

0102Permit1993 - Box No. —

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1993

01-02 ✓

Alamance County

01021993

Haw River District



December 2, 1993

Sherry C. Hoyt
Environmental Engineer
Solid Waste Section
Department of Environment, Health,
and Natural Resources
P.O. Box 27687
Raleigh, N.C. 27611-7687

RE: Scheduled December 1993 Ash Sampling.

Dear Ms. Hoyt,

Thank you again for the time you extended to me today about our December, 1993 Ash sampling. As we discussed we are not in operation because of equipment repair and incinerator clean out. We will begin to collect our ash sample the first full week of operation in lieu of the third week of December. I will ask Webb Tech for "rush" results on the composite for submittal to you. Again, thanks for your time and consideration.

If I can be of any assistance please call me at (910)-578-8900.

Sincerely,



J.W. Hill
Safety Manager

01-02

2



September 10, 1993

Ms. Sherri C. Hoyt
Environmental Engineer
Solid Waste Section
Department of Environmental, Health,
and Natural Resources
P.O. Box 27687
Raleigh, North Carolina 27611-7687

RE: Operations/Contingency Plan and Personnel Changes

Dear Ms. Hoyt:

Attached is a copy of the revisions to the above referenced plan for BFI Medical Waste Systems (Southeast), Inc. The revisions are minor in nature and address changes that reflect current personnel and operations. Please review and file with your copy of our plans.

Ed Haas has accepted a position with our Southern Region in Alabama and I have replaced Ed as the District Manager for the Haw River facility.

If you have any questions or comments on the revisions, please do not hesitate to contact me at (919) 789-8900. I look forward to working with you and providing any assistance as needed.

Sincerely,

Bonnie James

Bonnie James
District Manager

A. Facility



(1) Solid Waste Permit #01-02-I
Air Quality Permit #5896R5
Waste Water Permit #0030

(2) Name

BFI Medical Waste Systems (Southeast) Inc.

(3) Type of Service

This location is engaged in the collection, transportation, and destruction of medical, pharmaceutical and USDA regulated waste via incineration.

(4) Mailing address

P.O. Box 310
Haw River
North Carolina
27258

(5) Location

1168 Porter Avenue
Haw River
North Carolina
27258

(6) Hours of Operation

24 hours per day
7 days per week

(7) Telephone

(919) 578-8900 (Local)
(800) 234-4785 (Emergency)

(8) SIC Code- 4953

4935 Refuse Systems
Garbage Collection, Destruction, Processing
Dead Animal Disposal
Collection and Disposal of Ashes

B. CONTACT PERSON

- (1) Bonnie James
District Manager
1168 Porter Avenue
Haw River, North Carolina 27258
(919) 578-8900
- (2) Rodney Bateman
Operations Manager
1168 Porter Avenue
Haw River, North Carolina 27258
(919) 578-8900
- (3) Larry L. Holloway
Vice President
BFI Medical Waste Systems (Southeast) Inc.
8607 Roberts Drive
Atlanta, Georgia 30350
(404) 640-2300



C. Characteristics of Special Wastes Handled at the Facility

(1) Waste Code

No waste code is available for infectious waste in Title 40 Code of Federal Regulations.

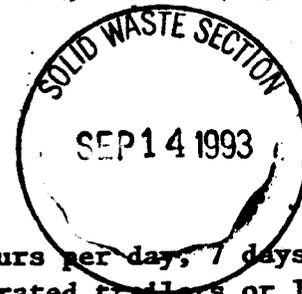
(2) Type by Name

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 wastes:

- * isolation wastes
- * cultures and stocks of etiologic agents
- * blood and blood products
- * pathological wastes
- * other wastes from surgery and autopsy
- * contaminated laboratory wastes
- * sharps

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 either stored in refrigerated trailers or loaded into a 6000 cubic foot cooler until it is ready to be processed. When it is time to process the waste, it is removed from the cooler, a refrigerated trailer, or a refrigerated van (depending upon where it is stored). In the case of boxes it is then staged at the conveyor. The boxes are loaded onto the conveyor where they move to the scales. Each box is weighed and scanned for billing and tracking purposes. In the case of tubs or carts, the containers are weighed and scanned and then moved to the automatic cart dumper where the lids are locked open and containers secured to the lift. Weighing allows the 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 of waste are placed in the loader hopper 4 to 10 boxes per load, depending on weight. The operator steps to the control panel, clear of the hopper lid and begins the loading process. When utilizing the tub/cart/box dumper a button is pressed from a secure location at or near the control panel to lift the secured tubs/carts/boxes and automatically dump the waste into the hopper. Pressing a button, he closes the hopper lid on the ram loader. The tub/cart/box dumper is returned to the original position where the tub/cart are removed from the dumper. 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 power 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 just clear of the guillotine door: as the door starts to close, a water spray turns on to quench any sparks which may have adhered to the ram face. The ram then returns to the rear position in preparation for 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 rises in temperature, other hydrocarbon 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 the lower hearth.

