

Hi Katelyn,

The EPA has reviewed the response provided by ARUP on behalf of Med-X re Mod1 – Storing of Related Waste Overnight (SSD-6761-Mod-1).

The applicant's response addresses the EPA's query.

Detailed comments are as follows:

1. Proponent's response

With respect to the EPA's query, the response notes with respect to storage of 450kg of each type of 'related waste':

- There is capacity to store 450kg of clinical waste 'overnight' within sealed bunds in the staging area, or sealed within the autoclave carts to be treated the 'following day'.
- There is capacity to store 500kg of cytotoxic waste in the cytotoxic waste storage area.
- An emergency storage area of pharmaceutical waste will be located within the clean bin store, and this can be used in the unlikely event that 450kg of pharmaceutical waste requires storage overnight.
- 450kg of anatomical waste would not be stored overnight. The maximum storage capacity for anatomical waste is a total 180kg in the two (90kg) onsite storage freezers.

2. Capacity to store anatomical waste is only 180kg

The EPA notes the facility has or will have capacity to store 450kg of each type of 'related waste' except for anatomical waste. The maximum storage capacity of anatomical waste is 180kg.

The EPA notes to remove any ambiguity from the proposed amended condition, the following wording (or similar) may be more appropriate:

From:

A6 The applicant must not:

(d) store more than 450 kilograms of clinical and related waste outside of the approved hours of operation;

To:

(d) store outside of the approved hours of operation more than:

i) 450 kilograms each of clinical, cytotoxic, and pharmaceutical waste, and

ii) 180 kilograms of anatomical waste,;

3. Saturday scenario does not appear to have been considered, however impacts are unlikely to be significant.

The EPA notes the response appears to overlook the scenario where the waste arrives late on a Saturday. The approved operating hours are Mon-Sat only. Waste received late on Saturday that cannot be processed that day will require storage for two nights, until Monday.

The EPA advises that despite this, impacts associated with storage from Saturday to Monday of up to 450kg of each type of 'related waste not including anatomical waste' and up to 180kg of anatomical waste, are unlikely to be significant where the waste is managed in accordance with current and proposed measures and controls.

If the modification is approved, the facility's Waste Monitoring Plan (WMP) and OEMP must be updated to ensure these plans are current and address the proposed amendments.

If you wish to discuss the above please contact me on (02) 9995 6091 or at john.klepetko@epa.nsw.gov.au.

Regards, John

John Klepetko

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The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

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