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Backus, Pat

From: Backus, Pat
Sent: Tuesday, May 10, 2011 1:24 PM
To: 'Wolpert, Sarah (TX)'
Subject: Creswell Medical Waste Facility

Sarah,

I apologize for taking so long to review your submission. The past few months have been very busy for me.

In reviewing the revised operations plans, I compared the revised plan to the one dated January 21, 2011. There were a few things that had been changed from a previous submittal that were back to the older version. I don't know if the changes were intention or just the wrong starting document.

General

1. WM Healthcare will be issued a new permit. The number will be 94-07TP-TP-2011.
2. Section 2: Property Information - Update to state that you have purchased the facility.

Operations Plan

1. Section 3.2 – The statutory definition of medical waste is not correct. This was corrected in the previous version of the operations plan. Please refer to it to make corrections.
2. Section 3.3 – The service area listed is different from the one stated in the previous plan. Please clarify which is correct and make changes if necessary.
3. Section 3.4 – The operations have changed but the capacity of waste stored remains the same. Please review. Please list the capacity for each operation.
4. Section 3.6 – The sign information has changed. Again, just want to confirm this is correct.
5. Section 3.7 – There is also difference in the alternative facility for untreated medical waste. The facility in Texas was in an earlier version of the plan, but removed for the January 2011. Please confirm this information.
6. Section 3.8 – Please separate the autoclave process as you have for the Red Bag Solutions and Sharps Recycling Process with a heading. Also address the treatable waste going to either the autoclave or Red Bags Solution process.
7. Section 3.8, page 6, 3rd paragraph – Please identify the landfill as was done in the previous version (correct name, permit number, etc) or else state it will be the same as the other waste .
8. Page 7 – Waste Processing – Will the information kept from the treatment be the same as the information from the autoclave as stated in Section 3.17? It might be better to give a brief description of what process information (proof of sterilization) is kept and the critical operating conditions for sterilization under each process description.
9. Page 7 – Sharps Recycling Process – If I understood correctly, the treated sharps for the shredder are sharps that are sterilized at your site in the autoclave. If so, please modify the paragraph where the disposal of the material treated by the autoclave is described. (Page 6) It only lists the landfill.
10. Page 8 – Float Sink Tank – Will undesirable materials be taken to the same landfill as previously mentioned for autoclave waste? Will it be added to the other waste container or shipped separately?
11. Page 9 -Sharps Recycling – Please indicate that the finished product will be sent to a recycler.
12. Materials that will be sent to recyclers – Please indicate if the material will be stored on-site prior to shipping to recyclers and amount stored. Although a recovered material is not subject to regulation as a solid waste, there are some stipulations that you should be aware of.

130A-309.05

c) *Recovered material is not subject to regulation as solid waste under this Article. In order for a material that would otherwise be regulated as solid waste to qualify as a recovered material, the Department may require any person who owns or has control over the material to demonstrate that the material meets the requirements of this subsection. In order to protect public health and the environment, the Commission may adopt rules to implement this subsection. In order to qualify as a recovered material:*

- (1) *A majority of the recovered material at a facility shall be sold, used, or reused within one year;*
- (2) *The recovered material or the products or by-products of operations that process recovered material shall not be discharged, deposited, injected, dumped, spilled, leaked, or placed into or upon any land or water so that the products or by-products or any constituent thereof may enter other lands or be emitted into the air or discharged into any waters including groundwaters, or otherwise enter the environment or pose a threat to public health and safety; and*
- (3) *The recovered material shall not be a hazardous waste or have been recovered from a hazardous waste. (1989, c. 784, s. 2; 1995 (Reg. Sess., 1996), c. 594, s. 9.)*

13. Section 3.11 - There are some slight difference in the previously submitted version in addition to the process training for the new operations.

You may send the revision to me as an email attachment.

Thanks,
Pat

Patricia M. (Pat) Backus, P.E.

NC Department of Environment and Natural Resources
Division of Waste Management - Solid Waste Section
1646 Mail Service Center
Raleigh, NC 27699-1646

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Backus, Pat

From: Wolpert, Sarah (TX) [swolpert@wm.com]
Sent: Wednesday, March 30, 2011 4:55 PM
To: Backus, Pat
Cc: Schaubach, Todd; Mott, Jamie; Etta, Ayuk
Subject: Creswell Operations Plan Update & Facility Layout
Attachments: FINAL Creswell Operations Plan - 03-30-11.pdf; CRESWELL_ET_BUILDING LAYOUT_033011.pdf

Good afternoon Pat - Attached is the updated Operations Plan for the Creswell facility for your review prior to formal submittal. Included in the update to the plan are the operations for the Red Bag Solutions unit and the Sharps Recycling unit. In addition, I have attached the facility layout with each operation identified. I will wait for your response prior to submitting the two bound paper copies as required.

