

① Alamance County
1992

01-02

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State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

January 3, 1992

Mr. Larry L. Holloway
Vice President
BFI Medical Waste Systems (Southeast), Inc.
8607 Roberts Drive
Atlanta, Georgia 30350

RE: Amendment to Permit No. 01-02-I
BFI Medical Waste Systems (Southeast) Inc.
Alamance County

Dear Mr. Holloway:

Enclosed is an Amended Solid Waste Permit and Conditions of Permit for the referenced facility. The amendment reflects a change in ownership and operation of the existing and recently upgraded medical waste incineration facility formerly owned and operated by Thermal Reduction Systems, Inc.

If you have any questions or comments, please contact our office at (919) 733-0692.

Sincerely,

A handwritten signature in cursive script that reads "Sherri C. Hoyt".

Sherri C. Hoyt
Environmental Engineer
Solid Waste Section

cc: Ed Haas
James C. Coffey
Julian Foscue
Jeff Rodgers

AMENDMENT TO PERMIT NO. 01-02-I
DATE ISSUED 12/31/91

STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT, HEALTH, AND NATURAL RESOURCES
DIVISION OF SOLID WASTE MANAGEMENT

P.O. BOX 27687

RALEIGH, NC 27611

S O L I D W A S T E P E R M I T

Browning-Ferris Industries (BFI)
Medical Waste Systems
(Southeast) Inc.

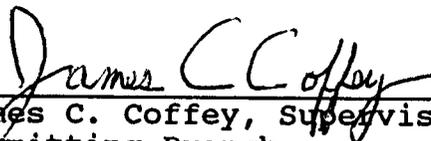
is hereby issued a permit to operate a

Medical Waste Treatment Facility

located

Porter Avenue, Graham, Alamance County

in accordance with Article 9, Chapter 130A, of the General Statutes
of North Carolina and all rules promulgated thereunder and subject
to the conditions set forth in this permit.



James C. Coffey, Supervisor
Permitting Branch
Solid Waste Section

S O L I D W A S T E P E R M I T

CONDITIONS OF PERMIT:

GENERAL

1. BFI Medical Waste Systems (Southeast) Inc. is permitted to operate a Medical Waste Treatment Facility consisting of two natural gas-fired, 1911 pounds per hour maximum permitted charging capacity each, multiple chamber medical waste incinerators, and associated air pollution control devices and appurtenances.
2. The approved plan is described by Attachment 1, "List of Documents for Approved Plan".
3. This permit will be subject to review every five years as per 15A NCAC 13B .0201(c), according to the issuance date of this permit. Modifications, where necessary shall be required in accordance with Rules in effect at the time of review.
4. This facility is permitted to receive only medical waste as defined in 15A NCAC 13 B Section .1201(4) and as described in the approved plan. No hazardous wastes, radioactive wastes, household wastes or wastes not identified in the approved plan may be received or treated at the facility.

OPERATION:

1. Storage facilities for medical waste shall be provided at the treatment facility as described in the approved plan, in accordance with 15A NCAC 13B .1207(1), and as specified herein:
 - a. 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 receipt.
 - b. Only authorized personnel shall have access to areas used to store Regulated medical waste.
 - c. 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 insects shall be controlled.

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- d. Prior to treatment, all regulated medical waste shall be confined to the storage area.
 - e. All floor drains located in the storage area shall discharge directly to an approved sanitary sewage system. Washdown water from the incinerator area may be recycled for use in the ash quench tank. Ventilation shall be provided and shall discharge so as not to create nuisance odors.
 - f. A plan shall be prepared, maintained, and updated as necessary to ensure continued proper management of Regulated medical waste at the facility.
2. This facility shall conform to the operating procedures described in the approved plan, in accordance with 15A NCAC 13B Section .1207, and as specified herein.
- a. Regulated medical waste shall be subjected to a burn temperature in the primary chamber of not less than 1200 degrees Fahrenheit.
 - b. Gases generated by the combustion shall be subjected to a minimum temperature of 1800 degrees Fahrenheit for a period of not less than one second.
 - c. Automatic auxiliary burners which are capable, excluding the heat content of the wastes, of independently maintaining the secondary chamber temperature at the minimum of 1800 degrees Fahrenheit shall be provided. Interlocks or other process control devices shall be provided to prevent the introduction of waste material to the primary chamber until the secondary chamber achieves operating temperature.
 - d. Continuous monitoring and recording of primary and secondary chamber temperatures shall be performed.
 - e. A maintenance and preventative maintenance program for plant equipment and instrumentation, as described in the approved plan, shall be implemented. Equipment and instrument maintenance, as well as instrument calibration shall be performed as per factory recommendations. Maintenance and calibration logs shall be kept on-site and provided to the Section upon request.
 - f. Emergency response plans and procedures shall be incorporated into the operational plan and implemented.
 - g. All operating personnel shall be trained in the proper procedures for facility operation, maintenance, trouble-shooting and repair, and emergency response. A list of all positions, personnel and qualifications, for each shift, shall be maintained and provided to the Section upon request.
3. The facility Air Permit shall be maintained and all operations conducted in strict adherence to the conditions of the permit.

4. Any water which comes into contact with solid waste shall be maintained on-site or disposed of in accordance with all pertinent local, state, and/or federal rules and regulations.

