

US EPA ARCHIVE DOCUMENT



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

- Bad housekeeping
- Keep us waiting
- Knowledgeable personnel not available
- Records not readily accessible or organized
- No escorts
- Denial of Entry





Air (40 CFR 50-99)

- Air Conditioning/Refrigeration
<http://www.epa.gov/region02/cfc>
- Asbestos
<http://www.epa.gov/asbestos>
- Boilers/Emergency Generators
- Medical Waste Incinerators
<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
http://www.epa.gov/region02/waste/public/sqg_pdf.pdf
- 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



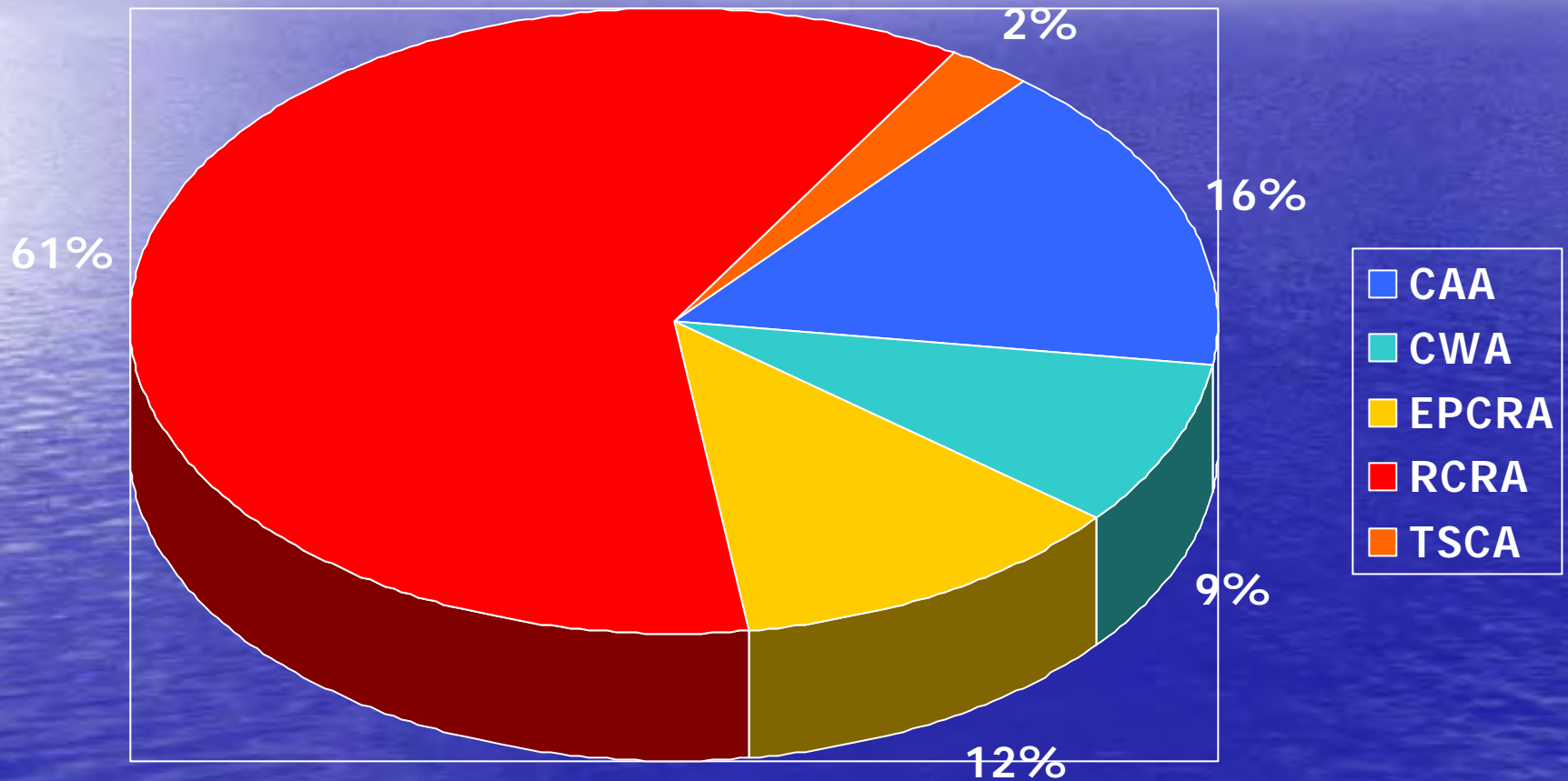
Other Requirements

- 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

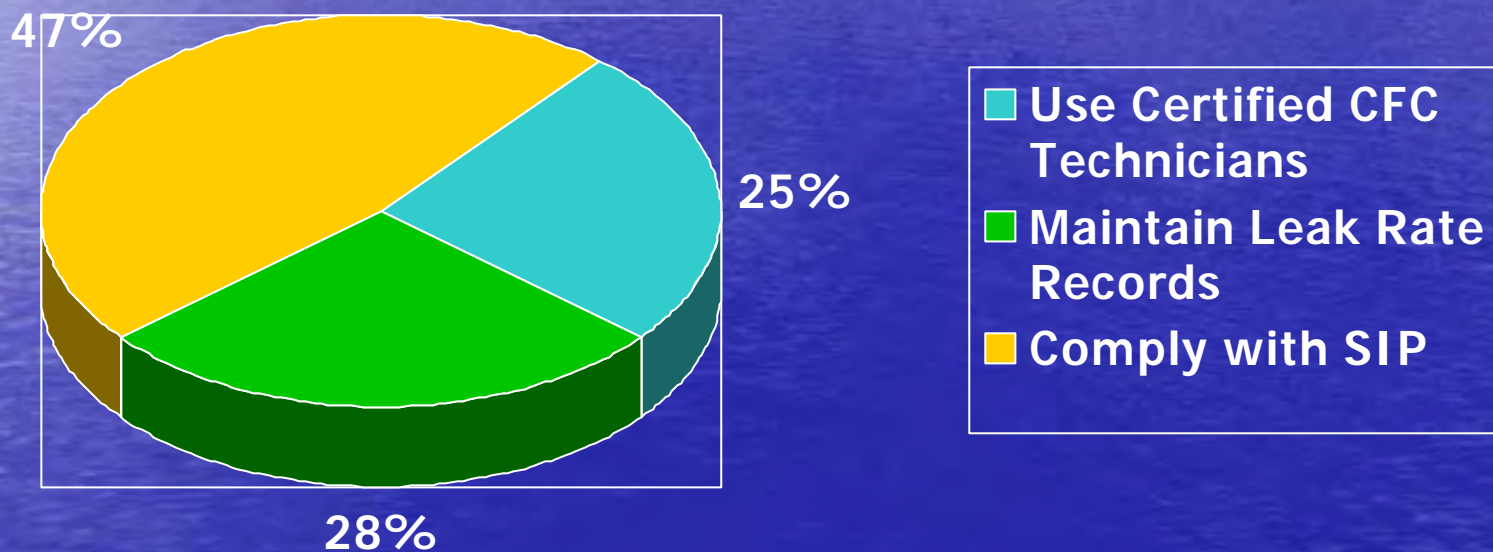


Violations from Audits



