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Solid Waste Section
Asheville Regional Office

MedWaste Solutions, LLC
Medical Waste Treatment Facility
Gastonia, North Carolina

OPERATIONS PLAN

Date: October 1, 2011
Revised date: October 27, 2011

1.0 INTRODUCTION

MedWaste Solutions, LLC plans to operate a medical waste treatment facility located at 148 Boxwood Lane, Gastonia, NC. The site, consisting of a 10,000 square foot building on approximately two (2) acres is properly zoned (letter attached) with sanitary sewer and natural gas service. The site is properly suited for medical waste treatment operations, transfer of medical waste for appropriate treatment off site, and transportation and storage of untreated and treated medical waste. The facility can house four (4) steam sterilization (autoclave) units. Treated waste will be transferred into a container prior to being transported to a permitted Sub-Title D landfill under contract to Waste Management, Inc. The operating parameters for waste treatment are detailed in this Operating Plan, with applicable requirements set forth in the North Carolina GS 130A-294, Solid Waste Management Program and including 15A NCAC 13B..

2.0 FACILITY IDENTIFICATION

MedWaste Solutions, LLC
148 Boxwood Lane
Gastonia, NC. 28054

3.0 OPERATIONS

The facility is operated in accordance with rules and regulations set forth by the Division of Waste Management, North Carolina GS 130A-294, Solid Waste Management Program, 15A NCAC 13B and the City of Gastonia, NC. The manufacturer's Operating Manuals are kept on file at the plant office. All employees, based on job description, shall receive training as to the contents of the manual, safety procedures and practices, operation, maintenance, and servicing of the equipment. MedWaste Solutions accepts prepackaged boxes, reusable and disposable containers of various sizes containing medical waste and sharps waste from generators and transporters. The waste is treated by means of steam sterilization equipment after which it is disposed of in a permitted Sub-Title D landfill. Wastes requiring incineration will be transferred to a permitted incinerator capable of treating by pass waste that includes all waste material that is not treatable in the autoclave sterilization process, i.e. pharmaceuticals, pathological (human and animal), liquids, etc. as governed by 15A NCAC 13B. This section summarizes the routine operating procedures for the safe and effective management of the waste. The section includes procedures and policies for the following:

1. Equipment operation and maintenance
2. Onsite waste flow
3. Unloading procedures
4. Sorting/inspection/recording procedures
5. Hours of operation

6. Access control
7. Time and capacity limits

3.1 EQUIPMENT OPERATION AND MAINTENANCE

3.1A General Operations

Waste is transported to the treatment facility from generators, by way of MedWaste Solutions drivers or licensed transporters with whom MedWaste Solutions contracts treatment services. Waste is received at the facility in corrugated boxes or reusable and other disposable containers where they are offloaded from vehicles at the dock doors. Personnel using hand trucks, forklifts, and conveyors, transfer the waste to a scale/barcode scanning station, where the customer information and container weight is recorded. Once scanned and weighed, the waste is loaded into treatment carts, staged and treated in the autoclave. After treatment the waste is transferred to a waste container for transport to a permitted disposal landfill. Any waste requiring incineration will be transferred to another properly licensed and permitted incinerator or treatment facility. Incineration waste is primarily noticed by visual inspection of the red bags as they are transferred into the treatment carts and by an abnormal weight situation. The main objective is to work with and train our customers to properly segregate and label the various waste streams. Proper handling at the source will minimize the handling of waste materials at the treatment facility.

The autoclave control system is a comprehensive data collection, display and retention which is operator friendly while providing detailed electronic and hard copy management of data for regulatory purposes and for demonstrating treatment efficacy and securing the operating data for a period of seven (7) years.

To respond to the concerns relative to the presence of radioactive materials in the waste loads, a radioactivity detector is included which gives an alarm upon the detection of radioactive substances in the load, locking out the autoclave cycle and requiring the intervention of the operator. The radioactive waste will then be returned to the generator or picked up by an approved transporter.

There are no added chemicals introduced into the steam sterilization process. A built in cool down cycle avoids handling of hot carts, thus preventing exposure to potential injury, and a built in washing cycle keeps the inside of the chamber and the waste carts clean.

3.1B Detailed Operations

3.1B(1) Service

MedWaste Solutions provides collection and/or treatment services to the health care industry in this region. The service usually includes providing containers and other necessary supplies for proper packaging of the waste materials along with barcode labels for transport and tracking. Proper packaging includes using only approved red bags and cardboard boxes, tape, and labels. Boxes that are not packaged properly will not be picked up including weighing over 50 pounds, boxes that are crushed, torn or distorted in any way, label not attached (name and address

correct), or not completely taped shut on the top and bottom. Any nonconforming boxes must be repackaged before picked up for transport.

3.1B(2) Medical Waste Transport

Medical waste will be transported in trucks by employees of MedWaste Solutions, contract drivers for MedWaste Solutions, and other waste transporters. Medical waste is shipped to the facility in approved corrugated boxes, reusable containers, or other disposable containers. MedWaste Solutions will not transport, or accept for transport, waste that is not properly packaged or classified in accordance with 15A NCAC 13B section .1204.

