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NORTH CAROLINA
Environmental Quality

March 1, 2022

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

IMMEDIATE ACTION
NOTICE OF VIOLATION
Docket # 2022-040

Mr. Michael P. Deason
Pharmaceutical Dimensions, Inc.
7353-A West Friendly Avenue, Greensboro, NC 27410
Greensboro, NC

SUBJECT: Immediate Action Notice of Violation
Pharmaceutical Dimensions, Inc.
7353-A West Friendly Avenue, Greensboro, NC 27410
Site EPA ID#: NCR 000 174 375
Guilford County

Dear Mr. Deason:

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (Section) was authorized to operate the State Resource Conservation and Recovery Act (RCRA) Hazardous Waste Program under the Solid Waste Management Act (Act), N.C.G.S. 130A, Article 9 and rules promulgated thereto at l5A NCAC 13A (Rules), in lieu of the Federal RCRA program.

On January 10, 2022, Dan Girdner and Heather Goldman with the Division of Waste Management, Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. The facility was inspected due to a Compliance Assistance Visit (CAV) conducted on June 2, 2021, where deficiencies were observed and documented for the facility to correct. A Compliance Evaluation Inspection (CEI) was performed on January 10, 2022, where ongoing and additional violations were observed.

Statement of Facts Related to the Compliance Inspection

Pharmaceutical Dimensions operates as a reverse distributor of pharmaceutical products. Reverse distributors receive potentially credible hazardous waste pharmaceuticals (both prescription and non-prescription potentially credible hazardous waste pharmaceuticals) from healthcare facilities to determine if credit can be issued and manages the waste for disposal at a permitted treatment, storage, or disposal facility (TSDF) or manages the waste to be destined for another reverse distributor. This facility only sends hazardous waste pharmaceuticals to TSDFs. The facility also receives non-hazardous waste pharmaceuticals. Facility personnel stated that they disposed of hazardous and non-hazardous pharmaceutical waste and related packing by incineration. The facility relocated to the current location and notified as a Large Quantity Generated (LQG) on January 29, 2020. Hazardous Waste Section staff explained that potentially credible hazardous waste pharmaceuticals are managed under 40 CFR 266 Subpart P and not 40 CFR 262.17. Based on the information provided by the facility, the facility was operating as a reverse distributor under 40 CFR 266 Subpart P and a Very Small Quantity Generator (VSQG) during the June 2, 2021, CAV and the January 10, 2022, CEI. The facility has failed to notify as a reverse distributor, as defined in 40 CFR 266.500.

On January 10, 2022, Daniel Girdner and Heather Goldman with NCDEQ, met Michael Deason, Owner, and Tim McQueen, Contractor, at the site for a CEI inspection. Mr. Deason explained that he had been out of the daily operations of the business prior to September 2021, but since then had returned to the business operation.

Accumulation Areas (AAs) – The facility has one AA where it accumulates evaluated hazardous waste pharmaceuticals, located between warehouse shelves in the area behind the offices, in the southwest corner of the warehouse. At the time of inspection, there were eight (8) containers of hazardous waste pharmaceuticals in the AA. The hazardous waste containers observed in the AA during the June 2, 2021 site visit were still onsite, accumulating on pallets. The oldest date observed on the hazardous waste containers in the AA was May 24, 2021. The containers were all clean, closed, had adequate aisle space, and were observed as follows:

- One (1) 5-gallon container. Labeled as “Hazardous Waste Pharmaceutical”, “Waste Flammable Liquid, ethanol, tinctures, coal tar extracts”; D001; dated 5/26/2021, with a flammable placard.
- One (1) 55-gallon container. Labeled as “Hazardous Waste Pharmaceutical”, “Waste Aerosols”; D001; dated 5/24/2021, with a flammable gas placard.
- One (1) 5-gallon container. Labeled as “Hazardous Waste Pharmaceutical”, “Waste Flammable Liquid, ethyl alcohol, Isopropyl/ Tinctures”; D001; dated 5/24/2021, with a flammable liquid placard.
- One (1) 55-gallon container. Labeled as “Hazardous Waste Pharmaceutical”, “Waste Toxic Solid Organic (warfarin cyclophosphamide)”; P042, U058; dated 5/24/2021, with a toxic placard.
- One (1) 5-gallon container. Labeled as “Hazardous Waste”, “Waste Flammable Solid Organic (Camphor, Sulfur)”; D001; dated 7/30/2021, with a flammable solid placard.
- One (1) 5-gallon container. Labeled as “Hazardous Waste”, “Waste Corrosive Liquid, (Acetic Acid, Lactic Acid)”; D002; dated 8/20/2021, with a corrosive placard.
- One (1) 10-gallon container. Labeled as “Hazardous Waste Pharmaceutical”, “Waste Toxic Solid Organic (Epinephrine, Warfarin)”; P042, P001; dated 6/8/2021, with a toxic placard.
- One (1) 5-gallon container. Labeled as “Hazardous Waste Pharmaceutical”, “Waste Oxidizing Solid (Potassium Nitrate, Sodium Nitrate, Silver Nitrate”; D001, D011; dated 5/24/2021, with an oxidizing

