

1998

⑧ Alamance County

01-02

0102 Permit 1998 Box No.

01021998

01-02

# Scan Document



CONSULTANTS SERVING THE  
ENVIRONMENTAL INDUSTRY

VA 804-355-4520  
NC 336-323-0092

BFI Med Waste, Inc.

spoke w/ Rachelle Maxheimer  
sending letter requesting  
new permit  
in name of BFI Med Waste  
Inc.

subsid of Stericycle, Inc  
w/ financial qualifications  
& Compliance history  
for Stericycle

acquisition closed on 11/12/99

NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT



JAMES B. HUNT JR.  
GOVERNOR

WAYNE McDEVITT  
SECRETARY

WILLIAM L. MEYER  
DIRECTOR

December 9, 1998

Mr. J.W. Hill  
BFI Waste Systems of North America. Inc.  
Haw River District  
P. O. Box 310  
Haw River, NC 27258

Re: Modification to Permit No. 01-02-I  
BFI Waste Systems of North America, Inc.  
Medical Waste Incinerator  
Alamance County

Dear Mr. Hill:

Enclosed is a modification to Permit No. 01-02-I. The modification reflects revisions to the facility operations plan and ash sampling protocol, as well as the facility name change.

Please note the new permit format. The Section now references the Solid Waste Management Rules in the permit conditions rather than restating them.

If you have any questions regarding the permit, please contact me at (919) 733-0692, ext. 259.

Sincerely,

Sherri Coghill  
Environmental Engineer  
Solid Waste Section

cc: Julian Foscue  
Hugh Jernigan

**NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES**  
DIVISION OF WASTE MANAGEMENT



**JAMES B. HUNT JR.**  
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DIRECTOR

Solid Waste Permit No. 01-02-1  
Part II - Permit to Operate  
Date of Original Issue: 12/31/91  
Modification Date: 12/9/98  
Page 1

**SOLID WASTE PERMIT**

BFI Waste Systems of North America, Inc.  
is hereby issued a PERMIT TO OPERATE a  
MEDICAL WASTE INCINERATION FACILITY

located on Porter Avenue, Haw River, Alamance County, North Carolina in  
accordance with Article 9, Chapter 130A, of the General Statutes of North  
Carolina and all rules promulgated thereunder and subject to the conditions  
set forth in this permit.

  
James C. Coffey, Supervisor  
Permitting Branch  
Solid Waste Section

### **ATTACHMENT 3:**

#### List of Approved Documents

1. Operations Plan, submitted by BFI Waste Systems of North America, Inc., as revised through 12/8/98.
2. Ash Sampling and Analysis Plan, submitted by BFI Waste Systems of North America, Inc., dated November 7, 1997.
3. Request for name change dated June 27, 1997.
4. BFI Medical Waste Systems (southeast), Inc. - Solid Waste Permit Application, submitted January 11, 1991.
5. Revision to Permit Application, submitted July 8, 1991.
6. Revision to Permit Application , submitted July 22, 1991.
7. Approval Letter for Ash Disposal, dated July 25, 1991.
8. Contract with Piedmont Sanitary Landfill to dispose of ash, dated July 24, 1991.
9. Facility Air Permit.
10. Approval Letter for Ash Disposal, dated August 25, 1992.

## ATTACHMENT 4:

### GENERAL CONDITIONS

1. This permit approves the operation of the medical waste incineration facility as described in the approved plans. The approved plans are described in Attachment 3, "List of Approved Documents". Where discrepancies may exist, the most recent approved submittal shall govern.
2. This permit is subject to review every five years according to the issuance date of this Permit to Operate. Modifications, where necessary, shall be required in accordance with Rules in effect at the time of review.
3. In the event of conflicts between this Permit to Operate and previously issued conditions, the conditions of this Permit to Operate shall supersede previously issued conditions.
4. This facility is subject to the requirements of all applicable sections of the most recent version of the North Carolina Solid Waste Management Rules, 15A NCAC 13B and the specific conditions contained herein.
5. Additional conditions and revisions of the approved documents or changes during the operation of the facility require approval by the North Carolina Solid Waste Section.
6. Medical Waste is subject to the general requirements of 15A NCAC 13B .1202.
7. Regulated Medical Waste is subject to the requirements of 15A NCAC 13B .1203.
8. On or before August 1 of each year, the permittee shall report the amount of waste received (in tons) at this facility and treated at this facility to the Solid Waste Section, on forms prescribed by the Section. This report shall include the following information:
  - a. The reporting period shall be for the previous year, beginning July 1 and ending on June 30;
  - b. The amount of waste received and treated in tons, compiled on a monthly basis; and
  - c. The completed report shall be forwarded to the Regional Waste Management Specialist for the facility. A copy of the completed report shall be forwarded to the County Manager of each county from which waste was received.

9. This facility is permitted to receive medical waste as defined in 15A NCAC 13B Section .1201(4), and as described in the approved plan.

#### **OPERATIONAL CONDITIONS**

10. This facility shall conform to the operating requirements described in the approved plan, 15A NCAC 13B .0509, .1207(1) and (3), and the conditions specified herein.
11. Transportation of untreated regulated medical waste shall conform to the requirements of 15A NCAC 13B .1205.
12. Storage facilities for untreated medical waste shall be provided at the treatment facility as described in the approved plan, in accordance with 15A NCAC 13B Sections .0104, .1206 and .1207(1), and as specified herein.
13. Combustion ash shall be managed in accordance with approved plan documents, 15A NCAC 13B .1207(3), and the conditions specified herein.

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DECEMBER 08, 1998

SHERRI C. Coghill  
ENVIRONMENTAL ENGINEER  
SOLID WASTE SECTION  
NC DEPARTMENT OF ENVIRONMENT AND  
NATURAL RESOURCES  
PO BOX 27687  
RALEIGH, NC 27611-7687

RE: OPERATION PLAN REVISION

Dear Ms. Coghill,

Thank you for the time you extended to me on the phone Dec. 07, 1998 concerning the ash sampling protocol and name change for this facility.

The revision referenced is section 5 -1 about the new ash sampling protocol.

If you need further information please contact me at (336) 578-8900.

Sincerely,

A handwritten signature in black ink that reads "J. W. Hill".

J.W.Hill  
MESH

# FAX TRANSMISSION

HAW RIVER MEDICAL WASTE  
1168 PORTER AVE.  
HAW RIVER, NC 27258  
(336) 578-8900  
FAX (336) 578-8903

TO: Sherri Coghill

DATE: 12-8-98

FAX# 919-733-4810

PAGES: 3

FROM: J.W. HILL

SUBJECT: DPS Plan Revision

COMMENTS:

Thanks for the help - the draft looks good  
Call if you need more information  
Merry Christmas!

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## ASH SAMPLING AND ANALYSIS PLAN

### A. Introduction:

*The purpose of this document is to provide a standard protocol for the sampling and analysis of incinerator ash at the BFI Medical Waste Haw River facility. The sampling protocol contained within will provide an easy and effective method for obtaining a representative composite sample of incinerator ash. Since all the ash from the incinerator is collected in a twenty yard roll-off container, the sample will be taken from a full container before it leaves the facility.*

### B. Scope:

*The collection of a composite sample representative of the entire load will be accomplished by sectioning off the roll-off container into eight equal grids, and, utilizing a thief sampler, removing a core sample from each grid. Cores from each grid will be representative of the respective grid from top to bottom. All eight core samples will be combined to form the final composite sample, representative of the entire load.*

*The composite sample will be properly labeled and containerized, and with accompanying chain of custody and sample analysis request, forwarded to a analytical laboratory for analysis.*

### C. Equipment:

- (1) Sampling thief- a five foot (5) long, two (2) to two and one half (2 1/2) inch diameter pvc tube.
- (2) Mixing bucket- a five (5) gallon plastic pail with lid.
- (3) Personal protective equipment- rubber gloves, safety glasses/shields, disposable coveralls, and respirators as needed.
- (4) Sufficient sample containers to collect and transport the samples to the analytical laboratory.

