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March 9, 2012

Mr. Michael A. Kemp, P.E.
Manager, Industrial Solid Waste Unit
Georgia Department of Natural Resources
Environmental Protection Division
Land Protection Branch
4244 International Parkway, Suite 104
Atlanta, GA 30354

RECEIVED

MAR 13 2012

SOLID WASTE
MANAGEMENT PROGRAM

Re: Proposed MedSafe, LLC Biomedical Waste Processing Facility

Dear Mr. Kemp:

Mayor Grace McCrimmons of Payne City has forwarded to our office your February 14, 2012 letter, which was addressed to Allen McKee of MedSafe, LLC with a copy of Mayor McCrimmons.

In your letter it is set out that the assertions in Mayor McCrimmons' September 9, 2011 letter are inconsistent with previous correspondence EPD has received from Payne City regarding the proposed MedSafe, LLC facility, and that EPD requires further documentation from Payne City to resolve the inconsistencies and definitively address the documentation required by certain items of the "processing facility – checklist."

With that in mind, on behalf of Payne City and Mayor McCrimmons, I have been asked to make a response.

Attached are the following documents:

- A copy of Payne City's letter of September 9, 2011, to EPD.
- A copy of the Resolution of the Mayor and Council of the City of Macon expressing concern regarding the proposed location of the medical waste processing plant, adopted September 6, 2011 by the Macon City Council, expressing among other things that the location is not conducive to the health and welfare of the citizens of Macon and that a proposed location of the facility should be identified elsewhere.

- Cover of the Joint Solid Waste Management Plan for Bibb County, City of Macon, and Town of Payne City prepared by the Middle Georgia RDC for Bibb County, City of Macon and Payne City, dated June 2006, as amended July 2007 and within which is contained a "Payne City Solid Waste Management Plan" and a procedure for plan consistency requiring that in order for EPD to issue or renew a permit for a solid waste handling facility, the facility or facility expansion must be consistent with local government solid waste management planning, and identifying the procedure that Bibb County, the City of Macon, and the Town of Payne City will use to determine plan consistency. The entire Joint Solid Waste Management Plan is more than eighty pages, and if a full copy is deemed necessary by your office, please advise so that arrangements can be made to copy that.

Please advise if any further information is requested from the Town of Payne City with regard to this issue.

Sincerely,



C. Robert Melton
Attorney for the Town of Payne City

CRM/cb

cc: Honorable Grace McCrimmons
Mayor, Payne City
112 Green Street
Payne City, GA 31204

Mr. David Pope
Spivey, Pope, Green & Greer, LLC
PO Box 899
Macon, GA 31202

Georgia Department of Natural Resources

Environmental Protection Division

Land Protection Branch

4244 International Parkway, Suite 104, Atlanta, Georgia 30354

Mark Williams, Commissioner

Judson H. Turner, Director

404/362-2537

February 14, 2012

Mr. Allen McKee
 Managing Member
 MedSafe, LLC
 Post Office Box 36
 Geneva, GA 31810

**SUBJECT: Local Government Documentation Inconsistencies
 Proposed MedSafe, LLC Biomedical Waste Processing Facility
 Bibb County - APL 0112**

Dear Mr. McKee:

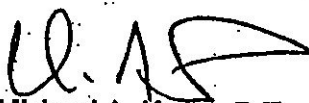
Payne City Mayor Grace McCribbons states in a September 9, 2011 letter (copy attached for reference) to the Georgia Environmental Protection Division (EPD) that the subject facility "...is incompatible with the existing land use." and that "...MedSafe, LLC is no consistent with the Solid Waste Management plan for Payne City."

Mayor McCribbons also asserts in her letter that zoning, land use and solid waste management consistency letters previously submitted to EPD regarding the subject facility were not properly considered by the Payne City Mayor and City Council, and are therefore not valid.

The assertions in Mayor McCribbons September 9, 2011 letter are inconsistent with previous correspondence EPD has received from Payne City regarding the proposed MedSafe, LLC facility. In order to continue our permit application review, EPD requires further documentation from Payne City that resolves the inconsistencies and definitively addresses the documentation requirements in items 2, 3, 4, and 8 of the attached document titled *Processing Facility - Checklist For Use By EPD Review Team*.

If you have any questions regarding this letter or any other permitting issues, please contact me at 404-362-4918.