Low velocity air is forced through the burning bed of carbon and other waste residuals releasing heat and burning to inert ash. Control of all airflow in this chamber is critical to proper pyrolytic combustion.

The primary gases of partially burned smoke and hydrocarbons flow into the hot secondary chamber. A combination of tangential and radial air injection assures complete mixing and combustion. A pilot flame assure immediate ignition of the exhaust gases thus assuring full chamber utilization for retention time. Proper combustion air, turbulence, temperature, and retention time result in a minimum emission.

The clear, hot exhaust gases leave the secondary chamber and pass out through the refractory lined stack to the wet acid scrubber system.

The hot flue gases pass through a quench section where the gas temperature is reduced. The gases then pass through a impingement plate scrubber to remove particulate matter and is discharged through a demisting tower and out the secondary stack.

The recirculated water is maintained at a PH of 8.0 to 8.5 for acid gas removal. Sodium Hydroxide is used as the naturalization agent.

Back in the primary chamber, the waste continues to feed and pyrolyse. On an automatic time basis the ash plow will extend out from under the hearth step moving the burned out ash towards the ash drop at the end of the chamber. As the ash drops down the ash chute, it enters the water filled quench tank. This water quenches the ash and seals the air out of the primary chamber. A ash dragon drags the ash up a dewatering ramp and drops it into the ash cart.

The resulting ash is extracted from the system daily and transported to an approved Landfill for co-disposal with municipal waste. Representative samples of the ash are analyzed twice each year to track the make up of the ash and allow for analysis of customer waste for monitoring and waste stream analysis.

Other operations such as preventative maintenance, housekeeping, record-keeping, etc. are described in later sections.

B. EQUIPMENT LIST

- (1) 2 Joy Energy System 2500 TES 1911 lb/hour Incinerators
- (2) 2 Sly Model 265 Wet Acid Scrubbers
- (3) Scale/Printer Computer System
- (4) Steam Cleaner
- (5) Related Office Equipment
- (6) Related Shop Maintenance Equipment
- (7) Four (4) 20yd Ash Containers
- (8) Two Ash bins
- (9) Forklift
- (10) Conveyor System
- (11) Washdown Spray Washer
- (12) Tubwash Unit (future)
- (13) DMP - Water Treatment System

C. SAFETY EQUIPMENT

- (1) Uniforms provided and laundered
- (2) Tyvek clothing for emergency response
- (3) Work Gloves
- (4) Fire Extinguishers
- (5) Shower Facilities
- (6) First Aid Kits
- (7) Respirators
- (8) Hard Hats and Faceshields for unloading vehicles
- (9) Spill Response Kits
- (10) Hearing Protection as required
- (11) Steel Toed/Shank Boots
- (12) Aprons
- (13) Eye Wash Stations

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. Working temperatures of less 45 degree Fahrenheit will be maintained. Waste will not be stored for longer than 14 days.
- (4) Contingency plans to properly contain, control, and collect spillage are in existence for the facility.
- (5) Inspection and monitoring procedures are performed as required by the manufacturers of the processing equipment.
- (6) Monthly inspection of the facility using a facility inspection checklist is conducted by the District Manager. Random inspections are conducted by upper management.

F. PREVENTIVE MAINTENANCE

- (1) All equipment is tested and maintained as necessary to assure its proper operations in case of an emergency. This includes the adjustment, repair or replacement of worn parts before the equipment or system fails.
- (2) All vehicles, trailers, tubs, and carts are decontaminated after each use and are fit for intended use before normal operations continue.
- (3) Records of inspections, testing and maintenance are maintained on site.

