

Healthcare Environmental Compliance

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Common Hospital Hazardous Waste Violations/Issues

- Labeling of hazardous waste (HW) not done or incorrect
- Not conducting proper weekly inspections of HW storage
- Improper disposal of chemotherapy drugs
- HW determinations not done or incorrect
- No or inadequate HW manifests
- Throwing HW down the drain
- Improper management of expired pharmaceuticals, paints, etc.



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Common Hospital Hazardous Waste Violations/Issues (Cont'd)

- Lack of contingency plan
- Lack of or inadequate training for employees in HW management
- Failure to ensure that HW meets Land Disposal Restriction
- Failure to upgrade or close underground storage tanks (USTs) by 12/22/1998
- Improper consolidation of wastes from nearby facilities



Common Errors Made in Waste Identification

- Waste generation process not described
- Test methods not identified
- Sampling methods not specified
- Field and laboratory QA/QC not identified
- Proper conversion factors not used
- Representative sample not obtained



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Common Errors Made in Waste Identification (Cont'd)

- Failure to reevaluate after process change
- Failure to properly evaluate newly generated wastes
- Failure to evaluate all waste streams
- Failure to take advantage of variances, exemptions, or policies that could result in reduced regulatory requirements



Universal Waste Rule

- EPA finalized the Universal Waste Rule on May 11, 1995
 - ✓ Done to streamline recycling efforts for commercial and industrial groups. Exempts hazardous wastes that are generated domestically as well
 - ✓ Universal wastes are not regulated under full RCRA Subpart C, but rather by streamlined Universal Waste Rules (40 CFR 273)
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Universal Waste Rule (Cont'd)

- The universal waste rule exempts the following:
 - ✓ Hazardous waste batteries
 - ✓ Hazardous waste thermostats (mercury containing thermostats)
 - ✓ Certain lamps
 - ✓ Certain hazardous waste pesticides
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Universal Waste Rule (Cont'd)

- States have autonomy when it comes to the Universal Waste Rule:
 - ✓ States do not have to adopt it
 - ✓ States can add or remove wastes
 - ✓ States can also have more stringent requirements
 - ✓ NY uses federal guidelines for Universal Waste
 - ✓ NJ has state guidelines for Universal Waste Rule and includes computer monitors (CRTs) as universal wastes
 - ✓ Federal rule applies in VI
 - ✓ PR has not adopted the Universal Waste Rule
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Examples of Hospital Universal Waste

- Nickel cadmium or sealed lead-acid batteries found in
 - ✓ Electronic equipment
 - ✓ Mobile phones
 - ✓ Laptop computers
 - ✓ Emergency backup lighting
- Mercury-containing thermostats
- Lamps that have a hazardous component
 - ✓ Fluorescent lights
 - ✓ High intensity discharge lamps
 - ✓ Neon lamps
 - ✓ Mercury vapor lamps
 - ✓ High pressure sodium lamps
 - ✓ Metal halide lamps



Proposed Rule

- Proposed rule - June 12, 2002
- Exclusion from the definition of solid waste, which would streamline RCRA management requirements for used CRTs and glass removed from CRTs sent for recycling
- Also sought comment on streamlining management requirements for used mercury-containing equipment by adding it to the federal list of universal wastes
- <http://www.epa.gov/epaoswer/hazwaste/recycle/electron/crt.htm>



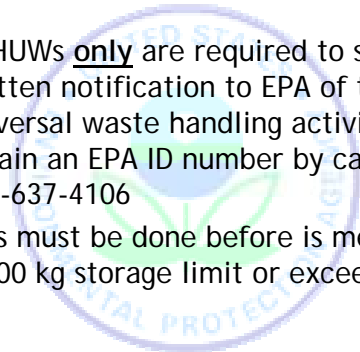
Types of Universal Waste Handlers

- Small (500 kg or less) mobile waste handlers
- Large (more than 500 kg) mobile waste handlers or stationary QHUs



EPA ID Number & Notification

- LQHUWs only are required to send a written notification to EPA of their universal waste handling activities and obtain an EPA ID number by calling 212-637-4106
- This must be done before is met the 5,000 kg storage limit or exceeded



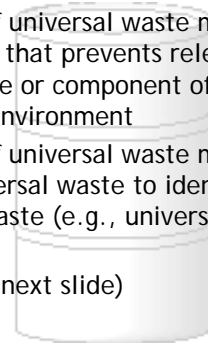
Notification includes:

- Statement indicating that the facility is a LQHUW
- Name, physical and mailing address of facility
- Name and business phone number of person responsible for managing universal waste at facility
- List of all types and quantities of universal waste managed by the facility (e.g. batteries, pesticides, thermostats, lamps)



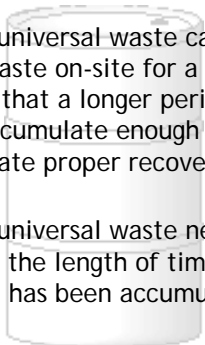
Proper Management

- All handlers of universal waste must manage them in a way that prevents releases of the universal waste or component of universal waste to the environment
 - All handlers of universal waste must mark or label the universal waste to identify the type of universal waste (e.g., universal waste-batteries)
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Proper Management (Cont'd)

- All handlers of universal waste can only keep the universal waste on-site for a year unless they can prove that a longer period is necessary to accumulate enough universal waste to facilitate proper recovery, treatment or disposal
- All handlers of universal waste need to be able to demonstrate the length of time that the universal waste has been accumulated



Training

- SOHUW must train all employees who handle universal waste about the proper handling and emergency procedures appropriate to the types of universal waste handled at the facility
- LQHUW must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relative to their responsibilities during normal facility operations and emergencies



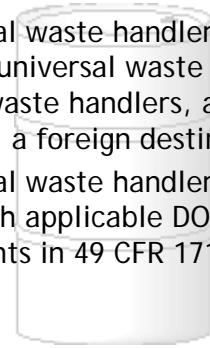
Emergency Response

- All handlers of universal waste must immediately contain all releases of universal waste and other residues from universal waste.
- They must also determine if any material resulting from the release is a hazardous waste and properly handle it as such.



Proper Disposal

- All universal waste handlers can only send their universal waste to other universal waste handlers, a destination facility, or a foreign destination.
- All universal waste handlers need to comply with applicable DOT shipping requirements in 49 CFR 171-180.



Recordkeeping

- LQHUWs only are required to keep records of their shipments of universal waste and, if applicable, any universal waste they receive from other handlers.
- These records may take the form of a log, invoice, manifest, bill of lading, or other shipping document.
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Recordkeeping (Cont'd)

- The record of shipment must include the name and address of the facility to which you are sending the universal waste, the quantity of each type of universal waste sent, and date of shipment.
- The record of receipt must include the name and address of the facility sending you universal waste, the quantity of each type of universal waste received, and the date you received the universal waste.

