

EXHIBIT 3

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5401 Longley Lane, Ste 5, Reno, NV 89511 / P 775.242.3200 / trinityconsultants.com

SCANNED INTO ONBASE

DATE: 4/9/2026

April 2, 2026

Jonathan Zittel, P.E.
Permitting Branch Supervisor
Bureau of Sustainable Materials Management
Nevada Division of Environmental Protection
901 S Stewart St, Suite 4001
Carson City, NV 89701
jzittel@ndep.nv.gov

RE: Revised Application (v7.0) for the MediWaste Medical Waste Treatment Facility, Nye County, Permit #SW1900REV00. Comments on Application v7.0.

Dear Mr. Zittel:

Please find below MediWaste's responses to comments provided in the Revised Application (v7.0) for the MediWaste Medical Waste Pyrolysis Treatment Facility, Nye County, Permit #SW1900REV00. We have also included attachments and the revised permit application for your review.

The Nevada Division of Environmental Protection – Bureau of Sustainable Materials Management (NDEP-BSMM) received the revised draft application on January 14, 2026, which was prepared by Trinity Consultants on behalf of MediWaste Disposal LLC. NDEP-BSMM has requested that a revised application addressing their comments be provided by April 3, 2026.

The response below, submitted by Trinity Consultants on behalf of MediWaste, includes specific references to the information requested for the revised application to assist the NDEP-BSMM in completing the issuance of the draft approval.

MEDIWASTE RESPONSE

Included below is the requested additional information (NDEP requested information identified in italics) and response below provided by MediWaste.

1. Fire Suppression Plan

NDEP Comment:

- a. In section "7.2 Fire Suppression", the application states that Building 1 is outfitted with a sprinkler system, but there is no mention of a sprinkler system or other fire suppressing system within Building 2 – where the 7 pyrolysis units are housed. Please clarify whether the fire suppression system in place or to be designed for Building 2.

MediWaste Response: *The location of fire suppression systems was mistakenly noted as being in Building 1. The fire sprinkler system is located in Building 2 where the pyrolysis unit are housed. The revised application with this correction in section 7.2 is attached.*

HEADQUARTERS

12700 Park Central Dr, Ste 600, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.365.9203

2. Schedule of Compliance Items – Financial Assurance

NDEP Comment:

- a. The NDEP-BSMM is placing the Financial Assurance matter as schedule of compliance (SOC) items inside the permit under Section "G Compliance Schedule" of the DRAFT Permit attached.

MediWaste Response: *Understood, MediWaste will comply with the Compliance Schedule requirements outlined in the DRAFT permit for Financial Assurance.*

3. Schedule of Compliance Items – Ash Sampling Frequency Plan

NDEP Comment:

- a. The NDEP-BSMM requires that MediWaste submit an Ash Sampling Frequency Plan, such as the one submitted in the v5.0 Application from MediWaste.
- b. For guidance regarding the SOC item, the NDEP-BSMM requires that any retention sample cannot be combined with other retention samples and then statistically sampled together to obtain a potentially diluted representative sample. Each retention sample must be tested individually from each pyrolysis processing unit. If any retention sample that is tested or retested contains hazardous constituents, or is characteristically hazardous per 40 CFR 261.3(a), please describe how MediWaste will ensure proper disposal of the hazardous waste. Furthermore, please describe how MediWaste will prevent comingling of hazardous waste pyrolysis batches with solid waste batches, per 40 CFR 261.3(a) and 40 CFR 261.3(b).
- c. Please see an example of a sampling frequency plan drafted by the NDEP-BSMM below in Table 1.

Table 1. Hydrated Ash Waste Sampling Schedule Per Pyrolysis Unit (TBD)

Stage	Sampling Frequency	Duration*	Reporting
I	Twice Daily (once per 12 hours)	One Week (7 days, 14 samples minimum)	Once the results for a stage are available, a report including the sampling results and analysis will be submitted to the NDEP-BSMM within fourteen (14) business days of receipt.
II	Weekly	Three (3) months	
III	Monthly	Three (3) months	
IV	Quarterly	5 years (20 quarters)	
V	After the first 5 years, the sample frequency will be discussed with the authority.		

*Sample frequency and duration are minimums

Any exceedances of permitted hazardous waste limits in a sample will revert the facility back to the previous stage and sampling frequency.

MediWaste Response: *MediWaste has included a draft Ash Sampling Frequency Plan with the revised application. The Ash Sampling plan has been discussed with Jeffrey Kinder and Annalyn Settlemeyer from NDEP; they determined the methodology was sufficient to properly characterize the ash stream and manage the material in a manner that is protective of human health and the environment.*

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If you have any questions or comments about the information presented in this letter, please do not hesitate to call me at (720) 879-1670 or Ryan Oganessian at (714) 401-3327.

Sincerely,

TRINITY CONSULTANTS



Jenna Kube  
Senior Consultant

Attachments

cc: Ryan Oganessian, MediWaste  
Fortunato Villamagna, Vulcan Systems  
Matthew Tarnoff, Trinity Consultants, Inc.  
Christian Pineda, NDEP

## **Attachment 1: Revised MediWaste Application**