



Stericycle®

Protecting People. Reducing Risk.™

1525 Sterchi Street
Knoxville, TN 37921

OPERATING PLAN

March 2014

1.0 INTRODUCTION

Stericycle, Inc. operates a regulated medical waste transportation facility located at 1525 Sterchi Street, Knoxville, TN.

This Operating Plan has been prepared in accordance with the applicable requirements set forth in TN DEC, Division of Solid Waste Management Rules, Chapter 0400-11-01 – Solid Waste Processing and Disposal and the Permit-By-Rule.

Facility Information: Stericycle, Inc.
Chris Stanfill, Transportation Supervisor
1525 Sterchi Street
Knoxville, Knox County, TN 37921
Office Phone: 865-521-0722
Emergency 24 Hour Contact # 865-207-0823

Contact Information: Wade Van Zee
Stericycle, Inc.
Regional Environmental Manager
5815 Weldon Springs Road, Clinton, IL 61727
Phone: 217-935-4791
wvanzee@stericycle.com

Landowner Information: HCI, LP
2910 River Oaks Dr.
Monroe, LA 71201
(318) 323-0209

2.0 OPERATIONAL PROCEDURES

Operations at the Knoxville facility include:

- Regulated medical waste storage and transfer;
- Non-hazardous waste pharmaceutical collection for transfer to an incineration facility for destruction;
- Regulated Garbage collection for transfer to a permitted treatment facility;

2.1 Waste Receipt and Transportation

Regulated medical waste, non-hazardous pharmaceuticals and Regulated Garbage is picked up from generators on a scheduled or on-call basis. It is the responsibility of the waste generator to

properly package their waste in accordance with all state and federal guidelines. Stericycle does not transport, or accept for transport, waste that is improperly packaged or classified.

Stericycle does not accept waste for pick-up or treatment if the package is:

- leaking,
- packaged incorrectly,
- not labeled or labeled incorrectly,
- structurally compromised,
- visibly contaminated,
- non-compliant, or
- contains non-conforming waste.

Prevention programs require proper notification and training about wastes not acceptable for treatment via autoclaving and/or incineration. Stericycle's Waste Acceptance Protocol is included as Appendix A.

Stericycle transports all wastes under the following policies in accordance with Chapter 0400-11-01:

- Transporters shall not accept waste that is improperly packaged.
- Regulated medical waste shall be transported in a manner that prevents leakage of the contents of the package.
- The integrity of the package shall be maintained at all times.
- The labeling and marking of the package shall be maintained at all times.
- All loads containing regulated medical waste shall be covered during transportation.
- A contingency plan shall be prepared and maintained in each vehicle used in the transporting of regulated medical waste. The operator of each vehicle shall be knowledgeable of the plan.
- Vehicles used for the transportation of regulated medical waste shall be thoroughly cleaned and disinfected before being used for any other purpose and in the event of leakage from packages.

Stericycle's BioTrack system tracks all waste containers from the point of generation, through transportation, to treatment at the processing facility.

2.2 Container Unloading and Handling

The waste is handled in the following steps once it arrives at the Knoxville transfer facility:

1. Containers are removed from the route truck and transported to tractor trailer via a two-wheeled dolly.
2. Racks of reusable sharps containers are rolled off the route truck and either stored on the floor inside the facility or immediately loaded onto a trailer.
3. Depending on the volume being unloaded, waste containers may be unloaded and stacked on the floor for loading later that day.
4. Waste that requires transfer for incineration is separated and then loaded onto a trailer for transport to the designated facility. A separate trailer is used for waste that can be autoclaved.

Stericycle, Inc. employs its own proprietary bar code identification and tracking system, *Biotrack*, in which each container is labeled with the generator's unique code. At the time of collection, the driver scans the containers to be collected with a handheld computer which prints a receipt indicating the date and time of collection. The receipt is given to the generator. The *Biotrack* document provides the generator with verification of collection and provides Stericycle, Inc. one of the means to track the waste from collection to treatment. Each month customers are sent an invoice, which summarizes their collections for the month.

