



FACILITY COMPLIANCE AUDIT REPORT

Division of Waste Management Solid Waste Section

UNIT TYPE:										
Lined MSWLF		LCID		YW		Transfer		Compost	SLAS	COUNTY: Durham PERMIT NO.: 32-09I FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Incin	X	T&P	FIRM	
CDFL		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO	SDTF	

Date of Audit: 12/03/2010

Date of Last Audit: 01/20/2010

FACILITY NAME AND ADDRESS:

GlaxoSmithKline, Inc.
 3025 Cornwallis Road
 RTP, Durham County, NC

GPS COORDINATES: **N:** 35.92026 **E:** -78.86762

FACILITY CONTACT NAME AND PHONE NUMBER:

Lindsey C. Walata, P.G. (919) 483-4640

FACILITY CONTACT ADDRESS:

5 Moore Drive, PO Box 13398
 Mailcode Nth-P.1164
 RTP, NC 27709-3398

AUDIT PARTICIPANTS:

Neal Parker – GSK, Manager of Environmental & Waste-Global Services
 Lindsey Walata – GSK, RTP Environmental Manager
 Greg Brooks – Clean Harbors, Program Manager
 Chris Marriott – NC DENR, Solid Waste Section

STATUS OF PERMIT:

Original Issue:	February 8, 1996
Modification/Renewal (change in ownership/change in service area):	May 14, 2002
Amendment (Permit Renewal):	March 22, 2007
Modification (Ops. Plan revision-change in ash/lime sampling procedure):	August 19, 2009
Modification (Ops. Plan revision-change in overfire water tank operation):	July 9, 2010
Permit Review Date:	March 22, 2012

PURPOSE OF AUDIT:

Comprehensive Audit & Resolve NOV issued on January 20, 2010

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:

PERMIT CONDITION 11: This facility shall conform to the operation requirements described in the approved plan, 15A NCAC 13B .0529, .1207(1) and (3), and the conditions specified herein.

The approved operations plan for the facility states: "The incinerator uses domestic water injected into the primary (lower) combustion chamber to cool the burning waste when the temperature exceeds 1500 F. In 2009 a project was completed that provides a tank and pump to allow reclaimed water to be substituted for the domestic cooling water. The reclaimed water is unregulated aqueous wastewater containing dilute concentrations of pharmaceutical compounds from R&D operations. Now, either domestic water or wastewater can be used for cooling with this system."

On January 13, 2010, Neil Parker with GlaxoSmithKline (GSK) notifies Chris Marriott of SWS of a D001 RCRA hazardous waste charged into the incinerator via the reclaimed water tank. Further investigations by GSK revealed that other RCRA hazardous wastes [methylene chloride (F002), acetone (F003), and toluene (F005)] were possibly charged into the incinerator via the reclaimed water tank.

Recommended corrective action consisted of taking the reclaimed water tank (a.k.a overfire water tank) out of service until a revised Operations Plan is submitted, approved by the SWS, and implemented.

On May 28, 2010, Neil Parker hand delivered the request for Permit Modification to the Central Office of the Solid Waste Section on Oberlin Road in Raleigh, NC. The request contained: a revised application with red-line changes; Exhibit 15-Daily Burn List form; Exhibit 16-Screening Certification Log; and Exhibit 19-P Building Overfire Water Tank Operations Instructions. These same documents were submitted electronically via email on the same day.

On July 9, 2010 the Solid Waste Section issued a Permit Modification to GSK that approved and incorporated the submitted documents.

As of December 3, 2010 the violations have been corrected. GSK can utilize the overfire water tank in accordance with the approved plans referenced in the July 9, 2010 Permit.

AREAS OF CONCERN AND COMMENTS:

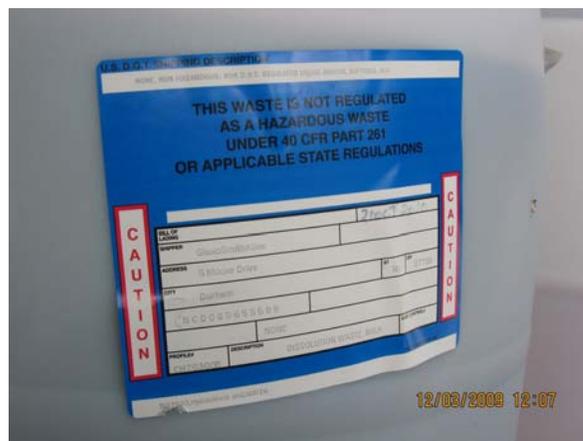
- 1) Facility is a medical waste incinerator owned by GlaxoSmithKline. The incinerator operations are contracted to Clean Harbors.
- 2) The new Permit, issued July 9, 2010 was discussed and reviewed with all audit participants.
- 3) According to Mr. Brooks, the incinerator is currently operating 2 days per week, with a burn time of 6-8 hours each operational day. Incineration days may increase if the demand for treatment of waste material increases. The incinerator was not in operation at the time of this inspection.
- 4) The overfire water tank is not in-use at this time. Currently City of Durham public water is being utilized for cooling of the incinerator chamber. Mr. Brooks expects to begin using cooling water from waste liquids via the overfire water tank sometime during the first quarter of 2011. Clean Harbors and GSK are still preparing an additional Standard Operation Procedure for the use of the tank. Once the SOP is agreed upon the use of the tank should begin. Mr. Brooks gave a verbal synopsis of the approved procedure referenced in the Permit for accepting the R&D liquid waste for use in the overfire water tank.
- 5) The overfire tank has been reconnected for pressure/leak testing with City of Durham water. According to Mr. Brooks, no leaks were detected from the tank, pumps, or piping and all valves functioned properly. At the time of this inspection the tank was full of City water.
- 6) The facility primarily accepts GSK waste from GSK facilities nationwide. Occasionally, GSK is asked to destroy law enforcement seizure material.
- 7) The NCDENR Division of Air Quality has issued a permit # 04612T30 for the facility. The Permit was issued on June 1, 2010 and expires on November 30, 2013.
- 8) Training records were reviewed. GSK conducts Commercial Industrial Solid Waste incinerator Training for

