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September 20, 2023

City of Oklahoma City Parks & Recreation Department
Attention: Melinda McMillan-Miller, Director
420 W. Main St. Suite 210
Oklahoma City, OK 73102
Email: Melinda.mcmillan@okc.gov

**Re: Tier I Permit Application Regulated Medical Waste Transfer Station
Medical Waste Services
11995 Hwy. 62 East
Harrison, AR 72601
Terracon Project # 35237088**

Dear Ms. McMillan-Miller,

Terracon provided a location determination request to your office dated May 3, 2023 on behalf of Medical Waste Services for their proposed Northeast 23rd Transfer Station. Following the request, Medical Waste Services personnel and others have interacted with City Council members and other stakeholders to evaluate the anticipated project.

After consideration of local zoning, the Proposed RMW Transfer Station was relocated approximately 400 feet south within the property as shown on the revised **Figure 2** attached to this letter. Please consider the attached, revised figure and provide any determination that your Department may have. We will provide any determination and comments that you may have to the ODEQ as part of the permitting process. The original May 3, 2023 submittal is attached to this letter for your convenience.

If you have any questions or comments or need any additional information, please feel free to contact me at Tony.Bardella@terracon.com at your convenience.

Sincerely,
Terracon Consultants, Inc.

A black rectangular box containing the name 'Tony Bardella' in a white, cursive script font.

Tony Bardella
Staff Engineer

A blue ink signature of F. Owen Carpenter, written in a cursive style.

F. Owen Carpenter, P.E., P.G.
Senior Solid Waste Engineer

Enclosures: Updated Figure 2 - Site Map
May 3, 2023 Correspondence

Explore with us

3.0 Operational Standards for the Facility

Below is a summary of the operational aspects of the facility. Those items in the application that are “not applicable” are operational issues not associated with the handling of medical waste.

Public Access Control — The trailer storage area will be surrounded by fencing. Public access is intended to be controlled with locking gates. The gates require key or passcodes for entry to the transfer station area. Containers will be locked inside trucks and/or trailers at all times. Spaces are secured using door handle locks and/or deadbolts requiring key or code access.

Measuring Waste — All medical waste at the facility will be accompanied by a manifest and shipping document listing the number of containers by generator included in the shipment. It is anticipated that the facility will receive approximately 1,500 pounds of regulated medical waste per day at the transfer station. Upon arrival at the designated treatment location, containers will be weighed, recorded, scanned for radiation, and the documented chain of custody is completed upon treatment of the waste.

Accident Prevention and Safety — Care will be taken to maximize the safety of both employees and the public. Safety will be maintained by using a process in which the waste is sealed in leak-proof, rodent proof containers with tight fitting lids at the point of generation; minimizing the risk of exposure. Trucks and trailers will be sealed with roll up doors that are secured and locked at all times during periods of no transfer. All MWS personnel will be trained in accident prevention and safety including, but not limited to, the OSHA Blood Borne Pathogen Standards, DOT requirements, and the Waste Exclusion Plan.

Recordkeeping — All medical waste will be accompanied by a manifest and shipping document. Chain of custody documentation beginning with the generator and concluding with appropriate disposal will be maintained for a period no less than three years.

Employee Facility — Shelter from the elements (cold, heat, rain, etc. - but not tornados) and restrooms are provided for personnel inside the building located on site.

Blowing Litter — Waste will be containerized at all times. Containers will be sealed with tight fitting lids which will remain closed throughout the entire transfer process. There will be no blowing litter from this operation. Any litter generated as a byproduct of human presence (food and drink containers, paperwork, etc.) will be discarded into supplied trash cans on site.

Processing Time — Shipments of medical waste containers transferred at the facility will be placed onto trailers per ODEQ regulations. Every attempt will be made to remove full trailers from the site and transferred to a designated site for treatment and disposal within 96 hours.

Large Bulky Items — All medical waste at the facility will either be in sealed plastic containers with lids, or closed plastic lined cardboard boxes. There are no bulk items under definition of medical waste. This section is more appropriate to solid waste operations concerning items that do not fit in waste containers. In all cases here, waste is containerized within containers which meet all applicable standards.

Salvage — No salvaging or recycling will be associated with the operation.

Vector Control — As only containerized waste will be transferred; vectors are not expected to be an issue with this operation.

Dust Control — Control for dust will not be applicable. There will be minimal truck traffic associated with this application.

Discharge — No discharges will be associated with the activities at this location.

Residue Management — No residues will be generated in this operation at this transfer facility.

Storm Water Runoff Control — Waste will be in sealed containers, in enclosed vehicles, and above water at all times. Waste at this transfer station will never be exposed to stormwater.

Noise Control — Other than the vehicles mentioned, no heavy equipment is used in connection with this operation. Therefore, no noise control is needed.

Odor Control — Waste will be in sealed containers at all times, which will mitigate odors. Any odiferous containers will be inspected and if necessary, transferred to the designated treatment facility as soon as possible.

Aesthetic Enhancement — The property currently includes appropriate fencing and landscaping to maintain the integrity of the property visually and to control noise.

Road Types — This transfer station is accessible by asphalt and concrete roadways maintained by the city, county, and state.

Equipment - In addition to trucks, there will be several other minor equipment items used at the facility to facilitate operations and handling, such as hand truck dollies. When not in use, these will be stored and secured. No heavy equipment will be utilized at this transfer station.

No waste will be burned at this site

**Medical Waste Transfer Station Site of Interest
0.5-mile buffer**