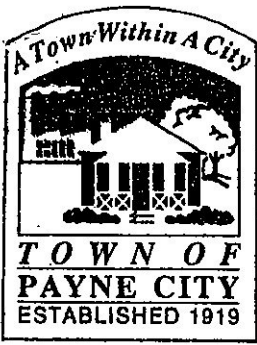
Sincerely,



Michael A. Kemp, P.E.
 Manager, Industrial Solid Waste Unit

Enclosures

cc: Honorable Grace McCribbons - Mayor of Payne City
 David Pope - Spivey, Pope, Green & Greer, LLC
 West Central District EPD
 Jeff Cown, Barbara Howard
 File (PER): Bibb County - MedSafe, LLC [APL 0112]



Georgia Department of Natural Resources
Environmental Protection Division
Mr. Jeff Cown and Mr. Michael Kemp
4244 International Parkway
Suite 104
Atlanta, GA 30354

September 9, 2011

Dear Mr. Cown and Mr. Kemp,

Payne City held a public meeting on 8/31/2011 to hear Med Safe LLC's proposal to site a biomedical waste facility in our town. A previous meeting was not properly noticed, and this was the official hearing. No other public meetings about Med Safe have been held in Payne City. We examined the proposal to see if it was consistent with our Solid Waste Management Plan. The applicant Mr. McKee and his partner Ken Taylor were not able to answer many of the questions from the public. They did not submit plans for the facility to us. At the meeting, it was clear, with one or two exceptions, which the public was not in favor of this facility.

On 9/6/2011 the City of Macon passed a resolution stating their concerns about this facility. Mr. McKee plans to route traffic through a parking lot at Freedom Park which is owned and operated by the City of Macon. At the public meeting on 8/31/2011 their traffic engineer voice his concerns about the toll that steady truck traffic on roads that were not designed for this type of vehicular traffic, and the director of parks and recreation was very concerned about commercial traffic through a city park. Five members of the Macon City Council were in attendance at the public meeting on 8/31 and they expressed their concerns about the facility, which were followed by the resolution passed on 9/6.

The Mayor and Council reviewed all of the information presented and on 9/7/11 they voted to reject the proposal based on its inconsistency with their solid waste management plan. They founded it inconsistent for the following reasons:

1. Payne City's land use is residential and commercial. This plant is inconsistent with the current land use. All changes to the land use plan and any zoning changes must be voted on by the Mayor and Council as required by our city charter. No votes to make these changes have been taken. The proposed facility is to be sited in a commercial area, and is immediately adjacent to a residential area and a heavily used park owned by the City of Macon. This facility is incompatible with the existing land use.

2. The proposed facility will use unproven technology. The manufacturer of the equipment cannot be reached, and their plant is for sale. There is no other plant of this type operating in the United States, and information from an engineer in England points out serious concerns about the safety and efficacy. The applicant was not able to produce any information about the noise level from this plant, nor was the applicant able to produce any information about the odors from the plant or the waste before and after treatment. The applicant did not supply an emergency plan that showed how they would address spills or other accidents with the dangerous oxidizing chemicals used at the proposed facility. Close proximity to residents and ball fields make these provisions critical.
3. The applicant has failed to provide adequate information and analysis to show that this proposal would meet the safety requirements required by Payne City and our solid waste management plan. The City of Macon has passed a resolution in opposition to this plant because they are concerned about the safety at Freedom Park that shares a property line with the proposed facility.
4. The proposed facility will place an undue financial burden on Payne City. We do not have the funds to repair roads damaged by semi-truck traffic, nor do we have emergency response capabilities if there is an accident.
5. The proposed facility will damage the existing infrastructure in Payne City. Our roads are not built to handle semi-trucks traffic on a daily basis and they are in need of repair right now. We do not have the funds nor do we intend to upgrade our roads to accommodate regular truck traffic.
6. The proposed facility will have a negative financial impact on Payne City. A number of our existing commercial businesses have indicated that they will move if this facility is sited. We have seen an increase in the number of small commercial businesses in Payne City and we want to encourage more such businesses to locate here. A waste handling facility will reverse this trend. We have no agreement with the proposed facility about permit fees, nor the granting of a business permit.

Several letters have been submitted to EPD by Mr. McKee and Mr. Taylor stating that this facility meets zoning, land use, and solid waste handling plans for Payne City. Our city charter states that any of these determinations must be passed by the Council and Mayor. There have been no votes about the Med Safe facility except the one taken on 9/7/11. Mr. McKee has also submitted a consistency determination dated 7/10/07. This vote was taken about another type a facility, and our city attorney has advised us that each facility must be reviewed independently. No votes taken in 2007 are transferrable to this facility, and none of the letters did not have council action are valid.

Please except this letter as formal notice that Med Safe LLC is no consistent with the Solid Waste Management plan for Payne City. Please let me know if you have any questions.

