

## **RCRA Inspection Report**

### **1) Inspector and Author of Report**

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Enforcement and Compliance Assurance Division  
Chemical Safety and Land Enforcement Branch  
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### **2) Facility Information**

West Palm Beach VA Medical Center  
7305 N. Military Trail  
West Palm Beach, FL 33410

EPA ID#: FLR000005694  
NAICS #: 622110 – General Medical and  
Surgical Hospitals

### **3) Responsible Officials**

Yolanda Stewart  
Green Environmental Management Services (GEMS) Program Manager  
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### **4) Inspection Participants**

Yolanda Stewart, West Palm Beach VA Medical Center  
Joe Scaramuzzino, West Palm Beach VA Medical Center  
Austin Mazur, West Palm Beach VA Medical Center  
Lyumma Archeval, West Palm Beach VA Medical Center  
Sandy Jeudy, West Palm Beach VA Medical Center  
Mike Lettern, West Palm Beach VA Medical Center  
Clarence Parrish, West Palm Beach VA Medical Center  
Robert Shelton, West Palm Beach VA Medical Center  
Julia Spence, West Palm Beach VA Medical Center  
Christian Caiafa, West Palm Beach VA Medical Center  
Zach Orr, West Palm Beach VA Medical Center  
Luz Maldonado, West Palm Beach VA Medical Center  
Duy Huynh, West Palm Beach VA Medical Center  
Kaitlyn Edwardo, Florida Department of Environmental Protection (FDEP)  
Bailey Daniels, FDEP  
Jeff Gregg, FDEP  
Kayla Acosta, U.S. Environmental Protection Agency (USEPA)

### **5) Date of Inspection**

February 4, 2025, at 9:00 A.M.

## 6) Applicable Regulations<sup>1</sup>

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, and rules 62.710.210 -.901, and 62-730 *et seq.* of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.).

Pursuant to Fla. Admin. Code Ann. r. 62-730.020(1) [40 C.F.R. § 260.10], a small quantity generator is a generator who generates the following amounts in a calendar month: (1) Greater than 100 kilograms (220 lbs) but less than 1,000 kilograms (2200 lbs) of non-acute hazardous waste; and (2) Less than or equal to 1 kilogram (2.2 lbs) of acute hazardous waste listed in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.31] or Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.33(e)] of this chapter; and (3) Less than or equal to 100 kilograms (220 lbs) of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous waste listed in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.31] or Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.33(e)] of this chapter.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16]), SQG may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, as required by [STATE COUNTERPART] [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16] (hereinafter referred to as the “SQG Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.501(d)(1)], a healthcare facility who manages non-creditable hazardous waste pharmaceuticals and potentially creditable hazardous waste pharmaceuticals that are not destined for a reverse distributor is subject to Sections 266.502 and 266.505 through 266.508 for those materials in lieu of parts 262 through 265.

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<sup>1</sup> As the State’s authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.501(d)(2)], a healthcare facility who manages potentially creditable hazardous waste pharmaceuticals that are prescription pharmaceuticals and destined for a reverse distributor is subject to Sections 266.502(a), 266.503, 266.505 through 266.507 for those materials in lieu of parts 262 through 265.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

## 7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine West Palm Beach VA Medical Center's (known herein after as "WPB VAMC" or "the facility") compliance with the applicable requirements of RCRA and the corresponding Florida regulations. This was an EPA lead inspection.

## 8) **Facility Description**

WPB VAMC provides healthcare services to Veterans and their families. This facility also conducts innovative research to advance health care for Veterans and the nation. Research areas include COVID-19, cardiology, gastroenterology, mental health, neuromusculoskeletal medicine, oncology, pharmacology, pulmonary and critical care medicine. WPB VAMC is also a training facility for future healthcare providers.

WPB VAMC began operations in 1995. The facility is comprised of 67 acres of land and employs approximately 2,800 employees with approximately 1200-1500 employees who handle hazardous waste. This facility operates 24 hours a day and seven days a week.

WPB VAMC first registered as a very small quantity generator of hazardous waste on February 5, 1997. On July 18, 2007, the facility re-notified as a small quantity generator (SQG). The facility's most recent hazardous waste notification was submitted on November 8, 2019, and the facility notified as a SQG of hazardous waste. According to the most recent notification, the facility generates hazardous waste pharmaceuticals, used oil, universal waste, and the following hazardous wastes:

| <b>Waste Type</b>                                            | <b>EPA Waste Code(s)</b>           |
|--------------------------------------------------------------|------------------------------------|
| Characteristic of Ignitability                               | D001                               |
| Characteristic of Corrosivity                                | D002                               |
| Characteristic of Reactivity                                 | D003                               |
| Characteristic of Toxicity                                   | D005, D007, D009, D010, D011, D038 |
| Acutely Toxic Waste – Discarded Commercial Chemical Products | P001, P012, P075                   |

| Waste Type                                           | EPA Waste Code(s)                                                           |
|------------------------------------------------------|-----------------------------------------------------------------------------|
| Toxic Waste – Discarded Commercial Chemical Products | U010, U034, U035, U058, U129, U132, U150, 188, U200, U205, U206, U239, U248 |

## 9) **Previous Inspection History**

FDEP has conducted one RCRA CEI at the subject facility between 1997 and 2025 and found no violations during that inspection, which was conducted on February 5, 1997.

