



FACILITY COMPLIANCE AUDIT REPORT

Division of Waste Management Solid Waste Section

UNIT TYPE:

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

Date of Audit: 07/01/10**Date of Last Audit:** 1/06/10**FACILITY NAME AND ADDRESS:**

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

GPS COORDINATES: N: 36.06564 E: 79.34915**FACILITY CONTACT NAME AND PHONE NUMBER:**

Alan Skrzypczak, Facility Manager
 336-578-8900 ext.24
 email address: askrzpczak@stericycle.com

FACILITY CONTACT ADDRESS:

SAME

AUDIT PARTICIPANTS:

Alan Skrzypczak, Stericycle, Inc. – Facility Manager
 Al Jarrell, Stericycle, Inc. – Maintenance Manager
 Chris Marriott, NCDENR - SWS
 John Patrone, NCDENR – SWS

STATUS OF PERMIT:

Original Permit Issued: January 31, 1991
 Permit Modification Issued: January 9, 1998
 Permit Renewal (Name change & Revised Operation Plan): September 15, 2003
Permit Review Date: September 15, 2008

PURPOSE OF AUDIT:

Comprehensive Audit

NOTICE OF VIOLATION(S):

None

You are hereby 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 Statute or Regulations. For the violation(s) noted here, 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.

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STATUS OF PAST NOTED VIOLATIONS:

None

AREAS OF CONCERN AND COMMENTS:

- 1) The facility is a medical waste treatment operation consisting of two incinerators.
- 2) The site typically operates 24 hours per day in 2-12 hour shifts, 7 days per week. Exceptions to this schedule are for scheduled maintenance and repair down time.
- 3) The facility accepts non-hazardous waste consisting of regulated medical waste, unregulated medical waste, controlled substances seized by law enforcement, chemotherapeutic waste, health care industry documents, USDA-APHIS international waste, and pharmaceuticals.
- 4) **Facility should ensure that a copy of the current Operations Plan is stored on site and available at all times.**
- 5) Permit review date was September 15, 2008. A request for review was made by Stericycle, Inc. on October 27, 2008.
- 6) The Title V air permit has expired. A renewal application was submitted on August 31, 2006 as required with the Division of Air Quality schedule for permit renewals. The Draft Air Quality Permit was posted for a comment period on February 15, 2010. The public comment period for the draft ended on May 25, 2010, and the EPA comment period ended on June 1, 2010.
- 7) Continuous monitoring and recording of chamber temperatures is completed by a circular chart recorder.
- 8) The facility operating records were checked. A detailed review of daily operating records for February 3, 2010 was completed. The chart recorders indicated that temperatures exceeded the minimum of 1200 degrees F. for the primary chamber, and 1800 degrees F. in the secondary chamber during operations of both incinerator units. On February 3, 2010, load rates for unit #1 ranged from 0 (no hourly load) to 1909 lbs/hour, with an average load rate of 1814.0 lbs/hr. On the same day, the unit #2 load rates ranged from 1705 to 1910 lbs/hr, with a daily average of 1888.8 lbs/hr. These load rates are below the permit maximum of 1911 lbs/hr.
- 9) At the time of inspection both incinerator #1 and incinerator #2 were in operation.
- 10) A check of the readouts during the visit indicated temperatures of 1964 degrees F in the upper and 1836 degrees F in the lower chamber of unit #1. Unit 2 readout indicated temperatures of 1940 degrees F and 1767 degrees F in the upper and lower chambers, respectively. All of these temperatures are above the minimum operating temperatures for each chamber. The three hour average temperature for unit 1 & 2 was 1995 and 1951.9, respectively.
- 11) Ash generated by the incinerator is processed through a water squelch, then transferred to a 20 yard container, dewatered, and hauled by Republic Waste to Upper Piedmont Landfill in Rougemont, NC. The facility generally fills 2 of the 20 yard containers each operating day. All containers are dewatered under cover and drained into the floor drains.
- 12) Drain water from the ash is collected via floor drains and is piped to the pre treatment/water reuse system for the squelch or diverted to the City of Graham WWTP. The facility holds an Industrial User Pretreatment Permit issued by the City of Graham on July 1, 2006. This Industrial User Permit expires on June 30, 2011.
- 13) The facility samples the ash for pH, free liquids, and TCLP constituents (excluding herbicides and pesticides) listed in US EPA manual SW-846 twice a year.
- 14) Ash was sampled for the complete parameter list on May 11, 2010. The samples were sent to NC certified laboratories in Huntersville, NC and Asheville, NC. The results indicated that all TCLP concentrations were below hazardous levels.
- 15) Due to prior results indicating levels of lead that may be hazardous, the facility takes additional ash

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samples analyzed only for lead twice a year. The most recent lead only sampling occurred on February 11, 2010. The TCLP result was 0.060 mg/L. This result is below the hazardous regulatory limit of 5.0 mg/L, allowing for continued disposal of the ash in a NC Subtitle D landfill.

- 16) The Annual Facility Report was discussed. The reporting form can be found here: <http://portal.ncdenr.org/web/wm/sw/annualreports>. This report is due on August 1, 2010.

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



Phone: 336-771-5090

Chris Marriott
Environmental Senior Specialist
Regional Representative

Delivered on : <u>July 12, 2010</u> by		Hand delivery	<input checked="" type="checkbox"/>	email		Certified No. []
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Cc(via email): Mark Poindexter, Field Operations Branch Supervisor
Jason Watkins, Central District Supervisor
Donald Herndon, Compliance Officer