Previously, we had also discussed the reusable sharps container system already permitted at the Creswell facility. At this point, the location of the unit has not been identified so we would propose to submit an updated facility layout once that location is decided. I know that the permit transfer is a priority and I wanted to ensure that we got you this information as soon as possible.

Please feel free to call or e-mail me if you would like to discuss the enclosed information. Thank you for your assistance!

Sarah Wolpert
Permitting Manager
Healthcare Solutions
Tel 713 394 5446
Cell 713 703 6204

Waste Management
1001 Fannin
Houston, TX 77002

From: Backus, Pat [mailto:pat.backus@ncdenr.gov]
Sent: Monday, March 21, 2011 9:09 AM
To: Wolpert, Sarah (TX)
Subject: RE: Treated Sharps Recycling

Just a drawing showing where operations/equipment are. It does not need to be stamped.

Pat

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From: Wolpert, Sarah (TX) [mailto:swolpert@wm.com]
Sent: Sunday, March 20, 2011 2:07 PM
To: Backus, Pat
Subject: RE: Treated Sharps Recycling

Hi Pat – I have a quick question regarding the facility drawing outlining the operations at the Creswell site. Is there a requirement for the site plan to be stamped or does it simply need to show the location of the operations proposed at the site? Please let me know so I can get you exactly what you need. Thanks!

From: Backus, Pat [mailto:pat.backus@ncdenr.gov]
Sent: Wednesday, March 16, 2011 9:41 AM
To: Wolpert, Sarah (TX)
Subject: RE: Treated Sharps Recycling

Sarah,

Thanks for officially cancelling. My meeting reminder just popped up and I wasn't sure whether to stay at my desk or not.

Please submit what you have electronically. It gives me time to work it into my schedule.

Our section is probably the most electronic of the department and we would like to eliminate paper. However, we have limited scanning and printing capabilities, particularly for large drawings. We are still required to file a paper copy of the final approved version in our archives. Your facility also needs to have the final copy with an approval stamp at the facility. That's why we ask for two paper copies and an electronic copy. With a relatively small document such as yours, I prefer to have the second copy and mail the approved copy. Sometimes when we are dealing with larger applications, the consultant just wants the stamped page and they print the final document for the facility. Our budget is really tight so that is why try to get everything we need from the applicant. For the final submittal, I would like to have two paper copies, each in a binder or bound with plastic comb.

Anyway, it's ok to send the initial material electronically. However, please review it first.

Thanks,

Pat

Telephone: (919) 508-8520
Fax: (919) 733-4810

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From: Wolpert, Sarah (TX) [mailto:swolpert@wm.com]
Sent: Wednesday, March 16, 2011 9:52 AM
To: Backus, Pat
Subject: RE: Treated Sharps Recycling

Hi Pat – Thank you for the information regarding the recycling operation. I'm not sure we need to talk today regarding this operation since it seems pretty straight forward with the information provided below. I will cancel the meeting request for this morning. I am still waiting on the updated drawings for the submittal entailing the Red Bag Solutions

equipment, etc. I was curious if we would be able to submit the updated ops plan and the site plan electronically so that you could review and possibly provide feedback prior to final submittal? Let me know your thoughts and we will provide what is needed.

From: Backus, Pat [mailto:pat.backus@ncdenr.gov]
Sent: Monday, March 14, 2011 1:46 PM
To: Wolpert, Sarah (TX)
Subject: Treated Sharps Recycling

Sarah,

Sorry, I didn't give you an immediate answer. My mind was focused on another issue.

As you stated, after the sharps are treated they are classified as a solid waste. If the treated sharps can be feasibly recycled and removed from the solid waste stream for sale, use, or reuse, they would be classified as a "recovered material".

The following are North Carolina General Statutes (G.S.) that apply to a recovered material.

G.S. §130A-290(a)(24) "Recovered material" means a material that has known recycling potential, can be feasibly recycled, and has been diverted or removed from the solid waste stream for sale, use, or reuse. In order to qualify as a recovered material, a material must meet the requirements of G.S. 130A-309.05(c).

