FACILITY COMPLIANCE AUDIT REPORT
Mecklenburg County Land Use and Environmental Services Agency
Solid Waste Services

UNIT TYPE:													
Lined MSWLF		LCID		YW		Transfer		Compost		SLAS		COUNTY: MECKLENBURG	
Closed MSWLF		HHW		White goods		Incin	X	T&P		FIRM		PERMIT NO.:	60-09-I
CDLF		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF		FILE TYPE:	COMPLIANCE

Date of Audit: January 25, 2010 **Date of Last Audit:** November 11, 2009

FACILITY NAME AND ADDRESS:
BMWNC, Inc.
3212 Campus Ridge Road
Matthews, North Carolina 28105

GPS COORDINATES: N: 35:06:02 **E:** 080:41:48

FACILITY CONTACT NAME AND PHONE NUMBER:
Tom Hulm
(704) 821-4766

FACILITY CONTACT ADDRESS:
Tom Hulm
Healthcare Waste Solutions
3250 Campus Ridge Road
Matthews, North Carolina 28105

Mr. Rich Geisser
Health Care Environmental
1281 Viele Avenue
Bronx, N. Y. 10474

AUDIT PARTICIPANT
Mike Stilwell-Environmental Specialist
Tom Hulm-Plant Manager

STATUS OF PERMIT:
Issued - September 29, 2003
Expires – September 29, 2008, Currently under review, Larry Frost of NCDENR

PURPOSE OF AUDIT:
Monthly Compliance Inspection

NOTICE OF VIOLATION(S):

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.

STATUS OF PAST NOTED VIOLATIONS:
N/A

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AREAS OF CONCERN AND COMMENTS:

January 25, 2010

Inspected the BMWNC, Inc. Medical waste incinerator, Solid Waste Permit Number 60-09-I, located at 3250 Campus Ridge Road to determine whether the facility is operating in compliance with the operating permit and conditions outlined in the North Carolina Solid Waste Management Rules.

Weather: Clear and approx. 45° F at 1:00 PM.

Observations: Facility was not operational during inspection..

Reviewed manifests for loaded trailers stored at the facility. All trailers emptied within 3-4 days.

Incinerator had been down approx. 4 hours for repair. Manager stated it would be back operational that day.

The receiving area floor appeared to be maintained in a sanitized condition.

Cart wash was not being used at time of inspection. No accumulation of waste was present in the in wash unit.

REVIEW OF SPECIFIC PERMIT CONDITIONS and LIMITATIONS:

S-1 thru S-3 Define the permit and applicable definitions.

S-4 "The facility shall conform to the operating procedures described in the approved operating plan, in accordance with 15A NCAC 13B .1206- "Requirements for Storage of Regulated Medical Waste.

S-5 "The facility shall conform to the requirements of 15A NCAC 13B Rule .1207(1)(a-j) - "Operational Requirements/Regulated Waste Treatment Facilities" for all regulated medical waste treated at the incineration facility.

S-6 "The facility shall conform to the incineration operating procedures described in the approved plan, in accordance with 15A NCAC 13B .1207(3)- Operational Requirements/Regulated Medical Waste Treatment Facilities".

- Facility was operating in general compliance incineration requirements outlined in Rule .1207(3).

S-7 "The Facility shall conform to the ash management procedures described in the approved plan, in accordance with 15A NCAC 13B .1207(3) - "Operational Requirements/Regulated Medical Waste Treatment Facilities"."

- All containers had good seals and were retaining all materials as required.

S-8 "This facility shall conform to the ash sampling procedures described in the ash sampling procedures described in the approved plan, in accordance with 15A NCAC 13B .1207(3) - "Operational Requirements/Regulated Medical Waste Treatment Facilities"."

S-9 "This facility shall conform to the reusable cart sanitation operating procedures described in the operating plan"

- Facility appears to be conforming to the reusable cart sanitation plan.

S-10 "BMWNC, Inc. Personnel shall inspect each load of waste deposited on the site for acceptability prior to treatment"

-Facility appears to be operating in compliance with this condition.

S-11 "Equipment shall be provided to control accidental fires....."

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-Fire extinguishers are located in strategic areas in facility.