Sincerely,



Grace McCrimmons
Mayor, Payne City

SPONSORED BY
Henry Fixlin
 Council Member
Lauren Benedict
 Council Member
Nancy White
 Council Member
Charles Jones
 Council Member
Louis Tompkins
 Council Member
Tom Ellington
 Council Member

COMMITTEE REPORT
Tom Ellington
 Chairman
Henry Fixlin
 Vice Chairman
Lauren Benedict
 Secretary
Nancy White
 Treasurer
Charles Jones
 Member
Louis Tompkins
 Member
Tom Ellington
 Member

<i>Henry Fixlin</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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ACTION TAKEN AND DATE: _____

O AND R COMMITTEE

APPROVED AS TO FORM FOR CITY ATTORNEY BY
Christina R. Helms
 Christina R. Helms
 Assistant City Attorney

R-11-0105

A RESOLUTION OF THE MAYOR AND COUNCIL OF THE CITY OF MACON, GEORGIA, EXPRESSING CONCERN REGARDING THE PROPOSED LOCATION OF A MEDICAL WASTE PROCESSING PLANT IMMEDIATELY ADJACENT TO THE SOFTBALL FIELDS IN FREEDOM PARK AND TO RECOMMEND THAT THE MACON-BIBB COUNTY INDUSTRIAL AUTHORITY BE CONSULTED TO IDENTIFY A BETTER LOCATION FOR THIS TYPE FACILITY; AND FOR OTHER PURPOSES.

Read first time _____

And referred to the Committee on _____

REPORT

Rendered *September 6, 2011*
 and *Adopted*



VOTE

	Yes	No	Absent	Absent
Hutto	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Miley	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lucas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cranford	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
DeFore	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schlesinger	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ricklin	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Timley	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ellington	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tompkins	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Jones	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Watkins	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Benedict	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
White	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Kaplan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total:	13	0		2

SPONSORS: VIRGIL WATKINS; LAUREN BENEDICT; NANCY WHITE;
JAIME KAPLAN; CHARLES JONES; LOUIS TOMPKINS;
TOM ELLINGTON; AND HENRY FICKLIN

A RESOLUTION OF THE MAYOR AND COUNCIL OF THE CITY OF MACON, GEORGIA, EXPRESSING CONCERN REGARDING THE PROPOSED LOCATION OF A MEDICAL WASTE PROCESSING PLANT IMMEDIATELY ADJACENT TO THE SOFTBALL FIELDS IN FREEDOM PARK AND TO RECOMMEND THAT THE MACON-BIBB COUNTY INDUSTRIAL AUTHORITY BE CONSULTED TO IDENTIFY A BETTER LOCATION FOR THIS TYPE FACILITY; AND FOR OTHER PURPOSES.

Purpose: To express concern regarding the proposed location of a medical waste processing plant adjacent to Freedom Park.

WHEREAS, the medical waste process is new enough that there are no similar plants in Georgia, nor are there any similar plant prototypes in the entire Southeastern United States, where citizens and government officials might observe the safety record of such a plant process; and

WHEREAS, the proposed process uses large quantities of powerful bleaching liquids which can combine with many waste products to produce large clouds of irritating and poisonous gases; and

WHEREAS, this plant has the potential to produce tons of putrescible waste next to a City of Macon recreation facility and would be in close proximity to restaurants, commercial businesses and residential areas; and

WHEREAS, this plant is not consistent with the land use in the surrounding area; and

WHEREAS, this plant will generate a considerable amount of truck traffic through a park owned and operated by the City of Macon and this traffic would endanger the children who use this park and would degrade the park itself; and

WHEREAS, there are many empty and more-appropriate, available industrial sites in Bibb County, and the Macon-Bibb County Industrial Authority should be consulted to help locate a better location for this type facility.

NOW, THEREFORE, BE IT RESOLVED by the Mayor and Council of the City of Macon and it is hereby so resolved by the authority of the same that the governing body of the City of Macon expresses its concern regarding the proposed location of a medical waste

processing plant immediately adjacent to Freedom Park and recommends that the Macon-Bibb County Industrial Authority be consulted to help identify a better location for this facility.

SO RESOLVED this 6th day of September, 2011.

James E. Turnley
President, City Council

SO APPROVED this 7th day of September, 2011.