### D. Preparation:

**APPROVED**  
DIVISION OF SOLID WASTE MANAGEMENT  
DATE: 12/9/98 BY: SLC

*Prior to sampling, the roll-off container will be divided into a grid of eight equal sections. for example, a typical roll-off container with the inside dimensions of 19 1/2 feet by 7 feet will be divided into 8 equal sections 58 1/2 inches by 42 inches as shown in figure 1- this section.*

*To prevent contamination of the sample, all equipment used to collect the sample, such as the sampling thief and equipment will be washed with hot tap water and detergent, rinsed with copious amounts of hot tap water, and then rinsed with a deionized water. The equipment will be allowed to air dry, and stored in clean kraft paper and stored in an area to avoid contamination with dirt or dust. All sample containers are to be provided by the laboratory contracted to do the analysis, and shall be pre-cleaned.*

*E. Sampling:*

*A TCLP sample for toxic metals will be taken twice per year using the following process:*

*(1) Notify the analytical laboratory of the scheduled sampling date to allow a reasonable length of time for the receipt of the sample containers at the facility.*

*(2) Divide the full roll-off container into its eight equal grid sections as specified above.*

*(3) Use the sampling thief and collect a core sample from each grid section.*

*(4) Remove the sample from the thief and place it into the pre-cleaned mixing bucket.*

*(5) Proceed as above and collect one sample from each of the remaining sections.*

*(6) After all the core samples are collected and deposited into the mixing bucket, thoroughly mix the sample to composite the subsamples into a final homogeneous composite sample.*

(7) *Once mixing is complete, fill the sample containers and label as follows:*

- (a) *Name of sampler*
- (b) *Name of facility*
- (c) *Name of sample point*
- (d) *Date/time of sampling*
- (e) *Preservative (if any)*
- (f) *Constituents to be analyzed*

(8) *After the sample has been collected, prepare it for shipment to the laboratory as described in the instructions provided by the laboratory. Complete copies of the attached chain of custody and sample analysis request forms and submit with the samples.*

(9) *Upon receipt of the results, carefully review the results noting any abnormalities. File the results and maintain for a period of 3 years.*

*F. Analysis:*

*The combustion ash sample shall be analyzed for the following:*

(1) *Free liquids by paint filter analysis.*

(2) *PH*

(3) *The sample will be analyzed for toxicity characteristics metals in accordance with the attached referenced methodologies:*

**REFERENCED METHODOLOGIES**

<i>Preparation/Method Name</i>	<i>Section/Method Number (References)</i>
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*Sample Preparation:*

*Toxicity Characteristic Leaching Procedure.....(2)*

*Microwave Acid Digestion of Aqueous Samples and*

*Extracts for Total Metals Analysis by AAS or ICP.....3015(1)*

Metals:

Mercury, manual cold vapor technique.....7470(1)  
Arsenic, barium, cadmium (ICP).....6010(1)  
Chromium, lead, selenium, silver (ICP).....6010(1)

References:

- 1) Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, November, 1986, Third Edition, USEPA, SW-846 and additions thereto.
- 2) "Method 1311 - Toxicity Characteristic Leaching Procedure (TCLP)", 40 CFR Part 261, Appendix II.

G. Disposal

(1) Should ash be generated that is tested to be hazardous, the 20 yd. which was held on sight while waiting for the analysis will then be properly disposed of at a permitted hazardous waste facility.

(2) To ensure that the exceedance is not a permanent problem, we will test the next (14) fourteen 20 yd. containers for the parameter of the exceedance. All containers testing non-hazardous will be disposed of at a permitted Sub Title D Landfill.

**CHAIN-OF-CUSTODY**

Shuttle Number: \_\_\_\_\_ Seal No. \_\_\_\_\_ Prepared/Sealed By: \_\_\_\_\_ (print name)

Laboratory: \_\_\_\_\_ (signature) \_\_\_\_\_ (date)

**SHIP TO**  
 Company: \_\_\_\_\_ Attn: \_\_\_\_\_  
 Address: \_\_\_\_\_ Phone: \_\_\_\_\_

**SAMPLE IDENTIFICATION**  
 Facility/Site: \_\_\_\_\_

**SHUTTLE CONTENTS:**

LAB I.D.	Site Source I.D.	Sample I.D.	# of Bottles	Size	P* G*	Preservative	Parameter(s)

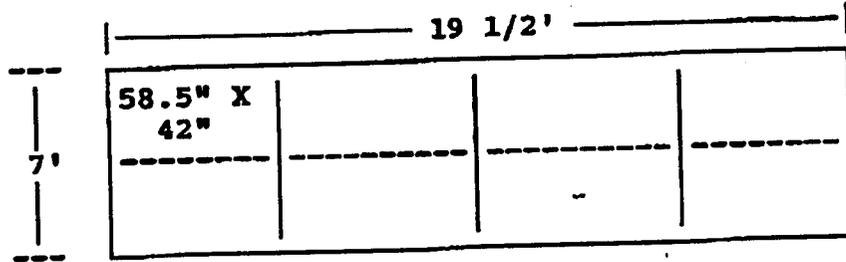
Container type: P\* = Plastic, G\* = Glass

(1) Shuttle opened by: _____ (print name)	Date	Time	Seal Intact No. _____	Yes	No	(signature)
(2) Shuttle prepared for shipment by: _____ (print name)	Date	Time	New Seal Installed No. _____	Yes	No	(signature)
(3) Shuttle received at Lab by: _____ (print name)	Date	Time	Seal Intact No. _____	Yes	No	Lab's Name: _____ (signature)
SSK Temp. rec'd: _____ deg. C						

cc-sar.doc

Fill in all applicable areas on both the paperwork and bottle labels. Make sure little or no headspace in the bottles exists. Cool samples to approx. 4 deg. C (in wet ice) and replace wet ice with frozen ice packs prior to shipment. Ship overnight air to contracted laboratory. Call in advance to notify laboratory when to expect shipment.

**TOP VIEW**



**Figure 1. Typical Twenty (20) Yard Roll-off Container**

**SAMPLE ANALYSIS REQUEST**

BFI Sample No(s): \_\_\_\_\_

-----  
Date Sampled: \_\_\_\_\_ No. of Samples \_\_\_\_\_

Assigned Laboratory: \_\_\_\_\_ Laboratory Contact: \_\_\_\_\_

Location: \_\_\_\_\_ Phone: \_\_\_\_\_

Analyses Requested: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Sample Description: \_\_\_\_\_ Shuttle No: \_\_\_\_\_

Liquid \_\_\_\_\_ Sludge/ Solid \_\_\_\_\_ Oil \_\_\_\_\_ Other \_\_\_\_\_ See attached Chain  
of Custody for details on sample volumes, containers, preservatives, sampling dates.  
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Safety Precautions: \_\_\_\_\_ Normal Laboratory Hygiene \_\_\_\_\_ Avoid skin/eye contact  
\_\_\_\_\_ Avoid breathing vapors/dust \_\_\_\_\_ Other \_\_\_\_\_  
-----

Special Handling/Storage: Refrig. @ 4 degrees C. \_\_\_\_\_

Receiving Laboratory's Comments: (Headspace, etc.) \_\_\_\_\_  
\_\_\_\_\_

<u>Sample submitted by:</u>		<u>Sample received by:</u>	
SSK temperature rec'd _____ deg. C			
_____	_____	_____	_____
Name	Title	Name	Title
_____	_____	_____	_____
Company	Date/Time	Company	Date/Time

Contract Lab Nos. or Project IDs : \_\_\_\_\_

SEND REPORT TO:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

SEND INVOICES TO:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

CC: \_\_\_\_\_

P.O. # \_\_\_\_\_

A. FACILITY

(1) SOLID WASTE PERMIT # 01-02-I  
AIR QUALITY PERMIT # 5896R9  
WASTEWATER PERMIT #0030

(2) NAME

BFI WASTE SYSTEMS OF NORTH AMERICA, INC

(3) TYPE OF SERVICE

THIS LOCATION IS ENGAGED IN THE ACCEPTANCE,  
ARRANGEMENTS FOR TRANSPORTATION, AND DESTRUCTION OF  
MEDICAL, PHARMACEUTICAL, AND USDA REGULATED WASTE  
VIA INCINERATION.