MedWaste Solutions shall also maintain compliance with the requirements of section 15A NCAC 13B .1205 which include:

- Transporters shall not accept waste that is improperly packaged.
- Regulated medical waste shall be transported in a manner that prevents leakage of the contents of the package.
- The integrity of the package shall be maintained at all times.
- The labeling and marking of the package shall be maintained at all times.
- All loads containing regulated medical waste shall be covered during transportation.
- The universal biohazard symbol shall be displayed on all transportation vehicles, in accordance with the US DOT Standards and 49CFR 172 Subpart F.
- Regulated medical waste shall be delivered to a permitted storage or treatment facility within seven (7) calendar days of the date of shipment from the generator.
- Refrigeration at an ambient temperature between 35 and 45 degrees Fahrenheit shall be maintained for regulated medical waste that will not be delivered for treatment within seven (7) calendar days.
- A contingency plan shall be prepared and maintained in each vehicle used in the transporting of regulated medical waste. The operator of each vehicle shall be knowledgeable of the plan.
- Vehicles used for the transportation of regulated medical waste shall be thoroughly cleaned and disinfected with a mycobacteriocidal disinfectant before being used for any other purpose and in the event of leakage from packages.
- While transporting regulated medical waste, vehicles are prohibited from transporting any material other than solid waste and supplies related to the handling of medical waste.

3.1B(3) Container Unloading and Handling

The waste containers are offloaded at the dock by hand truck, forklift or rolled off (some containers are equipped with wheels) by plant employees.

Packages of waste shall remain intact from the generator's site during transport and to time of treatment. There shall be no recycling efforts or intentional removal of waste from its packaging prior to the waste being treated. Packaging of waste is handled in a manner that does not impair the integrity of the packaging. Containers of waste shall not be compacted before transfer.

All reusable waste containers shall be constructed of smooth and easily cleanable materials that are impervious to liquids and capable of being readily maintained in sanitary condition.

3.1B(4) Unacceptable Waste

Properly classified waste materials, which are received at the facility, but cannot be processed by steam sterilization, are segregated and staged for further transport to an alternate facility. Unacceptable waste received is returned to the generator, as soon as practical, or is transferred to an appropriate disposal facility. Shipping documents are utilized to track this material to the proper treatment and disposal facility. No waste will be accepted that does not meet the packaging requirements of 15A NCAC 13B .1204.

3.1B(5) Treatment Cart Loading (Manual and Hydraulic Dumpers)

After waste containers have been scanned and weighed, they are conveyed to a dumping platform or hydraulic tipper/dumper. Disposable contents and/or the contents of the reusable containers are then dumped into the treatment carts.

After dumping, the reusable containers are conveyed to a container washer where they are cleaned with hot water and an approved disinfectant. The dumping process is repeated until the treatment carts are full or until they have the proper weight in them for loading into the autoclave.

3.1B(6) Medical Waste Weighing

Waste received at the facility is unloaded and tracked by scanning a customer installed barcode, provided by MedWaste Solutions, as it passes over a scale. This provides the information for regulatory and billing purposes. Also, the autoclave contains a scale to weigh each load before it is rolled into the chamber.

3.1B(7) Container Disinfection

After the reusable containers are emptied, they are conveyed to a hot water cleaning station where they are cleaned with a high-pressure spray that is mixed with the appropriate cleaner/disinfectant. When the cleaning operation is completed, the containers are staged to dry. Containers are then either moved to a storage area or loaded onto trucks for delivery to a generating facility for the collection of waste.

3.1B(8) Loading and Unloading Autoclave

Once the treatment carts are filled with untreated medical waste, the carts are conveyed to a staging position. Treatment carts are then loaded into the autoclave.

Unloading treated carts of waste material is conducted the same way, after which, they are staged to be emptied into the disposal container. The carts are emptied into the disposal container by use of a forklift or other hydraulic means. Once emptied, the treatment carts are available again for refill with untreated medical waste. If a cart contains any residue after dumping it will be taken to the wash station for cleaning before being put back in service.

3.1B(9) Sterilization Process

MedWaste Solutions will use a North Carolina approved autoclave for sterilization. This revolutionary technology is the only integrated, automatic, variable operating parameter autoclave in the industry. The vessel is constructed of stainless steel, is 5' in diameter, 11' long

and have an operating pressure of 20 psi at a temperature of 260 degrees Fahrenheit. The autoclave holds two (2) carts holding about 300 pounds each of medical waste. Steam for the autoclave is supplied by a 20 hp boiler.

Once the autoclave is loaded, the door is closed and the steam sterilization process is initiated from the control panel. The cycle time of the treatment process is determined by the total weight of the load and the type of material being treated (red bag, sharps or suction containers). The preprogrammed process consists of three (3) phases to assure proper sterilization and allow safe removal of the carts. Phase 1 consists of 2 vacuum cycles where the chamber is heated to a target temperature of 250 degrees Fahrenheit. Phase 2 includes the residence time required (as per requirements of 15A NCAC) for the waste to reach 250 degrees and obtain a log6 kill. Phase 3 is the cool down cycle before the carts can be removed from the vessel. The control cabinet is equipped with a key switch that can change the computer's residence time settings from a log6 kill to a log12 kill for pandemic or bioterrorist attack conditions. The entire process has no air emissions or offensive odors.

The process parameters are recorded and maintained through the control system. This includes cycle times, weight, temperatures and cycle types. The process data will be retained on hard copy in the office and electronically for three (3) years.

