



City of Seattle Charles Royer, Mayor King County Tim Hill, Executive

Seattle-King County Department of Public Health Bud Nicola, M.D., M.H.S.A., Director

CERTIFIED MAIL NO. P 652 442 012

January 5, 1990

Mr. Bob Sanders Kleenwell Biohazard 17800 Des Moines Memorial Drive South Seattle, WA 98148

Dear Mr. Sanders:

Earlier this month, it was reported to the Health Department that your Infectious Waste Transport Company was storing infectious waste at a site for up to two months. The Health Department, in investigating this complaint, found that your company is storing waste for up to two weeks at a time. At the time of the issuance of the permit for your company, it was stipulated that any storage of infectious waste would require Health Department approval. The Health Department was not notified by your company of the change in operational procedures, nor was it notified when Kleenwell switched from having its waste disposed of through SureWay Incineration to American Environmental.

The present storage time of the infectious waste at your facility does not meet the requirements (seven days from the time of generation) set out in the code. Your present operation, therefore, is in violation of Title 10 of the Code of the King County Board of Health. The changes implemented in the operation of your company have classified the facility as an Infectious Waste Storage/Treatment Operator (IWSTO) as well as an Infectious Waste Transporter. This additional classification subjects your company to additional requirements that are outlined below.

1. Infectious Waste Management Plan: A plan must be developed that describes all aspects of infectious waste handling for your facility. The plan should be specific to your facility, not merely a reiteration of the County Rules. The plan should describe the types of infectious stored, the amount of infectious waste stored at any one time, how and where the infectious waste is stored, etc. Please refer to Section 10.28.070 of the code for details of what is required in the plan.

2. Storage and Containment of Infectious Waste: Section 10.28.070.B sets out the specific requirements for the storage of infectious waste, including site requirements, disinfection requirements, and time/temperature requirements. Your facility must meet these requirements.

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3. Contingency Planning: Your company must develop a contingency plan that outlines provisions for an alternate treatment plan in the event of equipment breakdown, etc. for treating waste prior to disposal (Section 10.28.070.C.3).

As mentioned previously, your present facility is in violation of the Code with respect to storage times. The code (Section 10.28.070.B.8) requires:

Unless approved in writing by the health officer, infectious waste other than sharps shall be treated in accordance with paragraph C within 8 days, if waste is stored at temperatures exceeding thirty two (32) degrees fahrenheit or zero (0) degrees centigrade, or within ninety (90) days if said waste is stored at temperatures at or below thirty two (32) degrees fahrenheit (32) zero (0) degrees centigrade commencing from the time of generation. (Emphasis added.)

In order for your facility to come into compliance with the regulations, in addition to those items stated above, it will be necessary for (1) the infectious waste stored must meet the time/temperature requirements set out above; (2) a written waiver from that requirement must be granted by the health officer; (3) the operation of the storage facility must cease entirely.

To apply for a waiver from the requirement, we will need the following information to be submitted in a written waiver request to the Health Department:

1. The location and nature of the storage site for infectious waste.
2. The maximum amount of infectious waste to be stored at any one time.
3. The types and relative amount of each category of infectious waste to be stored as outlined in the definition of Infectious Waste in the Code (Section 10.08.223)
4. The storage temperature of the infectious waste, including information on how this temperature will be maintained and controlled.
5. The approximate storage time for each box of infectious waste, and how this turn around time will be maintained.
6. Security measures in place for the site; including but not limited to the following: information concerning security measures for spills,

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fire protection, vandalism, burglary, etc; a letter from the owner of the site verifying these measures, as well as acknowledging that the site is to be used as an infectious waste storage facility.

If you decide to request a waiver of the time/temperature storage requirement, we will need the request delivered to this office within 30 days of receipt of this letter. A review of the request may require an administrative hearing with our department, and we will contact you if this is necessary. Submittal of a waiver request does not in any way guarantee that the waiver will be granted. If we do not receive the request within the time stipulated, and if your facility continues to operate in violation of the code, the permit for the Infectious Waste Transport will be immediately suspended or revoked.

If you have any questions regarding these conditions, please contact Shelley Kneip at 296-4831 or me at 296-4785.

Sincerely,

Greg Bishop *by skt*

Greg Bishop, Supervisor
Solid Waste Program

GB:skt

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