TRACKING DOCUMENTS FOR MEDICAL WASTE

STERICYCLE, INC. "BIOTRACK™" System for Tracking Waste:

All waste collected by a medical waste transporter from the generating facility/person for treatment must be accompanied by a tracking document.

STERICYCLE, INC. has a unique approach to the tracking process known as "BIOTRACK™". Barcodes and optical scanners or "readers" record pertinent data required for tracking and billing.

The tracking document must meet US DOT and State requirements, which include, but are not limited to:

Name, address, telephone number of medical waste hauler

Type and quantity of medical waste transported

Generator name, addresses and phone number

Name, address, telephone number of permitted medical waste treatment facility

Authorized signature at the permitted treatment facility receiving the waste (treatment facility copy only)

A signed copy of the tracking document(s) will be provided to the customer at the time of waste collection or acceptance.

The tracking document(s) will be in the custody of the STERICYCLE, INC. driver hauling the medical waste to its treatment destination at all times.

Once the waste is treated copies of the completed manifest is scanned and customers are available to view online and print.

STERICYCLE, INC. will maintain signed copies of all tracking documents for a minimum of 3 years.

2.3 Unacceptable Waste

Waste not accepted for treatment at the Knoxville facility includes:

- Radioactive waste
- Hazardous waste as defined by the US EPA
- Explosive materials, including aerosol cans.

2.4 Incineration Waste

Waste that is received at the facility such as pathological, residual chemotherapy and non-hazardous waste pharmaceuticals is packaged by the generator in cardboard or plastic containers and labeled with a yellow bar code that identifies it as incineration waste. Incineration waste accepted by the Stericycle Knoxville facility will be transported to an incinerator, primarily:

Stericycle - Haw River, NC
Incinerator
1168 Porter Avenue
Haw River, NC 27258
(336) 578-8900

2.5 Autoclave Waste

Waste that is received at the facility such as regulated medical waste, and Regulated Waste is packaged by the generator in cardboard or plastic containers and labeled with a white bar code that identifies it as autoclave waste. Autoclave waste accepted by the Stericycle Knoxville facility will be transported to an autoclave, primarily:

Stericycle - Cleveland, TN

Autoclave
2190 Westland Drive SW
Cleveland, TN 37311

Stericycle – Beaver Dam, KY

Autoclave
One Technology Place
Beaver Dam, KY42320

2.6 Storage

Regulated medical waste, non-hazardous waste pharmaceuticals and Regulated Garbage is stored in a manner that prevents leakage and maintains the integrity of the packaging at all times.

Waste that is collected for transfer in Knoxville is transported in closed, secured and permitted trucks/trailers. The doors to the storage area of each collection truck/trailer are locked during all times that a Stericycle employee is not in attendance with the vehicle or the vehicle is awaiting unloading for transfer. All facility entrances and trucks are labeled to alert the public regarding the type of waste being transported or handled. Any waste that may be stored on the floor is normally moved to a trailer within 24 hours during the week and 48 hours over the weekend. Once a trailer is filled it is normally hauled to a treatment facility within 48 hours.

The facility is currently operating Monday through Friday. On the weekends trailers may be swapped out. Trained personnel are always present during operating hours. Unauthorized persons are not allowed in areas used to store waste. All doors are locked and closed when the facility is vacated for weekends, holidays, etc.

2.7 Record Keeping

All containers must be labeled at the generating location before being accepted for transportation. BioTrack optical scanners record when a container is picked up. Each container is scanned again at the Knoxville facility prior to transfer. This process not only provides a typed manifest for tracking purposes, but it produces verifiable documentation of the waste trail for each container the company handles.

Records of waste are maintained for each shipment of and include the following:

- Name and address of generator,
- Date received,
- Amount of waste received by container number from each generator,
- Date treated,
- Name and address of ultimate disposal facility.