The efficacy of the sterilization process is confirmed using dual species (*Bacillus Atrophaeus* and *Geobacillus Stearothermophilus*) biological indicators. After the sterilization cycle is completed, the spores are recovered and analyzed in an incubator to determine kill efficacy. Results of the spore test are recorded in a log and maintained in the office. All time and temperature requirements of North Carolina regulations will be met or exceeded in this process. Frequency of efficacy testing will be once per week, as required in section .1207(2)(d).

3.1B(10) Record Keeping

When the door of the autoclave closes for the start of the process cycle, record keeping automatically begins. The controls electronically records time, temperature and pressure for each cycle. This information/record is maintained on file for three (3) years.

3.1 B(11) Treatment Bin Dumper

The treatment carts are picked up by the forklift and emptied into the hopper of the compactor. After the treatment cart is emptied, it is lowered back onto the floor and rolled to the staging area for reloading of medical waste.

3.1B(12) Emergency Shutdown

An emergency shutdown button is located at the control panel for the autoclave.

3.1B(13) Transport to Landfill of Treated Waste

Treated materials are slightly reduced in volume during the vacuum process and inherent melting during the pressure cycles. The treated waste is stored in a roll off container not to exceed seven (7) days until it is transported to a landfill.

3.1B(14) Equipment Operator Training

All employees will receive training and will become knowledgeable of the procedures, equipment and sterilization process. Training programs are oriented towards maintenance and safe operation of the facility.

3.1B(15) Maintenance Equipment

Employees will use maintenance schedule and inspection sheets to monitor and inspect the facility. Visual inspection of all the equipment will be conducted daily to insure that it is in proper working condition. Any equipment in need of repair or maintenance will be removed and replaced, or repaired immediately. A copy of the maintenance, inspection and monitoring plan and its inspection schedule are attached to this Operating Plan.

3.2 ONSITE TRAFFIC PATTERNS

Vehicles containing untreated waste will enter the facility and approach a designated parking area or dock door determined by the shift operator. Vehicle traffic will pass through a designated gate gaining access to the loading and unloading area. All vehicles carrying untreated waste will enter the facility through the same gate to the property.

3.3 LOADING AND UNLOADING PROCEDURES

Prior to leaving the facility, the driver will check his daily route sheet to assure that all pickups are scheduled and to plan his course of efficient routing. The driver will also obtain all necessary documents (manifests, reports, etc.) to be delivered to customers. While reviewing his daily schedule, the driver makes notes of the supplies that he may need to deliver to the customers.

The driver will perform a vehicle inspection according to OSHA regulations..

All biomedical wastes picked up by MedWaste Solutions are pre-packaged by the customer at the customer's facility prior to loading into the truck. A biomedical waste manifest tracking form is completed for each pickup and signed by the customer acknowledging proper segregation and packaging. MedWaste Solution's sorting, inspecting and recording procedures are described in section 3.4 below.

When all containers are properly marked and coded, the driver will stack the containers across the interior of the vehicle body using care not to damage or tip the containers. Each row of containers or boxes or combination of, are secured using cargo retaining straps to prevent tipping. The driver will lock the vehicle upon completion of loading at each customer location.

Upon arrival at the treatment facility the driver will report to the transportation manager or shift supervisor on duty. The vehicle will be unloaded under the direction of the shift supervisor. While unloading, the responsible shift supervisor will verify that all containers, boxes, carts, and bins are manifested and accounted for. All required paperwork will be handed over to the shift supervisor or the transportation manager.

During the unloading, containers designated for incineration are set aside and staged into a holding area for transport to an approved incinerator. At the time of the transfer to an incineration facility, a new manifest is prepared for proper receipt of these materials at the incineration facility. This waste will be transferred in less than seven (7) days.

After all biomedical waste is unloaded; the driver will complete a visual inspection of the vehicle. All vehicles are cleaned/disinfected when visibly soiled. If a leak is noticed anytime a vehicle contains medical waste, the leaking substance will be collected in a bucket, absorbed in kitty litter and dumped into a bag. The bag will then be treated in the autoclave before being disposed of in the trash container. Any soil contamination will be picked up and disposed of in a similar manner. The leaking container will be located in the vehicle and removed immediately and disposed of according to normal treatment procedures. The vehicle will be cleaned and disinfected before being returned to service.

3.4 SORTING, INSPECTION, AND RECORDING PROCEDURES

When handling containers, all personnel in contact with containers will ensure that the utmost care is taken to prevent damage to containers and that spills are prevented. Employees will wear proper protective equipment (PPE) at all times while handling waste containers.

Prior to moving any containers from the customer's storage area to the vehicle for loading, the driver will inspect each container to verify that it meets the following conditions:

- a) Each container will be properly sealed and taped as per requirements of 15A NCAC 13B.1204 before transport to the facility.
- b) Each container must not be damaged (crushed, cut, bent, or leaking).
- c) Each container must be in an upright position.
- d) Any improperly packaged containers will be reported to the customer for repackaging. MedWaste employees will not assist in the packing procedures.

Once all containers are inspected, the driver will transport them to the vehicle using any method that will not damage or tip the containers.

When loading containers into a MedWaste vehicle, each container received from a customer will be marked or labeled as follows:

- a) Customer account number
- b) Customer location information
- c) Transporter location information
- d) Individual container number

(MedWaste Solutions barcode label provided to customers contains all the above information).

When all material is properly identified, the driver will load the containers into the truck as described in above section 3.3. The driver will then complete the waste manifest, obtain an authorized customer representative signature and leave a copy with the customer. Prior to departing the customer's premises, the driver will re-inspect the containers to ensure they are properly stacked, not damaged, and show no visible signs of leakage. The driver will then update his route sheet and continue to his next stop or return to the MedWaste facility.