G. HOUSEKEEPING PROCEDURES

- (1) Below are housekeeping practices to be followed by all personnel in the shop, office, and equipment storage areas.
 - (a) Neat and orderly storage of repair and replacement equipment, tools, cleaners, and lubricants.
 - (b) Prompt removal of small spillage using available absorbing compounds and cleaners.
 - (c) All trash should be picked up and properly disposed of as detected.
 - (d) Maintenance of dry, clean floors by use of brooms, squeegees, vacuum cleaners, and mops.
 - (e) Maintenance of proper spacing for pathways and walkways between containers, equipment and work areas.
 - (f) Maintenance of good housekeeping in the locker room, lunch room, and shop office.
- (2) Cleaning Supplies
 - (a) Containers with pre-mixed disinfectant solution
 - (b) Brush brooms
 - (c) Mops
 - (d) General cleaners with paper towels
 - (e) Floor cleaner, wax, and general disinfectants
- (3) Cleaning Techniques
 - (a) All surfaces shall be cleaned in the top to bottom fashion, a disinfectant solution of saniquat or clorox diluted 50 to 1 shall be used to clean the operations area of the plant.
 - (b) Caution must be taken not to soak electrical equipment.
 - (c) Conveyor should be disinfected daily using saniquat or clorox solution or equivalent.
 - (d) Stairs and handrails shall be cleaned using a brush and disinfectant.

- (e) A soft cloth or towel shall be dampened with the disinfectant and the surfaces of all computer apparatuses shall be wiped, including the keyboard, screen, scanning wand, scale, computer and scale tables.
- (f) All doors, handles, and handrails on the vehicle shall be scrubbed with a brush and disinfectant and wiped down.
Windows and other fixtures in the vehicle will be cleaned as needed.

I. EMERGENCY PROCEDURES - PLANT OPERATIONS

(1) Contingency Plan Description

- (a) The facility is equipped with fire extinguishers. The location of the units are pinpointed on the floor plan.
- (b) Due to the nature of our operations the most predictable emergencies lie in spills of liquids, and remote possibilities of fire.
- (c) The fire department and police department are familiar with the nature of our operations and are able to respond on short notice.
- (e) Due to the biological nature of the material, the potential for exposure via release of the waste suddenly or non-suddenly would not appear to pose a problem should that release be to the air or soil. Micro-organisms do not survive without medium in the environment. Aero-solization of infectious waste does not pose adverse threats.

(2) Response Procedures to Liquid Spills or Leaks

- (a) Upon discovery of a leaking box or a liquid spill, the employee is to take the following steps to minimize the incident:
 - * Apply absorbent material to contain the liquid.
 - * Isolate the leaking box, re-bag the box and process the box immediately for incineration.
 - * Clean the absorbent material up with a shovel and broom. The material should be placed in a red bag and promptly incinerated.
 - * Disinfect the area with clorox solution and sweep into the drain. Dry mop the area.

(3) Emergency Response to Solid Spills

(a) Upon discovery of a spill involving the solid contents of a box the employee should respond in the following manner to minimize the incident:

- * Immediately repackage the material in a red bag. This can be placed in a new box and sealed. The old box should be processed for incineration immediately.
- * The area should be disinfected with a clorox or saniquat solution or equivalent. The solution should be swept into the drain and the area dry mopped.

(4) Emergency Response to Fires

- (a) Upon discovery of a fire, no matter how small, the receptionist should be notified. An Emergency Response Coordinator will be notified and will respond to the area.
- (b) If the fire is small and easily contained and extinguished with a fire extinguisher or the fire hose, proceed to extinguish the fire. If the fire is out of control, notify the office to call the fire department and evacuate the facility.
- (c) In the event the fire is in the scrubber, open the stack cap and shut down the scrubber. It is always necessary to call the fire department for fires in the scrubber.
- (d) If the fire is a vehicle fire, notify the office so the fire department can be called.

(b) Other Equipment Readily Available

- * Through arrangements with Holt Contractors there is a back hoe available on short notice for liquid containment to prevent the liquid 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 employees should immediately evacuate through the nearest unobstructed exit. Office personnel should follow posted evacuation routes. The muster point will be 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:

Bonnie James
District Manager
136 E West Crescent Square Drive
Graham, N.C. 27253
Bus. (919) 578-8900
Home (919) 570-4651

Rodney Bateman
Plant Manager
3907 Keystone Road
Snow Camp, N.C. 27349
Bus. (919) 578-8900
Home (919) 376-9308

(3) Processing Area

- (a) Before each shift, it is the responsibility of the supervisor to see that the equipment for cleaning and disinfecting is available.
- (b) A sprayer shall be filled with the proper mixture of disinfecting solution and stored near the operator's station.
- (c) Absorbent material should be readily available.
- (d) The processing area should be kept clean during the shift.
- (e) At the end of each shift, the processing area should be cleaned as described in Section 3. G
- (f) As the trailers and collection vehicles are unloaded, all paper and trash should be picked up and disposed of in the incinerator.