G.S. §130A-309.05(c) Recovered material is not subject to regulation as solid waste under this Article. In order for a material that would otherwise be regulated as solid waste to qualify as a recovered material, the Department may require any person who owns or has control over the material to demonstrate that the material meets the requirements of this subsection. In order to protect public health and the environment, the Commission may adopt rules to implement this subsection. In order to qualify as a recovered material:

- (1) A majority of the recovered material at a facility shall be sold, used, or reused within one year;
- (2) The recovered material or the products or by-products of operations that process recovered material shall not be discharged, deposited, injected, dumped, spilled, leaked, or placed into or upon any land or water so that the products or by-products or any constituent thereof may enter other lands or be emitted into the air or discharged into any waters including groundwaters, or otherwise enter the environment or pose a threat to public health and safety; and
- (3) The recovered material shall not be a hazardous waste or have been recovered from a hazardous waste. (1989, c. 784, s. 2; 1995 (Reg. Sess., 1996), c. 594, s. 9.)

The process and process equipment would not require permitting under the solid waste rules as long as you meet the qualifications.

You should modify your operation plan to indicate that treated sharps will/may go to this other process for recycling rather than to the landfill. In your records, you should keep track of the quantity of material that is recycled rather than disposed for the annual report and so that you can prove it is a recovered material .

In addition, you may want to look into the tax certification program which involves real or personal property tax exemptions in regards to recycling or resource recovery of or from solid waste. See <http://portal.ncdenr.org/web/wm/sw/taxcert> . You would need to call the contacts listed on the portal page for more information.

If you still need to talk on Wednesday, I'll be here.

Thanks,
Pat

Patricia M. (Pat) Backus, P.E.

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Division of Waste Management - Solid Waste Section
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OPERATIONS PLAN



WM Healthcare Solutions, Inc.

**301 East Saint David's Road
Creswell, Washington County
North Carolina, 27928**

March 2, 2011

Prepared by

**WM Healthcare Solutions, Inc.
1001 Fannin Ste 4000
Houston, Texas 77002**

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Fax (713) 287-2503

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SECTION 3.1 GENERAL DESCRIPTIONS

The facility operates in accordance with the rules and regulations set forth by the North Carolina Division of Waste Management and the Town of Creswell. The facility was engineered constructed and permitted for regulated medical waste treatment, transfer of medical and solid waste for appropriate treatment off site, and for handling reusable sharps containers.

The plant can operate 24-hrs a day, seven days a week.

Office hours will be Monday through Friday from 8:00 AM to 4:00 PM.

SECTION 3.2 ACCEPTABLE WASTES

The facility accepts medical wastes defined by NCGS 130A-290(a)(17a) as “any solid waste generated from diagnosis, treatment or immunization of human beings or animals, in research pertaining thereto, or in the production or testing of biological organisms, but not including 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) “The following solid wastes are not hazardous wastes: Household waste, including household waste that has been collected, transported, stored, treated, disposed, recovered (e.g., refuse-derived fuel) or reused. Household waste means any material (including garbage, trash and sanitary wastes in septic tanks) derived from households (including single and multiple residences, hotels and motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds and day-use recreation areas). A resource recovery facility managing municipal solid waste shall not be deemed to be treating, storing, disposing of, or otherwise managing hazardous wastes for the purposes of regulation under this subtitle, if such facility: (I) Receives and burns only (A) Household waste (from single and multiple dwellings, hotels, motels, and other residential sources) and (B) Solid waste from commercial or industrial sources that does not contain hazardous waste; and (ii) Such facility does not accept hazardous wastes and the owner or operator of such facility has established contractual requirements or other appropriate notification or inspection procedures to assure that hazardous wastes are not received at or burned in such facility,” in effect on 1 July 1989.

Medical waste is subject to the requirements in 15A NCAC 13B.1200 Medical Waste Management.

The facility also accepts and manages garbage as specified in 7CFR 330.400 Subpart Garbage and 9CFR 94.5 Regulations of certain garbage. Regulated garbage requirements are certified and enforced by the US Department of Agriculture's (USDA) Animal and Plant Health inspection Services (APHIS) and the US Department of Homeland Security's, US Customs and border Patrol (CBP).

Haulers of waste to the facility have US Department of transportation (DOT) manifests signed by generators attesting that the waste is non-hazardous and packaged properly per DOT and state regulations. The facility does not accept hazardous or liquid waste.

