

February 5, 2021

### DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Room 380 Providence, Rhode Island 02908

Facility Name: MedRecycler-RI, Inc.

Site location: 1600 Division Road, West Warwick, RI 02893

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What is proposed at this facility? The Application is for a facility to treat regulated medical waste up to 70 tons/day by using pyrolysis.

What is Pyrolysis? Is it incineration? Pyrolysis is similar to incineration in that they both use high heat to break down organic materials such as cloth and plastic. It differs from incineration in that the heating is done in an anoxic (without oxygen) environment. The process produces a flammable gas that is then burned in the presence of oxygen to produce electricity.

Will Waste be stored at the Site? The application proposes that medical waste would be stored on site in trailers and in containers within the building. At any time, no more than 20 containers of regulated medical waste shall be stored inside the facility; no more than 25 trailers of regulated medical waste shall be onsite. Should the permit be approved, the applicant will be required to post a bond to allow the state to dispose of waste in the event the facility became insolvent and left waste onsite.

## What opportunities are there for public participation in the DEM process?

Rhode Island General Law (23-18.9-9) establishes the criteria that must be followed for public notice and public participation. The law requires that after review of the application, the Department must give public notice of the intention to issue or deny. The Department issued a Notice of Intent to Issue on January 11, 2021, and public notice was published in he Kent County Daily Times, The Warwick Beacon, The East Greenwich Pendulum and The Providence Journal on January 21-22, 2021. A public informational workshop was held via Zoom on 1/25/2021. A Recording of the informational meeting on 1/25/21 can be found by clicking

here. The statute also requires a formal public hearing be held (scheduled for 3/15/2021 via Zoom, link below). During this public comment hearing, interested members of the public may submit oral comments on the record, but neither the Department nor the applicant will be responding to the comments during the hearing. The public comment period will remain open for an additional 30 days after the hearing, and once the Department has had the opportunity to review all comments, it will issue a written response to all substantive comments received.

In addition to the required notices and hearings, the Department has been in contact with local Public Safety Officials for most of the 2 years the review has been ongoing. Prior to publication of the notice we personally notified the Town Manager of East Greenwich, Town Manager of West Warwick, the East Greenwich Fire Chief, and the West Warwick Fire Chief to make sure the communities could participate in the process and inform interested parties.

What about air pollution from the Site? In addition to the current application, Medrecycler applied for and was granted a minor source permit by the RIDEM/Office of Air Resources on May 7, 2020. This permit contains emissions limits, monitoring and startup testing requirements both before and after the facility begins operation. The minor source determination is based on the quantity of material to be burned at the facility.

Is there a risk of people being exposed to pathogens? The major thrust of our Medical Waste Program is the protection of human health. This includes both workers handling medical waste as well as the general public. The requirements in the regulations specify that efficacy must be demonstrated prior to startup and periodically once a facility starts to receive waste. The regulations regarding treatment processes require both temperature monitoring and testing with heat resistant bacterial spores (i.e. *Geobacillus stearothermophilus*) to prove their effectiveness.

This application proposes to shred untreated medical waste. Our regulations specify that such shredding can only be done in a fully enclosed environment. To determine if this environment is in fact, fully enclosed, the license is being conditioned to require separate testing to be performed to verify if bacterial spores can be released during the shredding process. This testing will be required prior to final approval to begin accepting waste and will be required to be performed by an independent third party vendor. Neither of the tests described above have been done, and in fact, can only be done when the equipment is installed and operational. Also, RIDEM determined that the currently proposed testing protocols are insufficiently detailed at this time. Therefore, permit conditions have been included to require additional details of the testing protocol, Department approval, and oversight prior to testing.

# What waste products will be produced?

The application is for a process that produces the following wastes:

- 1. Flammable gas (syngas) that will be burned to generate electricity.
- 2. Solid ash-like material will need to be disposed of in accordance with RI Regulations.
- 3. A flammable tar to be used to heat the vitrification system.

#### What Happens Next?

Now that the public notice and <u>public informational workshop</u> has taken place the next step is a formal public comment hearing on 3/15/2021 (details below). The Department will continue to accept written comments for 30 days after the public comment hearing. After that, the Department will respond to all substantive comments received and render a final decision within 90 days.

The Public Hearing on 3/15/2021 at 4PM via Zoom can be accessed using the link below:

https://us02web.zoom.us/j/5211383116, Meeting ID: 521 138 3116 Or by phone at: 1-929-205-6099

The application and additional materials can be found at our web page <u>click here</u> A Recording of the informational meeting on 1/25/21 can be found by clicking <u>here</u>.