(4) MAILING ADDRESS

P.O.BOX 310  
HAW RIVER,N.C. 27258

(5) LOCATION

1168 PORTER AVE.  
HAW RIVER N.C. 27258

(6) HOURS OF OPERATION

24 HOURS PER DAY  
7 DAYS PER WEEK

(7) TELEPHONE

(336) 578-8900 (LOCAL)  
(800) 950-2010 (EMERGENCY)

(8) SIC CODE 4953

4953 REFUSE SYSTEMS  
GARBAGE COLLECTION, DESTRUCTION,PROCESSING  
DEAD ANIMAL DISPOSAL  
COLLECTION AND DISPOSAL OF ASHES

REVISED 5-8-98

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**APPROVED**  
DIVISION OF SOLID WASTE MANAGEMENT

DATE 12/9/98 BY JLC

Revised pages dated 5/8/98  
& 12/8/98

## B. CONTACT PERSON

- (1) RICK GABEY  
DISTRICT VICE PRESIDENT  
1168 PORTER AVE  
HAW RIVER, NC 27258
- (2) ALAN SKRZYPCZAK  
OPERATIONS MANAGER  
1168 PORTER AVE  
HAW RIVER, NC 27258
- (3) J.W. HILL  
MESH  
1168 PORTER AVE.  
HAW RIVER, NC 27258

## C. CHARACTERISTICS OF SPECIAL WASTE HANDLED AT THE FACILITY

- (1) WASTE CODE

NO WASTE CODE IS AVAILABLE FOR INFECTIOUS WASTE IN TITLE 40 CODE OF FEDERAL REGULATIONS

- (2) TYPE BY NAME

INFECTIOUS WASTE ARE DEFINED AS FOLLOWS:

THOSE WASTES THAT POTENTIALLY CONTAIN PATHOGENIC AGENTS THAT, BECAUSE OF THEIR CONCENTRATION AND QUANTITY, MAY CREATE A DANGER TO THE HEALTH OF THE PERSON EXPOSED TO THE WASTE. THE U.S. EPA RECOMMENDS 13 TYPES OF WASTE BE DESIGNATED INFECTIOUS WASTE:

- ISOLATION WASTE
- CULTURES AND STOCKS OF ETIOLOGIC AGENTS
- BLOOD AND BLOOD PRODUCTS
- PATHOLOGICAL WASTES
- OTHER WASTE FROM SURGERY AND AUTOPSY
- CONTAMINATED LABORATORY WASTES
- SHARPS

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION  
DEPARTMENT OF ENVIRONMENT, HEALTH AND NATURAL RESOURCES

DIVISION OF AIR QUALITY

AIR PERMIT NO. 5896R9

Issue Date: March 20, 1998

Effective Date: March 20, 1998

Expiration Date: April 30, 2001

Replaces Permit: 5896R8

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To construct and operate air emission source(s) and/or air cleaning device(s), and for the discharge of the associated air contaminants into the atmosphere. In accordance with the provisions of Article 21B of Chapter 143, General Statutes of North Carolina (NCGS) as amended, and other applicable Laws, Rules and Regulations,

BFI Waste Systems of North America, Inc.  
1168 Porter Avenue  
Haw River, Alamance County, North Carolina

(the Permittee) is hereby authorized to construct and operate air emissions sources and/or air cleaning devices and appurtenances consisting of:

1. two impingement plate type wet scrubbers (132 gallons per minute of sodium hydroxide solution, ID Nos. A and B) with mist eliminators installed one each on two natural gas-fired, 1,911 pounds per hour maximum permitted charging capacity each, type 0 and type 4 waste to include non-hazardous pharmaceutical waste, multiple chamber incinerators (each with two (2) 2.3 million Btu per hour input primary chamber burners, and a 5.3 million Btu per hour heat input secondary chamber burner, ID Nos. A and B), and
2. one diesel fuel-fired emergency generator (395 kilowatts maximum permitted capacity),

in accordance with the completed application (APP0100010.97A) received July 10, 1997, including any plans, specifications, previous applications, and other supporting data, all of which are filed with the Department of Environment, Health, and Natural Resources, Division of Air Quality (DAQ) and are incorporated as part of this Permit.

This Permit is subject to the following specified conditions and limitations including any TESTING, REPORTING, OR MONITORING REQUIREMENTS:

**A. SPECIFIC CONDITIONS AND LIMITATIONS**

1. Any air emission sources or control devices authorized to construct and operate above must be operated and maintained in accordance with the provisions contained herein. The Permittee shall comply with applicable Environmental Management Commission Regulations, including Title 15A North Carolina Administrative Code (NCAC), Subchapter 2D .0408, .0516, .0521, .0522, .0535, .1100 and .1200, and Subchapter 2H .0610.

2. The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive particulate matter, toxic air pollutant, lead, visible and/or odorous emissions from becoming airborne.
3. As required by 15A NCAC 2D .0521, "Control of Visible Emissions," visible emissions from the incinerators and the emergency generator, established after July 1, 1971, shall not be more than 20 percent opacity when averaged over a six-minute period, except that six-minute periods averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four (4) times in any 24-hour period. However, sources which must comply with 15A NCAC 2D .0524 "New Source Performance Standards" or .1110 "National Emission Standards for Hazardous Air Pollutants" must comply with applicable visible emissions requirements contained therein.
4. Operation of the incinerators shall be in accordance with the following conditions and stipulations:
  - a. The Permittee shall not exceed a maximum charge rate of 1,911 pounds per hour to each incinerator. Records indicating the hourly (beginning on the hour) weight charged to the incinerators shall be maintained and available for inspection by the Division of Air Quality,
  - b. The Permittee shall not charge any waste into the incinerator until the proper operating temperature of 1,800 degrees Fahrenheit is attained in the secondary chamber,
  - c. Gases generated by the combustion shall be subjected to a minimum temperature of 1800 degrees Fahrenheit for a period of not less than one second,
  - d. Continuous temperature records shall be maintained for the primary and secondary chambers of each incinerator,
  - e. Pressure drop across the wet scrubbers shall be monitored and recorded hourly,
  - f. Continuous monitoring of the pH level in the wet scrubber system is required,
  - g. The incinerators' stack height shall be minimum of 65 feet above ground level,
  - h. Continuous monitoring of oxygen or carbon monoxide is required, and
  - i. Incineration of wastes shall be limited to Type 0 and Type 4 wastes consisting of isolation wastes, cultures and stocks of etiological agents, blood and blood products, pathological wastes, other wastes from surgery and autopsy, contaminated laboratory wastes, sharps, diagnosis unit wastes, animal carcasses and body parts, animal bedding and other bedding and other wastes from animal rooms, discarded biological, contaminated food products, and contaminated equipment as generated by Acute Care Hospitals, Acute Psychiatric Hospitals, Skilled Nursing Facilities, Intermediate Care Facilities, Veterinary Clinics, Physician Clinics, Pharmaceutical Companies and Suppliers, and USDA Regulated Facilities.

5. As required by 15A NCAC 2D .0522, "Control and Prohibition of Odorous Emissions," the Permittee shall not cause, allow, or permit any source to be operated without employing suitable measures for the control of nuisance odors.
6. As required by 15A NCAC 2D .0516 "Sulfur Dioxide Emissions from Combustion Sources," sulfur dioxide emissions from the incinerators and the emergency generator shall not exceed 2.3 pounds per million Btu heat input.
7. TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REPORTING REQUIREMENT - Pursuant to 15A NCAC 2D .1100 and in accordance with the approved application for an air toxic compliance demonstration, the following permit limits shall not be exceeded:

<u>EMISSION SOURCE(S)</u>	<u>TOXIC AIR POLLUTANT(S)</u>	<u>EMISSION LIMIT(S)</u>
Incinerators (ID Nos. A and B)	Chromium VI	0.117 pounds per year
	Arsenic	0.92 pounds per year
	Cadmium	40.85 pounds per year
	Hydrogen Chloride	7.6 pounds per hour
	Hexachlorodibenzo-P-dioxin	0.009 pounds per year
	Tetrachlorodibenzo-P-dioxin	0.0058 pounds per year
	Mercury	1.536 pounds per day
	Chlorine	32.56 pounds per day; 1.36 pounds per hour

- (a) To demonstrate compliance with the above limits, the following restrictions shall apply:
    - (i) The charge rate into the incinerator (ID No. A) shall not exceed 1,911 pounds per hour.
    - (ii) The charge rate into the incinerator (ID No. B) shall not exceed 1,911 pounds per hour.
  - (b) The Permittee shall maintain records or any other process operational information as is necessary to determine compliance with 15A NCAC 2D .1100. All records of compliance shall be maintained in a log book and made available for inspection by personnel of the Division of Air Quality.
8. PERFORMANCE TESTING REQUIREMENT - The Permittee shall test one of the two incinerators (ID Nos. A or B, to be selected by the DAQ prior to the testing date) once every twenty-four to twenty-six consecutive months to demonstrate compliance with 15A NCAC 2D .0408, .0521, .1100, and .1200 for the following pollutants: lead, opacity, arsenic, beryllium, cadmium, chlorine, chromium (VI), hexachlorodibenzo-p-dioxin, tetrachlorodibenzo-p-dioxin, hydrogen chloride, hydrogen fluoride, manganese, mercury, nickel, and particulate matter.
- (a) EMISSION LIMITATIONS - The emission limits listed in the table below represent the total emissions from both incinerators (ID Nos. A and B) unless otherwise specified. Note, emission limits for some of these pollutants are based on previous stack testing and air dispersion modeling.

