

**From:** [John Klepetko](#)  
**To:** [redacted] s74  
**Cc:** [Erwin Benker](#); [redacted] s74  
**Subject:** RE: Daniels Health NSW Pty Ltd - EPL 3419 - Clinical Waste Disposal - Request for information  
**Date:** Monday, 17 September 2018 9:49:00 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

Dear [redacted] s74

Thank you for responding to the EPA's request to provide information relevant to the disposal of clinical waste at the Genesis facility at Eastern Creek.

The EPA is conducting a site inspection and will meet with Daniels Health NSW (Daniels) this Thursday to discuss the issue, along with matters associated with the EPA's review of the environment protection licence (EPL) for the Daniels Health Silverwater facility. I'll forward you the meeting invitation for your reference. I note that [redacted] s74 will be attending this meeting.

As you have advised, if the EPA identifies any further information to that provided in your response, we will contact you and [redacted] s74.

Regards, John

### John Klepetko

#### Principal Technical Advisor – Hazardous Materials Unit

Hazardous Incidents & Environmental Health, NSW Environment Protection Authority  
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**From:** [redacted] s74

**Sent:** Friday, 14 September 2018 3:45 PM

**To:** John Klepetko <[John.Klepetko@epa.nsw.gov.au](mailto:John.Klepetko@epa.nsw.gov.au)>

**Cc:** Erwin Benker <[Erwin.Benker@epa.nsw.gov.au](mailto:Erwin.Benker@epa.nsw.gov.au)>; [redacted] s74

[redacted] s74

[redacted] s74

**Subject:** Daniels Health NSW Pty Ltd - EPL 3419 - Clinical Waste Disposal - Request for information

Good afternoon John,

Further to your email below and to assist with your enquiry into the matter relating to disposal of clinical waste at the Dial A Dump Industries facility at Eastern Creek, Cleanaway is able to provide the following information. Supporting attachments have been included in the zip file.

**Types and amount of clinical and related waste received and processed at Daniel Health**

The types and amount of clinical and related waste received and processed at the Daniels Health Silverwater site for the month of August is outlined below.

cl4(c), cl4(d)

#### **Processes and activities undertaken on site to treat, process and dispose of clinical and related waste**

The Silverwater site has two processes for the treatment of clinical and related wastes, these being:

- High temperature incineration, and
- Autoclave

The following wastes codes are treated using the incineration process (in the order listed in our EPA licence 3245): J120, T120, F110, F100, J160, J100, N205, N100, E100, G160, G110, H100, R100, R130, E120, R120, R140, T100. Please note that the majority of the wastes treated by high temperature incineration are R100, R120, R130, R140 waste codes.

The following waste codes are treated using the Autoclave process: R100 Clinical and R100 Sharps wastes.

#### **Any application/s to NSW Health and approval/s from NSW Health for clinical waste treatment device/s, and/or the treatment of any clinical and related waste**

An application for the Approval of method to treat clinical waste by Autoclave was submitted to the NSW Department of Health in July 2014.

The application was approved by the Director General on 11 December 2015 with an expiry of 11 December 2020. It is noted that the parameters in the approval were not in accordance with the application and correspondence was made with the department to rectify the approval. The parameters in the application and the relevant supporting efficacy documentation set out the operating cycle as being 145C for 15 minutes at 430kPa; however, the approval parameters were reported as 143C for 30 minutes at 600kPa.

The Department of Health has acknowledged that the parameters on the approval are erroneous and are to provide an addendum to the approval which is expected to be received the week commencing 17 September 2018. Supporting documentation is included as Attachment 1.

#### **Processes (QA/QC and other) and data to demonstrate clinical and related waste has been effectively and reliably treated – and in accordance with any approval/s from NSW Health;**

The following information is provided to verify that clinical and related waste were effectively treated during the period 27 to 31 August:

- Laboratory analysis (spore and Polio); and
- Autoclave operating parameter data (time, temperature and pressure).

Supporting documentation is included as Attachment 2.

**The status of equipment used to treat and manage clinical and related waste, in particular between 27 and 31 August;**

The Daniels Health maintenance team perform daily maintenance checks of the Autoclave. Records for the period 27 to 31 August are provided as Attachment 3. Third-party inspections are also carried out in addition to these daily maintenance checks (refer Attachment 3). These checks confirm the status of the equipment used to treat and manage clinical and related waste at the facility.

