ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Janet Napolitano
Governor

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.adeq.state.az.us

Stephen A. Owens
Director

February 17, 2004
PRU04 - 076

CERTIFIED MAIL
Return Receipt Requested

Edward Petrullo
Director & General Manager
Milum Textile Services, Medical Waste Management
333 North Seventh Avenue
Phoenix, Arizona 85007

Re: Solid Waste Facility Plan Approval - Biohazardous Medical Waste Treatment and Storage Facility
Milum Textile Services (MTS) - Medical Waste Management (MWM)

Dear Mr. Petrullo:

Please find the attached an original of an MTS-MWM biohazardous medical waste treatment and storage facility plan approval letter.

A copy of this facility plan approval shall be placed in the facility plan file at the facility or an alternative location approved by the Director.

Pursuant to Arizona Administrative Code (AAC) R18-13-702.D, ADEQ will submit an itemized statement of the review costs to Milum Textile Services. Milum Textile Services will be billed for the costs that exceed the initial fee, payable within 45 days from the receipt of this bill, or shall be reimbursed the different if actual cost of the review is less than the initial fee.

If you have any questions about this letter, please contact me at (602) 771-4581. Or toll free in Arizona at (800) 234-5677, Ext. 771-4581.

Sincerely,

Deepal Gunawardena
Environmental Engineering Specialist
Solid Waste Plan Review Unit
Waste Programs Division

cc: Kim McDaniel, Manager, Inspection and Compliance Unit

STATE OF ARIZONA
DEPARTMENT OF ENVIRONMENTAL QUALITY

BIOHAZARDOUS MEDICAL WASTE TREATMENT, STORAGE, AND TRANSFER FACILITY PLAN APPROVAL NUMBER 07045200.00

1.0 Facility Information and Approval Signature

In accordance with the provisions of Arizona Revised Statutes (ARS) Title 49, Chapter 4:

Facility Name: Milum Textile Services (MTS) Medical Waste Management (MWM)

Owner/Operator: Craig Milum, CEO and President
5351 East Exeter Boulevard
Phoenix, Arizona 85018

is authorized to process biohazardous medical waste utilizing thermal neutralization of the waste by use of heat treatment with an industrial autoclave and further encapsulation for medical sharps. The Milum Textile Services, doing business as MTS Medical Waste Management (MTS-MWM), facility is located at the Northwest corner of North 34th Drive and Flower Street at 3152 North 34th Drive, Phoenix, Arizona 85007, encompassing the Southwest 1/4 of Section 26, Township 2 North, Range 2 East of Gila and Salt River Base and Meridian. MTS-MWM facility is located on 0.69 acres of property and all processing and storage of biohazardous medical waste occurs inside the 9150 square foot building.

Latitude	33° 48' 44" North
Longitude	112° 13' 15" West

This approval shall be deemed effective on the date of the Waste Programs Division Director's signature below, provided that the facility is operated and maintained in accordance with all the conditions described in this approval document.

Approved on behalf of the Arizona Department of Environmental Quality:

Shannon M. Davis, Director
Waste Programs Division

Signed this 17 day of Feb, 2004

I.1 Approval

a. This approval allows MTS-MWM to use the following processing units for its Phase I through Phase III Operations:

(i) A Bondtech BTT6X20 autoclave system of 6 feet diameter, and 20 feet long, with FX2N Series, SuperMicro Programmable Logic Controller and Honeywell 4500 Series Circular Chart Recorder capable of continuous recording of date, time, process duration and real time pressure and temperature;

(ii) A 200 HP boiler and associated water softener system;

(iii) Washmart SA 2000 robotic wash system for Sharpsmart container cleaning;

(iv) Daniel Sharpsmart reusable sharps containers;

(v) A Geiger - Mueller counter with detection range from 0 to 50,000 counts per minute;

(v) A 512 square feet walk-in cooler storage system capable of maintaining 40°F or less throughout; and

(vi) A Marathon RamJet RJ-250SC-34 or similar Roll-on/Roll-off container with an attached compactor unit for storage of sterilized solid waste.

b. Phase IV Operation: This approval allows MTS-MWM to increases its maximum treatment capacity from 2,250 pounds per cycle to maximum of 4,500 pounds per cycle by introducing a second Bondtech BTT6X20 autoclave system. However, this approval does not grant permission to change any of the other listed units without prior approval of the department.

c. This approval allows MTS-MWM to process a maximum throughput capacity of 2,250 pounds per cycle (Phase I through III) and double its throughput capacity to 4,500 pounds per cycle with the Phase IV operation.

d. This approval allows MTS-MWM to use the reusable sharp containers (Daniel Sharpsmart) to collect medical sharps from generators. All reusable sharp containers shall be cleaned after each use as specified in Arizona Administrative Code (AAC) R18-13-1407.A.2.b.

e. This approval allows MTS-MWM to collect and store chemotherapy waste for a maximum of 90 days from the date of collection. This storage and transfer operation shall be conducted in accordance with the conditions set forthwith in AAC R18-13-1411.

