



# 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













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# 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](http://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](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](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



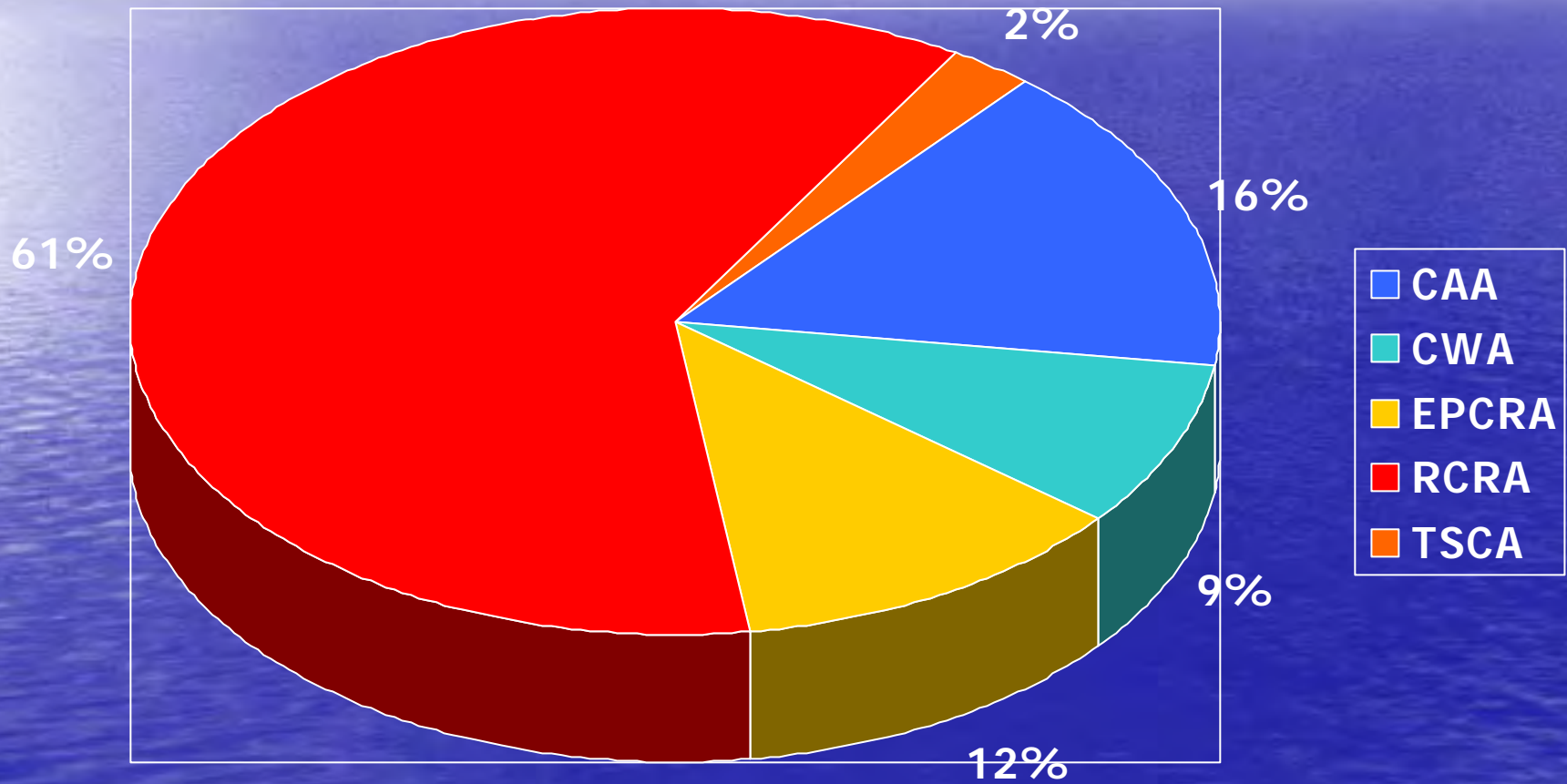
# Other Requirements

- 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](http://www.epa.gov/compliance/incentives/auditing/protocol.html)