## 10) **Opening Conference**

On February 4, 2025, EPA inspector Kayla Acosta, accompanied by FDEP Environmental Consultant and Inspector Kaitlyn Edwards, FDEP Environmental Manager Bailey Daniels, and FDEP Environmental Manager for the Division of Waste Management Jeff Gregg, arrived at WPB VAMC at approximately 9:00 AM. The inspectors were immediately received by WPB VAMC personnel and escorted to a conference room. The inspectors were joined by Joe Scaramuzzino, Chief of Safety; Clarence Parrish, Chief of Environmental Management Services; Yolanda Stewart, GEMS Program Manager; Sandy Jeudy, Accreditation Specialist; Lyumma Archeval, Chief of High Reliability and Quality Management; Robert Shelton, Safety Specialist; and Julia Spence, Executive Director for the opening conference. The inspectors introduced themselves, showed their credentials to facility personnel, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (iPad) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

The facility personnel provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before the facility representatives led the inspectors on a tour of the facility operations.

## 11) **Inspection Observations**

### Laboratory Services (Hematology and Histology):

The inspectors were introduced to Luz Maldonado, Laboratory Manager who provided an overview of the laboratory services and explained that on average the laboratories conduct approximately two million laboratory tests per year. The inspectors observed safety data sheets, eye wash stations, emergency shower stations, and fire extinguishers throughout the Laboratory Services area.

#### HEMATOLOGY

The Hematology laboratory is used to analyze patient blood through a Beckman Coulter DxH Slide Maker Stainer. This process generates waste methanol. The WPB VAMC safety team comes to the laboratories twice per week to collect hazardous waste satellite accumulation area (SAA) containers and moves them to the facility's less than 180-day central accumulation area (CAA). The inspectors observed the following hazardous waste (Photos 1):

- Two 1-gallon containers of methanol waste. The containers were both closed and labeled "Hazardous Methanol Waste." One container was missing an indication of the hazard while the other was marked with an NFPA diamond indicating the hazards of the contents.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i)-(ii)], a generator must mark or label its container with the following: (i) The words "Hazardous Waste" and; (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).**

Facility personnel added an NFPA Diamond to the container missing the indication of the hazard of the contents and the inspectors explained that the label should read "Hazardous Waste," and the contents can be described ("Hazardous Waste—Methanol" for example).

#### HISTOLOGY GROSSING AREA:

The Histology Grossing Area is a prepping area for the Histology Laboratory where patient tissue is examined through microscope. Xylene waste and reagent waste is generated and stored in this area. The inspectors observed the following waste:

- One 1-gallon closed containers of 10% formalin. The containers were labeled as Non-RCRA Regulated Waste.
- Two 2-gallon closed containers of 10% formalin. The containers were labeled as Non-RCRA Regulated Waste.

The inspectors requested the SDS for the 10% formalin. During the records review the SDS was provided, and it appears the waste is non-hazardous waste. No hazardous waste was observed in this area.

#### BA302-Basement:

Universal waste lamps are stored in the hospital basement in a caged area. Universal waste lamps are shipped offsite monthly. A spill kit and fire extinguishers were observed in this area. The inspectors observed the following universal waste (Photos 2-3):

- One box of 2-ft used lamps. The container was labeled “Universal Waste,” dated January 2025, and open.
- Seven cardboard boxes 4-ft used lamps. Three cardboard boxes were open, and one container was missing a universal waste label and date. The oldest date observed was January 24, 2025.

**Pursuant to Fla. Admin. Code Ann. r. 62-737.400(5) [40 C.F.R. § 273.13(d)(1)], a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.**

**Pursuant to Fla. Admin. Code Ann. r. 62-737.400(5)(b) [40 C.F.R. § 273.14(e)], each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)”.**

**Pursuant to Fla. Admin. Code Ann. r. 62-737.400(7) [40 C.F.R. § 273.15(c)], a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.**

Open universal waste containers were promptly closed by facility personnel who also labeled those containers that were missing labels and a date.

#### Universal Waste Battery Storage:

Universal waste batteries are stored outside in a shed adjacent to the two CAA trailers. Universal waste batteries are shipped offsite every two months. The inspectors observed the following universal waste (Photos 4-5):

- Two blue bins storing universal waste lead-acid batteries. The containers were labeled with the words “Universal Waste—Batteries” and dated January 7, 2025.
- One 5-gallon container of spent lead acid batteries labeled “Universal Waste—Batteries” and dated January 7, 2025.
- 19 cardboard boxes containing used lithium-ion batteries that were closed but missing universal waste labels. Accumulation start dates for lead acid batteries are placed on the

blue bins in front of the cardboard boxes for tracking earliest accumulation start dates and tracking by shipping documents.

- One container of non-PCB ballasts managed as universal waste, but the container did not have a universal waste label or accumulation start date.
- Two 5-gallon containers of lithium-ion batteries. The containers were labeled “Universal Waste—Batteries” and dated January 7, 2025.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.14(a)], Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: “Universal Waste—Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”**

Containers of universal waste batteries that were accessible and were missing a universal waste label were labeled by facility personnel during the inspection. Other containers of universal waste batteries which were missing labels were not accessible because they were stored behind other universal waste containers and required moving containers out to be accessible. The inspectors requested photos of those containers with universal waste labels to be sent after the inspection.