Robert A. B. Reiche
Mayor

F:\RES\2011 Watkins concern medical waste-Freedom Park.doc

City of Macon, Ga.
I do hereby certify that the above and foregoing
Resolution was duly passed at the Regular Meeting
of the Council of the City of Macon, held
9-6-2011 With my hand and seal of
the City of Macon this 9-7-2011
Joseph L. Humphrey
Clerk of Council

SUBMITTED TO MAYOR'S OFFICE
September 7, 2011
RETURNED FROM MAYOR'S OFFICE
September 8, 2011 10:53 AM

**THE JOINT SOLID WASTE MANAGEMENT PLAN
FOR BIBB COUNTY, CITY OF MACON, AND
TOWN OF PAYNE CITY**

Prepared by

The Middle Georgia Regional Development Center

for

Bibb County, City of Macon, and Payne City

**June 2006
Amended July 2007**

TABLE OF CONTENTS

INTRODUCTION.....	7
OVERVIEW OF AREA.....	9
Location in the State.....	9
Topography.....	9
Current and Projected Population.....	9
Total Households and Household Size.....	10
Business and Industrial Activity.....	11
WASTE DISPOSAL STREAM ANALYSIS.....	14
Current Waste Stream Composition.....	14
<i>Total Landfilled MSW Composition.....</i>	<i>14</i>
<i>Landfilled MSW Composition by Generating Sector.....</i>	<i>15</i>
<i>Landfilled MSW Composition for Construction and Demolition Waste.....</i>	<i>16</i>
<i>Commonly Recycled Materials Disposed.....</i>	<i>18</i>
<i>Future Waste Stream Generation.....</i>	<i>18</i>
WASTE REDUCTION ELEMENT.....	21
Inventory and Assessment.....	21
<i>Source Reduction.....</i>	<i>21</i>
<i>Recycling.....</i>	<i>22</i>
<i>Yard Trimming Mulching/Composting.....</i>	<i>24</i>
<i>Special Management Items.....</i>	<i>24</i>
Waste Reduction Needs and Goals.....	25
<i>Source Reduction Needs.....</i>	<i>25</i>
<i>Recycling.....</i>	<i>26</i>
<i>Mulching/Composting.....</i>	<i>26</i>
<i>Special Management Items.....</i>	<i>27</i>
COLLECTION ELEMENT.....	28
Inventory and Assessment.....	28
<i>City of Macon.....</i>	<i>28</i>
<i>Town of Payne City.....</i>	<i>29</i>
<i>Unincorporated Bibb County.....</i>	<i>30</i>
Solid Waste Collection Needs and Goals.....	32

DISPOSAL ELEMENT.....	33
Inventory and Assessment.....	33
<i>Disposal Facilities</i>	<i>33</i>
<i>Thermal Treatment Technologies</i>	<i>34</i>
Contingency Strategy in Event of Disruption to Primary Option.....	35
<i>Bibb County</i>	<i>35</i>
<i>City of Macon.....</i>	<i>35</i>
<i>Town of Payne City.....</i>	<i>36</i>
Assurance of Ten-Year Disposal Capacity	36
<i>Bibb County</i>	<i>36</i>
<i>City of Macon.....</i>	<i>36</i>
<i>Town of Payne City.....</i>	<i>37</i>
Solid Waste Disposal Needs and Goals	37
LAND LIMITATION ELEMENT.....	39
Identification of Unsuitable Areas.....	39
<i>Exclusionary Factors</i>	<i>39</i>
<i>Restricting Factors.....</i>	<i>41</i>
Land Limitation Strategies	42
<i>Discouraging Location in Unsuitable Areas</i>	<i>42</i>
<i>Selection of Sites for New Solid Waste Handling Facilities</i>	<i>42</i>
Procedure for Plan Consistency	44
<i>Public Involvement and Notification</i>	<i>44</i>
<i>Analyzing Anticipated Impact of Proposed Facility on Existing Waste Management</i> <i>Facilities</i>	<i>46</i>
<i>Analyzing Anticipated Impact of Proposed Facility on Adequate Collection and</i> <i>Disposal Capability within Planning Area.....</i>	<i>46</i>
<i>Analyzing Anticipated Impact upon Achieving Waste Reduction Goal.....</i>	<i>46</i>
Land Limitation Needs and Goals.....	47
EDUCATION AND PUBLIC INVOLVEMENT ELEMENT	48
Local Government Programs.....	48
School System Programs	50
Litter Prevention.....	50
Education/Public Involvement Needs and Goals	51
DISASTER DEBRIS MANAGEMENT PLAN	53

