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From: Wolpert, Sarah (TX)
To: Backus, Pat;
cc: Schaubach, Todd; Etta, Ayuk; Lewis, Julie; Mott, Jamie;
Subject: RE: Creswell Medical Waste Facility
Date: Tuesday, May 24, 2011 12:47:48 PM
Attachments: 05-24-11 Creswell Application Title Page & Section 1-2.pdf
Creswell Operations Plan - May 2011 v.2.pdf

Good afternoon Pat - Attached are the revised Sections 1 & 2 and the updated Operations Plan that incorporate your comments and questions below. I have also provided a brief description of what was included in the revised plan to address each of the comments/questions that you noted. Please advise if you have questions, concerns, or require additional information regarding these changes. Please feel free to contact me at anytime to discuss. Thanks!

General

1. WM Healthcare will be issued a new permit. The number will be 94-07TP-TP-2011. **General Information page was updated to include the new permit number.**

2. Section 2: Property Information - Update to state that you have purchased the facility. **Section 2 was updated to state that WM Healthcare Solutions, Inc. purchased the property.**

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. **Section 3.2 was updated to reflect the previous medical waste definition.**

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. **The service area will include all of the areas mentioned but will not be limited to these states. Since the recycling equipment is located at the Creswell facility ideally, WMHS would like to propose that we have the potential to accept waste not limited to that service area.**

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. **Untreated RMW storage capacity will remain**

the same regardless of the new sharps recycling operation. However, the new equipment will reduce the solid waste that is landfill, which will now be recycled.

4. Section 3.6 – The sign information has changed. Again, just want to confirm this is correct. **The sign information has been updated to reflect the current owner, etc.**

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. **The Texas incinerator should be included in the list. The plan has been amended to show both facilities and also states that the list is not limited to these two sites but will be taken to a WM Healthcare Solutions, Inc. facility.**

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. **The autoclave process, Red Bag Solutions process, and the Sharps Recycling process have all been outlined and described in the Operations Plan modification.**

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. **The following text was added to the beginning of Section 3.8 to state the following: "All residual solid waste from the facility (autoclaves, red bag solutions, sharps recycling, etc.) will be disposed of at East Carolina Environmental Regional Landfill located in Aulander and operates under permit number 08-03, or an alternate state approved landfill."**

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. **The following text has been included in the Red Bag Solutions**

Waste Processing and Disposal section to address the above question. "A cycle kill report is generated for each cycle showing that the waste was properly treated. Records will be retained onsite. All residual waste that will not be sent to the recycler will be disposed of in the compactor onsite and sent to either the East Carolina Environmental Regional Landfill located in Aulander and operates under permit number 08-03, or an alternate state approved landfill."

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. **The following text has been included in the autoclave Waste Processing & Disposal Section to address the above question: "Autoclave carts containing treated sharps containers are taken to either the Sharps Recycling unit for further treatment to be recycled or rolled out of the plant and emptied into a compactor vessel utilizing a hydraulic dumper. The compactor is then transported to either the East Carolina Environmental Regional Landfill located in Aulander and operates under permit number 08-03, or an alternate state approved landfill. The carts are then wheeled back to the dock where they are refilled with treatable waste and the sterilization process is repeated."**

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? **The following text has been included to address the above question: "These undesirable materials will be then taken to an authorized landfill as stated in section 3.8, where it will be disposed of."**

11. Page 9 -Sharps Recycling – Please indicate that the finished product will be sent to a recycler. **The following text has been included to address this comment: "The finished product from the recycling system is a clean dry flake suitable for extruding or molding into new products, which is then packaged and shipped to a recycler once we collect approximately 30,000-40,000 lbs."**

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.

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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 following text has been included to address the above question relating to storage of the recyclable plastics: "The finished product from the recycling system is a clean dry flake suitable for extruding or molding into new products, which is then packaged and shipped to a recycler once we collect approximately 30,000-40,000 lbs."

13. Section 3.11 - There are some slight difference in the previously submitted version in addition to the process training for the new operations. **The training list has been modified. Please advise if additional trainings need to be included.**

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