

FACILITY COMPLIANCE INSPECTION REPORT
Department of Environmental Quality
Division of Waste Management - Solid Waste Section

| UNIT TYPE: | | | | | | | | | | | |
|-------------------|--|-----------------------|--|---------------|--|---------------------|--|---------|----------|------|-------------------------------------------------------------------------------------|
| Lined MSWLF | | LCID | | YW | | Transfer | | Compost | | SLAS | COUNTY: Guilford PERMIT NO.: 41-26 FILE TYPE: COMPLIANCE |
| Closed MSWLF | | HHW | | White goods | | Incin | | T&P | X | FIRM | |
| CDLF | | Tire T&P / Collection | | Tire Monofill | | Industrial Landfill | | DEMO | | SDTF | |

Date of Site Inspection: January 13, 2016

Date of Last Inspection: January 7, 2015

FACILITY NAME AND ADDRESS:

Ozone Waste Solutions Medical Waste Treatment Facility
 7353-A West Friendly Avenue
 Greensboro, NC 27410

GPS COORDINATES: N: 36.08545 E: -79.92655

FACILITY CONTACT NAME AND PHONE NUMBER:

Todd Kaufman, Site Manager – Ozone Waste Solutions
 w. 336-550-4037
 c. 336-337-1389
tkaufman@ozonewastesolutions.com

FACILITY CONTACT ADDRESS:

Ozone Waste Solutions
 Todd Kaufman, Site Manager
 7353-A West Friendly Avenue
 Greensboro, NC 27410

PARTICIPANTS

John Patrone, Environmental Senior Specialist - Solid Waste Section (SWS)
 Todd Kaufman, Site Manager – Ozone Waste Solutions
 Sheila Gambardella, Office Manager – Ozone Waste Solutions
 Mary McIntosh, Operations Account Manager – Ozone Waste Solutions

STATUS OF PERMIT:

Permit To Operate (PTO) issued January 2, 2015
 PTO expiration date March 25, 2019

PURPOSE OF SITE VISIT:

Comprehensive Inspection

STATUS OF PAST NOTED VIOLATIONS

None

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OBSERVED VIOLATIONS

None

The item(s) listed above were observed by Section staff and require action on behalf of the facility in order to come into or maintain compliance with the Statutes, Rules, and/or other regulatory requirements applicable to this facility. Be advised that pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Laws, Regulations, Conditions of a Permit, or Order under Article 9 of Chapter 130A of the N.C. General Statutes. Further, the facility and/or all responsible parties may also be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

ADDITIONAL COMMENTS

On January 13, 2016, John Patrone met with Todd Kaufman, Sheila Gambardella, and Mary McIntosh to conduct a comprehensive inspection of the Ozone Waste Solutions Medical Waste Treatment Facility on West Friendly Avenue in Greensboro, Guilford County.

1. The facility is a medical waste treatment and processing operation consisting of an ozonator.
2. The facility can also operate a medical waste transfer station.
3. The facility receives regulated and non-regulated medical waste and biomedical waste.
4. The office is open Monday through Friday 9:00 am to 5:00 pm. When applicable, the receiving department may operate from 6:00 am to 5:00 pm.
5. The facility pre-operational meeting was conducted on April 10, 2014.
6. During the inspection the ozonator was in operation.
7. The facility permit, site plan, operations plan, and contingency plan were discussed.
8. A certified copy of the facility permit has been recorded with the Guilford County Register of Deeds office on January 13, 2015, Bk: R7666 and Pg: 1647 – 1655.
9. Currently, the facility operates as needed, ~ twice a month. It began operation in October 2015. Prior use of the ozonator was conducted for testing and training purposes. As additional clientele are obtained the facility will increase operations accordingly.
10. Ozone Waste Solutions uses a refrigerated truck to haul medical waste to the facility.
11. The facility service area is North Carolina and contiguous states. Ms. Gambardella stated that the service area should be nationwide. Contact Larry Frost, SWS - Environmental Engineer at 828-296-4704, for further discussion.
12. The facility provides training for personnel (Mr. Kaufman and Ms. McIntosh). Personnel have completed HAZWOPER trainings and in-house trainings (see operations plan page 22). Mr. Kaufman stated that he has had manufacturer training in the operation and service of the ozonator, in addition to having assisted with the construction of the ozonator on site.
13. Mr. Kaufman stated that there is no factory recalibration/maintenance service intervals required to be conducted by the manufacturer for the ozonator.
14. It is suggested that the facility maintain an ozonator inspection checklist to verify procedural startup, operation, and shutdown.
15. Medical waste received has a barcode containing generator information. The barcode is scanned upon receipt. The boxes contain the universal biohazard symbol and infectious waste/medical waste statement. The facility records the date that each box of medical waste was shipped. Ensure the date is written on each box. The facility also maintains a hand-written log of when trailers are received.
16. The facility provides clients with boxes and plastic bags.
17. The facility maintains records of the amount of medical waste received by package, generator information, date received, and date treated. Records were verified for October 20, 2015 through January 13, 2016. The amount of solid waste received is 1,478.6 lbs.
18. The facility annual report (FAR) was received by the SWS, dated July 27, 2015. Facility throughput for July 2014 through June 2015 is 2.62 tons. The amount of disinfected shredded medical waste hauled to the disposal facility is 2.62 tons.