#### Less than 180-Day CAAs:

WPB VAMC manages two CAAs for hazardous waste which are stored in two trailers located adjacent to the storage shed for universal waste batteries. CAA 1 stores all hazardous waste generated at the facility except for hazardous waste pharmaceuticals which are stored next door in the second trailer CAA 2. Both trailers are explosion proof with a sprinkler system and spill kit located next to the trailers. The entire facility is a No Smoking facility with “No Smoking” signs posted throughout the facility and designated smoking areas located outside and away from the CAAs. For emergencies the facility uses a Public Address system, emergency distribution system via text, two-way radios, and fire alarms that connect with the local fire department.

#### CAA 1:

The inspectors observed inadequate aisle spacing for hazardous waste containers stored in CAA 1 (Photos 6-7). The inspectors therefore could only document the containers that were visible at the time of the inspection. All containers that were visible and accessible were closed, labeled “Hazardous Waste,” and dated with an accumulation start date that did not exceed the 180-day accumulation time limit for SQGs. The earliest accumulation start date observed was January 6, 2025. Some containers were missing an indication of the hazard of the contents and were identified below. The inspectors observed the following waste:

- One 55-gallon container of hazardous waste alcohol. Missing an indication of the hazard of the contents.
- Three 8-gallon containers labeled “Hazardous Waste,” closed, dated, and one of these containers were missing an indication of the hazard of the contents.
- Two 55-gallon containers of hazardous waste xylene. Missing an indication of the hazard of the contents.

- One 60-gallon container of hazardous waste DAB. No issue.
- 11 1ft by 1ft cardboard boxes of hazardous waste DAB waste. No issues.
- One 10-gallon container of silver nitrate. Missing an indication of the hazard of the contents.
- One 55-gallon container of hazardous waste sodium hydroxide. Missing an indication of the hazard of the contents.
- Three 30-gallon containers of universal waste pesticides. Closed, labeled “Universal Waste—Pesticides” and dated. No dates were beyond one year.
- One 5-gallon container of hazardous waste mercury filters. Missing an indication of the hazard of the contents.
- 16 5-gallon containers of universal waste pesticides. Inspectors could not get to each container to observe if they were all labeled. Those that were visible appeared to be closed and had labels for “Universal Waste—Pesticides” and were dated.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b)(6)(i)(B)], a small quantity generator must mark or label its containers with the following: (B) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).**

**Pursuant to Fla. Admin. Code Ann. R. 62-730.160 (1) [40 C.F.R. § 262.16(b)(8)(v)], the small quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.**

**Pursuant to Fla. Admin. Code Ann. R. 62-730.160 (4), generators required to inspect containers under 40 C.F.R. 262.16(b)(2)(iv) and 262.17(a)(1)(v), [as adopted in subsection 62-730.160(1), F.A.C.] shall maintain adequate aisle space between containers of hazardous waste to allow for inspection of the condition and labels of the individual containers.**

Facility personnel marked hazardous waste containers that were easily accessible with indication of the hazards of the contents during the inspection. During the exit interview the inspectors requested photos be emailed showing the remaining hazardous waste containers marked with an indication of the hazard of the contents and staged to provide adequate aisle space.

## CAA 2—Hazardous Waste Pharmaceuticals:

Hazardous waste pharmaceuticals are stored in a separate trailer next to CAA1. The inspectors observed the following waste (Photos 8-10):

- 28 8-gallon containers of pharmaceutical waste. Each container was closed and labeled “Hazardous Waste” instead of “Hazardous Waste Pharmaceuticals” and were not dated.

The facility ships off hazardous waste pharmaceuticals monthly and were able to confirm that hazardous waste pharmaceuticals are not accumulated past one year. The inspectors provided compliance assistance on the requirements for hazardous waste pharmaceuticals including the proper labeling and three options for tracking accumulation start dates.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(e)] labeling containers used to accumulate non-creditable hazardous waste pharmaceuticals at healthcare facilities. A healthcare facility must label or clearly mark each container of non-creditable hazardous waste pharmaceuticals with the phrase “Hazardous Waste Pharmaceuticals.”**

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(f)(2)(i)-(iii)], a healthcare facility that accumulates non-creditable hazardous waste pharmaceuticals on-site must demonstrate the length of time that the non-creditable hazardous waste pharmaceuticals have been accumulating, starting from the date it first becomes a waste. A healthcare facility may make this demonstration by any of the following methods listed in 40 C.F.R. § 266.502(f)(2)(i)-(iii).**

During the exit interview, the inspectors requested photos demonstrating containers storing hazardous waste pharmaceuticals were properly labeled and dated.

## Maintenance Shop:

The maintenance shop is located near to the water tower. This shop is used to conduct maintenance on vehicles and equipment. The inspectors observed the following waste (Photos 11-13):

- Two (2) 55-gallon drums for used oil. The containers were closed and labeled used oil.
- One (1) 5-gallon container of spent aerosol cans labeled “Universal Waste.”

