



**FACILITY COMPLIANCE AUDIT REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

**UNIT TYPE:** (check all that apply to this audit with same Permit number)

Lined MSWLF		LCID		YW		Transfer		Compost		SLAS		<b>COUNTY:</b> Alamance <b>PERMIT NO.:</b> 01-02 <b>FILE TYPE:</b> COMPLIANCE
Closed MSWLF		HHW		White goods		Incin		T&P		FIRM		
CDLF		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF		

Date of Audit: 03/09/07.

Date of Last Audit: 01/18/07

**FACILITY NAME AND ADDRESS:**

Stericycle, Inc.  
 1168 Porter Avenue  
 Haw River, North Carolina 27258

**GPS COORDINATES: (Decimal Degrees) N:** 36.06564 **E:** 79.34915

**FACILITY CONTACT NAME AND PHONE NUMBER:**

J.W. Hill, Area Manager-Environmental, Safety, and Health  
 336-578-8900 ext.23

**FACILITY CONTACT ADDRESS (IF DIFFERENT):**

Same

**AUDIT PARTICIPANTS:**

J.W. Hill, Stericycle  
 Hugh Jernigan, N.C. Solid Waste Section

**STATUS OF PERMIT:**

Original Permit Issued: January 31, 1991  
 Permit Modification Issued: January 9, 1998  
 Permit renewal with name change and revised Operational Plans: September 15, 2003  
**Permit Expiration Date: September 15, 2008**

**PURPOSE OF AUDIT:**

Follow-up concerning ash analysis

**NOTICE OF VIOLATION(S) (citation and explanation):**

None

You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$5,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. If the violation(s) noted here continue, you may 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.

**STATUS OF PAST NOTED VIOLATIONS (List all noted last audit):**

None

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**AREAS OF CONCERN AND COMMENTS:**

1. The site visit was conducted as a follow-up to a fly ash lead problem and review of recent lead sampling.
2. The facility is a medical waste treatment operation consisting of two incinerators. The site typically operates 24 hours per day, 7 days a week, excepting scheduled maintenance and repair down time.
3. Received a phone call from J. W. Hill of Stericycle on July 17, 2006 concerning results of analysis from recent sampling of an ash roll-off container. The TCLP analysis indicated the lead levels were exceeding the regulatory limits of 5.0mg/l. The facility was to hold the ash roll-off container, conduct a retest of the ash, and conduct sampling and analysis of all ash containers before shipment to a landfill, and contact the Hazardous Waste Section for guidance on disposal and manifesting.
4. Met with J. W. Hill for an inspection of the facility and to discuss the ash analysis on July 19, 2006. A second sampling and analysis of the ash container in question also revealed lead levels in excess of the regulatory limits. It was agreed all ash roll-off containers are to be sampled and have analysis conducted before shipment, and this procedure will continue until otherwise notified. The ash roll-off containers, which exceed the 5.0mg/l. lead limits, are being taken to a hazardous waste disposal facility. Review of the TCLP analysis indicated no other parameters were questionable, so lead was the only TCLP analysis to be conducted on the subsequent containers. All of the ash sampling results are being submitted to the Solid Waste Section. The facility has been attempting to identify the source of the elevated lead levels.
5. Met with Mr. Hill on March 9, 2007 to discuss the results of efforts to find the source of lead in the incoming waste, results of recent analysis, and future sampling protocols. Stericycle has sent letters to the medical waste generators and have sent sales personnel to inform the medical waste generators not to attempt to dispose lead materials in medical waste being sent to Stericycle. From July 20<sup>th</sup> to date, 243 analysis have been conducted on the ash containers. Of these analysis, 37 have shown to be exceeding the lead limits and the ash was sent to a hazardous waste disposal facility. The trend has indicated that the levels of lead have decreased both the amount of lead and the occurrence frequency. There have been no analysis exceeding the lead limits in the last 57 ash roll-off containers, and the detected lead amounts range from non-detected to an average of approximately 0.5mg/l..
6. It appears that the source of excessive lead in the medical waste stream has been eliminated.
7. Stericycle has submitted to the Solid Waste Section, a revised ash sampling procedure utilized by other Stericycle facilities as a potential future procedure for the Haw River facility. The revised ash sampling procedure was reviewed during previous inspections.
8. It is recommended Stericycle return to the approved ash sampling procedure, with additional lead sampling being conducted twice between the semi-annual sampling events.
9. Mr. Hill is submitting a revised (revision to recently submitted request incorporating additional sampling) sampling protocol.

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

Hugh Jernigan Phone: 336-771-5093  
*Regional Representative*

**Distribution: original signed copy to facility -- signed copy to compliance officer – e-mail or copy to super**

Delivered on : <u>03/13/07</u> by		hand delivery	x	US Mail		Certified No. [ ]
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Cc: Mark Poindexter  
 Amy Annechino  
 Deborah Aja

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