**The disposal process used for the disposal of clinical and related waste;**

Clinical and related wastes received to the Silverwater site are treated either by autoclave or high temperature incineration, depending on the specific waste stream as outlined in our response above. The outputs of these treatment processes are classified in accordance with NSW EPA Waste Classification Guidelines, 2017. The waste generated following treatment is classified as follows:

- Autoclaved Clinical Waste is pre-classified as General Solid Waste – Non Putrescible
- Incinerated Clinical Waste as:
  - Bottom Ash is pre-classified as General Solid Waste – Non Putrescible
  - Fly Ash is pre-classified as General Solid Waste – Non Putrescible

For completeness, the facility at Silverwater also has a separate product destruction operation that simply shreds items broadly from the 'healthcare' sector for customer brand protection purposes. Products that are destructed include items such as unused medical devices and unused medical PPE. The products are non-dangerous goods and not regulated wastes. The waste is disposed of by Bingo Industries under the designation of 'shredded bio medical'. This is a Bingo internal designation to identify it as separate to our autoclave or incinerator waste.

**Transporter and disposal facility details for clinical and related waste streams and/or processed clinical and related waste streams generated at Daniels Health at Silverwater, including waste disposal records for the month of August;**

All treated clinical wastes are collected and transported from our Silverwater site by Bingo Industries. Bingo Industries, up until recently, disposed of the wastes at a NSW EPA licensed disposal facility operated by Suez at 1725 Elizabeth Drive Kemps Creek (EPL 4068). The material observed by EPA was disposed of at NSW EPA licensed facility operated by Dial A Dump Industries at Honeycomb Drive Eastern Creek (EPL 13426). Daniels Health had not requested Bingo Industries to use the Dial A Dump Industries at Honeycomb Drive, and were not aware that waste was being diverted to this disposal facility. All treated clinical wastes are now being transported to the Suez landfill at Kemp Creek for disposal, consistent with prior practice. A copy of the August monthly report from Bingo is provided at Attachment 4.

**Any other observations or information potentially relevant to the treatment, processing, transport and disposal of clinical and related waste, or treated clinical and related waste, from Daniels Health at Silverwater.**

Please refer to Attachment 5 for Autoclave calibration records and a copy of the Registration of Plant Certificate issued by SafeWork NSW.

In summary, Daniels Health take its environmental responsibilities very seriously and have always aimed to maintain high operating standards and foster an effective working relationship with the EPA in NSW. As always we are committed to working collaboratively with NSW EPA to ensure a resolution is achieved that satisfies the on-going compliance with the licence, regulatory requirements and the company's internal expectations for the site.

In the meantime, if you have any queries, or if there is any additional information you require, please do not hesitate to contact me or [s74] (copied on this email)

Kind regards

[s74]

[s74]

Head of Environment and Regulatory Compliance

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**From:** John Klepetko <[John.Klepetko@epa.nsw.gov.au](mailto:John.Klepetko@epa.nsw.gov.au)>

**Sent:** Wednesday, 5 September 2018 4:43 PM

**To:** [s74]

[s74]

**Cc:** Erwin Benker <[Erwin.Benker@epa.nsw.gov.au](mailto:Erwin.Benker@epa.nsw.gov.au)>; [s74]

[s74]

; Rebecca Murray <[Rebecca.Murray@epa.nsw.gov.au](mailto:Rebecca.Murray@epa.nsw.gov.au)>

**Subject:** RE: Daniels Health NSW Pty Ltd - EPL 3419 - Clinical Waste Disposal - Request for information

Dear [s74]

Thank you for providing Daniels Health's initial response as requested, and advising that Cleanaway is currently gathering information which will address the information outlined in my email.

The EPA accepts Cleanaway's proposed extension (to Friday 14 September) to allow a fuller response to be provided.

Please let me know if you have any queries or if any issues arise.