<u>Source</u>	<u>Pollutant</u>	<u>Emission Limit</u>	<u>Applicable Regulation</u>
incinerators (ID Nos. A and B)	particulate matter	$E = 0.002P$ (lb/hr) <sup>a</sup>	2D .1200 (each unit)
	opacity	20%	2D .0521 (each unit)
	chromium VI	0.117 lb/yr	permit limit as established through modeling
	arsenic	0.92 lb/yr	permit limit as established through modeling
	cadmium	40.85 lb/yr	permit limit as established through modeling
	hydrogen chloride	7.6 lb/hour	permit limit as established through modeling
	hexachlorodibenzo-P-dioxin	0.009 lb/yr	permit limit as established through modeling
	tetrachlorodibenzo-P-dioxin	0.0058 lb/yr	permit limit as established through modeling
	mercury	1.536 lb/day	permit limit as established through modeling - 2D .1200
	chlorine	32.56 lb/day 1.36 lb/hour	permit limit as established through modeling
lead	1.5 mg/m <sup>3</sup> <sup>b</sup>	2D .0408	

<sup>a</sup>  $E = 0.002P = 0.002 \times (1911) = 3.822$  lb/hr - each unit when operating at full load  
E = allowable emission rate for particulate matter in lb/hr.  
P = refuse charge in lb/hr

<sup>b</sup> ambient concentration standards

The emission limits listed in the table below represent the total emissions from both incinerators (ID Nos. A and B). Both the Toxics Permitting Emission Rate (TPER) and the Acceptable Ambient Level (AAL) are listed for each pollutant for which testing will be performed. If source testing reveals that emissions of a pollutant listed below are above the TPER, the facility shall then perform dispersion modeling to show compliance with the AAL at the property boundary.

<u>Source</u>	<u>Pollutant</u>	<u>TPER, AAL</u>	<u>Applicable Regulation</u>
incinerators (ID Nos. A and B)	beryllium	0.28 lb/yr $4.1 \times 10^{-6}$ mg/m <sup>3</sup> <sup>b</sup>	2H .0610 2D .1100 (annual)
	nickel	0.13 lb/day $0.6 \times 10^{-2}$ mg/m <sup>3</sup> <sup>b</sup>	2H .0610 2D .1100 (24-hour)
	hydrogen fluoride	0.63 lb/day $0.3 \times 10^{-1}$ mg/m <sup>3</sup> <sup>b</sup>	2H .0610 2D .1100 (24-hour)
	manganese	0.63 lb/day $0.31 \times 10^{-1}$ mg/m <sup>3</sup> <sup>b</sup>	2H .0610 2D .1100 (24-hour)

<sup>b</sup> ambient concentration standards

- (b) PERFORMANCE TESTING - The EPA test methods listed in the following table shall be used to perform the required testing.

<u>Affected Source</u>	<u>Pollutant</u>	<u>EPA Test Method</u>
incinerators (ID Nos. A and B)	particulate matter	Method 5
	opacity	Method 9
	chromium VI	SW846 - Method 0013
	arsenic	Method 29
	cadmium	Method 29
	hydrogen chloride	Method 26A
	hexachlorodibenzo-P-dioxin	Method 23
	tetrachlorodibenzo-P-dioxin	Method 23
	mercury	Method 29
	chlorine	Method 26A
	lead	Method 29
	beryllium	Method 29
	nickel	Method 29
	hydrogen fluoride	Method 26A
manganese	Method 29	

- (i) To afford the Regional Supervisor, Division of Air Quality, the opportunity to have an observer present, the Permittee shall provide the Regional Office, in writing, at least thirty (30) days notice of any required performance test(s).

- (ii) Within 180 days of the issue date of this permit, the Permittee shall conduct the required initial performance test(s) on one of the two incinerators and submit a written report of the test(s) to the Regional Supervisor, Division of Air Quality. Subsequent performance test(s) shall be conducted within twenty-four to twenty-six months from the date of the initial performance test(s) and then every twenty-four to twenty-six months thereafter. As with the initial performance test(s), the incinerator to be tested during the subsequent performance test(s) shall be selected by the DAQ prior to the testing date.
  - (iii) This permit may be revoked, with proper notice to the Permittee, or enforcement procedures initiated, if the results of the test(s) indicate that the facility does not meet applicable limitations.
  - (vi) The source shall be responsible for ensuring, within the limits of practicality, that the equipment or process being tested is operated at or near its maximum normal production rate or at a lesser rate if specified by the Director or his delegate.
  - (v) All associated testing costs are the responsibility of the Permittee.
9. TEST PROTOCOL REQUIREMENT - At least forty-five (45) days prior to performing any required emissions testing, the Permittee must submit a testing protocol to the Regional Supervisor, Division of Air Quality for review and approval. The incinerators must be operated at no less than 90% of their maximum process rates during the emissions testing. The medical waste incinerated during the emissions testing, must be representative of the waste typically incinerated at the facility. All testing protocols must be approved by the DAQ prior to performing such tests.
10. REPORTING REQUIREMENT - The Permittee shall submit a test report within 60 days of testing.
11. RECORD KEEPING REQUIREMENT - The Permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in this permit for a minimum of three (3) years from the date of recording.
12. NOTIFICATION REQUIREMENT - As required by 15A NCAC 2D .0535, or for sources applicable to 15A NCAC 2D .0524 or .1110, when particulate matter, toxic air pollutant, sulfur dioxide, lead, visible and/or odorous emissions exceed Environmental Management Regulations for more than four (4) hours, the Regional Supervisor, Division of Air Quality, shall be notified as promptly as possible, but in no case later than twenty-four (24) hours or on the next working day of becoming aware of the occurrence. Such notice shall specify the facility name and location, the nature and cause of the excess emission, the time when first observed, the expected duration, and the estimated rate of emissions. This reporting requirement does not allow the operation of the facility in excess of Environmental Management Commission Regulations.

## B. GENERAL CONDITIONS AND LIMITATIONS

1. REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, AND REQUESTS FOR RENEWAL shall be submitted to the:

Regional Supervisor  
North Carolina Division of Air Quality  
585 Waughtown Street  
Winston-Salem, NC 27107

2. PERMIT RENEWAL REQUIREMENT - The Permittee, at least ninety (90) days prior to the expiration date of this Permit, shall request permit renewal by letter in accordance with 15A NCAC 2Q .0304 (d) and (f). Pursuant to 15A NCAC 2Q .0203 (i), no permit application fee is required for renewal of an existing air permit. The renewal request should be submitted to the Regional Supervisor, Division of Air Quality.
3. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 2Q .0203 (a), the Permittee shall pay the Annual Permit Fee within thirty (30) days of being billed by the Division. Failure to pay the fee in a timely manner will cause the Division to initiate action to revoke the permit.
4. EQUIPMENT RELOCATION - A new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
5. REPORTING REQUIREMENT - Any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, Division of Air Quality:
  - (a) changes in the information submitted in the application regarding facility emissions;
  - (b) changes that modify equipment or processes of existing permitted facilities; or
  - (c) changes in the quantity or quality of materials processed.