S-12 "Fires shall be reported to MCDEP as soon as practical.

-No fires outside of the incineration unit have been reported.

S-13 "Facilities or practices shall not cause a discharge of pollutants into the waters of the State...."

-No discharge of pollutants to a water of the State was apparent.

S-14 Records of the amount of waste received at the facility shall be maintained and categorized according to the type of waste, State of origin, and North Carolina County of Origin.

S-15 On or before February 15 of each year, the permittee shall submit a report to MC-LUESA indicating the amount of waste received and incinerated....."

-Report was received and is not due again until Feb 15, 2010.

Compliance with Solid Waste Management Rules

15A NCAC 1207(1):

(a) "Refrigeration at an ambient temperature between 35° and 45° Fahrenheit shall be maintained for regulated medical waste not treated within seven (7) calendar days after shipment."-

(b) "Regulated medical waste shall be stored prior to treatment no more than 7 days after receipt."

(c) "Regulated medical waste shall be stored no longer than 7 days after treatment."

- Ash (treated regulated medical waste) is routinely moved off the site weekly or as needed.

(d) "Only authorized personnel shall have access to areas used to store Regulated medical waste".

- No unauthorized persons were observed in waste storage areas.

(e.) "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 insects shall be controlled."

- Waste storage and staging areas were judged to be clean. No floor coverings are used in the storage area.

(f) "Prior to treatment, all medical waste shall be confined to the storage area."

-No untreated waste was observed stored outside the storage area or closed trailers.

(g) "All floor drains shall discharge directly to an approved sanitary sewage system. Ventilation shall be provided and shall discharge so as not to create nuisance odors."

-Floor drains are plumbed to discharge to the quench water system. No nuisance odors were detected. Ventilation system was functioning.

(h) "A plan shall be prepared, maintained, and updated as necessary to ensure continued proper management of regulated medical

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waste at the facility."

- Plan maintained at the facility has been updated and all updates from Plant Manager are kept in permanent facility file at LUESA offices.

(i) "Records of Regulated medical waste shall be maintained for each shipment ....."

- Records for shipments of waste at the facility were available and reviewed.

(j) "Regulated medical waste treatment facilities that treat waste generated off-site shall submit to the division an annual report by August 1 of each year....."

-Facility has submitted report to NCDENR for FY 2008-09. The FY 2008-09 report has been received by this department.

15A NCAC 13B Section .1207(3):

(a) "Regulated medical waste shall be subjected to a burn temperature in the primary chamber of not less than 1200° Fahrenheit."

- Direct read and recorders indicated UNIT 1 was operating above 1200° Fahrenheit during this inspection. Unit 2 is off line.

(b) "Automatic auxiliary burners which are capable, excluding the heat content of the wastes, of independently maintaining the secondary chamber at the minimum 1800 Degrees Fahrenheit shall be provided."

-Auxiliary burners were functioning. Operator is doing a good job monitoring and maintaining the auxiliary burner and air flow control equipment.

(c) "Gases generated by the combustion shall be subjected to a minimum temperature of 1800° Fahrenheit for a period of not less than one (1) second."

- Incinerators are designed to meet the required retention time. The secondary chamber of Unit 1 was operating above1800° F.

(d) "Continuous monitoring and recording of primary and secondary chamber temperatures shall be performed."
- The temperature monitoring and recording system was operating.

(e) "An air quality permit shall be obtained from the Division of Environmental Management prior to construction and operating."

- The air quality permit was obtained and remains valid. Facility has obtained a New Source Performance Standard ("NSPS") air quality permit. A copy has been placed in this company's permanent Solid Waste file.

(f-k & m) "A plan of procedures for obtaining weekly and monthly composite ash samples shall be submitted....."

-Facility needs continue ash sampling and reporting as required.

(l) "Records of stack testing as prescribed in the Air Quality Permit shall be maintained at the facility.

-Records are maintained as required.

ATTACHMENTS: None

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

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(Mike Stilwell)
Environmental Specialist

Phone: (704) 432-1753 .

Delivered on : _____ **by:**		Hand delivery	X	US Mail		Certified No. [_]

cc: Teresa Bradford, Waste Management Specialist