The facility representatives stated that spent aerosol cans are managed as hazardous waste and not universal waste. The inspectors explained that if the spent aerosol cans are being managed as hazardous waste, then the container would need a hazardous waste label and an indication of the hazard of the contents.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i)-(ii)], a generator must mark or label its container with the following: (i) The words “Hazardous Waste” and; (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard**

**statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).**

A photo demonstrating the correct hazardous waste label and indication of hazard for the spent aerosol can container was requested during the exit interview.

Pharmacy BB-121:

The inspectors met with Duy Huynh, Pharmacist who escorted the inspectors throughout the pharmacy areas.

IV Room and Compounding:

This area is used to prepare medications and IVs for patients. The inspectors observed three 8-gallon black containers storing pharmaceutical waste (Photo 14). The containers were closed but labeled "Hazardous Waste" instead of "Hazardous Waste Pharmaceuticals" and did not have an accumulation start date.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(e)] labeling containers used to accumulate non-creditable hazardous waste pharmaceuticals at healthcare facilities. A healthcare facility must label or clearly mark each container of non-creditable hazardous waste pharmaceuticals with the phrase "Hazardous Waste Pharmaceuticals."**

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(f)(2)(i)-(iii)], a healthcare facility that accumulates non-creditable hazardous waste pharmaceuticals on-site must demonstrate the length of time that the non-creditable hazardous waste pharmaceuticals have been accumulating, starting from the date it first becomes a waste. A healthcare facility may make this demonstration by any of the following methods listed in 40 C.F.R. § 266.502(f)(2)(i)-(iii).**

In-patient Dispensing:

This area is for the dispensing of medication for patients that are receiving in-patient care. The inspectors observed two 8-gallon black containers storing pharmaceutical waste (Photo 15-16). The containers were closed but labeled "Hazardous Waste" instead of "Hazardous Waste Pharmaceuticals" and did not have an accumulation start date.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(e)] labeling containers used to accumulate non-creditable hazardous waste pharmaceuticals at healthcare facilities. A healthcare facility must label or clearly mark each container of non-creditable hazardous waste pharmaceuticals with the phrase "Hazardous Waste Pharmaceuticals."**

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(f)(2)(i)-(iii)], a healthcare facility that accumulates non-creditable hazardous waste pharmaceuticals on-site**

**must demonstrate the length of time that the non-creditable hazardous waste pharmaceuticals have been accumulating, starting from the date it first becomes a waste. A healthcare facility may make this demonstration by any of the following methods listed in 40 C.F.R. § 266.502(f)(2)(i)-(iii).**

**Out-patient Dispensing:**

This area is for the dispensing of medication for patients that are receiving out-patient care. The inspectors observed four 8-gallon black containers storing pharmaceutical waste (Photo 17). The containers were closed but labeled “Hazardous Waste” instead of “Hazardous Waste Pharmaceuticals” and did not have an accumulation start date.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(e)] labeling containers used to accumulate non-creditable hazardous waste pharmaceuticals at healthcare facilities. A healthcare facility must label or clearly mark each container of non-creditable hazardous waste pharmaceuticals with the phrase “Hazardous Waste Pharmaceuticals.”**

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(f)(2)(i)-(iii)], a healthcare facility that accumulates non-creditable hazardous waste pharmaceuticals on-site must demonstrate the length of time that the non-creditable hazardous waste pharmaceuticals have been accumulating, starting from the date it first becomes a waste. A healthcare facility may make this demonstration by any of the following methods listed in 40 C.F.R. § 266.502(f)(2)(i)-(iii).**

**Pharmacy BA-56:**

This pharmacy area is used for chemotherapy medications and is used for preparing and dispensing of chemotherapy medications. 5-gallon containers with yellow bags are used for trace chemotherapy waste to be sent for incineration. The inspectors observed two 8-gallon black containers of pharmaceutical waste. The containers were closed but labeled “Hazardous Waste” instead of “Hazardous Waste Pharmaceuticals” and did not have an accumulation start date.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(e)] labeling containers used to accumulate non-creditable hazardous waste pharmaceuticals at healthcare facilities. A healthcare facility must label or clearly mark each container of non-creditable hazardous waste pharmaceuticals with the phrase “Hazardous Waste Pharmaceuticals.”**

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(f)(2)(i)-(iii)], a healthcare facility that accumulates non-creditable hazardous waste pharmaceuticals on-site must demonstrate the length of time that the non-creditable hazardous waste pharmaceuticals have been accumulating, starting from the date it first becomes a waste. A healthcare facility may make this demonstration by any of the following methods listed in 40 C.F.R. § 266.502(f)(2)(i)-(iii).**

#### Chemotherapy Infusion Clinic:

This area is where patients receive chemotherapy. The inspectors observed two 18-gallon black containers for pharmaceutical waste. The containers were closed but labeled “Hazardous Waste” instead of “Hazardous Waste Pharmaceuticals” and did not have an accumulation start date (Photos 18).

