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# Medical Waste Enforcement: Alabama Department of Environmental Management and Panama City Medical Waste Transporter Enter into Consent Order

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The Alabama Department of Environmental Management (“ADEM”) and Trilogy MedWaste Southeast, LLC (“Trilogy”) entered into an August 13th proposed Consent Order (“CO”). See Consent Order No. 21-XXX-CMW.

The CO addresses an alleged violation consisting of transporting medical waste in Alabama without having received an Alabama Medical Waste Transport Permit from ADEM.

The CO describes Trilogy as a foreign limited liability company, operating as a medical waste transporter located in Panama City, Florida. ADEM is stated to have issued a medical waste transporter permit to Enviromed of Bay County, Inc., on April 3, 2017. Such permit is stated to have expired on April 2, 2020.

ADEM is stated to have received email communication from Trilogy on January 12th indicating the change of ownership of Enviromed of Bay County, Inc. to Trilogy with:

... a question as to whether the Department had received the application for this change of ownership.

ADEM is stated to have informed Trilogy that its application had not been received and that Enviromed of Bay County’s medical waste transporter permit had expired. Trilogy’s medical waste transporter permit application is stated to have been received on January 15th.

ADEM subsequently requested the company’s shipping manifests for the past two years. The shipping manifests were received covering the period from March 3, 2020, to January 12, 2021.

The CO provides that based on a review of the shipping manifests, as well as Enviromed of Bay City’s expired transporter permit, and the emails and permit application from Trilogy, that Trilogy violated certain requirements of Division 17 of the ADEM Administrative Code.

Trilogy is alleged to have transported medical waste in excess of 20 times in Alabama between March 3, 2020, and January 12, 2021, without having received an Alabama medical waste transport permit from the department.

ADEM determined on February 9th Trilogy’s permit application for medical waste transport to be complete and issued a three-year medical waste transporter permit to the company.

Trilogy is stated to neither admit nor deny ADEM's contentions.

A civil penalty of \$8,000 is assessed.

A copy of the CO can be downloaded [here](#).