When unloading containers or boxes at the MedWaste facility, the plant operators will weigh each container and record its weight with a barcode scan. The transportation personnel will review each manifest for accountability each day of all containers, and note any discrepancies on the manifest or in the computer system to provide notes to customer service.

3.5 HOURS OF OPERATION

The MedWaste facility can operate 24 hours a day, 7 days a week for treatment processing. Office hours are Monday through Friday from 8:00 AM to 5:00 PM. Independent transporters delivering pre-manifested waste materials will be accepted by prior appointment only.

3.6 ACCESS CONTROL

Lockable gates will be provided for access into the facility. The gates will be locked during off-hours when no receiving or shipping of waste will occur. All doors to the facility will be locked prohibiting unauthorized entrance from the outside and secured during off-hours. The main entrance to the building and office areas will be open during normal business hours only. After hours, all doors to the facility will remain closed and locked prohibiting unauthorized outside entry with the exception of dock doors being utilized for operations.

All visitors to the facility are required to sign the visitor's log located in the front lobby. Under no circumstances will MedWaste allow and unescorted visitor to enter the facilities treatment area.

3.7 TREATMENT/STORAGE AND CAPACITY LIMITS

MedWaste Solutions is locally permitted to operate the treatment facility at 148 Boxwood Lane, Gastonia, NC. Permitted capacity is based on the maximum waste treatment capacities of the processing equipment, including future additions. MedWaste will operate the Gastonia, NC facility with the currently permitted steam sterilization unit not to exceed 12,000 pounds per day or 4 million pounds per year. Based on future expansion capabilities of the facility, the total capacity can be increased to 16 million pounds per year or 1.2 million pounds per month. The actual treatment capacity of each piece of equipment will vary based on the waste type, density, liquid weight, handling procedures, operator interface, and efficiency protocols. Before any future autoclaves are installed, MedWaste will notify the appropriate state agency for approval to do so and increase its financial assurance package as specified by the state of North Carolina.

All untreated waste is stored in a secure area located inside the facility or in enclosed, locked transport vehicles located within the secure area of the premises to await processing. Storage of untreated and treated waste at the facility will be based in accordance with 15A NCAC 13B Sections .1206 and .1207(1), based on the seven (7) day or refrigerated time status. Treated waste storage is maintained on the premises in a secure area awaiting transport for final disposal.

4.0 WASTE INSPECTION PLAN

Waste containers are packaged and sealed by the generator prior to pickup by MedWaste drivers. Due to the nature of biomedical waste, health hazards preclude all MedWaste personnel from opening boxes or cartons of waste for inspection at the facility. MedWaste enforces the defined protocols on the pre-approval manifests forms certified by the generator that the contents are in accordance with MedWaste restrictions and regulatory compliance. MedWaste will not ship or accept for shipment waste that is not packaged in accordance with the requirements of 15A NCAC 13B Section .1204.

5.0 BYPASS AND RESIDUAL PLAN

All processed waste from the facility will be treated in the approved treatment units and disposed in a permitted municipal solid waste landfill. Untreated waste may at times be transferred to a treatment facility other than MedWaste during equipment maintenance downtime or due to logistics situations. Untreated waste being transferred from the MedWaste facility will be manifested to track the materials from MedWaste to a site referred to in the Contingency Plan with prior approval from that facility. Manifest documentation will also indicate the tracking of waste transferred from the generator site or transfer station site directly to a contingency facility in such event. Requirements of 15A NCVAC 13B, Sections .1206 and .1207(1), will be adhered to at all times when the transfer of waste is required. Storage times will not exceed seven (7) calendar days without required refrigeration.

6.0 MAINTENANCE, INSPECTION AND MONITORING PLAN

6.1 EQUIPMENT MAINTENANCE

6.1A Preventative Maintenance

Preventative maintenance is designed as an aid in setting up a schedule of regular inspections and checks to determine the actual condition of the equipment and to maintain it in proper working order. The systematic use of a preventative maintenance program may be expected to reveal any potential adverse condition in the early stages when the remedy is relatively simple and inexpensive. This operating plan provides an overview of the manufacturers Equipment Operating Manuals.

6.1B Periodic Inspections (Steam Sterilizer and Boiler)

The treatment equipment should be kept clean at all times and special attention should be given to the safety pressure interlock system to guard against sticking of parts.

Check accuracy of instruments, gauges and thermocouples. Also check relief valves to see that they relieve at proper pressure.

Make sure in-line trap drains from steam supply line to vessel are functioning properly.

Frequently inspect flanged joints and other pipe connections.

Test relief valves at least once every year.

6.1C General Inspection and Maintenance

The following procedures should be performed at regular intervals as indicated. This frequency is the minimum and should be increased if usage of the autoclave demands.

Safety Valve: In accordance with the National Board of Inspections Code, periodic checking of the safety valve operation should be performed. Periodic inspection of the equipment by a qualified inspector is advisable. MedWaste conducts inspections of all pressure vessels and safety valve operation in accordance with the NC Department of Labor, Boiler Safety Bureau.

6.1D Minor Maintenance

Prior to performing maintenance, the control switch must be turned off, facility power to unit disconnected, and accessories must be cooled to room temperature.

Employees shall wear the proper PPE when cleaning or maintaining all equipment.