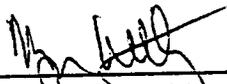
If appropriate, modifications to the permit may then be made by the Division of Air Quality to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

6. This permit is subject to revocation or modification by this Division upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.
7. This permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the Division of Air Quality.
8. This issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.
9. This permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
10. Reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, Division of Air Quality at such intervals and in such of form and detail as may be required in such by the Division. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.

11. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
12. Pursuant to North Carolina General Statute 143-215.3 (a) (2), no person shall refuse entry or access to any authorized representative of the Division of Air Quality who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
13. The Permittee must comply with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
14. PERMIT RETENTION REQUIREMENT - The Permittee shall retain a current copy of the Air Permit at the site. The Permittee must make available to personnel of the Division of Air Quality, upon request, the current copy of the Air Permit for the site.

Permit issued this the 20th day of March, 1998.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

  
\_\_\_\_\_  
Myron G. Whitley, P.E., Regional Supervisor  
Division of Air Quality  
By Authority of the Environmental Management Commission

Air Permit No. 5896R9

### 3. OPERATIONS AND CONTINGENCY PLAN

#### A. PLANT OPERATIONS

- (1) THE WASTE IS RECEIVED AT THIS FACILITY 24 HOURS PER DAY, 7 DAYS PER WEEK. THE WASTE IS STORED IN REFRIGERATED TRAILERS UNTIL IT IS READY TO BE PROCESSED. WHEN IT IS TIME TO PROCESS THE WASTE, IT IS REMOVED FROM THE TRAILER AND STAGED BY THE CONVEYER OR SCALE. THE BOXES AND REUSABLE BINS ARE LOADED ONTO THE CONVEYER WHERE THEY ARE SCREENED FOR RADIATION AS THEY MOVE TO THE SCALE. EACH BOX AND BIN IS SCANNED AND WEIGHED FOR BILLING AND TRACKING PURPOSES. IN THE CASE OF REUSABLE CARTS, THE CONTAINERS ARE PLACED ON THE FLOOR SCALE, SCREENED FOR RADIATION, WEIGHED AND SCANNED AND THEN MOVED TO THE CART DUMPER WHERE THE LIDS ARE OPENED, PLACED AND SECURED TO THE LIFT IN PREPARATION FOR CHARGING THE INCINERATOR. WEIGHING ALLOWS THE OPERATOR TO PROPERLY CHARGE THE INCINERATOR.
- (2) WHEN THE UNIT IS READY TO LOAD, THE HOPPER LID OPENS AUTOMATICALLY AFTER THE PREVIOUS LOAD IS PUSHED INTO THE INCINERATOR BY RAM FUNCTION. THE BOXES AND BINS OF WASTE ARE PLACED IN THE AUTOMATIC DUMPER AVERAGING ABOUT 4 TO 10 PER LOAD DEPENDING ON WEIGHT. THE OPERATOR STEPS TO THE CONTROL PANEL CLEAR OF THE DUMPER AND PRESSES THE START BUTTON TO BEGIN THE LOADING PROCESS. AFTER THE LOAD IS DUMPED, THE OPERATOR PRESSES ANOTHER BUTTON TO CLOSE THE LID ON THE RAM LOADER. THE WASTE DUMPER IS RETURNED TO THE ORIGINAL POSITION. THE OPERATOR HAS CONTROLLED ALL OF THESE FUNCTIONS WITH COMPLETE VISUAL CONTACT OF THE AREA FOR SAFETY.
- (3) THE WASTE IS NOW CONFINED IN THE LOADER HOPPER AWAY FROM ALL PERSONNEL. WHEN THE SYSTEM IS AT THE PROPER TEMPERATURE FOR LOADING AND THE PRESET LOAD INTERVAL TIME HAS ELAPSED, THE HYDRAULIC SYSTEM WILL POWER THE LOADER THROUGH ITS AUTOMATIC CYCLE. THE REFRACTORY LINED GUILLOTINE DOOR WILL RISE, OPENING THE PRIMARY CHAMBER TO THE LOADER. THE RAM WILL MOVE FORWARD PUSHING THE WASTE INTO THE CHAMBER. THE RAM THEN RETRACTS CLEAR OF THE GUILLOTINE DOOR. SHOULD THERE BE ANY SIGN OF FIRE IN THE LOADER AS THE DOOR OPENS THE OPERATORS ARE TRAINED TO EXTINGUISH IT IMMEDIATELY WITH THE HOSE AT THE LOADER PLATFORM. THE LOADER IS NOW READY TO ACCEPT THE NEXT LOAD.
- (4) THE PRIMARY CHAMBER IS DESIGNED WITH 3 LEVELS. WHEN THE WASTE IS PUSHED IN BY THE RAM IT IS EXPOSED TO THE HEAT OF THE CHAMBER AND THE VOLATILE MATERIALS, PRIMARILY PLASTICS AND BINDERS, START TO VAPORIZE. AS THE MASS OF THE WASTE RISE IN TEMPERATURE, OTHER HYDRO CARBON MATERIALS START TO PYROLYSE IN THE OXYGEN LEAN ATMOSPHERE. EACH SUCCEEDING LOAD PUSHES THE MASS OF BURNING WASTE THROUGH THE PRIMARY CHAMBER. AS THE LOAD INCREASES THE WASTE IS PUSHED FROM THE INITIAL HEARTH OVER A STEP DOWN TO A LOWER HEARTH.

## B. EQUIPMENT LIST

- (1) 2 SLY MODEL 265 WET ACID SCRUBBERS
- (2) SCALE / PRINTER COMPUTER SYSTEM
- (3) STEAM CLEANER
- (4) RELATED OFFICE EQUIPMENT
- (5) RELATED SHOP MAINTENANCE EQUIPMENT
- (6) FOUR (4) 20 YARD ASH CONTAINERS
- (7) TWO ASH BINS
- (8) TWO (2) FORKLIFTS
- (9) CONVEYER SYSTEM
- (10) TUBWASH UNIT( FUTURE)
- (11) DMP-WATER TREATMENT SYSTEM
- (12) EMERGENCY BACK-UP GENERATOR
- (13) REFRIGERATED TRAILERS FOR TRANSPORT AND STORAGE OF MEDICAL WASTE
- (14) BIG JOE LIFT (CART STACKER)
- (15) YARD TRACTOR (TRAILER JOCKEY)
- (16) 2 JOY ENERGY SYSTEM 2500 TES 1911 LB/HOUR INCINERATORS
- (17) WASHDOWN SPRAY WASHER

E. INSPECTION AND MONITORING PROGRAM

- (1) EACH TRAILER AND ALL OTHER EQUIPMENT USED TO TRANSPORT WASTE CONTAINERS IS INSPECTED DAILY. ALL OBSERVED DEFICIENCIES ARE PROMPTLY CORRECTED. IN ADDITION, THE VEHICLES THEMSELVES UNDERGO ROUTINE PREVENTIVE MAINTENANCE AND ARE MAINTAINED AND INSPECTED ACCORDING TO DOT REGULATIONS.
- (2) HOUSEKEEPING PRACTICES ARE MONITORED DAILY.
- (3) VISUAL INSPECTIONS OF THE REFRIGERATION EQUIPMENT IS PERFORMED DAILY. TEMPERATURES BETWEEN 35 AND 45 DEGREES FAHRENHEIT SHALL BE MAINTAINED FOR REGULATED MEDICAL WASTE NOT TREATED WITHIN 7 CALENDAR DAYS AFTER RECEIPT.
- (4) CONTINGENCY PLANS TO PROPERLY CONTAIN, CONTROL, AND COLLECT SPILLAGE ARE IN EXISTANCE FOR THE FACILITY.
- (5) INSPECTION AND MONITORING PROCEDURES ARE PERFORMED AS REQUIRED BY THE MANUFACTURERS OF THE PROCESSING EQUIPMENT.
- (6) MONTHLY INSPECTIONS OF THE FACILITY USING A FACILITY INSPECTION CHECKLIST IS CONDUCTED BY THE SAFETY MANAGER. RANDOM INSPECTIONS ARE CONDUCTED BY UPPER MANAGEMENT.

REVISED MAY 8, 1998

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(5) Arrangements with Emergency Authorities

- (a) Both the local police and fire departments will be briefed as to the nature of our operations. Arrangements will be made for a tour of the facility by both units as well as the local emergency response team.
- (b) The closest acute care facility to the plant is Alamance County Hospital. The hospital is on standby for emergency treatment in the event of contamination or occupational injury.