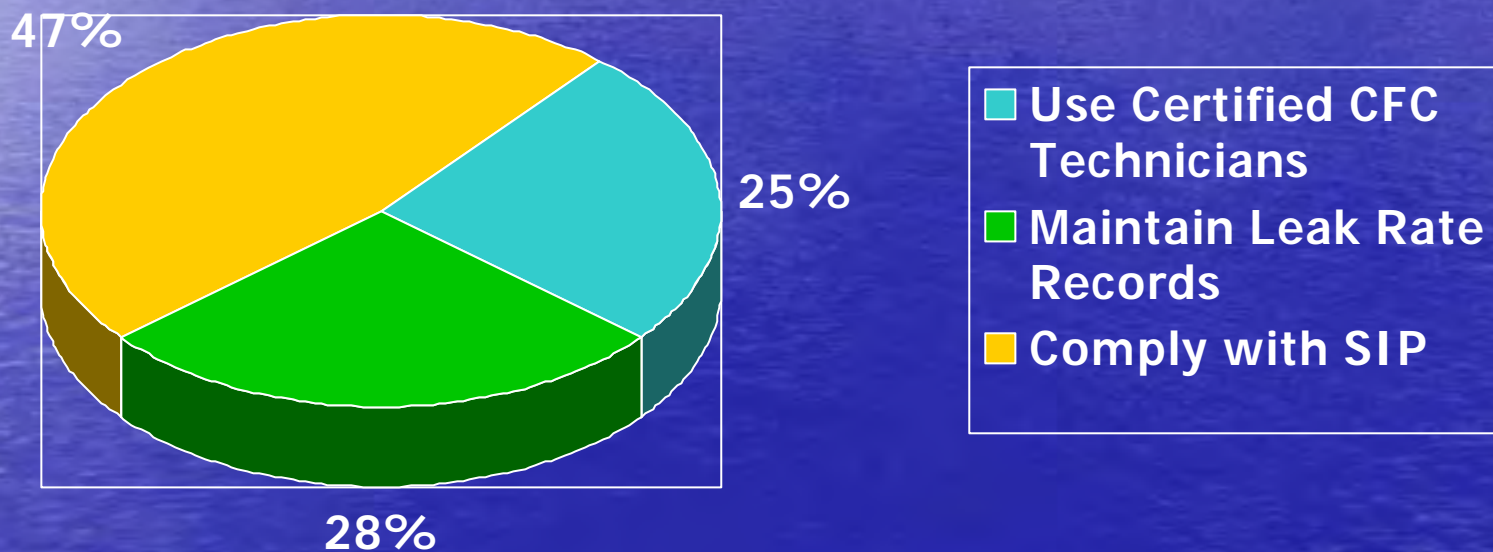


# Violations from Audits



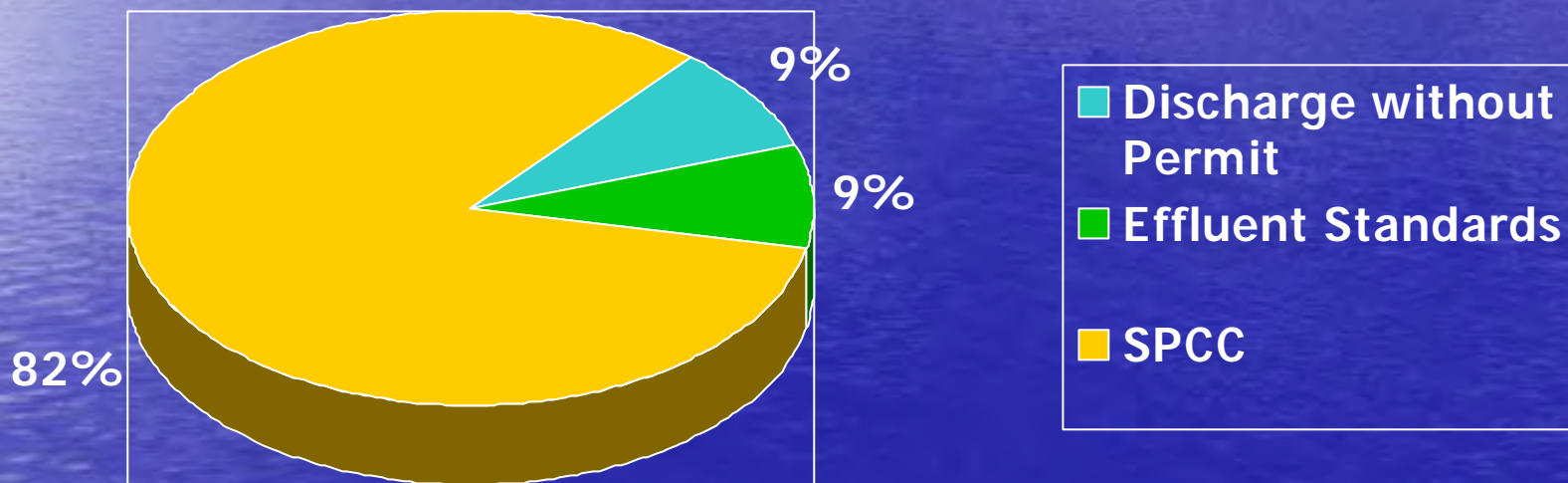


