Preparing for a Multi-Media Inspection at your Medical Facility

What to expect when an EPA Inspector comes to your door
Outline

• What is a multi-media inspection?

• What are the common environmental problems at medical facilities?

• How can medical facilities improve their environmental performance?
What is a Multi-Media Inspection?

- MMI is an inspection by two or more environmental programs (e.g., air, water, hazardous waste) conducted at the same time or within 6 weeks of each other.
Targeting Multi-Media Inspections

• Facilities are targeted for MMIs based on a number of factors such as past compliance history, complaints, regional/national priorities, significant environmental impacts, and high non-compliance rate in sector.
Standard Operating Procedures for Multi-Media Inspections

- Opening Meeting
- Conduct Site Visit
- End of the day Review Meetings (optional)
- Closing Meeting
- Follow-up Letter
- Enforcement if necessary
6 Ways To Convince An Inspector to Look More Closely

- Bad housekeeping
- Keep us waiting
- Knowledge personnel not available
- Records not readily accessible or organized
- No escorts
- Denial of Entry
6 Ways To Convince An Inspector to Look More Closely

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Air (40 CFR 50-99)

- Air Conditioning/Refrigeration
  [http://www.epa.gov/region02/cfc](http://www.epa.gov/region02/cfc)
- Asbestos
  [http://www.epa.gov/asbestos](http://www.epa.gov/asbestos)
- Boilers/Emergency Generators
- Medical Waste Incinerators
  [http://www.epa.gov/ttn/atw/129/hmiwi/rihmiwi.html](http://www.epa.gov/ttn/atw/129/hmiwi/rihmiwi.html)
- Other (e.g., degreasers, ETO sterilizers, spray booths)
Air Compliance Issues

- Failure to use properly trained and accredited asbestos personnel.
- Failure to notify EPA of asbestos removal projects and keep required documentation/recordkeeping.
- Failure to properly dispose of asbestos debris.
- Failure to close lids on parts washers when not in use.
- Failure to properly handle CFCs and records.
- Failure to include ETO sterilizer, spray paint booth, and parts degreaser in air permit.
Hazardous Waste (40 CFR Parts 260-282)

- Laboratories
- Dental Clinics
- X-rays Units
- Nuclear Medicine Areas
- Pharmacy
- Maintenance Areas
- Physical therapy
- Underground Storage Tanks
- Laundry
- Morgue
- Operating Rooms
- Nursing Units
- Hazardous Waste Storage Areas
- Medical Technology Unit
- Construction Areas
Hazardous Waste Questions

- Did the facility identify all their hazardous waste?
- How much hazardous waste does the facility generate on a monthly basis?
- Is the facility properly managing and disposing of its hazardous waste?
- Is the facility storing hazardous materials safely?
Hazardous Waste Questions

• Are hospital staff adequately trained in hazardous waste management?
• Is the hospital prepared for emergencies?
• Does the hospital have required records?
• Do the hospital’s underground storage tanks have the required corrosion, spill and overfill protection or were closed properly?
Hazardous Waste (HW) Issues

- No/infrequent weekly inspections of HW storage/satellite accumulation areas
- No/improper labeling of HW containers
- Open containers of HW
- No/Incorrect HW manifests
- Improper disposal of HW (e.g., throw fluorescent light bulbs and paints in trash, lab chemicals down drain)
Hazardous Waste (HW) Issues

- Lack of HW management training of employees
- Treating HW without a permit
- Lack of RCRA contingency plan
- Spill control equipment not readily accessible
- Failure to make HW determinations
Hazardous Waste (HW) Issues

- Failure to ensure that HW meets Land Disposal Restrictions
- Failure to upgrade/close underground storage tanks (USTs) by 12/22/98
- Malfunctioning leak detection systems on USTs
Hazardous Waste Environmental Compliance Audit Protocols

- Hazardous Waste Generators
- Used Oil and Universal Waste Generators
- Underground Storage Tanks
- Hazardous Waste Treatment, Storage, and Disposal Facilities
- Facilities Regulated under Subtitle D of RCRA

www.epa.gov/compliance/incentives/auditing/protocol.html
Hazardous Waste Environmental Assistance Resources

• Understanding the Hazardous Waste Rules: A Handbook for Small Businesses

• Hazardous Waste Requirements for Large Quantity Generators
  http://www.epa.gov/region02/waste/public/lqgpdf.pdf

• EPA’s Office of Underground Storage Tanks
  http://www.epa.gov/swerust1/index.htm
Water Regulations (40 CFR Parts 100-136, 460)

- **Wastewater Discharges**
  - NPDES: http://www.epa.gov/npdes
  - UIC: http://www.epa.gov/ogwdw/uic.html

- **Stormwater Discharges**
  - http://cfpub.epa.gov/npdes/home.cfm?program_id=6

- **Oil above ground and underground tanks**
  - http://www.epa.gov/oilspill/index.htm

- **Other (e.g. filtration plants)**
Water Compliance Issues

- No permit for wastewater discharges
- Not complying with permit conditions
- No/inadequate secondary containment of storage tanks/containers
- No SPCC plan
- Floor drains
Other Requirements

- Emergency Planning and Community Right to Know (40 CFR 302, 355, 370, 372)
  http://www.epa.gov/emergencies/content/epcra/index.htm

- Pesticides (40 CFR 150-189)
  http://www.epa.gov/pesticides/

- PCBs (40 CFR Part 761)
  http://www.epa.gov/opptintr/pcb/

www.epa.gov/compliance/incentives/auditing/protocol.html
Violations from Audits

- CAA: 16%
- CWA: 61%
- EPCRA: 12%
- RCRA: 9%
- TSCA: 2%
CAA Violations

- Use Certified CFC Technicians: 47%
- Maintain Leak Rate Records: 28%
- Comply with SIP: 25%
CWA Violations

- Discharge without Permit: 9%
- Effluent Standards: 9%
- SPCC: 82%
EPCRA Violations

- 60% MSDS
- 40% Chemical Inventory
RCRA Violations

- Generator Requirements: 66%
- Identification of HW: 15%
- Universal Waste: 7%
- Manifests: 4%
- Accumulation Time: 5%
- General Facility Standards: 2%
- Container Management: 1%
TSCA Violations

- 93% Lead Paint Disclosures
- 7% PCBs
Environmental Management Systems

• EMS is a set of management processes and procedures that allows an organization to integrate environmental considerations into day-to-day decisions and practices. It provides a framework for managing environmental responsibilities in a more systematic way.

• EPA Region 2’s EMS Website
  http://www.epa.gov/region02/ems
Environmental Auditing

- EPA’s Voluntary Audit Policy
- Audit Agreements
- EPA Region 2’s Auditing Website
  http://www.epa.gov/region02/capp/cip
Pollution Prevention

- Practice Greenhealth
  [http://www.practicegreenhealth.org](http://www.practicegreenhealth.org)

- Environmentally Preferable Purchasing
  [http://www.epa.gov/opptintr/epp](http://www.epa.gov/opptintr/epp)

- EPA Region 2’s P2 Healthcare Website
  [http://www.epa.gov/region02/p2/health.htm](http://www.epa.gov/region02/p2/health.htm)

- Environmental Self-Assessment for Health Care Facilities
  - NY Dept of Environmental Protection