placard.

Of these containers, there were three (3) 5-gallon, one (1) 10-gallon, and two (2) 55-gallon containers of hazardous waste pharmaceuticals that had exceeded the 180-day accumulation time limit. Mr. Deason explained that shipping the hazardous waste pharmaceuticals offsite was a top priority as soon as funding became available.

Potentially Credible Hazardous Waste Pharmaceuticals – An inventory of all the potentially credible hazardous waste pharmaceuticals and evaluated hazardous waste pharmaceuticals that were accumulated onsite, as required by 40 CFR 266.510(a)(2), was requested on the day of the inspection, January 10, 2022, by e-mail on January 19, 2022 and January 26, 2022, and over the phone on January 27, 2022. No inventory has been provided to the Section.

There were approximately one hundred thirty-five (135) boxes, ranging in size up to 10-gallons, observed nearest to the roll-up door where incoming boxes were staged. Mr. Deason explained that these containers had not been entered into their system, nor evaluated, and thus there would not be an inventory available for these materials. Some boxes had dates hand-written on them to indicate received dates used for sorting. There were fifty-one (51) boxes in the receiving area that were dated with a received date between September 14, 2021, to January 7, 2022 and eighty-four (84) boxes where a receive date was not visible. Receive dates for incoming boxes and number of boxes dated as such are in the table below. The facility failed to inventory forty-two (42) of the fifty-one (51) dated boxes, with received dates between September 14, 2021, and December 27, 2021, within thirty (30) calendar days of receipt. It is unclear how long the eighty-four (84) undated boxes had been onsite.

There were approximately one hundred twenty-eight (128), 8-gallon flip top lid containers staged toward the center of the warehouse that as Mr. Deason explained, had been evaluated and needed to be sorted. He was waiting on the manufacturer to give credit or staff to sort the container contents. The date of evaluation for the hazardous waste pharmaceuticals accumulating in these containers was not provided. This area was not being managed as an accumulation area for hazardous waste pharmaceuticals. Of these containers, there were forty-nine (49) that had a received date that was included on a printed label, and seventy-nine (79) containers where a date was not visible. Each of the forty-nine (49) containers had been onsite over 30-days, but less than 180-days. The facility failed to manage evaluated hazardous waste pharmaceuticals in compliance with 40 CFR 266.510(c).

There were twenty-six (26) approximately 8-gallon flip top containers staged up against the controlled substances cage that Mr. Deason explained were to be evaluated. The containers had a received date of August 2, 2021 through January 5, 2022. On the day of inspection, twenty-five (25) of these containers had exceeded the 30-day evaluation time limit for potentially credible hazardous waste pharmaceuticals. The facility failed to inventory twenty-five (25) boxes, with received dates between August 2, 2021, and November 23, 2021, within thirty (30) calendar days of receipt.

When inspectors inquired on which of these containers held hazardous waste Pharmaceuticals, Mr. Deason confirmed that any of them could contain hazardous waste pharmaceuticals as they had not been sorted yet, and was unable to provide this information. There were other flip top containers that Mr. Deason explained were “returnable” to the manufacturer, and as such they were not evaluated as part of this inspection.

Statutory and Regulatory Background,

A. 40 CFR 261.l(a), adopted by reference at 15A NCAC 13A .0106(a), identifies those solid wastes which are subject to regulation as hazardous wastes under parts 262 through 265, 268, and parts 270, 271, and 124 of this Chapter and which are subject to the notification requirements of Section 3010 of RCRA.