COMBUSTION ASH MANAGEMENT

1. The combustion ash management plan for the facility shall be implemented as specified herein. All pertinent personnel shall be trained in the procedures contained in the plan.
 - a. Appropriate and reasonable measures shall be taken to eliminate fugitive particle emissions within the facility and the combustion ash storage area. All pertinent personnel shall be equipped with appropriate devices designed to provide protection from fugitive dust emissions and trained in the proper use of such protective devices.
 - b. At all times during storage and transportation, combustion ash shall be properly wetted to prevent dust emissions. Over-wetting must be avoided.
 - c. All containers or vehicles used for the transportation of ash shall be leak resistant and closed or covered to prevent dust emissions during transportation.
 - d. Ash moisture content shall be such that after unloading at the approved disposal site, the ash remains sufficiently wetted until covered with soil or suitable dust suppressant.
2. Routine ash sampling and analysis plans shall be implemented as specified herein.
 - a. Procedures for obtaining representative weekly ash samples shall be implemented. At a minimum, a combustion ash sample of about one kilogram shall be collected once for every eight hours of operation of a continuously fed incinerator, once for every 24 hours of operation of an intermittently operated incinerator, or once for every batch of a batch loaded incinerator. Sampling shall be conducted from either the ash conveyance system or from the ash collection containers. Samples shall be composited into a closed container weekly and shall be thoroughly mixed and reduced to a representative sample.
 - b. Ash sampling procedures shall be initiated at the time the incineration system is first started for normal operation. After any significant change in facility design or operation, or after a change in waste source, the ash sampling plan will be subject to modifications to accommodate the changes and a re-characterization of the ash will be necessary.

- c. For the first three months of operation, a representative weekly sample shall be collected and analyzed at least once per month for the parameters specified in Condition 2.f. of this section.
- d. For the remainder of the first year of operation, one weekly representative sampling and analysis shall be conducted at least once per quarter for all parameters specified in Condition 2.f. of this section.
- e. For subsequent years of operation, representative weekly samples shall be collected and analyzed for parameters specified in Condition 2.f. of this section at least twice per year.
- f. The combustion ash samples shall be analyzed for the following:
 1. Leachable concentrations of all parameters prescribed by the Toxicity Characteristic Leaching Procedure, excluding herbicides and pesticides, as specified in USEPA Manual SW-846;
 2. Total concentrations of arsenic, barium, cadmium, chromium, copper, lead, manganese, mercury, nickel, selenium, silver, and zinc;
 3. Free liquids by Paint Filter Analysis.
 4. pH

If no semi-volatile or volatile organic compounds are detected in the first two sample analyses, then the permittee may request that analysis for the organic parameters required in Condition 2.f.1. of this Section be discontinued.

- g. Analysis results shall be submitted to the Solid Waste Section in a timely manner.
 - h. The ash sampling and analysis plan will be subject to review annually and revised in accordance with State and Federal guidelines in effect at the time of review.
3. Combustion ash from this facility shall be promptly disposed at a permitted sanitary landfill with a design approved by the Section for ash disposal, in accordance with the conditions of permit for the disposal facility.

RECORD KEEPING AND REPORTING

1. Records of Regulated medical waste shall be maintained for each shipment and shall include the following information:
 - a. name and address of generator
 - b. date received;
 - c. amount of waste received by number of packages (piece count) from each generator;
 - d. date treated;
 - e. name and address of ultimate disposal facility.

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This information shall be maintained at the treatment facility for no less than three years. The permittee shall submit to the Division an annual report, by March 1 of each year, that summarizes the information collected as prescribed above for the previous calendar year. The report shall be submitted on a form prescribed and approved by the Division.

2. Data from continuous chamber temperature monitoring shall be maintained at the facility for a period of three years and shall be made available to the Section upon request.
3. A log shall be kept documenting ash sampling, which shall include the date and time of each sample collected; the date, time, and identification number of each composite sample; and the results of analyses, including laboratory identification.
4. A completed "Procedures and Criteria for Waste Determination" form for combustion ash shall be submitted annually for Section review. With approval by DSWM, data from routine ash sampling may be used to satisfy the analysis requirements of the waste determination process.
5. Maintenance and calibration logs for plant equipment and instrumentation shall be maintained on site and made available to the Section upon request.
6. Records of stack testing as prescribed in the Air Quality Permit shall be maintained at the facility and made available to the Section upon request.
7. Records for the amount of waste received at the facility shall be maintained and categorized according to the type of waste, State of origin, and the North Carolina County of origin.
8. On or before August 1, 1992, and each year thereafter, the permittee shall report the amount of waste (in tons) received at this facility and disposed of in the incinerator to the Solid Waste Section, on forms prescribed by the Section. This report shall include the following information:
 - a. The reporting period shall be for the previous year, beginning July 1 and ending June 30;
 - b. The amount of waste received and incinerated (in tons), compiled on a monthly basis, and categorized as required in Condition No. 7 of this section; and
 - c. Notification that a copy of the report has been forwarded to all counties within the State of North Carolina from which accepted waste originated and to the county in which the facility is located.

ATTACHMENT 1

LIST OF DOCUMENTS FOR APPROVED PLAN

1. BFI Medical Waste Systems (Southeast), Inc. - Solid Waste Permit Application, submitted January 11, 1991.
2. Revision to Permit Application, submitted July 8, 1991.
3. Revision to Permit Application , submitted July 22, 1991.
4. Approval Letter for Ash Disposal, dated July 25, 1991.
5. Contract with Piedmont Sanitary Landfill to dispose of ash, dated July 24, 1991.
6. Air Permit No. 5896R4, effective upon transfer of ownership.