

Katelyn Symington
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Dear Katelyn,

RE: Arndell Park Clinical Waste Management Facility - MOD 1 - Storing of Related Waste Overnight (SSD-6761-Mod-1) – Response to Request for Information (RFI-19343316)

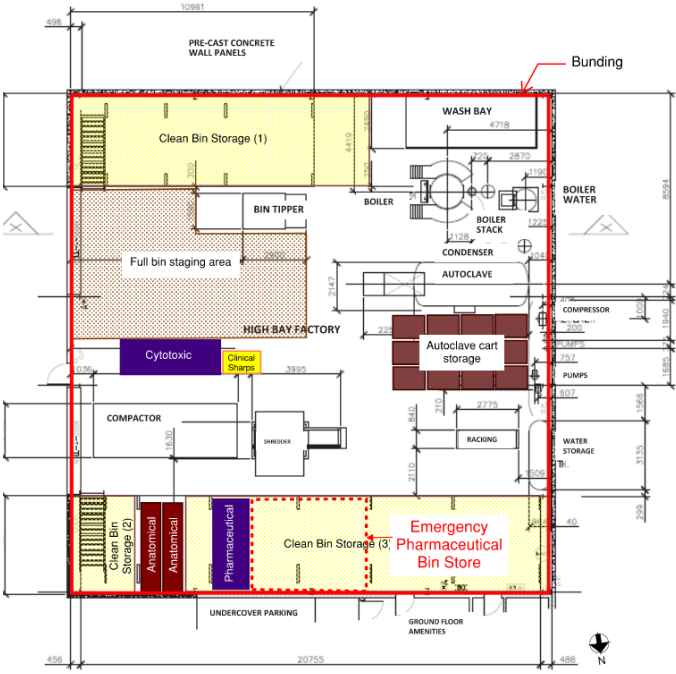
This letter is a response to the request for additional information (RFI-19343316) in regard to the modification application for the Arndell Park Clinical Waste Management Facility (SSD-6761-Mod-1). Arup has prepared this response on behalf of Med-X.

The requests for information and the responses are shown in Table 1.

Table 1 Request for information and responses

Author	Information Request	Response
DPIE	Confirm clinical and related waste would only be stored overnight in rare circumstances and confirm these circumstances are consistent with the description for SSD 6761 i.e. estimated to be up to five times per month.	It is confirmed that clinical and related waste would only be stored overnight in rare and untypical circumstances as per the SSD 6761. Under normal operations, waste would be treated within the working day. However in a circumstance outside of Med-X's control such as traffic conditions in Sydney or the breakdown of equipment or processes at third party facilities, the last delivery of clinical and related waste of the day may arrive too late to treat within the working day (before 7:00pm as per the SSD 6761). The likely maximum volume of waste to be stored overnight would be 450kg, equivalent to one Medium Rigid Vehicles (MRV) worth of waste. Related waste streams would be sorted and stored in the appropriate indoor location within the treatment facility. Based on current operating experience, late deliveries are only anticipated to occur approximately 3-5 times per month.
DPIE	Confirm related waste would continue to be removed daily, consistent with SSD 6761.	It is confirmed that related waste is collected daily from the site for treatment at a licensed facility as per the SSD 6761.
EPA	Request the proponent advise and confirm the storage capacity to be provided outside of the approved hours of operation will be at least 450kg for each type of clinical and related waste, to address a scenario where all 450kg is one waste type only.	When the last clinical and related waste delivery of the day arrives late there may not be enough time to treat the waste before the cease of operations (7.00pm). Therefore, the likely maximum volume of waste to be stored overnight would be 450kg, equivalent to one MRVs worth of waste. It is highly unlikely that the last delivery of the day would contain only one type of waste. Under current operations the site has not received 450kg of a related waste in a single delivery. However, the following mitigation measures are in place for this untypical scenario: 1. <i>Clinical waste:</i> can be stored in the bin staging area within the sealed bins if required. The bin staging area is 68m² and can accommodate a full MRVs load¹. If time permits, the clinical waste can also be loaded into the lined autoclave carts (4 x carts with a 150kg capacity each). Once the autoclave cart is full, the bin liner is tied off to seal all contents within the bin. Therefore,

¹ As per the SSD6761, the bin staging area can accommodate the maximum number of bins expected to arrive during one delivery: 12 x 120L, 53 x 240L and 8 x 660L.

Author	Information Request	Response
		450kg of clinical waste can be stored overnight either within sealed bins in the bin staging area or sealed within the autoclave carts to be treated in the autoclave immediately the following day. 2. <i>Cytotoxic waste</i>: as per the SSD 6761, the storage area for cytotoxic waste can hold a maximum of 500kg and is therefore adequate to store 450kg of cytotoxic waste overnight in the untypical scenario this required. 3. <i>Pharmaceutical waste</i>: It is highly unlikely that 450kg of pharmaceutical waste would require storage overnight. In the untypical scenario this occurs, the waste would be collected by a suitable waste collection contractor for transfer to a licensed facility the same day it is delivered. Alternatively, an emergency storage area for pharmaceutical waste will be allocated within the clean bin store as shown in Figure 1 below. Figure 1 – Pharmaceutical emergency bin store  4. <i>Anatomical waste</i>: All anatomical waste is stored in a commercial grade freezer with a 90kg capacity during current operations. An additional freezer 90kg capacity has been purchased to provide storage contingency. The quantities of anatomical waste are closely monitored, and the storage freezer is visually inspected throughout the day to determine if the freezer is nearing capacity. If the freezer is nearing capacity the anatomical waste is collected by a suitable waste collection contractor that day for incineration at an EPA licensed facility. 450kg of anatomical waste would not be stored overnight.

Should you wish to discuss any of these responses, please don't hesitate to contact me at:

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Yours sincerely,
Joyanne Manning