Agencies To Be Notified

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

Fire Department	911
Police Department	911
(electric)	(919) 229-9000
(Water)	(919) 228-8362
(Gas)	(919) 563-3521
* Regional Office	(404) 640-2300
* Corporate Office	(713) 870-8100
* Department of Natural Resources Winston Salem	(919) 896-7007
* National Emergency Response	1-800-424-8802

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

5. Ash Disposal Procedure

Operating at full capacity, this facility will generate approximately 24 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 and will continue this required testing at the Haw River facility. Testing will be conducted as per 5.1 and 5.2 respectively.

The ash will be collected in 20 yard containers specially designed for sludges. The containers will have drain connections 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. Prior to transportation and disposal the ash will be subjected to a paint filter test to ensure that it is not too wet. Transportation of the ash will be allowed only after the drains are closed and the container is covered with a tarp.

Enclosed is a copy of the approval letter from North Carolina Department of Environment and Human Resources for disposal of the ash at the BFI Charlotte Motor Speedway Landfill. This is the final site for the ash residue.

All lechate water from the ash and washdown water from the floor will be collected and recirculated back into the quench tank. We anticipate the evaporation rate from the quench will exceed the amount of waste water generated.

Revised August 16, 1993

ACCOUNT NO. _____

LOCATION CODE: _____

- NEW ACCOUNT
- NEW SERVICE LOCATION

- REINSTATE CUSTOMER
- CHANGE SERVICE LEVEL

OTHER CHANGE

BILLING INFORMATION

CUSTOMER NAME: _____
 STREET NUMBER: _____
 STREET NAME: _____
 CITY: _____ STATE: _____
 ZIP: _____ PHONE: () - -
 CONTACT: _____
 NUMBER OF INVOICES REQUIRED: 1

DO NOT WRITE IN THIS SPACE

SERVICE LOCATION INFORMATION

CUSTOMER NAME: _____
 STREET NUMBER: _____
 STREET NAME: _____
 CITY: _____ STATE: _____
 ZIP: _____ PHONE: () - -
 CONTACT: _____

DO NOT WRITE IN THIS SPACE

SERVICE DESCRIPTION

Customer Tax Exemption Number (If Applicable): _____

Service Begins On: / /

Service Schedule: _____ Time(s) per day/week/month

Number of Containers: _____

Type of Container: _____

Rates: _____

Recommencement Rate: _____

Special Instructions: _____

Date of Agreement: / /

TERMS AND CONDITIONS

BY SIGNING IN THE SPACE PROVIDED BELOW, THE CUSTOMER ACKNOWLEDGES HAVING READ AND THAT IT IS BOUND BY THE TERMS AND CONDITIONS ABOVE AND BELOW ON THIS PAGE AND CONTINUING ON THE REVERSE SIDE OF THIS PAGE.

"CONTRACTOR"

(CUSTOMER NAME)

BY (SIGNATURE) _____

(NAME OF OPERATING BROWNING-FERRIS INDUSTRIES SUBSIDIARY)

NAME (PLEASE TYPE OR PRINT): _____

BY/TITLE _____

TITLE (PLEASE TYPE OR PRINT): _____

**ARTICLE I
DISPOSAL SERVICES**

Customer shall provide to Contractor and Contractor shall collect and remove from Customer's premises, treat and/or dispose of all "Biomedical Waste" generated by Customer in accordance with the terms of this Agreement. The term "Biomedical Waste", as used herein, shall include only those wastes (a) defined by the United States Environmental Protection Agency (USEPA) as infectious wastes in its Guide for Infectious Waste Management, EPA/600-SW-85-014, May 1984, or defined by the USEPA as medical waste in 49 CFR 238.35, and any other wastes identified as infectious or similar wastes in any other applicable federal, state, county or municipal laws, regulations and guidelines, and (b) "Chemotherapy Waste" (also known as antineoplastic or cytotoxic waste). The term "Chemotherapy Waste", as used herein, means discarded items which have been contaminated by chemotherapeutic drugs or antineoplastic agents, provided that such items, including vials and syringes, shall be empty as defined in applicable federal, state, county or municipal laws, regulations and guidelines. The term Biomedical Waste specifically excludes (a) fetal remains and human tissues and (b) corrosive, reactive, radioactive, toxic and other hazardous wastes and substances as defined in any applicable federal, state, county or municipal laws, regulations and guidelines.