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19. Disinfected shredded medical waste has been hauled to a municipal solid waste landfill in Baltimore, Maryland. The facility operations plan states that disinfected shredded medical waste will be hauled to Uwharrie Regional Landfill (62-04). Contact Larry Frost, SWS - Environmental Engineer, to discuss a change of disposal facility or the addition of optional disposal facilities.
20. The facility has one roll-off container for the containment of disinfected shredded medical waste. The roll-off container is a vacuum sealed unit attached to the ozonator. Mr. Kaufman stated that when the ozonator is in operation disinfected shredded medical waste is infused with ozone, thus continually being disinfected.
21. The sealed container has a small window to verify when it is full. When the roll-off container is hauled to the landfill the ozonator does not operate. The disinfected shredded medical waste in the attached sealed roll-off container is integral to the ozonator. Disinfected shredded medical waste is not considered stored until the roll-off container is removed from the ozonator, at which time it is hauled-off for disposal.
22. Ozonator processing efficacy is verified via a 3M 1924 rapid readout test and a MesaStrip test. Each test uses biological indicators containing bacillus atrophaeus spores. The rapid readout tests are conducted at the facility by Mr. Kaufman. Mr. Kaufman stated that he was trained by their company chemical technician who was trained by the ozonator manufacturer. The November 15, 2015 test result record was verified. The MesaStrip test will be sent off periodically to a certified microbiology laboratory. Mr. Kaufman stated that the facility has not conducted a test to date. It is suggested that the facility conduct routine MesaStrip tests, either quarterly or biannually.
23. The facility has one scale. The scale was calibrated by J.A. King and Company, LLC on June 13, 2014.
24. The unit used for the disinfection of medical waste is the Ozonator Industries model number NG-3000. It is a sealed processing unit. The ozonator treats medical waste with up to 10,000 ppm of ozone achieving 99.9999 percent disinfection in ~ 15 minutes (process run time is ~ 20 minutes) and a reduction in volume by up to 90 percent. Disinfected shredded medical waste stored in the sealed roll-off container continually exposed to ozone furthers the breakdown of latex, plastics, and other compounds.
25. The ozonator is designed to treat medical waste containing 20 percent liquids. An absorbent material can be added to the feed-hopper for medical waste containing > 20 percent liquids. Ozone Waste Solutions client service agreement requires that medical waste contain the required percent liquids.
26. Medical waste received is off-loaded and inspected, weighed, logged-in, and placed on a manual roller conveyor. Each box is opened, one at a time, at the processing table. The plastic bag is placed in the ozonator feed-hopper and the box is flattened and placed on top. The percent liquid of the medical waste is estimated by the weight and feel of the bag and absorbent material is added if necessary.
27. Facility personnel wear a Tyvek suit and facemask during the medical waste treatment process. Solid Waste Section staff can observe facility operations from large office windows overlooking the processing floor.
28. The ozonator processing cycle maximum feed-hopper weight is < 500 lbs of medical waste. Mr. Kaufman stated that each feed-hopper is commonly ~ 120 lbs per processing cycle.
29. The controls for the ozonator are automated and the process will stop if a sensor fails. The feed hopper moves hydraulically up to the ozonator and dumps medical waste into a secondary hopper to be treated.
30. Mr. Kaufman stated that the ozonator unit emits ozone that is converted back to oxygen and does not require an air permit.
31. Mr. Kaufman stated that the ozonator unit and the associated medical waste processing operation does not require floor drains/drainage to a treatment tank or city sewer. Medical waste spill kits and absorbent material will be used to clean plastic trays and liquids in the event of a spill, leaking box, etc. The waste material will then be placed in the ozonator to be disinfected.
32. If medical waste leaks or spills in the refrigerated transport truck it will be cleaned with a medical waste spill kit and the waste material placed in the ozonator to be disinfected.
33. The Ozone Waste Solutions refrigerated truck contains a copy of the contingency plan (transportation security plan) and has universal biohazard symbol placards.
34. The facility waste screening process consists of: generator requirements to properly package and label boxes, driver(s) trained to reject boxes if leaking, inaccurately packaged, or incorrectly labeled, client contract requirement to abide by waste acceptance rules, company sales personnel educating clients, and the removal of plastic bags from boxes prior to ozonation allowing staff to deduce the contents by weight and feel.

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- 35. In the event of an unscheduled shutdown medical waste will be transferred to other medical waste treatment facilities or direct-hauled to medical waste treatment facilities upon pickup.
- 36. To date, the facility has not operated as a medical waste transfer station. If /when the facility operates as a medical waste transfer station each box will have a barcode and be stored adjacent to the off-load area to await pickup by a third-party. Boxes of medical waste may also be placed in the Ozone Waste Solutions refrigerated truck to await transport. The facility will maintain a medical waste transfer station manifest.
- 37. Facility financial assurance is up to date.
- 38. Access roads are of all-weather construction.
- 39. The building is locked to secure the medical waste ozonator and processing area.
- 40. The facility has a proper sign.
- 41. The PTO expiration date is March 25, 2019.
- 42. The PTO renewal application shall be submitted to the SWS by September 25, 2018.

Please contact me if you have any questions or concerns regarding this inspection report.

Phone: 336-776-9673

John Patrone, Environmental Senior Specialist
 Division of Waste Management, NCDEQ

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|----------------------------------|---|-------|--|---------------|--|---------|--|-------------------|
| Sent on: <u>January 21, 2016</u> | X | Email | | Hand delivery | | US Mail | | Certified No. [] |
|----------------------------------|---|-------|--|---------------|--|---------|--|-------------------|

Electronic Copies: Deb Aja, Western District Supervisor - SWS
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