1.2 Other Special Conditions incorporated in this Approval

a. Biohazardous medical waste can be accepted from a transporter only if the waste is accompanied by a tracking form (AAC R18-13-1412.A.3).

b. If a biohazardous medical waste container or medical sharps container is damaged or leaking, improperly labeled, or otherwise unacceptable, a treater either (i) rejects the waste and returns to the transporter, (AAC R18-13-1412.A.3. a. i), or (ii) accepts the waste and transfers it directly from the transporting vehicle to the treatment process unit (AAC R18-13-1412.A.3.a.ii). If the waste will not be treated immediately, it is to be repackaged for storage (AAC R18-13-1412.A.3.b.iii).

c. Biohazardous medical waste shall be treated within 24 hours of receipt or shall be refrigerated immediately at 40 °F or less upon determination that treatment or disposal will not occur within 24 hours (AAC R18-13-1412.A. 2.a). Biohazardous medical wastes that are awaiting processing within 24 hours, shall be stored temporarily in accordance with AAC R18-13-1408.

d. Biohazardous medical waste shall be processed according to the manufacturer's specifications for the unit (AAC R18-13-1412.7). The minimum temperature and the minimum retention time for Bondtech BTT6X20 unit are 275 °F and 30 minutes respectively. Additionally, medical sharps shall be further treated as defined in AAC R18-13-1419.3.

2.0 Statutory and Other Provisions

a. MTS-MWM shall not operate in a manner inconsistent with this approval, pursuant to Arizona Revised Statutes (ARS) § 49-791(A)(5).

b. This approval, issued pursuant to ARS § 49-762.03 and § 49-762.04, and AAC R18-13-1411 and R18-13-1412 does not relieve MTS-MWM of its responsibility to comply with other federal, state, county, or local requirements, and shall not be construed as permission to create a public health hazard, safety hazard, environmental nuisance, or cause contamination to the environment.

c. Arizona Department of Environmental Quality (ADEQ) reserves the right to issue administrative orders pursuant to ARS § 49-781 and § 49-764, or to seek other legal remedies as provided by law, if the MTS-MWM facility creates a public health hazard, safety hazard, or environmental nuisance; if violations of State laws occur; or if the MTS-MWM facility is in violation of this approval.

d. Pursuant to ARS § 49-763, ADEQ reserve the right to conduct inspections of the MTS-MWM facility once notification has been given to MTS-MWM to have its representative accompany the inspector. During this inspection, the Department may take photographs, gather information, collect samples, make copies of records, or conduct other recognized monitoring activities.

e. Pursuant to ARS § 49-782.A, the ADEQ reserves the right to suspend, amend, withdraw, condition or revoke this approval for the MTS-MWM facility if it is determined that the facility is in violation of ARS Title 49, Chapter 4, and AAC Title 18, Chapter 13, Article 14, or the approved facility plan.

f. MTS-MWM facility shall maintain the operating conditions and waste acceptance criteria described in the approved facility plan.

2.1 General Provisions

a. This ADEQ biohazardous medical waste treatment, storage, and transfer facility plan approval, issued pursuant to ARS § 49-762, 762.03, 762.04, 762.06 and AAC R18-13-1411 and R18-13-1412, grants permission to operate a biohazardous medical waste treatment, storage, and transfer facility as defined in AAC R18-13-1411 and R18-13-1412 at the location referenced in Part 1.0 of this approval.

b. This approval is granted under the conditions listed herein to protect human health and the environment. The approval for the location of this biohazardous medical waste treatment facility has previously been made by others through the planning and zoning process.

2.2 General Limitations

a. ADEQ limits the types of waste that can be accepted at this biohazardous medical waste treatment, storage, and transfer facility. MTS-MWM facility is only permitted to accept biohazardous medical waste as defined in ARS R18-13-1401.5 for storage and treatment. Chemotherapy waste can not be treated at this facility pursuant to AAC R18-13-1420.A.2.

b. Waste prohibited by federal or State of Arizona statutes or regulations from treatment or processing at a biohazardous medical waste treatment facility can not be handled by MTS-MWM.

2.3 Notifications

MTS-MWM shall submit notification of any Type II, III, or IV changes to the approved facility plan in accordance with ARS. § 49-762.06. MTS-MWM shall not implement any Type III or IV changes prior to ADEQ approval.