Introduction.....	53
Management Structure.....	54
Implementation Plan	55
<i>Phase I: Initial Debris Assessment</i>	<i>55</i>
<i>Phase II: Mitigating Threats to Public Health and Safety</i>	<i>55</i>
<i>Phase III: Response to Orderly Recovery and Less Immediate Threats to Public Health and Safety.....</i>	<i>56</i>
 IMPLEMENTATION STRATEGY	 59
 Bibb County.....	 60
City of Macon	65
Payne City.....	71

Tables

1. Total Population, 2000-2025	10
2. Total Households, 2000-2025	11
3. Average Household Size, 2000-2025	11
4. Percent of Employment by Industry, 2000	12
5. Comparative Table of Landfilled MSW Composition.....	15
6.1 Comparative Table of Landfilled MSW Composition by Generating Sector.....	16
6.2 Comparative Table of Landfilled MSW Composition by Generating Sector.....	17
7. Comparative Table of Landfilled MSW Composition by Generating Sector for Construction and Demolition Waste	17
8. Anticipated Waste Amounts for Bibb County Using FY 2004 Statewide Per Capita MSW Disposal Rate (2005-2020)	19
9. Anticipated Waste Amounts for Bibb County Using Per Capita MSW Disposal Rate-Reduction Goal (2005-2020)	20

Maps

1. Location Relative to the State and Region
2. Location Relative to Bibb County
3. Solid Waste Management Facilities
4. Airports with 10,000-Foot Buffer
5. Local, State, and Federal Lands
6. Floodplains, Wetlands, and River Corridors
7. Zoning Districts Where Landfills are not Permitted
8. Steep Slopes
9. Significant Groundwater Recharge Areas
10. Public Water Sources with Two-Mile Buffer
11. Composite of Exclusion Areas
12. Composite of All Limiting Factors

10-Year Disposal Capacity Assurance Letters

- Bibb County
- City of Macon
- Payne City

INTRODUCTION

In 1990, the Georgia General Assembly passed the Georgia Comprehensive Solid Waste Management Act. The intent of the General Assembly in developing and adopting this legislation was to establish a solid waste management planning process necessary to prevent environmental degradation, to manage resources and to effectively reduce and manage solid waste for the State and its residents.

The Act specifies that in order to receive a permit, grant or loan for a solid waste management facility, each city and county shall develop or be included in a comprehensive solid waste management plan. The Act requires that any request for a solid waste handling facility permit or funding for publicly owned and operated solid waste management facilities or equipment must be consistent with the solid waste management plans of all affected local governments. The most recent Solid Waste Management Plan for Bibb County, City of Macon and the Town of Payne City was adopted in April 1993.

To guide the preparation of local, multi-jurisdictional or regional plans, the Act mandated the preparation of Minimum Planning Standards and Procedures for Solid Waste Management. These Minimum Standards are adopted by the Georgia Department of Community Affairs Board; the most recent addition became effective on January 1, 2004. Based on these Minimum Standards, the Joint Solid Waste Management Plan for Bibb County, City of Macon and the Town of Payne City has the following components.

1. **An Overview of the Area** that includes a discussion of location, topography, population, and commercial and industrial activity in the area;
2. **A Waste Disposal Stream Analysis** that assesses who is generating the waste in the county and what they generate. This section of the report also includes the projected waste stream for the ten-year planning period.
3. **Five Core Planning Elements** that relate back to the Waste Disposal Stream Analysis; **Waste Reduction, Collection, Disposal, Land Limitation, and Public Education and Involvement**. Each of the elements must include an inventory and assessment and a list of needs and goals. For the Collection and Disposal Elements, a contingency strategy in the event of disruption to the primary option must be identified. The contingency strategy must include an alternative collection/disposal option on an interim basis and the estimated time to bring the contingency option on line. The Land Limitation Element must include a procedure the local governments will follow to determine if a proposed facility, public or private, is consistent with the plan.
4. **A Disaster Debris Management Plan** that specifies what procedures the local governments will follow for the collection and disposal of significant volumes of waste and/or special wastes resulting from any type of disaster, encouraging waste reduction (recycling) of such waste and public notification of the programs established to handle waste generated by a disaster.

5. After all the elements have been inventoried and assessed and the needs and goals have been identified, the Plan must identify an **Implementation Strategy** that includes specific actions that will be taken over the ten-year planning period to address the needs and goals expressed in the planning elements. The Strategy will consist of a table that lists the names of all jurisdictions included in the Plan, the activities, the year or years the activities are covering, the party or parties responsible for managing the activities, the estimated cost of the activities, and the funding source. The first five years of the Implementation Strategy will serve as the first Short-Term Work Program, while the second five-year period will be updated in accordance with the planning schedule established and revised from time to time by the Georgia Department of Community Affairs.