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(e)] labeling containers used to accumulate non-creditable hazardous waste pharmaceuticals at healthcare facilities. A healthcare facility must label or clearly mark each container of non-creditable hazardous waste pharmaceuticals with the phrase “Hazardous Waste Pharmaceuticals.”**

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(f)(2)(i)-(iii)], a healthcare facility that accumulates non-creditable hazardous waste pharmaceuticals on-site must demonstrate the length of time that the non-creditable hazardous waste pharmaceuticals have been accumulating, starting from the date it first becomes a waste. A healthcare facility may make this demonstration by any of the following methods listed in 40 C.F.R. § 266.502(f)(2)(i)-(iii).**

#### Pharmacy Reverse Distribution Storage Area BB-112:

The facility stores potentially creditable hazardous waste pharmaceuticals in room BB-112 before being sent to a reverse distributor. The potentially creditable hazardous waste pharmaceuticals are shipped out quarterly and are stored in two locked cages. The inspectors also observed one black 8-gallon container of hazardous waste pharmaceuticals (Photo 19). The containers were closed but labeled “Hazardous Waste” instead of “Hazardous Waste Pharmaceuticals” and did not have an accumulation start date.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(e)] labeling containers used to accumulate non-creditable hazardous waste pharmaceuticals at healthcare facilities. A healthcare facility must label or clearly mark each container of non-creditable hazardous waste pharmaceuticals with the phrase “Hazardous Waste Pharmaceuticals.”**

**Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.502(f)(2)(i)-(iii)], a healthcare facility that accumulates non-creditable hazardous waste pharmaceuticals on-site must demonstrate the length of time that the non-creditable hazardous waste pharmaceuticals have been accumulating, starting from the date it first becomes a waste. A healthcare facility may make this demonstration by any of the following methods listed in 40 C.F.R. § 266.502(f)(2)(i)-(iii).**

#### Morgue BA-304:

The hospital morgue is located in a temperature controlled secure room within BA-304. In front of the temperature-controlled room the inspectors observed a black 8-gallon container with a hazardous waste label on it (Photo 20). The inspectors asked what type of hazardous waste was

stored in the container because the contents were not labeled on the container. The employee operating the morgue was not available at the time and facility personnel escorting the inspectors were not sure. The inspectors requested this information as a follow up during the exit interview. It was later determined that this container was used as a regular trash can and not used to dispose of any hazardous waste. The facility stated the container was removed and would not be used to store regular trash.

#### Dental:

WPB VAMC operates an onsite dental clinic for patients to get routine dental work. The main hazardous waste generated in this area is amalgam (which contains mercury) and is generated from dental filling activities. Amalgam waste is transported via water suction to a solids separator that is serviced by Refined Solutions, LLC. The used amalgam is shipped to Bethlehem Apparatus Company in Hellertown, Pennsylvania for reclamation. The inspectors observed the following waste:

- One 500mL closed container labeled “scrap mercury/amalgam” with an indication of the hazard of the contents but no hazardous waste label (Photo 21).
- One 5-gallon container of spent aerosol cans (Photo 22). The container was open and labeled “Hazardous Waste” and was missing an indication of the hazard of the contents.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)(i)-(ii)], A container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) When temporary venting of a container is necessary.**

**Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i)-(ii)], a generator must mark or label its container with the following: (i) The words “Hazardous Waste” and; (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).**

Facility personnel immediately closed the container of spent aerosol cans and marked the container with an indication of the hazard for ignitability.

## **12) Records Review**

### Emergency Procedures Required for SQGs:

The actions that facility personnel should take in response to an emergency are described in the facility’s contingency plan, which was last updated on June 7, 2021.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee. The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Jerry Martinez de Villa is listed as the primary emergency coordinator, and other individuals are listed in the order in which they will assume responsibility as alternates. A copy of the contingency plan was most recently submitted to the Florida State Emergency Response Commission (SERC) and the Palm Beach County Local Emergency Planning Committee in 2024.

Evacuation routes and locations of fire extinguishers and spill contamination equipment are posted throughout the facility. Both the facility's emergency system and fire extinguishers are inspected monthly while eyewash stations are inspected weekly.

#### Training Records for SQG:

The facility ensures that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. The facility conducts annual hazardous waste training online for employees handling hazardous waste and training on handling hazardous waste pharmaceuticals. The facility provided a list of trainings for those employees via email after the inspection. The most recent training was conducted in 2024.

#### Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste and hazardous waste pharmaceuticals sent since 2022. Hazardous waste pharmaceuticals are shipped to Allworth, LLC in Birmingham, AL (EPA ID: ALD094476793). The facility uses the waste code PHARMS on manifests for the shipping of hazardous waste pharmaceuticals. All other hazardous waste and universal waste is shipped to Clean Harbors in Bartow, FL (EPA ID: FLD880729610) and Clean Earth of Calvert City in Calvert City, KY (EPA ID: KYD985073196). Based on manifest records, the facility appears to be generating SQG amounts of hazardous waste.

However, the facility appeared to have exceeded their SQG limit amount one time in 2024 for waste shipped off on manifest #01857214FLE dated 02/12/2024. The facility did not appear to notify FDEP of the episodic event.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.232(b)(2)], the small quantity generator must notify EPA no later than thirty (30) calendar days prior to initiating a planned episodic event using EPA Form 8700-12. In the event of an unplanned episodic event, the small quantity generator must notify EPA within 72 hours of the unplanned event via phone, email, or fax, and subsequently submit EPA Form 8700-12. The small quantity**

**generator shall include the start date and end date of the episodic event and the reason(s) for the event, types and estimated quantities of hazardous wastes expected to be generated as a result of the episodic event, and identify a facility contact and emergency coordinator with 24-hour telephone access to discuss the notification submittal or respond to emergency.**

Weekly Inspection Records:

The inspectors reviewed the facility's available records of inspections of the hazardous waste CAAs since 2022. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The records do not include the time of the inspection and the full name of the inspector conducting the inspections. No inspections were missing.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.160(3), Generators of hazardous waste who accumulate hazardous waste on-site under 40 C.F.R. §§ 262.16, and 262.17 [as adopted in subsection 62-730.160(1), F.A.C.], shall maintain written documentation of the inspections required under 40 C.F.R. §§ 262.16, and 262.17 [as adopted in subsection 62-730.160(1), F.A.C.]. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.**

The inspectors requested two weeks' worth of weekly inspections to be provided showing that facility personnel are documenting the name of the inspector and time of the inspection of the CAAs.