(6) Emergency Response Equipment

- (a) The emergency response equipment readily available on site includes:
  - \* Fire Extinguishers
  - \* Disinfectant
  - \* Portable pumps (wet and dry vacuum type)
  - \* Spill Kits (located on every vehicle and extra supplies in the supply cage)
  - \* Absorbent Materials
  - \* Bags for rebagging contaminated material
  - \* Boxes for reboxing the waste
  - \* Personal Protective Equipment

**(B.) OTHER EQUIPMENT READILY AVAILABLE**

- \* THROUGH ARRANGEMENTS WITH RENTAL CENTER, THERE IS A BACK-HOE AVAILABLE ON SHORT NOTICE FOR LIQUID CONTAINMENT TO PREVENT ANY POTENTIAL LIQUID SPILLS FROM LEAVING THE SITE.
- \* THE ABUNDANCE OF RENTAL COMPANIES IN THE IMMEDIATE AREA MAKES IT EASY TO OBTAIN VARIOUS PIECES OF EQUIPMENT AS DEEMED NECESSARY IN AN EMERGENCY.

**(7.) EVACUATION PLAN**

- (A.) IN THE EVENT OF AN EVACUATION, AN ANNOUNCEMENT WILL BE MADE OVER THE INTERCOM SYSTEM AND THE EMPLOYEES SHOULD IMMEDIATELY EVACUATE THROUGH THE NEAREST UNOBSTRUCTED EXIT. OFFICE PERSONNEL SHOULD FOLLOW POSTED EVACUATION ROUTES. THE MUSTER POINT WILL BE THE MAIN EXIT GATE.

**(8.) EMERGENCY COORDINATORS**

- (A.) THE NATURE OF THE OPERATIONS ENABLES A SHIFT FOREMAN, SUPERVISOR, OR COORDINATOR TO BE ON LOCATION AT ALL TIMES. THESE INDIVIDUALS HAVE ACCESS TO A TELEPHONE AND ARE IN CHARGE OF THE EMERGENCY SITUATIONS.
- (B.) THE PRIMARY INDIVIDUALS RESPONSIBLE FOR THE COORDINATION AND EVALUATION OF AN EMERGENCY SITUATION ARE:

J.W. HILL  
(336)421-0505 HOME  
(336)513-9377 PAGER  
(336)578-8900 OFFICE

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\* ALAN SKRZYPCZAK  
(336)449-4611 HOME  
(336)260-6863 MOBILE  
(336)578-8900 OFFICE

(9.) RESPONSIBILITIES OF THE EMERGENCY COORDINATOR

(A.) ONE OF THE EMERGENCY COORDINATORS WILL BE AVAILABLE AT ALL TIMES, EITHER AT THE FACILITY OR ON CALL.

(B.) UPON NOTIFICATION OR DISCOVERY OF AN EMERGENCY CONDITION THE COORDINATOR WILL EVALUATE THE SITUATION AND NOTIFY THE APPROPRIATE AGENCIES TO MINIMIZE THE INCIDENT.

(C.) IN ORDER TO PROPERLY NOTIFY THE AGENCIES, REGIONAL STAFF, AND CORPORATE STAFF, THE COORDINATOR SHOULD GATHER THE FOLLOWING INFORMATION (AFTER THE IMMEDIATE HAZARD HAS BEEN BROUGHT UNDER CONTROL.)

- \* NAME AND PHONE NUMBER OF THE COORDINATOR
- \* NAME AND ADDRESS OF THE FACILITY
- \* DATE AND TIME OF THE ACCIDENT
- \* TYPE OF ACCIDENT
- \* EXTENT OF INJURIES IF ANY
- \* POSSIBLE HAZARDS TO HEALTH AND ENVIRONMENT IF ANY
- \* POSSIBLE HAZARDS TO HEALTH OR ENVIRONMENT OUTSIDE THE FACILITY
- \* AGENCIES AND NAMES OF INDIVIDUALS CONTACTED.

(D.) AFTER THE EMERGENCY CONDITION HAS BEEN CONTROLLED THE COORDINATORS ARE RESPONSIBLE FOR INVESTIGATING THE INCIDENT TO ASSESS THE DAMAGES, DETERMINE CAUSE, AND WHAT STEPS NEED TO BE TAKEN TO PREVENT A REOCCURRENCE OF THE INCIDENT.

## J. Decontamination Procedures

### (1) Employees

- (a) Prior to taking breaks, employees shall remove and discard disposable items, and thoroughly wash their hands with soap.
- (b) Each employee is responsible for cleaning and disinfecting equipment used during the shift.
- (c) At the end of each work shift employees shall place worn clothing in containers provided.
- (d) Each employee is required to shower and change into street clothes at the end of each shift.
- (e) Employees are required to wear uniforms provided. Should the uniforms become spoiled as a result of a leak or spill, the employee must change immediately. If the employee came in contact with the liquid, he must shower immediately.
- (f) Office personnel entering the plant must wear eye protection.
- (g) After returning from the plant, all employees who cross the red line must wash their hands immediately.

### (2) Visitors

- (a) All visitors who enter the plant active area must wear eye protection and a lab coat. Shoe covers are available also. Prior to entering the office, these must be removed and left outside.
- (b) After returning from the plant, all visitors and office personnel who cross the red line must wash their hands immediately.

## 5. ASH DISPOSAL PROCEDURES

OPERATING AT FULL CAPACITY, THIS FACILITY WILL GENERATE APPROXIMATELY 75 TONS OF ASH PER WEEK. HISTORICAL DATA HAS SHOWN THAT THIS ASH IS NON-HAZARDOUS. WE HAVE BEEN TESTING AT OTHER FACILITIES USING THE EPA TOXICITY CHARACTERISTIC LEACHATE PROCEDURE .

WE WILL BE TESTING IN ACCORDANCE WITH THE NEW ASH SAMPLING AND ANALYSIS PLAN DATED NOVEMBER 7, 1997.

THE ASH WILL BE COLLECTED IN 20 YARD CONTAINERS SPECIALLY DESIGNED FOR SLUDGES. THE CONTAINERS WILL BE ELEVATED AT THE FRONT TO ALLOW FOR THE DRAINAGE OF WATER PRIOR TO TRANSPORT AND DISPOSAL. THE ASH, DUE TO THE WET NATURE, WILL NOT RELEASE FUGITIVE DUST INTO THE WORK ENVIRONMENT DURING OPERATIONS OR TRANSPORT. TRANSPORTATION OF THE ASH WILL BE ALLOWED ONLY AFTER THE CONTAINER HAS BEEN DRAINED AND COVERED WITH A TARP.

DISPOSAL OF THE ASH IS AT THE CHARLOTTE MOTOR SPEEDWAY LANDFILL .

ALL LEACHATE WATER FROM THE ASH DRAIN WILL BE DISPOSED OF THROUGH THE CITY SEWER SYSTEM IN COMPLIANCE WITH CITY OF GRAHAM PERMIT # 0030.

Revised December 08, 1998

## Agencies To Be Notified

In the event of an emergency such as fire, large spills, sudden release of contaminated materials, or explosion, the following will be notified immediately:

Fire Department	911
Police Department	911
(Electric)	(336) 229-9000
(Water)	(336) 228-8362
(Gas)	(336) 563-3521
*Support Center	(412) 269-4323
*Corporate Office	(713) 870-8100
*NCDENR Winston Salem	(336) 771-4608
*National Emergency Response	1-800-424-8802
*City of Graham (Spills)	(336) 570-6721

\*These locations will be notified only by the primary coordinator or with his permission.