SECTION 3.3: SERVICE AREA

The facility will be processing waste from Maryland, New York, New Jersey, North Carolina, Washington D.C., Virginia, West Virginia, and South Carolina.

SECTION 3.4: QUANTITY OF WASTE MANAGED

The facility can operate 365 days per year at a capacity of 84 tons of waste per 24-hour period.

SECTION 3.5: SITE SECURITY AND ACCESS CONTROL

The facility is secured on the perimeter by access-controlled gating. The building and associated property are monitored by ten high-definition light amplification cameras with the capacity to record and store 24-hours footage per day. Additionally buildings are secured by access-controlled doors and motion sensors. The building also has a 24- hour fire detection system that is monitored off-site.

SECTION 3.6: SIGNAGE

A new sign will be placed at the entrance displaying the facility name, type of waste accepted/permitted, operating hours as an emergency contact numbers as follows:

Name: WM Healthcare Solutions, Inc.

MEDICAL WASTE TREATMENT FACILITY

Type of waste accepted: Solid, Medical, USDA/APHIS/CBP

Office Hours: M-F 8 AM to 4 PM

Emergency Contact #: (757)-449-2370

(757) 510-6964

SECTION 3.7: ALTERNATE FACILITY FOR UNTREATED MEDICAL WASTE

Medical waste that cannot be treated at the Creswell facility will be transported to a WM Healthcare Solutions, Inc. processing facility at 318 Bell Park Dr. Woodstock GA, (Avalon South LLC) permit number: 028-042P, or 7501 State Hwy 65, Anahuac, TX 77514, permit #: 2239A.

SECTION 3.8: OPERATIONS

Regulated medical waste is transported to the facility in trucks and/or trailers by WMHS employees or by other licensed transporters. All waste is shipped in approved corrugated boxes, reusable containers and /or disposable containers that meet DOT requirements. The trucks and trailers back to the loading dock and the drivers come into the scale area with their manifests. The medical waste containers are off loaded at the dock by hand truck, forklift, conveyors, or by rolling them off if the container has wheels (such as sharps transporters and large reusable plastic containers).

Trained WMHS employees off load medical waste containers at the facility weighing each and the weight recorded on the accompanying manifest.

The waste containers are inspected and sorted as treatable and untreatable waste. The untreatable or bypass waste is loaded onto trailer positioned at the bay door for delivery to an approved site that can treat the bypass waste. A minimum of two trailers will be used in this bypass waste system so as not to violate the 7 days waste storage requirement. See 3.8 and 3.11.

Treatable waste is then placed in the autoclave treatment carts positioned at the dock edge and conveyed across the plant floor to the autoclave unit for processing. The reusable medical waste containers left at the dock are now empty and can be taken to the wash area for cleaning with an approved solution such as **Clorox Bleach EPA Reg#: 5813-1** (EPA List B- approved disinfectant). The containers are inspected for damage and sent for repairs if necessary. They are then positioned on the dock as units ready for outbound trucks.

Five autoclave carts filled with treatable medical waste are loaded onto the hydraulic lift that automatically rolls the carts to the sterilizer tube. The door is closed, the prescribed temperature and time are keyed and the unit is activated. At the end of the cycle, the door is open, the hydraulic ramp is raised, and the rear of the tube is raised to roll the five carts out. The ramp is lowered to the floor level and the treated carts are rolled off the ramp.

The now treated autoclave carts are emptied into a compactor vessel, utilizing a hydraulic dumper for shipment to East Carolina Environmental Landfill (approval # 90536), or an alternate state approved landfill. The carts are then wheeled back to the dock where they are refilled with treatable waste and the treatment process is repeated.

RED BAG SOLUTIONS UNIT PROCESS

PURPOSE AND DESCRIPTION OF ACTIVITIES

The Red Bag Solutions unit is an alternative treatment system for medical waste. The unit will be used to treat special waste from healthcare related facilities. The unit uses a process chamber that is pressurized with steam and super heated water, treating the medical waste, and making it non hazardous while the internal grinder cuts up the medical waste. The treatment process is performed within an enclosed system.

DELIVERY PROCESS

Disposable sharps containers are segregated from other waste at the customer locations. The disposable sharps containers are shipped by truck to the treatment facility. The facility receives the disposable sharps containers and they are then staged for loading into the Red bag Solutions unit.

