
- One pallet with twelve containers grouped together with plastic

All waste managed in this area at the time of the inspection was labelled "non-hazardous waste pharmaceuticals".

The unloading area is just outside the fencing of the pharmaceutical storage area. Emergency equipment noted included a bullhorn, spill kit, fire extinguisher, and "No Smoking" sign. At the time of the inspection the following containers were present:

- Eight 30-gallon containers labelled hazardous waste
- Three 55-gallon containers labelled hazardous waste
- 15 containers labelled universal waste lamps
- Ten boxes, of various sizes, labelled hazardous waste
- One 15-gallon container labelled hazardous waste

At the time of the inspection the following containers were present in the staging area:

- Twelve 55-gallon containers labelled non-hazardous waste
- Three 5-gallon containers labelled non-hazardous waste
- 10 boxes labelled universal waste lamps
- One 5-gallon bucket labelled universal waste lamps
- Four 55-gallon containers labelled hazardous waste
- Seven pallets labelled non-hazardous waste
- One pallet labelled hazardous waste

There were twenty 55-gallon containers labelled hazardous waste in the 10-day transfer area; eighteen

Cleanearth Specialty Waste Solutions Inc Inspection Report

Inspection Date: 08/18/2021

containers of various sizes labelled used oil in the used oil storage row; 336 non-hazardous waste containers of various sized stored in the designated non-hazardous waste rows; and seventy containers of universal waste stored in the designated universal waste row.

During the inspection there were six trailers stored on the concrete slab. One was full of hazardous waste ready for transport, two were partially filled, two were empty, and one was acting as a storage area for empty containers. Additionally, there were two trailers being offloaded and three supply trucks. On the south end of the property were six more trailers; one was empty, two were designated for supplies, and three were full of non-hazardous waste ready for transport.

Records

The 10-day storage area log was reviewed and found to be accurate.

The certificate of liability insurance previously submitted to the Department expired June 30, 2021. An updated policy, that is current, was received from Mr. McCaustland on September 8, 2021.

Training records for all staff was received via email from Mr. McCaustland on September 23, 2021. A review of 2019 – present found the records to be in compliance. Most trainings are provided by Cleanearth, on occasion training seminars are provided by other organizations.

The current contingency plan is identified as Revision 2, dated August 20, 2021. Matt Mulligan, Facility Manager, is listed as the Primary Emergency Coordinator and Mr. Gross is listed as a secondary contact. Local authority notifications were last sent in 2015 and the facility is working towards sending updated ones with the revised plan.

Receiving manifests for the last three years were reviewed in random intervals and found to be in compliance. Designated facilities for the various waste streams managed are as follows:

Hazardous Waste

- Clean Earth of Alabama (ALD981020894), Glencoe, Alabama
- Allworth, LLC (ALD094476793), Birmingham, Alabama

Universal Waste

- AERC (FLD984262782), West Melbourne, Florida

Non-hazardous Waste and Non-hazardous Pharmaceuticals

- Stericycle, Inc., Apopka, Florida
- Stericycle Specialty Waste Solutions, Inc. (FL0000702985), Miami, Florida
- US Ecology Tampa (FLD981932494), Tampa, Florida

Used Oil/Filters and Wastewater

- Aqua Clean Environmental (FLR000034033), Lakeland, Florida
- Green Wave Oil Recovery, LLC, Fort Lauderdale, Florida

Conclusion:

Cleanearth Specialty Waste Solutions Inc was inspected on August 18, 2021 for compliance with state and federal hazardous waste regulations and was in compliance at the time of the inspection.

Inspection Date: 08/18/2021

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.

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


Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
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	✓		

Cleanearth Specialty Waste Solutions Inc Inspection Report

Inspection Date: 08/18/2021

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

<u>Miranda Rothenberger</u> Principal Investigator Name	<u>Inspector</u> Principal Investigator Title
 <hr/> Principal Investigator Signature	<u>DEP</u> Organization
	<u>10/11/2021</u> Date

<u>Mackenzie Black</u> Inspector Name	<u>Inspector</u> Inspector Title
	<u>DEP</u> Organization

<u>Aaron Cayson</u> Representative Name	<u>Field Manager</u> Representative Title
	<u>Cleanearth Specialty Waste Solutions Inc</u> 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.

<u>Jason Gross</u> Representative Name	<u>Field Supervisor</u> Representative Title
	<u>Cleanearth Specialty Waste Solutions Inc</u> 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: <u>Daniel K. Hall</u>	Inspection Approval Date: <u>10/14/2021</u>
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