Waste Determinations:

The facility keeps a running list of all chemical products, associated safety data sheets, and associated EPA waste codes. The facility also has an available list of waste profiles and use Clean Harbors, LLC for assistance with waste determinations. No issues were noted.

Reverse Distributor Shipping Documentation:

Records of potentially creditable hazardous waste pharmaceuticals shipped for reverse distribution was provided a day after the inspection. The facility uses Inmar Pharmaceuticals as the reverse distributor and provided shipment tracking logs. No issues were noted.

**13) Closing Conference**

The inspectors conducted the exit meeting with facility personnel. During this meeting, the inspectors stated their preliminary conclusions of the inspection. The inspectors requested photos to be sent of the remaining containers storing universal waste batteries with missing labels, photos of adequate aisle space for hazardous wastes stored in the CAAs, photos of marking or labels of the indication of the hazard of the contents placed on hazardous waste containers that were missing them, and photos of containers storing hazardous waste

pharmaceuticals with the correct label “Hazardous Waste Pharmaceuticals” with accumulation start dates.

Facility personnel agreed to provide requested records and photos of corrective actions within two weeks of the inspection.

On February 5, 2025, Sandy Jeudy submitted hazardous waste training logs, hazardous waste pharmaceutical training logs, and reverse distributor shipment tracking logs via email. On the same day Yolanda Stewart provided photos of universal waste batteries and the non-PCB ballast with the proper labels, photos of adequate aisle space for the CAAs, and photos of containers storing hazardous waste pharmaceuticals with the correct label “Hazardous Waste Pharmaceuticals”. On February 7, 2025, Yolanda Stewart submitted via email photos of hazardous waste containers in CAA 1 with indication of the hazards of the contents, and photos of SAA containers that were missing an indication of the hazard and/ or a hazardous waste label (spent aerosol cans and container of used amalgam). On February 12, 2025, Yolanda Stewart submitted 2 weeks of weekly inspection logs which included inspector names and time of inspection and an updated form—8700-12FL Florida Notification of Regulated Waste Activity.

**14) List of Attachments**

Attachment 1 – Photo Log:

**15) Signed**

**KAYLA ACOSTA** Digitally signed by KAYLA  
ACOSTA  
Date: 2025.04.08 13:23:10 -04'00'

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Kayla Acosta  
Physical Scientist

**16) Concurrence**

**BROOKE YORK** Digitally signed by BROOKE YORK  
Date: 2025.04.08 13:33:00 -04'00'

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for Araceli B. Chavez  
RCRA Enforcement Section

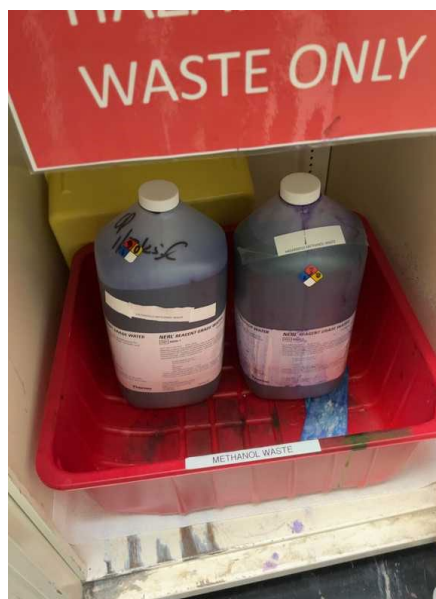
**Attachment 1 – Photo Log**

[22] Photos taken on: February 4, 2025

Photos taken by: Kayla Acosta

Photos taken with iPad

EPA Property Tag: SS8386



|                                                                                                                                                                                                                                                                  |        |        |                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|-----------------------------------|
| Photo 1                                                                                                                                                                                                                                                          |        |        | IMG-2025020410274027401688905.jpg |
| 02/04/2025 10:27 AM<br>(ET)                                                                                                                                                                                                                                      | No CBI | No PII | Photographer: Kayla Acosta        |
| Laboratory Service                                                                                                                                                                                                                                               |        |        | 26.78488347, -80.11115162         |
| Two 1-gallon containers of methanol waste. The containers were both closed and labeled “Hazardous Methanol Waste”. One container was missing an indication of the hazard while the other was marked with an NFPA diamond indicating the hazards of the contents. |        |        |                                   |



|         |  |  |                                   |
|---------|--|--|-----------------------------------|
| Photo 2 |  |  | IMG-2025020410485148512259240.jpg |
|---------|--|--|-----------------------------------|