B. 40 CFR 261.2(b), adopted by reference at 15A NCAC 13A .0106(a), states that materials are solid waste if they are abandoned by being [1] disposed of; or [2] burned or incinerated; or [3] accumulated, stored, or treated (but not recycled) before or in lieu of being abandoned by being disposed of, burned, or incinerated.

C. 40 CFR 261.3(a), adopted by reference at 15A NCAC 13A .0106(a), states that a solid waste, as defined in Section 261.2 is a hazardous waste if:

1. It is not excluded from regulation as a hazardous waste under Section 261.4(b); and

2. It meets any of the following criteria:

   i. It exhibits any of the characteristics of hazardous waste identified in Subpart

   ii. It is listed in Subpart D and has not been excluded from the lists in Subpart D under Sections 260.20, and 260.22 of this chapter.

   iii. It is a mixture of solid waste and hazardous waste that is listed in Subpart D solely because it exhibits one or more of the characteristics of hazardous waste identified in Subpart C, unless the resultant mixture no longer exhibits any characteristic of hazardous waste identified in Subpart C.

   iv. It is a mixture of solid waste and one or more hazardous wastes listed in Subpart D and has not been excluded from this paragraph under Sections 260.20 and 260.22 of this chapter.

D. NCGS 130A-290(6), defines "Disposal" as the discharge, deposit, injection, dumping, spilling, leaking or placing of any solid waste into or on any land or water so that the solid waste or any constituent part of the solid waste may enter the environment or be emitted into the air or discharged into any waters, including groundwater.

E. 40 CFR 124.2, adopted by reference at 15A NCAC 13A .0105(a) defines "Owner" or "Operator" as the owner or operator of any "facility or activity" subject to regulation under the RCRA program.

F. NCGS 130A-290(22), defines "Person" as an individual, corporation, company, association, partnership, unit of local government, State agency, federal agency or other legal entity.

G. NCGS 130A-290(41), defines "Storage" as the containment of solid waste, either on a temporary basis or for a period of years, in a manner which does not constitute disposal.

H. NCGS 130A-290(42), defines "Treatment" as means any method, technique or process, including neutralization, designed to change the physical, chemical or biological character or composition of any hazardous waste so as to neutralize such waste or so as to render such waste non-hazardous, safer for transport, amenable for recovery, amenable for storage or reduced in volume. "Treatment" includes any activity or processing designed to change the physical form or chemical composition of hazardous waste so as to render it non-hazardous.

I. 40 CFR 260.10, adopted by reference in 15A NCAC .0102(b), defines a "Generator" as any person, by site, whose act or process produces hazardous waste identified or listed in part 261 or whose act first causes a hazardous waste to become subject to regulation.

J. 40 CFT 266.500, adopted by reference in 15A NCAC .0111(g), defines "evaluated hazardous waste pharmaceutical" as a prescription hazardous waste pharmaceutical that has been evaluated by a reverse distributor in accordance with § 266.510(a)(3) and will not be sent to another reverse distributor for further evaluation or verification of manufacture credit.

K. 40 CFT 266.500, adopted by reference in 15A NCAC .0111(g), defines "Hazardous waste pharmaceutical*"* as a pharmaceutical that is a solid waste, as defined in § 261.2, and exhibits one or more characteristics identified in part 261 subpart C or is listed in part 261 subpart D. A pharmaceutical is not a solid waste, as defined in § 261.2, and therefore not a hazardous waste pharmaceutical, if it is legitimately used/reused (*e.g.*, lawfully donated for its intended purpose) or reclaimed. An over-the-counter pharmaceutical, dietary supplement, or homeopathic drug is not a solid waste, as defined in § 261.2, and therefore not a hazardous waste pharmaceutical, if it has a reasonable expectation of being legitimately used/reused (*e.g.*, lawfully redistributed for its intended purpose) or reclaimed.

L. 40 CFT 266.500, adopted by reference in 15A NCAC .0111(g), defines "Potentially creditable hazardous waste pharmaceutical*"* as a prescription hazardous waste pharmaceutical that has a reasonable expectation to receive manufacturer credit and is -

(1) In original manufacturer packaging (except pharmaceuticals that were subject to a recall);
(2) Undispensed; and
(3) Unexpired or less than one year past expiration date. The term does not include evaluated hazardous waste pharmaceuticals or nonprescription pharmaceuticals including, but not limited to, over-the-counter drugs, homeopathic drugs, and dietary supplements.