Regards, John

**John Klepetko**

**Principal Technical Advisor – Hazardous Materials Unit**

Hazardous Incidents & Environmental Health, NSW Environment Protection Authority  
+61 2 9995 6091

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**From:** [redacted] s74  
**Sent:** Wednesday, 5 September 2018 4:07 PM  
**To:** John Klepetko <[John.Klepetko@epa.nsw.gov.au](mailto:John.Klepetko@epa.nsw.gov.au)>; [redacted] s74  
[redacted] s74  
**Cc:** Erwin Benker <[Erwin.Benker@epa.nsw.gov.au](mailto:Erwin.Benker@epa.nsw.gov.au)>; [redacted] s74  
[redacted] s74 Rebecca Murray <[Rebecca.Murray@epa.nsw.gov.au](mailto:Rebecca.Murray@epa.nsw.gov.au)>  
**Subject:** RE: Daniels Health NSW Pty Ltd - EPL 3419 - Clinical Waste Disposal - Request for information

Hi John,

Further to our discussion yesterday, and my discussion with Dr Erwin Benker the day prior, Cleanaway is currently looking into the matter relating to disposal of clinical waste at the Geneses facility at Eastern Creek, as observed by EPA officers on Friday 24 August 2018. At this stage we are treating the waste as having originated from the Daniels Health treatment facility at Silverwater.

As part of our assessment we are currently gathering and collating a range of information, generally in line with that outlined in your email below. As requested, to assist EPA in their enquiry we will provide relevant information to you.

Whilst Cleanaway will be in a position to provide a partial response by Wednesday 12 September, our preference would be to provide a fuller response by Friday 14 September. Would you be able to accommodate a small extension of time to respond please?

Please do not hesitate to call if you have any queries or concerns.  
Kind regards

[redacted] s74

[redacted] s74

Head of Environment and Regulatory Compliance

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**From:** John Klepetko <[John.Klepetko@epa.nsw.gov.au](mailto:John.Klepetko@epa.nsw.gov.au)>

**Sent:** Tuesday, 4 September 2018 5:10 PM

**To:** [REDACTED] s74

[REDACTED] s74

**Cc:** Erwin Benker <[Erwin.Benker@epa.nsw.gov.au](mailto:Erwin.Benker@epa.nsw.gov.au)>; [REDACTED] s74

[REDACTED] s74

Rebecca

Murray <[Rebecca.Murray@epa.nsw.gov.au](mailto:Rebecca.Murray@epa.nsw.gov.au)>

**Subject:** Daniels Health NSW Pty Ltd - EPL 3419 - Clinical Waste Disposal - Request for information

Dear [REDACTED] s74

The NSW EPA Hazardous Materials Unit (HMU) has been advised that waste containing sharps collection waste such as syringes and 'blood products' have been identified in waste tipped at the Geneses facility at Eastern Creek (EPL No. 13426). This waste was observed at the tipping face at the Genesis facility on Friday 24 August 2018.

The waste is alleged to have come from Daniels Health at Silverwater (EPL No. 3419).

As a part of the EPA's investigation into this matter, the EPA would appreciate Daniels Health's assistance by investigating and providing information relevant to the treatment and disposal of clinical and related waste at Daniels Health's Silverwater facility, such as:

- types and amount of clinical and related waste received and processed at Daniel Health;
- processes and activities undertaken on site to treat, process and dispose of clinical and related waste;
- any application/s to NSW Health and approval/s from NSW Health for clinical waste treatment device/s, and/or the treatment of any clinical and related waste; and
- processes (QA/QC and other) and data to demonstrate clinical and related waste has been effectively and reliably treated – and in accordance with any approval/s from NSW Health;
- the status of equipment used to treat and manage clinical and related waste, in particular between 27 and 31 August;
- the disposal process used for the disposal of clinical and related waste;
- transporter and disposal facility details for clinical and related waste streams and/or processed clinical and related waste streams generated at Daniels Health at Silverwater, including waste disposal records for the month of August;
- any other observations or information potentially relevant to the treatment, processing, transport and disposal of clinical and related waste, or treated clinical and related waste, from Daniels Health at Silverwater.

Please provide an initial response by cob 5 September 2018, and a detailed response by cob Wednesday 12 September 2018.

Do not hesitate to contact me if you wish to discuss this matter.

Regards, John

**John Klepetko**

**Principal Technical Advisor – Hazardous Materials Unit**

Hazardous Incidents & Environmental Health, NSW Environment Protection Authority

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