Daily Maintenance:

1. Inspect chamber condition and blow down line strainers.
2. Remove any debris from roller track.
3. Check all gauges for proper operation, cracks or damaged covers.
4. Inspect piping for leaking fittings or other defects.
5. Remove debris from around the treatment units and process area.
6. Inspect carts, door locking function, and door seal.

Weekly Maintenance:

1. Verify that all control panel lights and instruments operate properly.
2. Visually inspect door gasket for proper sealing, replace if needed.
3. Clean drain line with scale remover solution.
4. Clean steam strainers.

Monthly Maintenance:

1. Check all fluid levels where applicable.
2. Grease door hinges.
3. Grease cart rollers and mechanisms as applicable.

Quarterly Maintenance:

1. Check steam and vacuum control valves for proper operation and leakage.
Warning: Be careful of steam escaping from the valve. Wear appropriate PPE.
2. Inspect vessel and railings for damage.

6.2 GUIDE FOR PREVENTATIVE MAINTENANCE

6.2A Preparation for Preventative Maintenance

1. Check electrical connections
2. Install test equipment if required

3. Shut off services and drain all lines when necessary

Door Assembly:

1. Inspect door for ease of operation
2. Check condition of door gasket, replace if necessary
3. Verify proper door alignment
4. Grease hinges and door lock mechanism.
5. Inspect door lock mechanism for wear

Unit Piping:

1. Inspect input strainer for debris
2. Clean strainers as necessary
3. Inspect steam trap for proper operations
4. Rebuild steam trap if needed
5. Inspect each gauge for accuracy
6. Calibrate or replace gauge if required
7. Make internal inspection of each check valve
8. Replace or rebuild check valve if necessary
9. Check safety valve for proper operation
10. Check each pneumatic and ball valve for proper operation
11. Rebuild/replace each pneumatic or ball valve if necessary
12. Inspect chamber drain strainer for debris
13. Flush chamber drain line

Control System:

Perform maintenance and checks as recommended by manufacturer

Final Test:

1. Clean dust and dirt from components
2. Inspect wiring, terminals, and socket connections for damage and fraying
3. Check chamber strainer for debris
4. Inspect door switch for proper operation
5. Check unit insulation for wear and tear, repair if necessary
6. Run unit through cycle to verify proper operation and check controls
7. Remove test equipment installed during operation
8. Install any covers removed during operation

Door Maintenance

GENERAL: Maintenance of the vessel door consists primarily of periodic lubrication, minor adjustment, and inspection at regular intervals to determine the necessity for parts replacement.

Cleanliness of the gasket seating surface is vitally important to proper sealing action and long gasket life.

LUBRICATION: Lubricate at intervals depending on the frequency of operation.

1. Lubricate fittings at the rear of the locking ring and shell

2. Guide and support rollers once weekly
 3. Hinge pin bearing once weekly
 4. Head and locking ring once weekly

INSPECTION: If the door fails to seal properly, check per instructions below:

1. Check for proper seating action of the head lip on the gasket and center if necessary using the hinge arm jam nuts.
2. Check for foreign material on the gasket-seating surface.
3. Check the gasket for condition. Replace the gasket if there is any evidence of splitting, cracking, fraying, cuts, or other imperfections. Refer to gasket installation instructions from manufacturer.
4. Inspect all door components for loose attaching hardware and tighten.

6.3 INSPECTION SCHEDULE

6.3A Site Security

1. Outside lighting will be inspected weekly and bulbs replaced as necessary.
2. Security gates and locks will be inspected monthly.
3. Warning signs will be inspected quarterly for proper visibility.

6.3B Safety, Emergency and Personal Protective Equipment (PPE)

The following equipment and PPE will be inspected quarterly for supply, accessibility and condition:

1. Gloves
2. Eyewear
3. Aprons
4. Disposable Coveralls
5. Rubber Boots
6. Face Masks
7. Goggles
8. Duct Tape
9. Hard Hats
10. Respirators
11. First Aid Kit
12. Eyewash Station

Fire Response Equipment

All fire extinguishers inside the facility and outside hydrants will be inspected monthly to check for damage, pressure leakage and accessibility. Any damaged extinguishers will be removed from service and repaired immediately.

Spill Cleanup Equipment

All materials and equipment used for spill cleanup both in the plant and carried on all vehicles will be checked quarterly for supply and accessibility. These items include:

1. Absorbent material (kitty litter)
2. Spill Kits

3. Bucket
4. Brooms
5. Shovels
6. Trash Bags

Storage Containers

All storage containers are inspected daily during the normal operation of the plant. These include corrugated boxes and reusable containers coming into the plant for processing.

7.0 WASTE TREATMENT CONTINGENCY PLAN

In the event of equipment failure or plant shutdown, MedWaste will ship untreated waste to permitted and approved facilities. In such an event, the requirements for storage and transport under 15A NCAC 13B will be maintained.