M. 40 CFT 266.500, adopted by reference in 15A NCAC .0111(g), defines "Reverse distributor" as any person that receives and accumulates prescription pharmaceuticals that are potentially creditable hazardous waste pharmaceuticals for the purpose of facilitating or verifying manufacturer credit. Any person, including forward distributors, third-party logistics providers, and pharmaceutical manufacturers, that processes prescription pharmaceuticals for the facilitation or verification of manufacturer credit is considered a reverse distributor.

Violations Requiring Immediate Action

It is the determination of the Section that the storage of hazardous waste pharmaceuticals constitutes the storage of solid/hazardous waste subject to all applicable requirements of 40 CFR Part 261 through Part 279, incorporated by reference in 15A NCAC 13A .0106 through .0119.

A. 40 CFR 266.510(a)(2), adopted by reference at 15A NCAC 13A .0111(g), states that a reverse distributor may accept potentially creditable hazardous waste pharmaceuticals from off site and accumulate potentially creditable hazardous waste pharmaceuticals or evaluated hazardous waste pharmaceuticals on site without a hazardous waste permit or without having interim status, provided that it complies with the following conditions:

(a) *Standards for reverse distributors managing potentially creditable hazardous waste pharmaceuticals and evaluated hazardous waste pharmaceuticals* –

(2) Inventory by the reverse distributor. A reverse distributor must maintain a current inventory of all the potentially creditable hazardous waste pharmaceuticals and evaluated hazardous waste pharmaceuticals that are accumulated on site.

Pharmaceutical Dimensions, Inc., is in violation of this regulation in that the facility failed to provide an inventory of all the potentially credible hazardous waste pharmaceuticals and evaluated hazardous waste pharmaceuticals that were accumulated onsite. The inventory was requested on the day of the inspection, January 10, 2022, by e-mail on January 19, 2022 and January 26, 2022, and over the phone on January 27, 2022. No inventory has been provided to the Section.

B. 40 CFR 266.510(a)(3), adopted by reference at 15A NCAC 13A .0111(g), states that a reverse distributor may accept potentially creditable hazardous waste pharmaceuticals from off site and accumulate potentially creditable hazardous waste pharmaceuticals or evaluated hazardous waste pharmaceuticals on site without a hazardous waste permit or without having interim status, provided that it complies with the following conditions:

(a) *Standards for reverse distributors managing potentially creditable hazardous waste pharmaceuticals and evaluated hazardous waste pharmaceuticals* –

(3) Evaluation by a reverse distributor that is not a manufacturer. A reverse distributor that is not a pharmaceutical manufacturer must evaluate a potentially creditable hazardous waste pharmaceutical within 30 calendar days of the waste arriving at the reverse distributor to establish whether it is destined for another reverse distributor for further evaluation or verification of manufacturer credit or for a permitted or interim status treatment, storage, or disposal facility.

Pharmaceutical Dimensions, Inc., is in violation of this regulation in that the facility failed to evaluate potentially creditable hazardous waste pharmaceuticals within thirty (30) calendar days. There were fifty-one (51) boxes, ranging in size up to 10-gallons, in the receiving area

that were dated with a received date between September 14, 2021, to January 7, 2022, and eighty-four (84) boxes, ranging in size up to 10-gallons, where a receive date was not visible. Forty-two (42) of the fifty-one (51) dated boxes had not been evaluated within thirty (30) calendar days of receipt. It is unclear how long the eighty-four (84) undated boxes had been onsite.

There were twenty-six (26) approximately 8-gallon flip top containers staged up against the controlled substances cage that Mr. Deason explained were to be evaluated. On the day of inspection, twenty-five (25) of these containers had exceeded the 30-day evaluation time limit for potentially credible hazardous waste pharmaceuticals.