Appendix G:

EQUIPMENT LIST

- (1) 2 SLY MODEL 265 WET ACID SCRUBBERS
- (2) SCALE / PRINTER COMPUTER SYSTEM
- (3) STEAM CLEANER
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- (16) 2 JOY ENERGY SYSTEM 2500 TES 1911 LB/HOUR INCINERATORS
- (17) WASHDOWN SPRAY WASHER

REVISED MAY 08,1998

## H. STAFFING CHART

- (1) DISTRICT VICE PRESIDENT
- (2) OPERATIONS MANAGER
- (3) MANAGER ENVIRONMENT SAFETY AND HEALTH
- (4) RECEPTIONIST /MANIFEST CONTROLLER
- (5) CUSTOMER SERVICE / TRANSPORTATION REP
- (6) FOUR LEAD OPERATORS
- (7) TWELVE INCINERATOR OPERATORS
- (8) ONE UTILITY /INCINERATOR OPERATOR
- (9) THREE MAINTENANCE MECHANICS

REVISED MAY 08,1998

**RECORD OF COMMUNICATION**

- PHONE CALL
- DISCUSSION
- FIELD TRIP
- CONFERENCE
- OTHER (SPECIFY)

(Record of item checked above)

TO: Sherri Coghill

FROM: Hugh Jernigan

DATE 7/27/98

TIME

SUBJECT: BFI Waste Management Systems of North America, Inc  
Alamance Co.

**SUMMARY OF COMMUNICATION**

I Enclosed is the ash sampling analysis conducted June 1998 as per permit requirements.

II Also enclosed is revisions to the operational plan for the facility (Permit 01-02-I). Corrected pages should be inserted into the operational plan in central files and the corresponding pages removed from the plan. Extra copy of revisions enclosed for your files.

Any questions please call

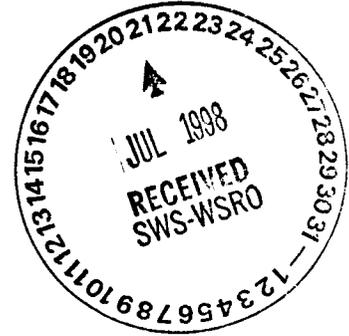
Thanks  
*[Signature]*



**CONCLUSIONS, ACTION TAKEN OR REQUIRED**

**INFORMATION COPIES**

TO:



JULY 16, 1998

MR. HUGH W. JERNIGAN JR.  
WASTE MANAGEMENT SPECIALIST  
SOLID WASTE SECTION  
NC DEPARTMENT OF ENVIRONMENT  
AND NATURAL RESOURCES  
DIVISION OF SOLID WASTE MANAGEMENT  
585 WAUGHTON ST.  
WINSTON SALEM, NC

Dear Mr. Jernigan,

Please find enclosed the results of our required ash sampling that was collected the third full week of June, 1998.

The second sampling for 1998 is scheduled in December.

If I can be of any assistance please contact me at (336) 578-8900.

Sincerely,

A handwritten signature in black ink that reads "J.W. Hill".

J.W.Hill  
MESH



Aquatic Bioassay Testing • Aquatic Toxicity Reduction Evaluations  
 Chemical Product Environmental Assessments • NPDES Testing  
 Reporting & Data Handling Services

1302 Belmont Street • Burlington, NC 27215-6935 • Phone (336) 570-4661 • Fax (336) 570-4698

## ANALYTICAL REPORT

**CUSTOMER:** Browning Ferris Industries  
**REPORT TO:** Mr. J.W. Hill

**WORK ORDER #:** 8F877-001  
**RECEIVED:** 06/30/98  
**REPORTED:** 07/15/98

**SAMPLE DESC:** TCLP MONITOR, ASH-6-1-21-98  
**SAMPLE TYPE:** TCLP, COMPOSITE  
**COLLECTED:** 06/22/98 08:00 to 06/28/98 12:00

**PO NUMBER:**

**SITE:** ASH

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
Paint Filter Test EPA 9095	Started 06/30/98 14:23 Analyzed 06/30/98 by LMB at BRI - Burlington		Pass Free Liq
pH Nonregulatory EPA 150.1	Started 06/30/98 16:00 Analyzed 06/30/98 by TMW at BRI - Burlington		8.8 SU
Arsenic in Solid by GF - Prep 3050B SW846-7060A	Started 07/08/98 12:15 Analyzed 07/10/98 by RTW at BRI - Burlington	0.96	<0.96 mg/Kg Dry
Barium in Solid by ICPMS-Prep 3050B SW846-6020	Started 07/08/98 12:15 Analyzed 07/10/98 by RTW at BRI - Burlington	3.8	6,970 mg/Kg Dry
Cadmium in Solid by ICPMS - Prep 3050B SW846-6020	Started 07/08/98 12:15 Analyzed 07/10/98 by RTW at BRI - Burlington	0.76	4.5 mg/Kg Dry
Chromium in Solid by ICPMS-Prep 3050B SW846-6020	Started 07/08/98 12:15 Analyzed 07/10/98 by RTW at BRI - Burlington	13	586 mg/Kg Dry
Copper in Solid by ICPMS - Prep 3050B SW846-6020	Started 07/08/98 12:15 Analyzed 07/10/98 by RTW at BRI - Burlington	38	8,610 mg/Kg Dry
Lead in Solid by ICPMS - Prep 3050B SW846-6020	Started 07/08/98 12:15 Analyzed 07/10/98 by RTW at BRI - Burlington	3.8	6,900 mg/Kg Dry
Manganese in Solid by ICPMS-Prep 3050B SW846-6020	Started 07/08/98 12:15 Analyzed 07/10/98 by RTW at BRI - Burlington	9.4	171 mg/Kg Dry
Mercury, Total by FIAS EPA 245.1	Started 07/08/98 13:30 Analyzed 07/09/98 by SJH at BRI - Burlington	0.17	<0.17 mg/Kg Dry
Nickel in Solid by ICPMS - Prep 3050B SW846-6020	Started 07/08/98 12:15 Analyzed 07/10/98 by RTW at BRI - Burlington	38	534 mg/Kg Dry
Selenium in Solid by ICPMS-Prep 3050B SW846-6020	Started 07/08/98 12:15 Analyzed 07/10/98 by RTW at BRI - Burlington	5.7	29 mg/Kg Dry



(8F877-001 continued)

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
Silver in Solid by ICPMS-Prep 3050B SW846-6020	Started 07/08/98 12:15 Analyzed 07/10/98 by RTW at BRI - Burlington	0.19	20 mg/Kg Dry
TCLP Arsenic by GF SW846-7060	Started 07/08/98 12:15 Analyzed 07/09/98 by RTW at BRI - Burlington	0.005	<0.005 mg/L
TCLP Barium by ICPMS SW846-6020	Started 07/08/98 12:15 Analyzed 07/09/98 by RTW at BRI - Burlington	0.0002	2.0 mg/L
TCLP Cadmium SW846-6020	Started 07/08/98 12:15 Analyzed 07/09/98 by RTW at BRI - Burlington	0.00004	0.0071 mg/L
TCLP Chromium SW846-6020	Started 07/08/98 12:15 Analyzed 07/09/98 by RTW at BRI - Burlington	0.0007	0.15 mg/L
TCLP Filter Test for Metals EPA 1311	Started 07/07/98 14:00 Analyzed 07/07/98 by SJH at BRI - Burlington	0	>0.5/100 Dry/Wet
TCLP Lead by ICPMS SW846-6020	Started 07/08/98 12:15 Analyzed 07/09/98 by RTW at BRI - Burlington	0.0002	1.5 mg/L
TCLP Mercury SW846-7471A	Started 07/09/98 12:20 Analyzed 07/10/98 by SJH at BRI - Burlington	0.0002	<0.0002 mg/L
TCLP Selenium SW846-6020	Started 07/08/98 12:15 Analyzed 07/09/98 by RTW at BRI - Burlington	0.0003	0.031 mg/L
TCLP Silver by ICPMS SW846-6020	Started 07/08/98 12:15 Analyzed 07/09/98 by RTW at BRI - Burlington	0.000010	0.00073 mg/L
Zinc in Solid by ICPMS - Prep 3050B SW846-6020	Started 07/08/98 12:15 Analyzed 07/10/98 by RTW at BRI - Burlington	94	2,050 mg/Kg Dry

MQL = Minimum Quantitation Limit

Certifications:

**BRI - Burlington**

NC Chemistry: #85, Biomonitoring: #002, Drinking Water: #37743, Radiation License: #001-0904-0G  
 VA SWCB ID: #000061, Drinking Water: #00018  
 SC Environmental: #00018  
 EPA Chemistry Lab ID: NC00137, Bioassay Lab ID: NC2721500



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July 15, 1998



MR. HUGH W. JERNIGAN  
WASTE MANAGEMENT SPECIALIST  
SOLID WASTE SECTION  
NC DEPARTMENT OF ENVIRONMENT  
AND NATURAL RESOURCES  
DIVISION OF SOLID WASTE MANAGEMENT  
585 WAUGHTOWN ST.  
WINSTON-SALEM, NC 27107

RE: OPERATIONS/CONTINGENCY PLAN UPDATE

DEAR MR. JERNIGAN,

AS WE DISCUSSED AT AN EARLIER DATE:

PLEASE FIND WITH THIS LETTER THREE COPIES OF EACH REVISED PAGE  
OF OUR OPERATIONS PLAN.