Customer is solely responsible for properly and lawfully packaging, labeling and storing Biomedical Waste. Customer shall store Biomedical Waste in containers supplied or approved by Contractor. Customer agrees that all containers supplied to Contractor by Contractor, and which carry Contractor's identification on the container, shall be collected and disposed of only by Contractor or its designated representatives. The storage of Biomedical Waste shall be confined to an area on Customer's premises to which only authorized personnel shall have access.

Contractor reserves the right to decline to accept for collection, transportation, treatment and/or disposal any Biomedical Waste which, in Contractor's judgment, it cannot transport, treat or dispose of in a lawful manner or without a risk of harm to public health or the environment. Improperly packaged, leaking, overweight or damaged containers are subject to rejection or to off-specification charges for repackaging and/or special handling. No containers will be picked up that are wet or leaking.

ARTICLE II - TITLE

Title to Biomedical Waste collected from Customer shall be transferred to and vest in Contractor at the same time that the Biomedical Waste is fully loaded into Contractor's truck. Prior thereto, all title to the Biomedical Waste shall be in Customer. Title to any waste other than Biomedical Waste shall remain with Customer.

ARTICLE III - SERVICES AND RATES

Contractor will provide the collection, transportation, treatment and/or disposal services enumerated above at the rates set forth above, plus all applicable taxes, assessments, and related charges, including retroactive adjustments for same. Contractor will provide all necessary equipment to perform such services and all such equipment shall comply with all applicable federal, state, county, and municipal laws, regulations, guidelines and permits. Contractor reserves the right to adjust the rates hereunder to fully cover pro rata increases in fuel, insurance and residual disposal costs, and increases in costs resulting from changes in regulatory requirements or guidelines or the enforcement thereof. Contractor may adjust rates from time to time for other reasons, but any such other adjustment, in the extent such adjustment results in a percentage increase greater than the percentage increase in the local (or if none, "U.S. City Average") Consumer Price Index for Urban Consumers (all items) published by the United States Department of Labor, Bureau of Labor Statistics since the date of the last such adjustment (or since the date of execution of this Agreement in the case of the first such adjustment), shall be subject to Customer's approval upon thirty (30) days notice from Contractor prior to the effective date of the adjustment.

Changes in the rates, type, size, and amount of equipment, and the frequency of service may be mutually agreed to orally or in writing by the parties without affecting the validity of this Agreement. Consent to oral changes shall be evidenced by the practices and actions of the parties.

Contractor may provide any of the services herein through its affiliates.

THE TERMS AND CONDITIONS CONTINUE ON THE REVERSE SIDE OF THIS PAGE

APPENDIX G: EQUIPMENT LIST

- (1) 2 Joy Energy System 2500 TES 1911 lb/hour Incinerators
- (2) 2 Sly Model 265 Wet Acid Scrubbers
- (3) Scale/Printer Computer System
- (4) Steam Cleaner
- (5) Related Office Equipment
- (6) Related Shop Maintenance Equipment
- (7) Four (4) 20yd Ash Containers
- (8) Two Ash bins
- (9) Forklift
- (10) Conveyor System
- (11) Washdown Spray Washer
- (12) Tubwash Unit (future)
- (13) DMP - Waste Water Treatment System
- (14) Emergency Back-up Generator

Revised August 16, 1993

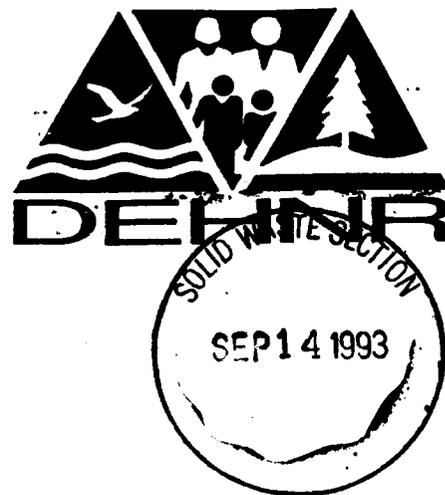
H. Staffing Chart

- (1) District Manager
- (2) Operations Manager
- (3) Receptionist/Manifest Controller
- (4) 4 Shift Supervisors
- (5) 12 Operators
- (6) 1 Utility Person
- (7) 2 Maintenance Mechanics
- (8) Safety Manager
- (9) 2nd Shift Supervisor

