



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	COUNTY: Gaston PERMIT NO.: 36-01TP FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Incin		T&P	<input checked="" type="checkbox"/>	FIRM	
CDLF		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF	

Date of Audit: April 9, 2008.

Date of Last Audit: September 27, 2007.

FACILITY NAME AND ADDRESS:

Sanitec Safe Waste, LLC
 1196 Noles Drive
 Mt. Holly, North Carolina

GPS COORDINATES: (Decimal Degrees) N: 35.31454 W: 081.03947

FACILITY CONTACT NAME AND PHONE NUMBER:

Mr. Mike Brotherton, Sanitec Safe Waste, LLC
 (704) 822-1802

FACILITY CONTACT ADDRESS (IF DIFFERENT):

Post Office Box 466
 Mount Holly, North Carolina 28120

AUDIT PARTICIPANTS:

Jose Cesnaros, Sanitec Safe Waste, LLC
 Charles Gerstell, NCDENR-Solid Waste Section
 William Patrakis, NCDENR- Solid Waste Section

STATUS OF PERMIT:

The Permit to Operate was issued on March 22, 2007. The permit will be subject to review on March 22, 2012, as per 15A NCAC 13B .0201(e).

PURPOSE OF AUDIT:

Comprehensive Audit

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

15A North Carolina Administrative Code 13B .1205(6) states: The universal biohazard symbol shall be displayed on all transportation vehicles, in accordance with Department of Transportation Standards and 49 CFR 172 Subpart F.

During the inspection, a trailer loaded with medical waste was observed in the trailer storage area. This trailer was not marked with the universal biohazard symbol. Therefore, Sanitec SafeWaste, LLC is in violation of 15A NCAC 13B .1205. To achieve compliance, all transportation vehicles must display the universal biohazard symbol.

15A North Carolina Administrative Code 13B .1205(8) states: 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 calendar days.

FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

Page 2 of 3

During the inspection, containers of waste were observed in the storage area portion of facility that were not refrigerated, and had exceeded the 7 calendar day deadline for treatment. I was informed that this material was waste that was to be taken to another facility to be treated. Waste consisted of chemo waste, pathological waste, and sharps. Therefore, Sanitec SafeWaste, LLC is in violation of 15A NCAC 13B .1205(8). To achieve compliance, all waste designated for shipment to a different facility for processing must be refrigerated at temperatures between 35 and 45 degrees Fahrenheit or shipped to a proper treatment facility within 5 calendar days of receipt of this Notice.

15A North Carolina Administrative Code 13B .1206(1) states: Regulated medical waste shall be stored in a manner that prevents leakage of the contents of the package.

During the inspection, a cardboard container of waste was observed partially crushed adjacent to the microwave unit on the west side of the facility. Bloody fluid was observed leaking from the container onto the facility floor. Therefore, Sanitec SafeWaste, LLC is in violation of 15A NCAC 13B .1206(1). To achieve compliance, all packages must be stored in a manner to prevent leakage of the contents of the packaging. Take immediate remedial control measures as outlined in the approved Operations Plan to clean up spills during the treatment process.

15A North Carolina Administrative Code 13B .1206(2) states: Regulated medical waste shall be stored in a manner that maintains the integrity of the package at all times.

During the inspection, multiple cardboard containers of waste were observed partially crushed adjacent to the microwave unit on the west side of the facility. Additional containers were observed partially crushed or overturned in the storage portion of the facility on the east side. Therefore, Sanitec SafeWaste, LLC is in violation of 15A NCAC 13B .1206(2). To achieve compliance, all damaged containers must be immediately treated, or if safe, repackaged in an undamaged container until properly treated.

15A North Carolina Administrative Code 13B .1206(4) states: Regulated medical waste shall not be stored longer than seven calendar days from the date of shipment from the generator unless the regulated medical waste is refrigerated at an ambient temperature between 35 and 45 degrees Fahrenheit.

During the inspection, containers of waste were observed in the storage area of the facility that had not been treated within the 7 calendar day deadline. This material was not refrigerated. Therefore, Sanitec SafeWaste, LLC is in violation of 15A NCAC 13B .1206(4). All waste that has not been treated within 7 calendar days must be immediately treated or refrigerated at an ambient temperature between 35 and 45 degrees Fahrenheit until the waste has been properly treated.

15A North Carolina Administrative Code 13B .1206(6) states: All areas used to store regulated medical waste shall be kept clean. Vermin and insects shall be controlled.

During the inspection, medical waste consisting of primarily of used gloves cloth material was observed on the floor of the storage portion of the facility on the east side. Therefore, Sanitec SafeWaste, LLC is in violation of 15A NCAC 13B .1206(6). To achieve compliance, all loose medical waste must be placed in proper containers until property treated.

15A North Carolina Administrative Code 13B .1207(b) states: Refrigeration at an ambient temperature between 35 and 45 degrees Fahrenheit shall be maintained for regulated medical waste not treated within seven calendar days after shipment.

During the inspection, containers of medical waste were observed within the storage area portion of the facility that had not been treated within 7 calendar days of being shipped to the facility. These containers were not refrigerated, to achieve compliance, all medical waste within the facility that has not been treated within 7 calendar days of shipment must be immediately be treated or refrigerated at an ambient temperature between 35 and 45 degrees Fahrenheit until the waste has been properly treated.

FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

Page 3 of 3

15A North Carolina Administrative Code 13B .1207(e) states: All areas used to store regulated medical waste shall be kept clean. Neither carpets nor floor coverings with seams shall be used in storage areas. Vermin and insets shall be controlled.

During the inspection, medical waste consisting of primarily of used gloves cloth material was observed on the floor of the storage portion of the facility on the east side. Therefore, Sanitec SafeWaste, LLC is in violation of 15A NCAC 13B .1207(e). To achieve compliance, all loose medical waste must be placed in proper containers until property treated.

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. 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

AREAS OF CONCERN AND COMMENTS:

- 1.) The permit approves the operation of a regulated medical waste treatment facility consisting of a microwave disinfection system manufactured by Sanitec, Inc. and associated facility appurtenances for storage and processing of treated and untreated regulated medical waste.
- 2.) Observed the operations of the facility. This facility processes approximately 12,000 to 16,000 pounds of waste per day.
- 3.) Treated medical waste is disposed of at the Gaston County Landfill.
- 4.) A small amount of processed waste was observed on the asphalt lot of the trailer storage parking area. Be sure all processed material that may fall onto the ground during pickup of the solid waste compactor is removed and taken back to the compactor to ensure all processed waste is disposed in a sanitary landfill.
- 5.) Reviewed efficacy test logs from October 31, 2007 through March 25, 2007, and waste manifests. All documents appeared to be in order.

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

Charles T. Gerstell (signature) Phone: (704) 663-1699
Charles T. Gerstell
Regional Representative

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

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Cc: Mark Poindexter, Field Operations Branch Head
Deborah Aja, Western Area Supervisor