C. **40 CFR 266.510(a)(5)(i), adopted by reference at 15A NCAC 13A .0111(g),** states that that a reverse distributor may accept potentially creditable hazardous waste pharmaceuticals from off site and accumulate potentially creditable hazardous waste pharmaceuticals or evaluated hazardous waste pharmaceuticals on site without a hazardous waste permit or without having interim status, provided that it complies with the following conditions:

(a) *Standards for reverse distributors managing potentially creditable hazardous waste pharmaceuticals and evaluated hazardous waste pharmaceuticals* –

(5) *Maximum accumulation time for hazardous waste pharmaceuticals at a reverse distributor.*

(i) a reverse distributor may accumulate potentially creditable hazardous waste pharmaceuticals and evaluated hazardous waste pharmaceuticals on site for 180 calendar days or less. The 180 days start after the potentially creditable hazardous waste pharmaceutical has been evaluated and applies to all hazardous waste pharmaceuticals accumulated on site, regardless of whether they are destined for another reverse distributor (*i.e.,* potentially creditable hazardous waste pharmaceuticals) or a permitted or interim status treatment, storage, or disposal facility (*i.e.,* evaluated hazardous waste pharmaceuticals).

Pharmaceutical Dimensions, Inc., is in violation of this regulation in that the facility exceeded the 180-day accumulation time limit of evaluated hazardous waste pharmaceuticals. There were three (3) 5-gallon, one (1) 10-gallon, and two (2) 55-gallon containers that had exceeded the 180-day accumulation time limit in the accumulation area, as observed on January 10, 2022. These containers were dates as 5/24/2021, 5/24/2021, 5/26/2021, 6/8/2021, 5/24/2021, and 5/24/2021 respectively.

D. **40 CFR 266.510(d)(1), adopted by reference at 15A NCAC 13A .0111(g),** states that a reverse distributor may accept potentially creditable hazardous waste pharmaceuticals from off site and accumulate potentially creditable hazardous waste pharmaceuticals or evaluated hazardous waste pharmaceuticals on site without a hazardous waste permit or without having interim status, provided that it complies with the following conditions:

(d) *When a reverse distributor must have a permit.* A reverse distributor is an operator of a hazardous waste treatment, storage, or disposal facility and is subject to the requirements of 40 CFR parts 264, 265, and 267 and the permit requirements of 40 CFR part 270, if the reverse distributor:

(1) Does not meet the conditions of this section;

Pharmaceutical Dimensions, Inc., is in violation of this regulation in that the facility exceeded the 180-day accumulation time limit of evaluated hazardous waste pharmaceuticals. There were three (3) 5-gallon, one (1) 10-gallon, and two (2) 55-gallon containers that had exceeded the 180-day accumulation time limit in the accumulation area, as observed on January 10, 2022. These containers were dates as 5/24/2021, 5/24/2021, 5/26/2021, 6/8/2021, 5/24/2021, and 5/24/2021 respectively. Based on the fact that the facility exceeded 180-day accumulation time limit of six (6) containers of hazardous waste pharmaceuticals, it has been determined that the facility is operating without a permit.

E. 270.10(a)(3), adopted by reference at 15A NCAC 13A .0113(b), Applying for a permit. Below is information on how to obtain a permit and where to find requirements for specific permits:

(3) If you are required to have a permit (including new applicants and permittees with expiring permits), you must complete, sign, and submit an application to the Director, as described in this section and §§ 270.70 through 270.73.

Pharmaceutical Dimensions, Inc., is in violation of this regulation in that hazardous waste has been stored without obtaining a hazardous waste management permit. Based on the fact that the facility exceeded 180-day accumulation time limit of six (6) containers of hazardous waste pharmaceuticals, it has been determined that the facility is operating without a permit.

F. 15A NCAC 13A .0109(a), states that any person who treats, stores, or disposes of hazardous waste shall comply with the requirements set forth in this Section. The treatment, storage, or disposal of hazardous waste is prohibited except as provided in this Section.

Pharmaceutical Dimensions, Inc., is in violation of this regulation in that hazardous waste has been stored without complying with the requirements set forth in 40 CFR 264, adopted by reference in 15A NCAC 13A .0109(a). Based on the fact that the facility exceeded 180-day accumulation time limit of six (6) containers of hazardous waste pharmaceuticals, it has been determined that the facility is operating without a permit.