Revised August 16, 1993

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Environmental Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
A. Preston Howard, Jr., P.E., Director



Air Quality Section
June 9, 1993

Mr. J. W. Hill
Safety Manger
BFI Medical Waste Systems
(Southeast), Inc.
8607 Roberts Drive
Atlanta, Georgia 30350

Dear Mr. Hill:

SUBJECT: Air Permit No. 5896R5
BFI Medical Waste Systems (Southeast), Inc.
Graham, North Carolina
Alamance County

In accordance with your completed application received June 1, 1993, we are forwarding herewith Permit No. 5896R5 to BFI Medical Waste Systems (Southeast), Inc., Graham, North Carolina for the construction and operation of air emission sources or air cleaning devices and appurtenances.

If any parts, requirements, or limitations contained in this Permit are unacceptable to you, you may request modification of your Air Permit pursuant to General Statute 150B-22 through which the Permit may be modified by the Director. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which modification is being sought. Unless such a request is made within thirty (30) days following the receipt of this Permit, this Permit shall become final and binding.

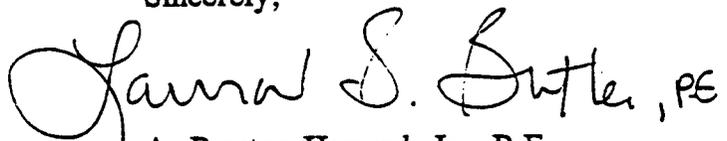
In the alternative, you have the right to request a formal adjudicatory hearing within thirty (30) days following receipt of this Permit, identifying the specific issues to be contended. This hearing request must be in the form of a written petition, conforming to General Statute 150B-23 of the North Carolina General Statutes, and filed with the Office of Administrative Courts, Post Office Drawer 27447, Raleigh, North Carolina 27611-7447. Unless a request is made for either an informal modification procedure pursuant to General Statute 150B-22 or a formal adjudicatory hearing pursuant to General Statute 150B-23, this Air Permit shall be final and binding.

As a reminder, all new construction of air pollution sources, air cleaning devices, or modifications to the sources contained in this Permit must obtain as required a Permit from this Division prior to construction. Failure to do so is a violation of General Statute 143-215.108 and may subject the Permittee to civil or criminal penalties contained in General Statute 143-215.114.

This Permit shall be effective from June 9, 1993 until July 1, 1996, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Should you have any questions concerning this matter, please contact Mr. Bruce Ingle at (919) 733-3340, extension 320.

Sincerely,

A. Preston Howard, Jr., P.E.

A. Preston Howard, Jr., P.E.

Enclosures

cc: Larry Coble

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

DIVISION OF ENVIRONMENTAL MANAGEMENT

AIR PERMIT NO. 5896R5

Issue Date: June 9, 1993

Effective Date: June 9, 1993

Expiration Date: July 1, 1996

Replaces Permit: 5896R5

To construct and operate air emission source(s) 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 as amended, and other applicable Laws, Rules and Regulations,

BFI Medical Waste Systems (Southeast), Inc.
1168 Porter Avenue
Graham, Alamance County, North Carolina

is hereby authorized to construct and operate air emission sources 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 4 waste to include non-hazardous pharmaceutical waste, multiple chamber incinerators each with a 2.3 million Btu per hour heat input primary burner and a 5.3 million Btu per hour heat input secondary burner,

in accordance with the completed application (APP016297) received June 1, 1993, including all plans, specifications, previous applications, and other supporting data, all of which are filed with the Department of Environment, Health, and Natural Resources 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. This Permit shall not supersede Air Permit No. 5896R3 issued to Thermal Reduction Systems, Incorporated of Porter Avenue, Graham, Alamance County, North Carolina until such time as ownership is legally transferred and the facility is acquired by BFI Medical Waste Systems (Southeast), Inc. Furthermore, this Permit is subject to revocation if the testing requirements and conditions of Air Permit No. 5896R3 are not met.