THE REVISIONS ARE MINOR IN NATURE TO INCLUDE PERSONNEL AND  
LIGHT EQUIPMENT ADDITIONS OR CHANGES. PLEASE REVIEW AND  
CONTACT ME WITH ANY CONCERNS OR QUESTIONS.

OUR CURRENT DVP, TOM HRUBESH, HAS ACCEPTED ANOTHER POSITION IN  
THE COMPANY AND RICK GABEY HAS REPLACED HIM AS DVP OF THE HAW  
RIVER FACILITY.

AGAIN, PLEASE CONTACT ME IF I CAN BE OF ASSISTANCE IN ANY WAY AT  
(336) 578-8900.

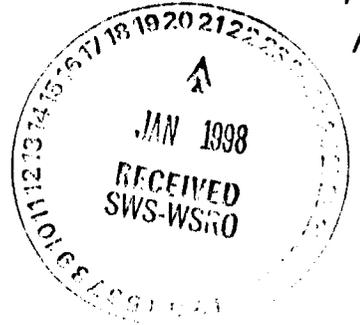
SINCERELY,

A handwritten signature in black ink that reads "J.W. Hill".

J.W.HILL  
MESH



CF  
01-02  
7



January 19, 1998

Mr. Hugh W. Jernigan, Jr.  
Waste Management Specialist  
Solid Waste Section  
N.C.D.E.H.N.R.  
585 Waughton St.  
Winston Salem, N.C. 27107-2241

Dear Mr. Jernigan,

Please find enclosed the results of our ash sampling for the third week of December 1997.

If I can be of any assistance, please contact me at: (336) 578-8900.

Sincerely,

*J. W. Hill*

J.W. Hill  
MESH





## ANALYTICAL REPORT

CUSTOMER: Browning Ferris Industries  
REPORT TO: Mr. J.W. Hill

WORK ORDER #: 7L665-001  
RECEIVED: 12/26/97  
REPORTED: 01/15/98

SAMPLE DESC: SPECIAL STUDY, 12-15-21-97 ASH

SAMPLE TYPE: ASH, COMPOSITE

PO NUMBER:

COLLECTED: 12/15/97 08:00 to 12/22/97 00:00 SITE: 12-15-21-97

PARAMETER	DATE/TIME/ANALYST	MQL	RESULT
Paint Filter Test EPA 9095	Started 01/07/98 13:20 Analyzed 01/07/98 by RAW		PASS Free Liq
Soil pH Measured In Water SW846-9045	Started 01/09/98 13:00 Analyzed 01/09/98 by RAW		8.63 SU
Arsenic, Total - Solid SW846-7060A	Started 12/31/97 09:30 Analyzed 01/02/98 by BMM	0.8	<0.8 mg/Kg Dry
Barium, Total - Solid SW846-6020	Started 12/31/97 09:30 Analyzed 01/02/98 by BMM	0.17	3,700 mg/Kg Dry
Cadmium, Total by ICPMS - Solid SW846-6020	Started 12/31/97 09:30 Analyzed 01/02/98 by BMM	0.034	9.8 mg/Kg Dry
Chromium, Total by ICPMS - Solid SW846-6020	Started 12/31/97 09:30 Analyzed 01/02/98 by BMM	0.59	180 mg/Kg Dry
Copper, Total by ICPMS - Solid SW846-6020	Started 12/31/97 09:30 Analyzed 01/02/98 by BMM	1.7	1,300 mg/Kg Dry
Lead, Total by ICP - Solid SW846-6020	Started 12/31/97 09:30 Analyzed 01/02/98 by BMM	0.17	170 mg/Kg Dry
Manganese, Total by ICPMS - Solid SW846-6020	Started 12/31/97 09:30 Analyzed 01/02/98 by BMM	0.42	180 mg/Kg Dry
Mercury, Total - Solid SW846-7471A	Started 01/05/97 14:00 Analyzed 01/06/97 by SJH	0.13	0.33 mg/Kg Dry
Nickel, Total by ICPMS - Solid SW846-6020	Started 12/31/97 09:30 Analyzed 01/02/98 by BMM	1.7	190 mg/Kg Dry
Selenium, Total by ICPMS - Solid SW846-6020	Started 12/31/97 09:30 Analyzed 01/02/98 by BMM	0.25	4.4 mg/Kg Dry



FEB 1998

Received 570-4661  
Solid Waste  
Section

(7L665-001 continued)

PARAMETER	DATE/TIME/ANALYST	ML	RESULT
Silver, Total - Solid SW846-6020	Started 12/31/97 09:30 Analyzed 01/02/98 by BMM	0.008	27 mg/Kg Dry
TCLP Arsenic by GF SW846-7060	Started 12/31/97 13:15 Analyzed 01/02/98 by BMM	0.005	0.007 mg/L
TCLP Barium-ICP SW846-6010A	Started 12/31/97 13:15 Analyzed 01/06/98 by RTW	0.005	22 mg/L
TCLP Cadmium SW846-6020	Started 12/31/97 13:15 Analyzed 01/02/98 by BMM	0.00004	0.0086 mg/L
TCLP Chromium SW846-6020	Started 12/31/97 13:15 Analyzed 01/02/98 by BMM	0.0007	<0.0007 mg/L
TCLP Filter Test for Metals EPA 1311	Started 12/29/97 14:00 Analyzed 12/29/97 by SJH	0	>0.5/100 Dry/Wet
TCLP Lead SW846-6020	Started 12/31/97 13:15 Analyzed 01/02/98 by BMM	0.0002	<u>4.6 mg/L</u>
TCLP Mercury SW846-7471A	Started 12/31/97 11:45 Analyzed 01/02/98 by SJH	0.0002	<0.0002 mg/L
TCLP Selenium SW846-6020	Started 12/31/97 13:15 Analyzed 01/02/98 by BMM	0.0003	0.021 mg/L
TCLP Silver SW846-6020	Started 12/31/97 13:15 Analyzed 01/02/98 by BMM	0.000010	<0.00001 mg/L
Zinc, Total by ICPMS - Solid SW846-6020	Started 12/31/97 09:30 Analyzed 01/02/98 by BMM	4.2	2,020 mg/Kg Dry

MQL = Minimum Quantitation Limit

Certifications:

NC Chemistry: #85, Biomonitoring: #002, Drinking Water: #37743, Radiation License: #001-0904-0G  
VA SWCB ID: #000061, Drinking Water: #00018  
SC Environmental: #00018  
EPA Chemistry Lab ID: NC00137, Bioassay Lab ID: NC2721500



JAMES B. HUNT JR.  
GOVERNOR

WAYNE McDEVITT  
SECRETARY

The Honorable Howard Coble  
Congress of the United States  
PO Box 814  
Graham, NC 27253-0814

Dear Representative Coble:

Thank you for your letter concerning the Bass Mountain Stump Dump on Bass Mountain Road in Alamance County, North Carolina.

Although it is not within the jurisdiction of the department to regulate the roadways or traffic at solid waste management facilities, I asked the Division of Waste Management to send a representative to visit the facility to determine if there were any solid waste violations occurring at the site.

The field staff member who inspects sites in Alamance County observed no solid waste violations at the Bass Mountain Stump Dump at the time of his inspection. He noted that the road to the landfill was heavily graveled and of all-weather construction.

If you have any further questions regarding this issue, please contact Mr. Dexter Matthews, chief of the Solid Waste Section, at 919-733-0692, extension 256.

Sincerely,

Wayne McDevitt  
Secretary

WMcD\WLM

cc: Richard Rogers, Legislative and Inter-Governmental Affairs  
William L. Meyer, Division of Waste Management