Compliance Schedule

Pharmaceutical Dimensions, Inc., shall comply with the following requirements:

1. Comply with 40 CFR 266.510(a)(2), adopted by reference at 15A NCAC 13A .0111(g). Pharmaceutical Dimensions, Inc., shall compile and provide a current inventory of all potentially credible hazardous waste pharmaceuticals and evaluated hazardous waste pharmaceuticals that are accumulated onsite, including quantities to the Section. This inventory shall also include the quantity and disposition of potentially credible hazardous waste pharmaceuticals and evaluated hazardous waste pharmaceuticals that were onsite during the January 10, 2022 site visit that are no longer being accumulated onsite. This inventory shall be provided to Dan Girdner at Daniel.girdner@ncdenr.gov or PO Box 632, McLeansville, NC 27301, **within 15 calendar days of receiving this Notice.**

2. Comply with 40 CFR 266.510(a)(3), adopted by reference at 15A NCAC 13A .0111(g). Pharmaceutical Dimensions, Inc., shall evaluate all potentially credible hazardous waste pharmaceuticals that have been onsite over 30-days and manage them in accordance with 40 CFR 266.510(b) or (c). The evaluation shall be completed and an updated inventory demonstrating the completed evaluation must be submitted to Dan Girdner at Daniel.girdner@ncdenr.gov or PO Box 632, McLeansville, NC 27301, **within 15 calendar days of receiving this Notice**. If the hazardous waste pharmaceutical has been onsite greater than 210 days, then this waste must be removed from the property and sent to another reverse distributor or a permitted or interim status treatment, storage, or disposal facility, as applicable and as required by Compliance Schedule Item 3.

3. Comply with 40 CFR 266.510(a)(5)(i), adopted by reference at 15A NCAC 13A .0111(g). Pharmaceutical Dimensions, Inc., shall remove all hazardous waste pharmaceuticals that have been onsite longer than 210 days, regardless if they are destined for another reverse distributor or a permitted or interim status treatment, storage, or disposal facility. 210 days is reflective of the time limits provided in 40 CFR 266 for the management of hazardous waste pharmaceuticals: 30-days for evaluation and 180-days accumulation time limit. Documentation, as required by 40 CFR 266.510(b)(4) and/or as required by 40 CFR 266.510(c)(6), demonstrating the hazardous waste pharmaceuticals have been shipped offsite must be provided to Dan Girdner at Daniel.girdner@ncdenr.gov or PO Box 632, McLeansville, NC 27301, **within 30-days of receiving this Notice.**

4. Comply with 40 CFR 266.510(a)(1)(i), adopted by reference at 15A NCAC 13A .0111(g). Prior to shipment of any hazardous waste, Pharmaceutical Dimensions, Inc., must update the facility's hazardous waste generator category, and subsequent notification must be submitted. You may contact Ms. Melodi Deaver with this office at (919) 707-8204 to make provisions for updating the facility's hazardous waste generator status and information.

5. Comply with l5A NCAC 13A .0109(a). Pharmaceutical Dimensions, Inc., shall no longer treat, store or dispose of hazardous waste without full compliance with this section. Pending shipment of hazardous waste for proper disposal, Pharmaceutical Dimensions, Inc., must comply with all applicable reverse distributor regulations found in 40 CFR Part 266 Subpart P, adopted by reference at 15A NCAC 13A .0111(g).

Potential Consequences of Failure to Comply

You must comply with each requirement of this Immediate Action Notice of Violation (IANOV); however, compliance will not divest the Section of its authority to issue an administrative penalty for the violations cited in this IANOV and additional violations cited in a subsequent Compliance Order with Administrative Penalty. In accordance with NCGS 130A-22(a), the penalty shall not exceed thirty-two thousand five hundred dollars ($32,500.00) per day in the case of a first violation. Each day of a continuing violation shall constitute a separate violation.

Pursuant to NCGS 130A-18, a violation of any provision of the Act or the Rules may also result in the Section initiating an action for injunctive relief. If an injunction is obtained, you will be subject to both the civil and criminal contempt powers of the North Carolina General Courts of Justice.

If you should have questions concerning the issuance of this IANOV, you may contact Dan Girdner at (919) 621-7747 or Daniel.Girdner@ncdenr.gov.

Sincerely,

Adam Ulishney Digitally signed by Adam Ulishney
Date: 2022.03.01 08:55:42 -05'00'

Adam Ulishney, Hazardous Waste Section Chief
Division of Waste Management

ec/cc: Tim McQueen, Pharmaceutical Dimensions, tmcqueen@ozonewastesolutions.com
GSO West, LLC, PO Box 3176, Raleigh, NC 27622
Heather Goldman – Hazardous Waste Eastern Regional Compliance Supervisor
Brent Burch – Compliance Branch Head, Hazardous Waste Section
Ken Rhame – EPA Region 4
John Patrone – Program Coordinator, Solid Waste Section
Central Office Files