



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

SOLID WASTE SECTION

May 29, 2013

Ms. Julie Lewis, Compliance Manager
WM Healthcare Solutions, Inc.
1001 Fannin Street, Suite 4000
Houston, Texas 77002

Subject: Determination of Completeness and Technical Review – New Permit Application
WM Healthcare Solutions – Medical Waste Treatment Facility
Yadkin County, DIN 19028

Dear Ms. Lewis:

The Division of Waste Management, Solid Waste Section (Section) received WM Healthcare Solutions, Inc.'s new permit application for the proposed medical waste treatment facility located in Yadkin County, on May 10, 2013, entitled; *Permit Modification Application Requesting Approval to Treat Regulated Medical Waste at 325 West Maple Street, Yadkinville, NC 27055*. Prepared by WM Healthcare Solutions, Inc. May 2013. DIN18960.

The Section has performed a review of WM Healthcare Solutions, Inc.'s application for a determination of completeness and determined the application is complete in accordance North Carolina General Statute NCGS 130A-295.8(e). A determination of completeness means the application contains the required components in accordance with North Carolina Administrative Code 15A NCAC 13B .1200.

In addition to the determination of completeness the Section has completed the technical review of the application and requests that you respond to the following items and provide a revised Operation Plan, in order to complete the application process;

Section 3 – Operation Plan

1. Section 3.2: Acceptable Wastes, The Operations Plan (Plan), states the facility accepts medical wastes as defined in NCGS 130A-290(a)(17a), the Plan must also specify which types of Regulated Medical Waste (15A NCAC 13B .1200) will be accepted for treatment at the facility; blood and body fluids in individual containers in volumes greater than 20 ml and microbiological waste. The Plan must also state that all pathological waste (as defined in 15A NCAC 13B .1200) will be stored and transported to a facility permitted to properly treat said waste.
2. Section 3.2: Acceptable Wastes, Plan, states the APHIS agreement is included, it is not. Prior to acceptance of an APHIS regulated material a copy of the facility's APHIS agreement must be provided to the Section.
3. Section 3.6: Signage, In the Plan, add the permit number to the signage requirement, in this case the permit number will be **9904-TP-2013**, upon permit issuance.



Page 2

WM Healthcare Solutions, Inc.

May 29, 2013

4. Section 3.8: Operations, The last paragraph of this Section refers to “an alternate state approved landfill”, the Plan must specify disposal sites. I recommend an alternative disposal site be specified since the East Carolina Environmental Regional Landfill is located over 200 miles from Yadkinville.
5. Section 3.8: Operations, In the Plan, explain the facility’s process for safe disposal of contaminated corrugated materials.
6. Section 3.9: Equipment at the Facility, In the Plan, explain/clarify the meaning of “...and utilize paper recorded that record cycle time...”.
7. Section 3.9: Equipment at the Facility, The Plan must include a description of efficacy monitoring in accordance with 15A NCAC 13B .1207.
8. Section 3.10: Storage of Material, Correct this section of the Plan, “This equates to 5600 pounds per 8 hrs shift...” should read *56,000* pounds per 8 hrs shift.
9. Section 3.18: Contingency Plan, Correct the second sentence of this section to read *shutdown* not “short down”.
10. Section 3.18: Contingency Plan, The second paragraph on page 9 of the Plan apparently refers to the last 3 paragraphs on the page, but is not understandable, rewrite the second paragraph.
11. Section 3.18: Contingency Plan, The last paragraph refers to the removal of unused medical supplies from the regulated medical waste the facility is to receive. Include in the Plan all procedures necessary to protect public health and the environment during this specific activity.
12. Section 3: Include in the Plan the facility’s ability and capacity to refrigerate Regulated Medical Waste, should it be needed.

Please address the issues presented in this letter and send a revised Operations Plan to my attention. If you should have any questions regarding this matter you may contact me at (828) 296-4704 or larry.frost@ncdenr.gov.

Sincerely,

Larry Frost
Environmental Engineer

ec: Charles Gerstell – SWS/MRO
Bill Patrakis – SWS/CO