8.0 EMPLOYEE TRAINING PROGRAM

MedWaste Solutions, LLC bases its training program on several sources: (1) Job position and company procedures training, (2) Regulatory requirements (EPA, DOT, OSHA). This policy establishes the specific training categories for which each employee must receive instruction and indoctrination. The categories as outlined above are as follows:

A. Job description and company procedures training:

1) Drivers are instructed in the following topics:

- | | |
|-----------------------------------------------------|---------------------------|
| a) Company policies | b) Company benefit plans |
| c) Bloodborne Pathogens | d) Emergency action plan |
| e) Hazard communication | f) Lockout/Tag out |
| g) Personal protective equipment | h) Permit confined spaces |
| i) Accident and injury reporting | j) Fire extinguisher use |
| k) DOT hours of service | l) DOT hazmat |
| m) Substance abuse and alcohol misuse | n) Waste acceptance |
| o) Pre/post trip inspections | p) Accident/warn devices |
| q) Access to exposure and medical records materials | r) Backing procedures |
| s) Proper lifting methods | t) Driver training |

2) Treatment unit operators are instructed in the following topics:

- | | |
|----------------------------------|------------------------------|
| a) Company rules | b) Permit confined spaces |
| c) Company benefit plans | d) Spill cleanup procedures |
| e) Equipment operation | f) DOT hazardous materials |
| g) Bloodborne Pathogens | h) Radiation training |
| i) Hazard communication | j) Accident/injury reporting |
| k) Personal protective equipment | l) Fire extinguisher use |
| m) Waste acceptance protocol | n) Hand/power tools |
| o) Container wash training | p) Emergency eyewash/shower |
| q) Emergency action plan | r) Access to medical records |
| s) Proper lifting | t) Machine guarding |

- u) Lockout/tag out
 - v) Powered forklift
 - w) Slip/trip/ladder safety
 - x) NC permit requirements
- 3) Plant managers/supervisors: In addition to having specific knowledge of driver and treatment unit operations and responsibilities, this category of employee is instructed in the following topics:
- a) Service contracts and documentation
 - b) Equipment calibration
 - c) Purchasing procedures
 - d) Operating records management
 - e) First aid and basic company required safety program
 - f) Emergency management
- 4) Bloodborne Pathogens Exposure Training: Specific training will be provided to collection and processing employees concerning hazard recognition and control methods related to infectious medical waste as per 29 CFR 1910.1030. The training outline is as follows:
- a) Purpose of Bloodborne Pathogen training
 - b) How infection can occur
 - c) Terms
 - d) Explanation of Hepatitis B and C
 - e) Explanation of Human Immunodeficiency Virus
 - f) How HIV and HBV infection can occur
 - g) MedWaste Exposure Control Plan
 - h) Tasks with occupational exposure to bloodborne pathogens
 - i) Preventing infection
 - Engineering controls
 - Work practice controls
 - Personal protective equipment
 - j) Hepatitis B vaccine
 - k) Exposure incident procedures and follow-up
 - l) Labeling

Records of training will be recorded and kept on file in the plant office. Contingency training will be conducted in intervals prescribed by regulatory authority and company policy, or as facility management deems it necessary for training update.

9.0 RECORD KEEPING

9.0A Operating and Maintenance Records

Operating and maintenance records will be maintained for all treatment processing operations. The plant manager is responsible for report submission in a timely manner. All waste management records, including any documentation provided by the transporter, are maintained for three years and made available for inspection by all regulatory agencies, along with employee training, transportation, and equipment maintenance records.

- a) Reports for treatment equipment operation
 - Daily log sheets
 - Processing records
 - Plant Operations weekly reports
 - Monthly production reports
 - Monthly statistical report
 - Monthly maintenance report
 - Disposal logs
 - Spill report (if required)
 - Accident report (if required)

- b) Report for Transportation Operations
 - Vehicle condition Reports
 - Customer manifest for each medical waste pickup
 - Spill report (if required)
 - Accident report (if required)

- c) Report for Transferred Waste Materials
 - Customer list
 - Shipping facility waste manifests
 - Receiving facility waste manifests

10.0 HOUSEKEEPING

In handling medical waste, good housekeeping practices will be implemented at the facility. The outside property will be maintained in a neat appearance by cutting and trimming the grass areas and spraying for weed control on the property. An extermination contract will be in place to control insects, vermin, etc. inside the building and around the perimeter of the building. The company owned trucks hauling medical waste will have spill kits and PPE on board for cleaning spills and leaks. Transporter's vehicles will be inspected and any noticeable leaks or spills will be cleaned and disinfected before the vehicle is released from the facility. For vehicles parked on the property, any leaks seen emitted from the vehicle will be contained in a bucket, the source located and removed from the vehicle. The spill will be immediately cleaned using the spill kit. Any contamination of the ground underneath the vehicle will be removed, placed in a bag and treated in the autoclave. The secured office area will have no carpeting (tile floors) and no contamination will be brought into the office area. Only authorized employees will be allowed in the office area. The plant area will be properly maintained to be clean, orderly and well lit. Spill cleaning materials, hospital grade disinfectants and PPE will be stored in the plant for employees to properly cleanup any spills using the required dwell times. The plant concrete floor will be washed at least weekly, or as required for spill cleaning, into the floor drains and discharged into the sanitary sewer. Management is trained and certified in biohazard cleaning. The autoclave has a cleaning cycle to maintain the inside of the autoclave chamber and the treatment carts. If any additional cleaning is required, the carts will be taken to the wash station where they will be pressure washed using hot water and disinfected before being returned to service.

11.0 COMMUNICATION

Should the treatment facility close for any reason other than normal business hours, the Company will inform the Division of Waste Management, Solid Waste Section, upon the closing, reason for closing and re-opening date.

