

**Oklahoma Department of Environmental Quality
Response to Public Comments
Tier III Permit Application and Draft Permit
OK Medical Waste Disposal, LLC
Oklahoma County**

June 30, 2020

The following includes written comments received by the Oklahoma Department of Environmental Quality on the Tier III Permit Application and Draft Permit for the OK Medical Waste Disposal Facility. A list of acronyms and a brief summary of the facility has been provided to deliver clarification prior to the response to comments.

List of Acronyms

DEQ - Oklahoma Department of Environmental Quality
OAC – Oklahoma Administrative Code
O.S. – Oklahoma Statutes

Summary

The OK Medical Waste Disposal Facility will accept, store, and treat regulated medical waste to achieve microbial inactivity, as well as process medical marijuana (defined in 63 O.S. § 428.1, in addition to the roots, stems, stalks, fan leaves, and seeds), medical records, and non-hazardous pharmaceuticals for disposal. DEQ received the Tier III Permit application of February 3, 2020, with supplemental information submitted on February 12, 2020 and March 23, 2020. The permit was determined to be administratively complete on March 2, 2020. Pursuant to OAC 252:4-7-8, the Solid Waste Permitting Unit conducted a technical completeness review; the application was found to be technically complete with the Draft Permit issued on April 21, 2020. Legal notice of the Draft Permit was published in the Choctaw Times on April 29, 2020. The notice of Draft Permit provided a 30-day opportunity to comment on the Tier III Permit Application and Draft Permit and request a public meeting. No requests for a public meeting were received, but written comments were received on May 12, 2020.

Public Comments and DEQ Responses

Public comments were submitted by Joseph Wignarajah, the OK Medical Waste Disposal Facility Applicant, via electronic mail attachment on May 12, 2020. The following comments are excerpts from the submittal with DEQ responses. The comments addressed errors within the draft permit.

DEQ Website and Public Participation

Comment 1: References to “Oklahoma Medical Waste Disposal, LLC” should be replaced with “OK Medical Waste Disposal, LLC.”

DEQ Response: References to “Oklahoma Medical Waste Disposal, LLC” will be corrected to “OK Medical Waste Disposal, LLC” in the Proposed Permit.

Comment 2: In reference to the facility receiving regulated medical waste from permitted third party transporters, “if wanted to begin transporting waste for ourselves, would it have to be another company?”

DEQ Response: DEQ does not regulate haulers. OK Medical Waste Disposal may use third party transporters and the facility’s own collection company.

Comment 3: In reference to the total waste processed through the autoclave per day is estimated to be two (2) tons, “this is initially, but in the Application I wrote that we’d process a maximum of 48,000 pounds per day. Does this need to reflect that?”

DEQ Response: The Proposed Permit will be corrected to reflect the maximum of 48,000 pounds of waste processed per day.

Comment 4: In reference to the population or population equivalent to be served is 2,266,590 persons, “this is the initial population serviced, but we estimated that we’d serve all of Oklahoma and Arkansas. See 25.1 of the Application.

DEQ Response: The Proposed Permit will be revised to include that OK Medical Waste Disposal will serve the population of Oklahoma and Arkansas, or 6,960,000 persons.

Comment 5: In reference to the storage of regulated medical waste outside of the enclosed processing building to minimize contact of surface water drainage and runoff from the waste, “the sealed compactors are technically outside of the building, but they will be covered by canopies.”

DEQ Response: The Proposed Permit will be corrected to reflect that storage of treated regulated medical waste in sealed compactors located outside the enclosed processing building will be covered by canopies.

Comment 6: In reference to the closure conditions of the facility, Permit Condition G, the facility will either clean close the facility or enter post-closure status to minimize the escape of constituents into the environment. “Should constituents be contaminants?”

DEQ Response: Constituents will be replaced with contaminants in the Proposed Permit.