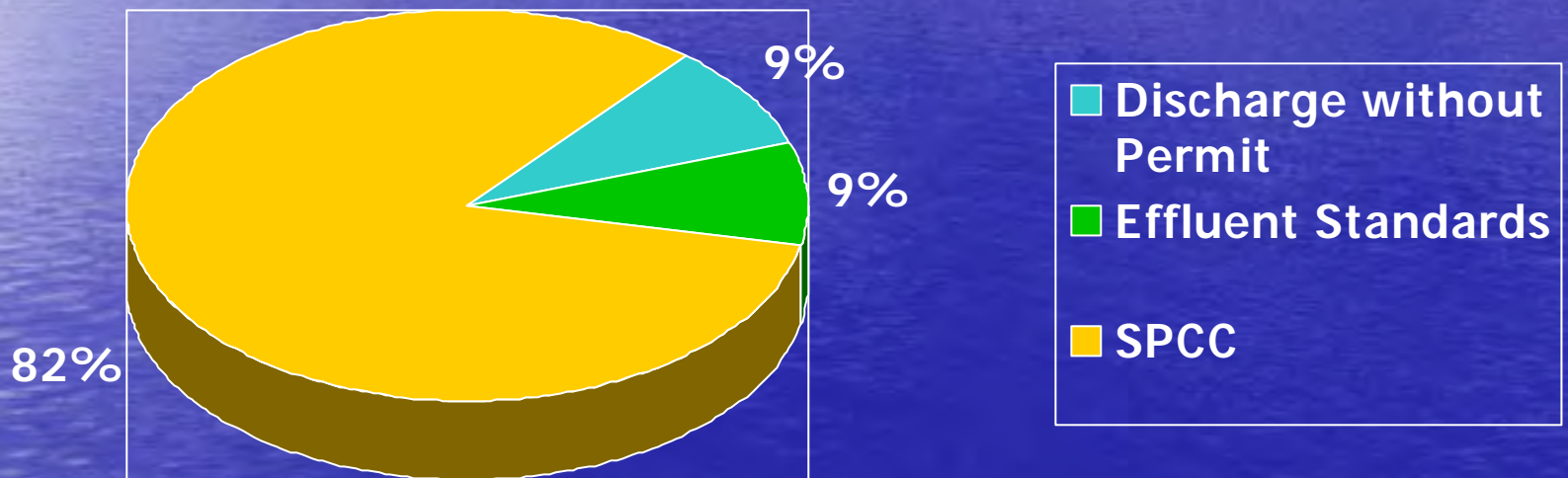


CAA Violations



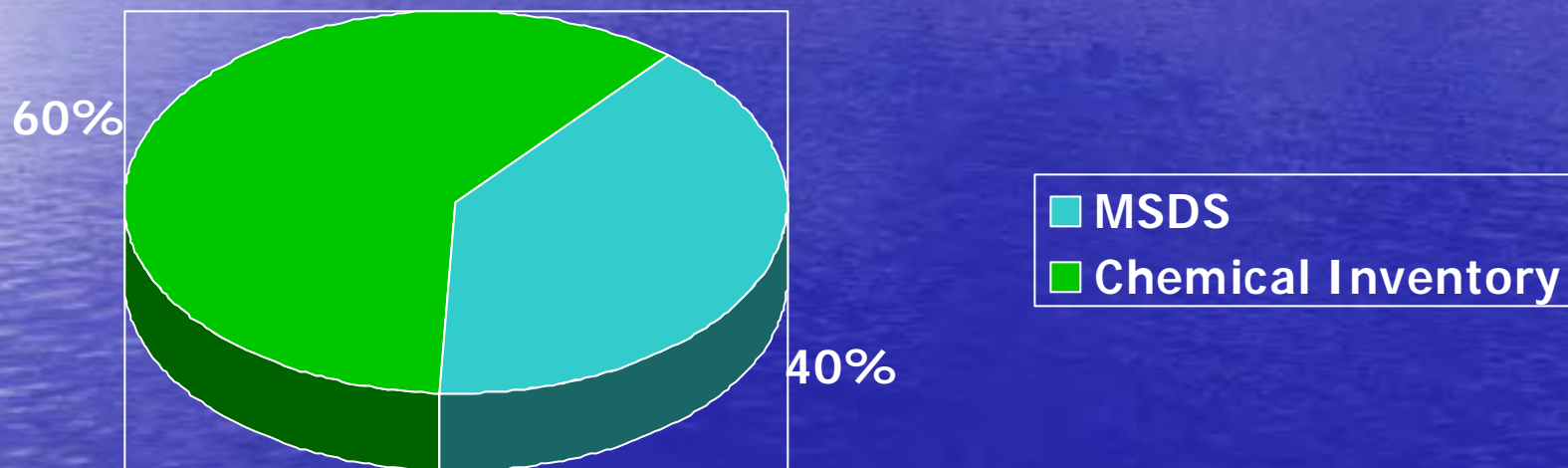


CWA Violations



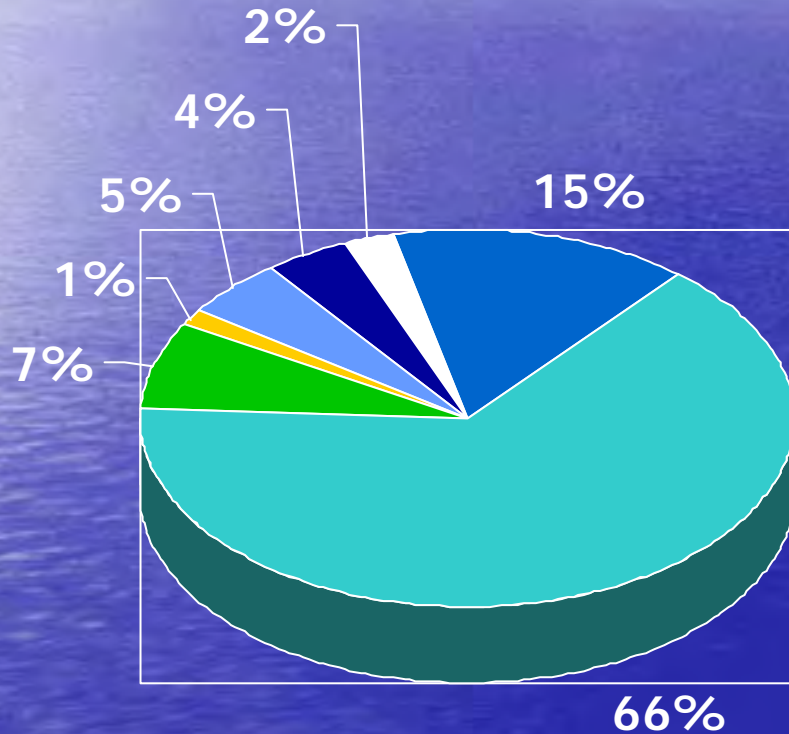


EPCRA Violations





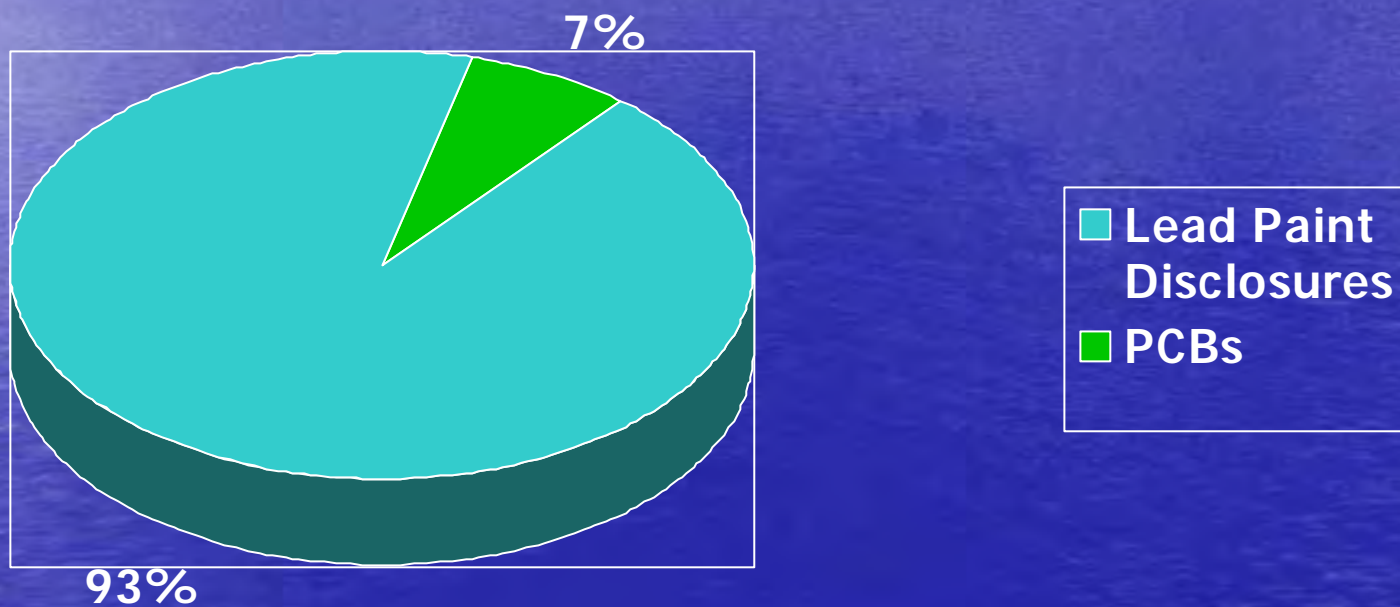
RCRA Violations



- Generator Requirements
- Identification of HW
- Universal Waste
- Manifests
- Accumulation Time
- General Facility Standards
- Container Management



TSCA Violations





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>
- Environmentally Preferable Purchasing
<http://www.epa.gov/opptintr/epp>
- EPA Region 2's P2 Healthcare Website
<http://www.epa.gov/region02/p2/health.htm>
- Environmental Self-Assessment for Health Care Facilities
– NY Dept of Environmental Protection
http://www.dec.ny.gov/docs/permits_ej_operations_pdf/esahcf.pdf