3.0 Approval of the Facility Plan

a. This ADEQ biohazardous medical waste treatment, storage and transfer facility plan approval, issued pursuant to ARS § 49-762, 762.03, 762.04, 762.06 and AAC R18-13-1411 and R18-13-1412 allows the following solid waste to be accepted:

i. Properly packaged biohazardous medical waste as defined in AAC R18-13-1401.5. a through e, accompanied by a duly completed tracking document.

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ii. Additionally, this approval allows the acceptance of properly packaged chemotherapy waste for storage up to maximum of 90 days. Within 90 days of acceptance the above waste shall be incinerated or disposed of in either an approved solid waste or hazardous waste disposal facility (R18 -13-1420.A.2).

3.2 Other Approvals

None

3.3 Operational Limitations

ADEQ under A.R.S. Title 49, Chapter 4, requires that MTS-MWM facility must operate:

a. In a manner that protects public health and safety and the environment and prevents and abates environmental nuisances.

b. To control wind dispersion and other surface dispersions of the materials so that they do not create a public nuisance or pose an imminent and substantial endangerment to public health or the environment.

c. To prevent or control on-site populations of disease vectors using techniques appropriate for the protection of human health and the environment.

d. To control public access and prevent unauthorized vehicular traffic by using artificial barriers, natural barriers, or both, as appropriate.

e. By recording and retaining in operating record information such as temperature, pressure and retention time for each and every autoclave cycle, total waste loads per cycle per autoclave, tracking documents, inspection records, equipment calibration records, training procedures and records, an immunization record, quality assurance/quality control tests, results, any remediation plans, equipment down time, facility shut down, etc.

3.4 Storm Water Management

a. The proper control of surface water drainage shall be implemented to prevent stormwater from running onto and stormwater from running off from the facility area.

b. The floor surface in the treatment and storage area either has a curb of sufficient height to control spills or slopes to a drain that connects to an approved sanitary sewage system (AAC R18-13-1412.A.4.b).

c. A drainage diversion system shall be constructed at the facility. The drainage diversion channels shall be capable of controlling rain and stormwater at the facility and all other effluent that are generated as a result of waste processing, cleaning and sanitation of equipment, bins, or containers.

4.0 Approval History

This approval - Phase I through Phase IV facility plan approval for MTS-MWM, Number 07045200.00, provided that each succeeding phase after Phase I conforms to the descriptions authorized in this approval.

5.0 References

a. Non-Incineration Biomedical Waste Treatment Technologies, September 1998, date submitted January 16, 2003, by Susan Springthorps & Joe Kennedy in support of Bioservices Group, Inc. (BGI)

b. A letter from Environmental Health Management Systems, Inc.(EHMSI) in support of BGI's Hydroclave System, dated January 23, 2003, by Nelson S. Slavik.

c. Letter from Deepal Gunawardena, ADEQ to Mr. Nelson S. Slavik , EHMSI regarding *BGI ESA System aa an Autoclaving Process*, dated February 04, 2003

d. *Biohazardous Medical Waste Treatment Equipment and Procedures*, by Peggy J. Guichard-Watters, ADEQ, dated May 13, 2003

e. *Steam Sterilization Treatment Plant Application, New Site: 3152 North 34th Drive*, dated October 17, 2003, by Milum Textile Services

f. *Administrative Completeness review of Milum Textile Services Medical Waste Treatment Facility Plan*, dated November 13, 2003, by Barbara Waterbury, ADEQ

g. *Summary: MTS Medical Waste Management's Public Involvement/Outreach Completed for a New Treatment Facility Located @ 3152 N.34th Drive, Phoenix, Arizona*, dated December 8, 2003, by Edward Petrullo, Steve Brittle, Law offices of Earl, Curley & Lagarde

h. *Revised Steam Sterilization Treatment Plant Application, New Site: 3152 North 34th Drive*, date revised October 17, 2003, by Milum Textile Services, date submitted December 8, 2003

i. Daniels the new standard in safe sharps collection an introduction brochure by Daniels Corporation, presented by Edward Petrullo, Milum Textile Services, date presented December 8, 2003

j. *Revised Steam Sterilization Treatment Plant Application, New Site: 3152 North 34th Drive*, Revised on December 15, 2003, by Milum Textile Services, date submitted December 17, 2003

k.. *MTS Medical Waste Management (MTS-MWM) Comprehensive List of Technical Deficiencies in the Plan*, by ADEQ, dated December 23, 2003

l. Responses to ADEQ technical comments by Milum Textile Services, dated January 20, 2004

m. MTS Medical Waste Management (MTS-MWM) Responses: Comprehensive List of Technical Deficiencies in the Plan (request additional certification for reply to ADEQ's technical deficiencies letter), by ADEQ, dated January 21, 2004

End of MTS-MWM Facility Plan Approval Phase I through IV
Approval Number 07045200.00