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Backus	02/08/2011	12872	94-06



North Carolina Department of Environment and Natural Resources  
Division of Waste Management

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

February 8, 2011

Ms. Sarah Wolpert  
WM Healthcare Solutions  
1001 Fannin Street  
Suite 4000  
Houston, TX 77002

Re: Application to Transfer Permit  
American Environment Group AEG, Medical Waste Treatment Facility  
Washington County, Permit 94-06, Document Id Number 12872

Dear Ms. Wolpert:

The Division of Waste Management, Solid Waste Section received and reviewed your application requesting a transfer of the permit of the referenced facility. The following are minor corrections that should be made to the application.

1. This is a suggestion for "Section 2: Property Information" that is more concise.

*The WM Healthcare Solutions facility is located in a rural area within the boundaries of the Town of Creswell in Washington County, North Carolina. It was originally constructed and permitted by wdp2, LLC as a medical waste treatment facility under Permit No. 94-05-TP. The facility was later purchased and operated by American Environmental Group AEG, Inc. under Permit No. 94-06-TP. WM Healthcare Solutions, Inc. will purchase the facility in February, 2011.*

*Medical waste is processed in a 25,175 square-foot building located on the 9.7-acre site. The property was surveyed by Jarvis Consultants, Inc. of Washington, North Carolina, for the wdp2, LLC and provided in the original permit application. No modifications have been made since the survey.*

2. Operation Plan Cover Sheet – If the application was prepared by the applicant you do not need to include "for WM Healthcare Solutions, Inc."
3. Section 3.2 – The statutory definition of medical waste is not correct. It is as follows:

NCGS 130A-290(a)(17a) "Medical waste" means any solid waste which is generated in the diagnosis, treatment, or immunization of human beings or animals, in research pertaining thereto, or in the production or testing of biologicals, but does not include any hazardous waste identified or listed pursuant to this Article, radioactive waste, household waste as defined in 40 Code of Federal Regulations § 261.4(b)(1) in effect on 1 July 1989, or those substances excluded from the definition of "solid waste" in this section.

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You do not need to include 40 CFR 261.4(b) (1). However, if you wish to include it, make it separate and quote it correctly.

4. In Section 3.8, include the location and permit number for receiving landfill. (The East Carolina Environmental Regional Landfill is located in Aulander and operates under permit number 08-03.)

You may make these changes and send them to me as a pdf.

If you have any questions, please contact me at (919) 508-8520 or by email at [pat.backus@ncdenr.gov](mailto:pat.backus@ncdenr.gov).

Sincerely,



Patricia Backus, PE  
Environmental Engineer  
Solid Waste Section

cc: Ed Mussler, PE, Permitting Branch Head