MedWaste Solutions, LLC

148 Boxwood Lane, Gastonia, NC 28054
803-412-0245

RECEIVED

OCT 31 2011

SOLID WASTE SECTION
ASHEVILLE REGIONAL OFFICE

North Carolina DENR
Division of Waste Management
2090 US Highway 70
Swannanoa, NC 28778

Attn: Larry Frost

Dear Larry:

Enclosed is the revised Operating Plan for our waste treatment facility in Gastonia, NC. The revisions are in response to your letter dated October 25, 2011 to better define some terms of the Plan. I have also added a section addressing the communication required for a plant closing.

Several typos and word deletions are correcting throughout the text. There are no other changes or additions to the Plan that changes the meaning of the text as originally submitted.

The revisions are as follows:

- 1) Corrected zip code, page 1.
- 2) Revised Section 3.0, define by pass waste, page 1
- 3) Revised Section 3.1A, defined waste requiring incineration, page 2
- 4) Revised Section 3.1B(1), defined proper packaging, pages 2 and 3
- 5) Added Section 11.0, plant closing communication, page 16

I trust that these changes are satisfactory for us to receive our operating permit.

Thank you, Larry, for your continuing assistance as we work through the permitting process. Please advise either Dale or me if you need any additional information.

Sincerely,



Gerry Moore, Plant Manager

"Providing a greener environment through technology"



September 29, 2011

Re: 148 Boxwood Ln
Gastonia, North Carolina
Gaston County Tax Parcel 100310

To Whom It May Concern:

The City of Gastonia's Zoning Office has reviewed the property referenced above and hereby certifies the following:

- 1) The subject property is located within the City of Gastonia's Planning Jurisdiction.
- 2) The City of Gastonia does have a zoning ordinance and sub-division ordinance, which regulates the subject property.
- 3) The subject property is located within the I-2 Industrial zoning district.
- 4) The proposed use of the property for the operation of a solid waste treatment facility; as outlined in a letter dated September 21, 2011, would be defined under the Unified Development ordinance as "Manufactured Goods, Class I", which is allowed by right within the I-2 zoning designation. I have attached a copy of this letter.

Please feel free to contact me at 704- 866-6746 with any questions you may have.

Sincerely,

A handwritten signature in blue ink that reads "Drew T. Pearson".

Drew T Pearson
Zoning Services Administrator

PO Box 1748
Gastonia, NC 28053
phone 704-866-6746 - fax 704-836-0044
drewp@cityofgastonia.com

MedWaste Solutions, LLC
148 Boxwood Lane
Gastonia, NC 28052

General Information

1. Name of facility: MedWaste Solutions Treatment Facility
2. Applicant information: MedWaste Solutions, LLC
148 Boxwood Lane
Gastonia, NC 28052

Contact: Dale Sullivan, General Manager
155 W. Springdale Road
Rock Hill, SC 29730

803-448-6224

Email: medwastesolutionnc@gmail.com

3. Landowner information: Charley Barkley
2179 Brookberry Lane
Gastonia, NC 28056

704-865-6450

Email: cabarkley2805@bellsouth.net

Certification by Land Owner (if different from Applicant):

I hereby certify that I have read and understand the application submitted by

MED WASTE SOLUTIONS for a permit to operate a solid waste management facility on land owned by the undersigned located at (address) 148 BOXWOOD LANE; (city) GASTON, NC, in GASTON County, and described in Deed Book and Page(s) _____.

I specifically grant permission for the proposed solid waste management facility planned for operation within the confines of the land, as indicated in the permit application. I understand that any permit will be issued in the names of both the operator and the owner of the facility/property. I acknowledge that ownership of land on which a solid waste management facility is located may subject me to cleanup of said property in the event that the operator defaults as well as to liability under the federal Comprehensive Environmental Responsibility, Compensation and Liability Act ("CERCLA"). Without accepting any fault or liability, I recognize that ownership of land on which a solid waste management facility is located may subject me to claims from persons who may be harmed in their persons or property caused by the solid waste management facility.

I am informed that North Carolina General Statute 130A-22 provides for administrative penalties of up to fifteen thousand dollars (\$15,000) per day per each violation of the Solid Waste Management Rules. I understand that the Solid Waste Management Rules may be revised or amended in the future, and that the siting and operation of the facility will be required to comply with any such revisions or amendments.

Charles A Barkley
Signature

09/29/11
Date

CHARLES A. BARKLEY
Print name

NORTH CAROLINA

Gaston County

I, Morris W. Kester, Notary Public for said County and State, do hereby certify that Charles A. Barkley, personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 29th day of September, 2011.

(Official Seal)

M. W. Kester
Notary Public

My commission expires 2-17-2013



Gaston County, North Carolina GIS - Windows Internet Explorer provided by Gaston County Government

http://egov1.co.gaston.nc.us/website/ParcelDataSite/viewer.htm

File Edit View Favorites Tools Help Convert Select

Gaston County, North Carolina GIS

Gaston County, North Carolina GIS Active Tool: Pan

Full Extent Clear Previous View Overview Map Measure
 Identify Parcel Zoom In Zoom Out Pan Select Parcel Print Map PRC