2. Any air emission sources or control devices authorized above must be operated and maintained in accordance with the provisions contained herein. The Permittee shall comply with applicable Environmental Management Commission Regulations, including 15A North Carolina Administrative Code (NCAC) 2D .0505, .0516, .0521, .0522, and .0535.
3. Visible emissions from the emission source (Permitted ID Nos. A and B) 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 or .0525 must comply with applicable visible emissions requirements contained therein.
4. NOTIFICATION REQUIREMENT - Within ten (10) days of the legal acquisition of Thermal Reductions, Incorporated facility by BFI Medical Waste Systems Incorporated, the Permittee shall provide written notice of the acquisition to the Regional Supervisor, Division of Environmental Management (DEM).
5. REPORTING REQUIREMENT - The Permittee shall submit the Guarantee of Closure Obligation to the Regional Supervisor, DEM within thirty (30) days of the acquisition date. The Guarantee of Closure Obligation shall be signed by a responsible representative of BFI.
6. NOTIFICATION REQUIREMENT - As required by 15A NCAC 2D .0535, or for sources applicable to 15A NCAC 2D .0524 or .0525, when particulate, visible, or odorous emissions exceed Environmental Management Regulations for more than four (4) hours, the Regional Supervisor, Division of Environmental Management, Winston-Salem Region, (919) 761-2351, 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 emissions, 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.
7. Operation of the incinerators shall be in accordance with the following conditions and stipulations:
 - a. The Permittee shall not exceed a maximum charge weight 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 DEM,
 - 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. Continuous temperature recorders shall be maintained for the primary and secondary chambers of each incinerator,

- d. Pressure drop across the wet scrubbers shall be monitored and recorded hourly,
 - e. The incinerators stack height shall be a minimum of 65 feet above ground level, and
 - f. Incineration of wastes shall be limited to Type O and Type 4 wastes consisting of isolation wastes, cultures and stocks of ethiological agents, blood and blood products, pathological wastes, other wastes for 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 biologicals, 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.
8. The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive volatile organic compounds and particulate emissions from becoming airborne.
 9. 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 Solid Waste Management.

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 Environmental Management
Winston-Salem Regional Office
Suite 100
8025 North Point Boulevard
Winston-Salem, North Carolina 27106
2. PERMIT RENEWAL REQUIREMENT - The Permittee, at least ninety (90) days prior to the expiration of this Permit, shall request its extension by letter. The letter should include the Permit number, the appropriate renewal fee, description of any modifications, and should be sent to the Regional Supervisor, Division of Environmental Management.
3. ANNUAL FEE PAYMENT - The Permittee must pay the annual administering and compliance fee or submit a certification for exemption within thirty (30) days after being billed by the Division. Failure to timely pay the fee or submit a certification for exemption in accordance with 15A NCAC 2H .0609(m) 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 Environmental Management:

- (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 Environmental Management to reflect any necessary changes in the Permit conditions. In no case are any new or increased emissions allowed that will cause 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 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 air 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 Environmental Management.
8. The 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 Environmental Management at such intervals and in such form and detail as may be required 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 North Carolina General Statute 143-215.114, including assessment of civil 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 Environmental Management 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.

Permit issued this the 9th day of June 1993.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION



sc
A. Preston Howard Jr., P.E., Director
Division of Environmental Management
By Authority of the Environmental Management Commission

Air Permit No. 5896R5



State of North Carolina
Department of Environment, Health, and Natural Resources

512 North Salisbury Street • Raleigh, North Carolina 27604

Division of Solid Waste Management

Telephone: (919) 733-0692

James B. Hunt, Jr., Governor

Jonathan B. Howes, Secretary

March 19, 1993

Mr. J. W. Hill
Safety Manager
BFI Medical Waste Systems (Southeast), Inc.
P. O. Box 310
Haw River, North Carolina 27528.

Re: Addendum to Approved Plan
BFI Medical Waste Systems (Southeast), Inc.
Permit No. 01-02-I
Alamance County

Dear Mr. Hill:

The Solid Waste Section has revised Attachment 1, "List of Documents for Approved Plan", of your Solid Waste Permit to include an additional approval letter for ash disposal. This revised list will replace the original attachment to Permit No. 01-02-I, dated 12/31/92.