2.8 Vector Control

The Knoxville facility is maintained and cleaned to minimize odors and vectors, and to provide a safe working environment and protect the safety and health of the public. The systematic waste process, which includes storage and handling specifications and policies, inhibits vector exposure to the waste materials.

3.0 HOURS OF OPERATION

The Stericycle Knoxville facility can operate 24 hours a day, 7 days a week for transfer. Office hours are Monday through Friday from 8:00 a.m. to 5:00 p.m.

4.0 ACCESS CONTROL

Access to the facility is controlled through a perimeter 6-foot chain link fence and other fencing/barriers. The entrance gate is locked when the site is unattended by Stericycle personnel. Facility security lights mounted throughout the yard illuminate the facility at night to discourage unauthorized access under the cover of darkness. All doors to the facility will be locked prohibiting unauthorized entrance from the outside and secured during off-hours. The main entrance to the facility and office areas will be open during normal business hours only, Monday through Friday from 8:00 a.m. until 5:00 p.m. After hours, all doors to the facility will remain closed and locked prohibiting unauthorized outside entry with the exception of bay doors being utilized for operations.

All visitors to the facility are required to sign the visitor's log located in the front lobby. Under no circumstances will Stericycle allow an unescorted visitor to enter the facilities transfer area.

5.0 STORAGE AND CAPACITY LIMITS

All untreated waste is stored in a secure area located inside the facility or in enclosed, locked 48 or 53 ft trailers located within the secure area of the premises pending transfer. The facility and trailers have a storage capacity of around 270 cubic yards.

Any waste that may be stored on the floor is normally moved to a trailer within 24 hours during the week and 48 hours over the weekend. Once a trailer is filled it is normally hauled to a treatment facility within 48 hours.

Maximum storage capacity for the location is 270 cubic yards. This includes 1 full trailer at 135 cubic yards and a half trailer at 67.5 cubic yards with an additional 67.5 cubic yards of inside temporary floor storage.

6.0 BYPASS AND RESIDUAL PLAN

The facilities listed below act as backup treatment facilities in the event the primary treatment facilities are down for an extended periods of time.

Clinton, IL

Incinerator
5815 Weldon Springs Road
Clinton, IL 61727
(217) 935-4791

Lake City, GA

Autoclave Facility
1924 Joy Lake Road
Lake City, GA 30260
(404) 362-9090

Concord, NC

Autoclave Facility
4403 Republic Court
Concord, NC 28027
(704) 795-1125

Memphis, TN

Autoclave Facility
540 Rivergate Road
Memphis, TN 38109
(901) 948-1356

Additional transportation capabilities are available in a contingency, if needed, from these and other Stericycle facilities in the region.

7.0 EMPLOYEE TRAINING PROGRAM

Employees receive the following training upon hire and annually:

- OSHA Bloodborne Pathogens (29 CFR 1910.1030)
- Bloodborne Diseases
- Hepatitis B Vaccination Program
- Exposure Protocol

- Personal Protective Equipment
- Hazard Communication (29 CFR 1910.1200)
- Lock-Out/Tag Out Policy & Procedures
- Radiation Safety and Monitoring
- First Aid and CPR
- Emergency Response Procedures
- Fire Safety
- Spill Response
- Driver training programs, including DOT Hazardous Materials Training and other DOT required training
- Waste Acceptance Protocol
- Additional function-specific training (Welding Safety, Forklift Safety, etc.) is completed as required.
- All equipment operators will receive training and will become knowledgeable of the procedures, equipment and sterilization process. Training programs are oriented towards maintenance and safe operation of the facility.

8.0 GENERATION OF WASTES

The facility will at times, generate commodities classified as "Universal Wastes". These items include fluorescent bulbs, and batteries. These wastes will be disposed of in accordance with state and federal guidelines. Currently, these items are kept in a supplied container until full (or within 1 year from the start date of accumulation) and then transported via a contracted vendor for disposal.

APPENDIX A

WASTE ACCEPTANCE PROTOCOL