LOADING PROCESS

An operator manually loads sharps containers into the processing chamber through the hatch opening. Once loaded, the operator closes the hatch and engages the "Start" button. (Unless the hatch is closed and locked, the system will not operate.) From this point forward, and until the process is complete, the operator has no additional interface with the equipment.

WASTE PROCESSING

Steam is injected into the process tank, followed by superheated water. After a brief soak, the pump grinder is activated and the material is drawn through a proprietary cutter and the impeller of the pump where it is cut again. Material is returned to the process tank where it continues to be cut into smaller and smaller pieces and re-circulated through the system.

After several minutes of cutting, formal treatment is initiated; temperature of the waste stream is held. At the end of the treatment cycle, cold water is injected into the vessel to cool the material.

Cooled, treated material is then discharged into a filter-separator system where solids are separated from the liquids. Liquids are discharged into the sanitary sewer. Solids, which have been reduced in volume, are captured, dewatered, and placed in a container placed automatically in a cart to be sent to the recycler for further processing. The operator is then ready to load sharps for the next cycle.

SHARPS RECYCLING PROCESS

The recycler is a unique, system designed to separate plastic from the waste stream. This is a continuous-flow system that shreds, pre-washes, grinds, rinses, dries buoyant plastic, and removes non-plastic materials (metal, glass, film, etc.) in the process. The buoyant material will be dried and deposited into gaylord boxes or other customer-supplied vessel.

Process

Treated sharps containers are introduced into a shredder that reduces the materials into tiny clean cut sizes. The material is then pre-washed as it travels through the conveyor and through a magnet.

Float Sink Tank

In the Recovery Systems Float/Sink Tank, material is deposited on to the surface of the water in the tank. Heavy material sinks to the sloped bottom of the tank. An auger or drag conveyor, which continually sweeps the bottom surface, conveys this material to an above-water discharge. These undesirable materials will be then taken to an authorized landfill where it will be disposed of. Buoyant material is conveyed and discharged by a partially submerged screw conveyor or a rotating paddle where it goes into the wash and rinse cycle.

Wash

In the wash stage, material is continually submerged, sprayed, and flushed with a heated closed loop wash solution. The combination of the heated water and attrition scrubbing from particle to particle contact while tumbling in the drum provides exceptional cleaning. The wash drum sections can be fitted with optional internal turbine scrubbers and a wash detergent pump for additional cleaning power. Small particles and dissolved contaminants pass through the perforated drum skin, collect in the sump, and are removed by a vibratory screener and sump auger conveyor system.

Rinse

The rinse stage uses a spray of clean preheated water to rinse away remaining wash solution and prepare the cleaned material for tumble de-watering and drying.

Centrifugal Drying:

This method involves a separate unit that uses high rotational velocities to remove moisture. Optional counter-flow heated air can be used to provide additional drying capacity.

Air Classifier

Plastic regrind is pneumatically conveyed to receiving cyclone. The material drops into rotary valve below cyclone and is metered into separation chamber. The blower on second cyclone induces an upward airflow in separation chamber. The light contaminants (labels, dust, dirt, etc.) are carried away with air stream into second receiving cyclone and deposited into gaylord box.

The finished product (flake) drops through the air stream and is deposited directly into gaylord boxes or conveyed to additional equipment for further processing. The finished product from the recycling system is a clean dry flake suitable for extruding or molding into new products.

SECTION 3.9: EQUIPMENTS AT THE FACILITY

Two R.E Baker Autoclaves – Combined processing capacity = 84 tons/day

Minimum operating temperature = 250⁰F @15psi for 45mins

The treatment units are electronically controlled and utilize paper recorded that record cycle time and temperature to demonstrate treatment efficacy.

Two boilers, associated carts and hand tools are installed and in operation at the facility. These pieces of equipment have been inspected and approved by the State of North Carolina and the manufacturer. Applicable permits and certification of inspection from the State and Manufacturer of the pressure vessel are available on site. These vessels are inspected annually.

Maintenance of the equipment will follow the maintenance inspection frequency, service; replacement of parts and other requirements recommended by the manufacturer of the key equipment and verified using inspection sheets. Inspections will be on a daily, weekly, monthly or other schedule as recommended. Visual inspection of all equipment will be done daily to insure proper working conditions. Equipment repair or maintenance will be done when inspected or on a schedule and non-repairable equipment will be replaced. A schedule of maintenance requirement will be posted at the plant and the tasks will be part of the training of employees.