If you have any questions or comments, please contact me at (919) 733-0692.

Sincerely,

A handwritten signature in cursive script that reads "Sherri C. Hoyt".

Sherri C. Hoyt
Environmental Engineer
Solid Waste Section

cc: Julian Foscue
Hugh Jernigan

ATTACHMENT 1

LIST OF DOCUMENTS FOR APPROVED PLAN

1. BFI Medical Waste Systems (Southeast), Inc. - Solid Waste Permit Application, submitted January 11, 1991.
2. Revision to Permit Application, submitted July 8, 1991.
3. Revision to Permit Application , submitted July 22, 1991.
4. Approval Letter for Ash Disposal, dated July 25, 1991.
5. Contract with Piedmont Sanitary Landfill to dispose of ash, dated July 24, 1991.
6. Air Permit No. 5896R4, effective upon transfer of ownership.
7. Approval Letter for Ash Disposal, dated August 25, 1992.



March 11, 1993

Sherri C. Hoyt
Environmental Engineer
Solid Waste Section
Department of Environmental, Health
and Natural Resources
P.O. Box 27687
Raleigh, NC 27611-7687

Subject: Proposed ammendments to BFI Medical Waste Systems S.E., Inc.
operational plan.

Dear Ms. Hoyt,

Thank you for the time you extended to me on the telephone March 10, 1993
over my concerns about some items in our operations plan. I am attaching the
proposed ammendments for your approval.

If I can be of any assistance I can be reached at (800) 234-4785. Your
assistance and understanding is appreciated.

Sincerely,

A handwritten signature in cursive script that reads "J.W. Hill".

J.W. Hill
Safety Manager

B. EQUIPMENT LIST

- (1) 2 Joy Energy System 2500 TES 1911 lb/hour Incinerators**
- (2) 2 Sly Model 265 Wet Acid Scrubbers**
- (3) Scale/Printer Computer System**
- (4) Two Pressure Washers**
- (5) Related Office Equipment**
- (6) Related Shop Maintenance Equipment**
- (7) Four (4) 20yd Ash Containers**
- (8) Two Ash Bins**
- (9) Forklift**
- (10) Conveyor System**
- (11) Tubwash Unit**

B. EQUIPMENT LIST

- (1) 2 Joy Energy System 2500 TES 1911 lb/hour Incinerators
- (2) 2 Sly Model 265 Wet Acid Scrubbers
- (3) Scale/Printer Computer System
- ~~delete~~ (4) ~~Steam Cleaner~~ Add Two pressure washers
- (5) Related Office Equipment
- (6) Related Shop Maintenance Equipment
- (7) Four (4) 20yd Ash Containers
- (8) Two Ash bins
- (9) Forklift
- (10) Conveyor System
- ~~delete~~ (11) ~~Window Spray washer~~
- || (12) Tubwash Unit (~~future, delete future~~)



6

State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

August 25, 1992

Mr. J.W. Hill
Browning-Ferris Industries, (Southeast) Inc.
P.O. Box 310
Haw River, NC 27258

Subject: Disposal of 10-20 Tons/Week of Medical Waste Incinerator
Ash at the Charlotte Motor Speedway (BFI) Landfill, (Permit
#13-04).

Dear Mr. Hill:

The Solid Waste Management Division has received a request for characterization of the subject waste. Based upon the submitted information, the waste appears to be non-hazardous. The Solid Waste Management Division has no objection to the sanitary landfill disposal of this waste, if in accordance with the conditions listed below:

1. The owner/operator of the landfill approves the disposal.
2. The waste contains no free liquids and can be confined, compacted, and covered in accordance with the Solid Waste Management Rules (15A NCAC 13B).
3. Additionally, a resubmittal of the Waste Determination Form and current supportive analytical data, is required on the anniversary of this approval.

Failure to meet these conditions may result in revocation of this approval, and subsequently, an administrative penalty. The approval is subject to change if new regulations were to prohibit this practice. If the process which generates the waste changes or if the composition of the waste changes significantly, this approval is void and re-evaluation of the waste will be required prior to subsequent disposal.

Mr. J.W. Hill
August 25, 1992
Page 2

If you have further questions, please contact this office at
(919) 733-0692.

Sincerely,

William R. Hocutt

William R. Hocutt
Waste Determination Coordinator
Solid Waste Section

cc: Richard Doby
Jeff Rodgers
John Marston/Harold Watson