|                                    |        |        |                            |
|------------------------------------|--------|--------|----------------------------|
| 02/04/2025 10:48 AM<br>(ET)        | No CBI | No PII | Photographer: Kayla Acosta |
| Basement /BA302                    |        |        | 26.78420433, -80.11224134  |
| Open box of universal waste lamps. |        |        |                            |



|                                                                                   |        |        |                                   |
|-----------------------------------------------------------------------------------|--------|--------|-----------------------------------|
| Photo 3                                                                           |        |        | IMG-2025020410542454242274705.jpg |
| 02/04/2025 10:54 AM<br>(ET)                                                       | No CBI | No PII | Photographer: Kayla Acosta        |
| Basement /BA302                                                                   |        |        | 26.78422981, -80.11228929         |
| Facility personnel closed containers of universal waste that were partially open. |        |        |                                   |



|                             |        |        |                                   |
|-----------------------------|--------|--------|-----------------------------------|
| Photo 4                     |        |        | IMG-2025020410583958392796684.jpg |
| 02/04/2025 10:58 AM<br>(ET) | No CBI | No PII | Photographer: Kayla Acosta        |

|                                           |                           |
|-------------------------------------------|---------------------------|
| CAA                                       | 26.78429408, -80.11339257 |
| Universal waste battery storage. Outside. |                           |



|                                                                           |        |        |                                  |
|---------------------------------------------------------------------------|--------|--------|----------------------------------|
| Photo 5                                                                   |        |        | IMG-202502041107307302794677.jpg |
| 02/04/2025 11:07 AM (ET)                                                  | No CBI | No PII | Photographer: Kayla Acosta       |
| CAA                                                                       |        |        | 26.78426635, -80.11343831        |
| Universal waste batteries cardboard boxes missing universal waste labels. |        |        |                                  |



|                          |        |        |                                   |
|--------------------------|--------|--------|-----------------------------------|
| Photo 6                  |        |        | IMG-2025020411122512252064998.jpg |
| 02/04/2025 11:12 AM (ET) | No CBI | No PII | Photographer: Kayla Acosta        |
| CAA 1                    |        |        | 26.78429184, -80.11341698         |

CAA 1, inadequate aisle space.



|                                                                                                            |        |        |                                   |
|------------------------------------------------------------------------------------------------------------|--------|--------|-----------------------------------|
| Photo 7                                                                                                    |        |        | IMG-2025020411141014101815002.jpg |
| 02/04/2025 11:14 AM<br>(ET)                                                                                | No CBI | No PII | Photographer: Kayla Acosta        |
| CAA 1                                                                                                      |        |        | 26.78430636, -80.11337529         |
| CAA 1, inadequate aisle space and hazardous waste containers missing indication of the hazard of contents. |        |        |                                   |



|                             |        |        |                                  |
|-----------------------------|--------|--------|----------------------------------|
| Photo 8                     |        |        | IMG-202502041131013112320024.jpg |
| 02/04/2025 11:31 AM<br>(ET) | No CBI | No PII | Photographer: Kayla Acosta       |
| CAA 2                       |        |        | 26.78424538, -80.11346257        |

Hazardous waste pharmaceuticals labeled with the words “Hazardous Waste” instead of “Hazardous Waste Pharmaceuticals”.



|                                           |        |        |                                   |
|-------------------------------------------|--------|--------|-----------------------------------|
| Photo 9                                   |        |        | IMG-2025020411324532452227776.jpg |
| 02/04/2025 11:32 AM (ET)                  | No CBI | No PII | Photographer: Kayla Acosta        |
| CAA 2                                     |        |        | 26.78421546, -80.11342856         |
| Hazardous Waste Pharmaceuticals in CAA 2. |        |        |                                   |



|          |  |  |                                   |
|----------|--|--|-----------------------------------|
| Photo 10 |  |  | IMG-2025020411325032502097388.jpg |
|----------|--|--|-----------------------------------|

|                                           |        |        |                            |
|-------------------------------------------|--------|--------|----------------------------|
| 02/04/2025 11:32 AM<br>(ET)               | No CBI | No PII | Photographer: Kayla Acosta |
| CAA 2                                     |        |        | 26.78421546, -80.11342856  |
| Hazardous waste pharmaceuticals in CAA 2. |        |        |                            |



|                                         |        |        |                                  |
|-----------------------------------------|--------|--------|----------------------------------|
| Photo 11                                |        |        | IMG-202502041158065862943020.jpg |
| 02/04/2025 11:58 AM<br>(ET)             | No CBI | No PII | Photographer: Kayla Acosta       |
| Maintenance Shop                        |        |        | 26.78701506, -80.11369764        |
| Used oil container in maintenance shop. |        |        |                                  |



|                                         |        |        |                                  |
|-----------------------------------------|--------|--------|----------------------------------|
| Photo 12                                |        |        | IMG-202502041158095893061010.jpg |
| 02/04/2025 11:58 AM<br>(ET)             | No CBI | No PII | Photographer: Kayla Acosta       |
| Maintenance Shop                        |        |        | 26.78658863, -80.11340647        |
| Used oil container in maintenance shop. |        |        |                                  |