Search Layers Legend Welcome Help

Gaston County

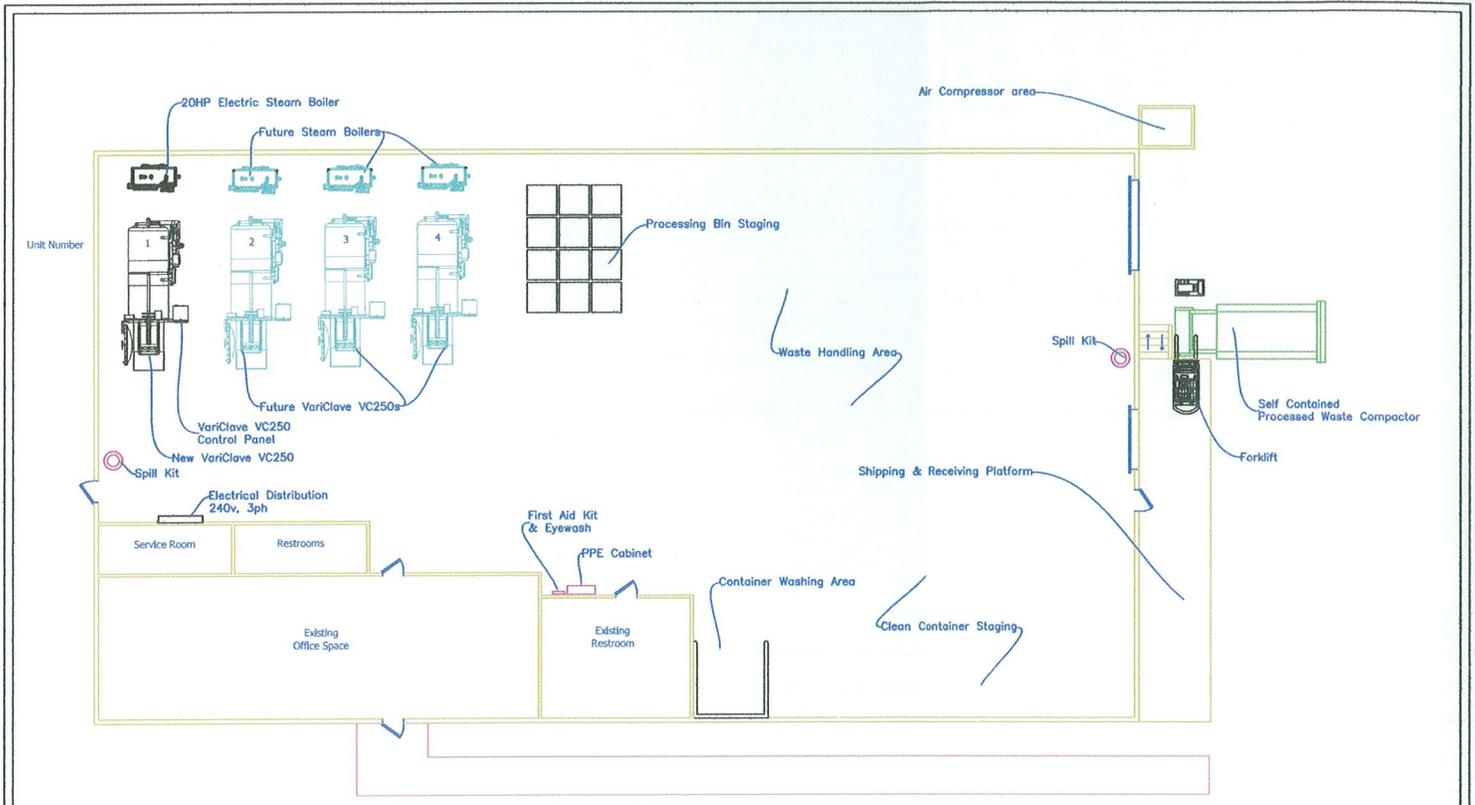
- All Layers
- Project Layers
- Road Information
- Parcel Information
 - Parcel BMP
 - Parcel Lines**
 - Owner Names
 - Parcel Numbers
 - Subdivision Annotation (Lot #)
 - Parcel Annotation (Dimensions)
- School Districts
- Miscellaneous Layers
- Municipality Layers
- Imagery
 - Orthophotos March 1997
 - Orthophotos March 2000
 - Orthophotos March 2005
 - Aerial Photos October 2006
 - Aerial Photos September 2007
 - Aerial Photos September 2008
 - Orthophotos March 2009
 - Orthophotos March 2010
 - Elevation Mosaic
 - HillShade
 - Voluntary Agricultural District
 - Topographic Data
 - Parcel Sales
 - Election Data

Gaston County, NC

Tax Payment | contact us | county | Data Sales | tax rates | FAQ | Additional Help | Neighborhood Sales

Current Scale 1: 2863 or 1 inch = 239 feet

Done Internet 100%



Projected Annual Processing Capacity

Unit Number	1	2	3	4
Unit Capacity*	4 million	4 million	4 million	4 million
Plant Capacity*	4 million	8 million	12 million	16 million
Target Date	Nov 2011	May 2012	Nov 2012	May 2013

* pounds of annual processing capacity

OnSite Sterilization, LLC
 319 Commerce Ct. Ste. 103
 Pottstown, PA 19464
 (610) 495-8214
 www.asksite.com

NOTE: This drawing is not for construction, and is subject to change pending verification of dimensions, spatial limitations, location of utility connections, operational requirements and comments and approval by Facility Engineering. Items may need to be added, removed or relocated resulting in change orders to the proposal.

Date: 28 Sept 2011	Project: MedWaste Solutions, LLC (NC) - Layout Proposal
Rev: 001	148 Boxwood Lane Gastonia, NC 28052
Drawn by: TAB	
Contact: Tim Barrett (barrett@asksite.com 610-495-8214)	

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