SECTION 3.10: STORAGE OF MATERIAL

Materials waiting to be processed will be stored in enclosed containers. No material will be stored for more than 7 days without refrigeration. All regulated waste materials are processed under dated manifests that show date picked up from generator and date delivered and processed at plant. The maximum amount of stored waste material is 168,000 pounds or 24-hour of processing. Each autoclave can process approx. 3500 pounds per hour with a total of 7000 pounds for both autoclaves onsite per hour. This amounts to 5600 pounds per 8 hrs shift, and 168,000 pounds for 3 shifts in a 24 hours period if plant operates at full scale.

SECTION 3.11: STAFFING

Shift staffing will be allocated as required by the facility manager. There will be a shift manager on-site during normal business hours. The manufacturer's operating manual will be kept on site for reference. All employees will receive proper training as prescribed by the manual based on their respective job descriptions, safety procedures and practice, operations, maintenance, OSHA regulations, including lock out tag out, blood borne pathogens, and tune-up and equipment maintenance etc...

Operators must undergo specific trainings including:

USDA compliance

Blood borne pathogens

Forklift Operations

Boiler Operation

Steam treatment

Standard OSHA training

Red Bag Solutions unit operations

Recycling systems unit operations

Reuseable sharps unit operations

SECTION 3.12: SURFACE WATER CONTROL

No storm water permit is required.

SECTION 3.13: APPROVAL OF DISCHARGE BY TOWN OF CRESWELL

There is a standing letter of approval for the facility from the Town of Creswell on file with NCDENR, Division of Waste Management from the previous owners. (See attachment)

SECTION 3.14: MAINTENANCE OF FACILITY IN SANITARY CONDITIONS

Shift cleanup includes sweeping and washing waste processing and storage areas of the facility with the use of EPA list-B approved disinfectant.

SECTION 3.15: LITTER AND DUST CONTROL

WMHS staff will police the grounds of the facility daily. All transfer of open waste will be performed inside the building avoiding the escape of any flying debris.

SECTION 3.16: FIRE PREVENTION

The facility is equipped with a fire detection system, monitored 24 hours a day from an offsite location. The Town of Creswell Fire Department is responsible for the area the facility is located. They have been provided with a key and access/alarm codes to the facility.

SECTION 3.17: RECORD KEEPING

Records of all process regulated medical waste are properly maintained in accord with the applicable rules and regulations of the state and Federal Agencies with jurisdiction over the facility. Permit copies, operation plan, SOP's and site drawings are maintained at the facility at all times.

Records of regulated medical waste shall be maintained for each shipment and kept for a minimum of three years. This information will include; name and address of generator, date waste was received, amount of waste received per generator, date treated and the name and address of final disposal facility.

Chart recorder wheels showing time and temperature for each treatment cycles shall be maintained at the facility for three years. A log of each test for effectiveness of treatment performed shall be maintained and shall include the type of indicator used, date, time and results of test. This test information shall be maintained at the facility for three years.

An annual report on a form prescribed and approved by the division will be generated showing tonnage received at the facility by month and by county.

SECTION 3.18: CONTINGENCY PLAN

WM Healthcare Solutions, Inc. has other permitted treatment facilities capable of backing up the Creswell facility in an event such need should occur. The processing systems at the facility are built independent from each other to prevent a total shut down of the plant because of a malfunction. The boilers are powered by with natural gas or diesel with a fueling station on-site.

In an event of a spill, SOP's are posted at the dock, at the treatment units and in the trucks. Noise and odors have been all but eliminated by piping the autoclave steam release down into the underground expansion tanks. There is also a quarterly monitored pest control box in place onsite to keep away rodent.

The facility had devised additional contingency related to items such as a trigger points, post shutdown Inspection, and an attempt to harvest Useable Items from the waste stream.

The trigger point is based on an amount of waste backlogged at the plant after a full days processing. WMHS trigger point is 110% of its daily throughput of 84 tons or 184,400 pounds. When this trigger point is met, waste must be diverted from WMHS Creswell, to an alternate processing facility until the amount of waste onsite is below the trigger point.

A representative from NCDENR's Division of Waste Management will be notified of any plant shutdown, other than in the normal course of business or any major repair or similar event. Prior to re-opening, a representative from NCDENR's Division of Waste Management will be given the opportunity to perform a Pre-Operation Inspection.

To the extent possible, WMHS, its haulers and generators will attempt to work together to identify and cull any unused medical supplies from the waste stream for future use by designated entities. Liability, de-labeling and logistics will be handled on a case-by-case basis.