|                                                                                                       |        |        |                                                   |
|-------------------------------------------------------------------------------------------------------|--------|--------|---------------------------------------------------|
| Photo 13                                                                                              |        |        | UW Aerosol Can Photo.jpeg                         |
| 02/04/2025 11:58 AM<br>(ET)                                                                           | No CBI | No PII | Photographer: Kaitlyn Edwardo with iPhone camera. |
| Maintenance Shop                                                                                      |        |        | 26.78658863, -80.11340647                         |
| Spent aerosol cans with universal waste label; however, facility is managing them as hazardous waste. |        |        |                                                   |



|                                                                     |        |                                   |  |
|---------------------------------------------------------------------|--------|-----------------------------------|--|
| Photo 14                                                            |        | IMG-2025020412185518551966540.jpg |  |
| No CBI                                                              | No PII | Photographer: Kayla Acosta        |  |
| Pharmacy BB-121                                                     |        | 26.78548598, -80.1126288          |  |
| Hazardous waste pharmaceutical container labeled “Hazardous Waste”. |        |                                   |  |



|                                                                     |        |        |                                   |
|---------------------------------------------------------------------|--------|--------|-----------------------------------|
| Photo 15                                                            |        |        | IMG-2025020412245724571803622.jpg |
| 02/04/2025 12:24 PM (ET)                                            | No CBI | No PII | Photographer: Kayla Acosta        |
| Pharmacy BB-121                                                     |        |        | 26.78541737, -80.11251162         |
| Hazardous waste pharmaceutical container labeled "Hazardous Waste". |        |        |                                   |



|                                                                     |        |        |                                   |
|---------------------------------------------------------------------|--------|--------|-----------------------------------|
| Photo 16                                                            |        |        | IMG-2025020412253925392122226.jpg |
| 02/04/2025 12:25 PM<br>(ET)                                         | No CBI | No PII | Photographer: Kayla Acosta        |
| Pharmacy BB-121                                                     |        |        | 26.78536909, -80.11242562         |
| Hazardous waste pharmaceutical container labeled "Hazardous Waste". |        |        |                                   |



|                                                                      |        |        |                                   |
|----------------------------------------------------------------------|--------|--------|-----------------------------------|
| Photo 17                                                             |        |        | IMG-2025020412281328131927181.jpg |
| 02/04/2025 12:28 PM<br>(ET)                                          | No CBI | No PII | Photographer: Kayla Acosta        |
| Outpatient dispensing                                                |        |        | 26.7853125, -80.11234573          |
| Hazardous waste pharmaceutical containers labeled "Hazardous Waste". |        |        |                                   |



|                                                                     |        |        |                                   |
|---------------------------------------------------------------------|--------|--------|-----------------------------------|
| Photo 18                                                            |        |        | IMG-2025020412441944191791026.jpg |
| 02/04/2025 12:44 PM<br>(ET)                                         | No CBI | No PII | Photographer: Kayla Acosta        |
| Infusion clinic                                                     |        |        | 26.78449869, -80.11131318         |
| Hazardous waste pharmaceutical container labeled "Hazardous Waste". |        |        |                                   |



|                                                                     |        |        |                                   |
|---------------------------------------------------------------------|--------|--------|-----------------------------------|
| Photo 19                                                            |        |        | IMG-2025020412512151211850091.jpg |
| 02/04/2025 12:51 PM<br>(ET)                                         | No CBI | No PII | Photographer: Kayla Acosta        |
| Reverse distribution bb 112                                         |        |        | 26.785324, -80.11243315           |
| Hazardous waste pharmaceutical container labeled "Hazardous Waste". |        |        |                                   |



|                                                                                                                            |        |        |                                  |
|----------------------------------------------------------------------------------------------------------------------------|--------|--------|----------------------------------|
| Photo 20                                                                                                                   |        |        | IMG-202502041301151151667055.jpg |
| 02/04/2025 01:01 PM (ET)                                                                                                   | No CBI | No PII | Photographer: Kayla Acosta       |
| BA-304                                                                                                                     |        |        | 26.78430181, -80.1122952         |
| Container with a hazardous waste label used for regular trash (non-hazardous). Container was later removed from this area. |        |        |                                  |



|                                                                                                                                       |        |        |                                  |
|---------------------------------------------------------------------------------------------------------------------------------------|--------|--------|----------------------------------|
| Photo 21                                                                                                                              |        |        | IMG-202502041306136131828765.jpg |
| 02/04/2025 01:06 PM (ET)                                                                                                              | No CBI | No PII | Photographer: Kayla Acosta       |
| Dental                                                                                                                                |        |        | 26.78462281, -80.11215158        |
| 500mL closed container labeled "scrap mercury/amalgam" with an indication of the hazard of the contents but no hazardous waste label. |        |        |                                  |



|                                                                                                                                                                              |        |        |                                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|----------------------------------|
| Photo 22                                                                                                                                                                     |        |        | IMG-202502041310091091889424.jpg |
| 02/04/2025 01:10 PM<br>(ET)                                                                                                                                                  | No CBI | No PII | Photographer: Kayla Acosta       |
| Dental                                                                                                                                                                       |        |        | 26.78468527, -80.11199248        |
| One 5-gallon container of spent aerosol cans (Photo 22). The container was closed and labeled “Hazardous Waste” but was missing an indication of the hazard of the contents. |        |        |                                  |