



North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

John E. Skvarla, III
Secretary

June 13, 2014

Mr. Howard Davenport, Operations Manager
Waste Management Healthcare Solutions, Inc.
301 Saint David Road
Creswell, North Carolina 27928

Subject: Permit Renewal Application – Determination of Completeness and Technical Review
Waste Management Healthcare Solutions, Permit No. 9407TP-TP-2011
Washington County, DIN 21267

Dear Mr. Davenport:

Determination of Completeness

On April 28, 2014 the Division of Waste Management, Solid Waste Section (Section) received your permit application for five (5) year renewal, entitled;

WM, Waste Management, Healthcare Solutions, Inc. Operations Plan. Prepared by WM Sustainability Services. April 2014. DIN 21264..

The Section has performed a review of the Facility'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.

Technical Review

Operations Plan – revise the plan and submit the complete revised plan to me.

1. Section B.10. Laws, Regulations and Policies for Medical Waste Disposal - OSHA rules do not designate waste that must be incinerated or otherwise treated. Therefore this section is misleading, and confusing as OSHA rules apply to the workplace environment and not to what and how waste must be treated or disposed of. References to federal law are not required as medical waste management is a state mandated function. The proper references for North Carolina are;
 - a. North Carolina General Statute (NCGS) 130A, Solid Waste Management.
 - b. North Carolina Administrative Code, 15A NCAC .1200, Medical Waste Management.
2. Section I. Equipment at Facility -
 - a. States the “Minimum operating temperature = 2500F...”. Insert the correct temperature.
 - b. States “These pieces of equipment have been inspected and approved by the State of North Carolina and the manufacturer.” Specify which pieces of equipment are approved of and by which agency of the State.

3. Section R. Fire Prevention – Insert that, NCDENR will be notified within 24 hours of any plant shutdown, other than in the normal course of business.....

Compliance Requirements – that remain to be submitted, reviewed and approved by either me or Ms. Rice.

4. WM Healthcare has been requested (by email communication) to provide an updated organization chart. The information requested should be submitted for review to Ms. Sarah Rice at sarah.rice@ncdern.gov.
5. WM Healthcare has been requested (by email communication) to provide a completed Compliance History Review. The information requested should be submitted for approval to Ms. Sarah Rice at sarah.rice@ncdern.gov.
6. WM Healthcare must submit updated Financial Assurance Cost Estimates for review and approval by the Section. The Estimates should represent the cost to hire a third party to remove, cleanup, haul and dispose of a minimum of five days volume of incoming waste plus the maximum amount of materials (waste and processed waste) that the facility plans to store onsite. Once approved WM Healthcare will be expected to establish an approved Financial Assurance mechanism. The information requested should be submitted for review and approval to my attention.

All items, presented above, must be addressed, reviewed and approved by the Section prior to issuance of the renewed Permit to Operate. All documents referenced in this letter may be accessed and downloaded from the Section's website at <http://portal.ncdenr.org/web/wm/sw>. Should you have any questions regarding this matter contact me at (828) 296-4704 or larry.frost@ncdenr.gov.

Sincerely,



Larry Frost, Environmental Engineer
Permitting Branch, Solid Waste Section
Division of Waste Management, NCDENR

cc: Jason Wrubel – WM Sustainability Services, 1021 Fannin Suite 2007, Houston, TX 77002
ec: Bill Patrakis – SWS/RCO
Ray Williams – SWS/WaRO
Sarah Rice – SWS/RCO