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their employees at the facility. According to the records, the trained personnel are: David Fletcher, Greg Brooks, Lindsey Walata, Neal Parker, Norman Anderson, and Larry Wells. The training events occurred on September 8, 2010 and October 8, 2010.

- 9) The waste water is collected in floor drains at the facility are connected to the City of Durham sanitary sewer system and are treated at the City's WWTP.
- 10) The dissolution waste that will be pumped into the overfire water tank for cooling water was viewed in containers. The containers are being stored at Waste Pad #2, which is permitted for the holding of hazardous waste. The containers with a bar code tracking label are transported to the waste pad. After paper records check for characteristic hazardous wastes and treatment for pH adjustment by the technician, a "DISSO" label will be placed on the container (picture on left below). After a second check by the Program Manager (or another manager) a non-hazardous waste label is placed on the container (picture on right below). Containers should only be transported to the incinerator building for loading into the overfire water tank if both labels are affixed to the container.

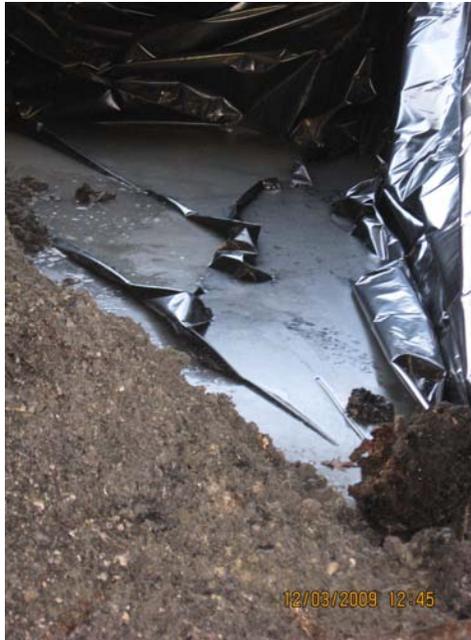


- 11) The incinerator daily burn log forms were reviewed for the month of August 2010. The forms include a description of the waste material, the load rate, and chamber temperatures. All parameters for operation were properly met according to the forms. According to the forms, the incinerator operator operated 15 days in the month of August 2010.
- 12) The laboratory data of the ash and spent lime sampling was reviewed. Samples were taken on April 16, 2010 and October 15, 2010. All of the analyzed constituents were reported below RCRA hazardous waste levels after TCLP preparation.
- 13) The facility has a large walk in type refrigerator for the storage of regulated medical wastes and other biological wastes. Biological wastes consisting of animal bedding was observed stored in the refrigerator during this inspection. The temperature of the refrigerator was viewed to be 38.0 degrees Fahrenheit.
- 14) Other waste stored at the facility waiting to be incinerated consisted of: expired pharmaceutical product; manufacturing plant waste; excess labels; empty containers; and, clinical returns.
- 15) Ash is collected from the incinerator in a small bin (less than 5 cubic yards) for dewatering. The bin drains out holes in the bottom of the bin over floor drains. A floor drain is located where the bin sits as it is loaded with ash from the incinerator. When the bin is full, it is moved to a drain at the center of the floor for further dewatering. When dewatering is complete, the bin is emptied into a lined roll-off container for transport to a disposal facility.

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- 16) The roll-off container being filled at the time of this inspection was observed to contain a significant amount of liquid (See pictures below). Please ensure that ash is fully dewatered prior to placing into the lined transportation roll-off container. **The liquid observed in the roll-off should be pumped out prior to any additional ash being placed into the roll-off.**



- 17) Spent lime is stored in a sealed container during collection, storage, and transport. The facility had one lime container in use to collect spent lime. Two other containers were on-site, but were labeled as empty.

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

Chris Marriott
 Environmental Senior Specialist
Regional Representative

Phone: 336-771-5090

Delivered on : <u>December 10, 2010</u> by		Hand delivery	<input checked="" type="checkbox"/>	E-Mail		Certified No. <u> </u>
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cc: Mark Poindexter, Field Operations Branch Supervisor (via email)
 Jason Watkins, Central District Supervisor (via email)
 Donald Herndon, Compliance Officer (via email)