# CAA Violations



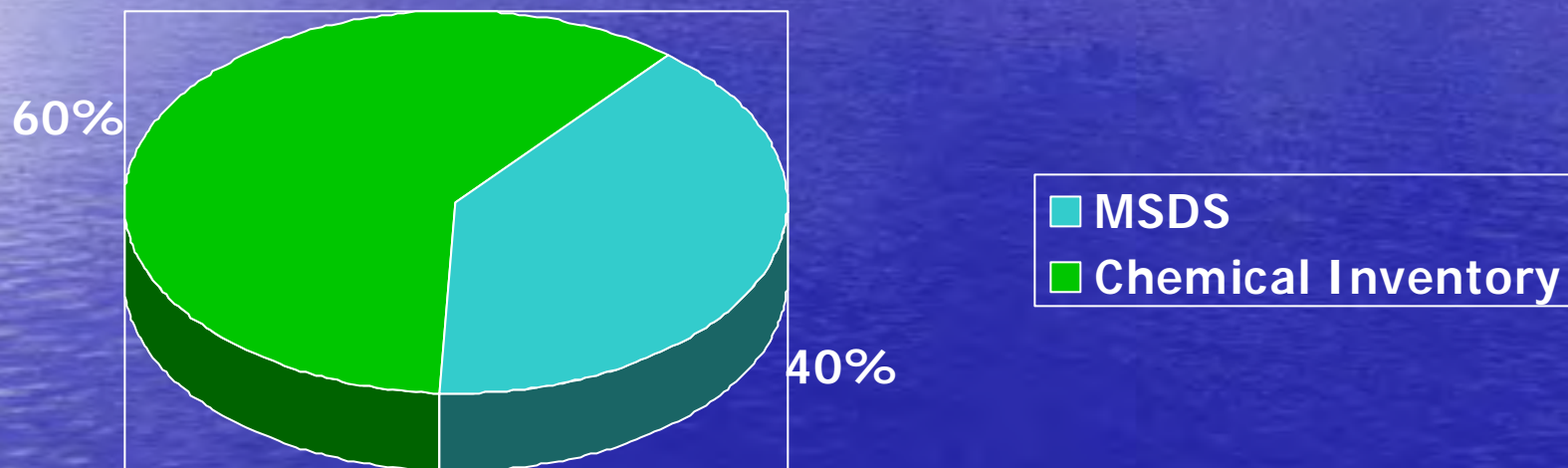


# CWA Violations



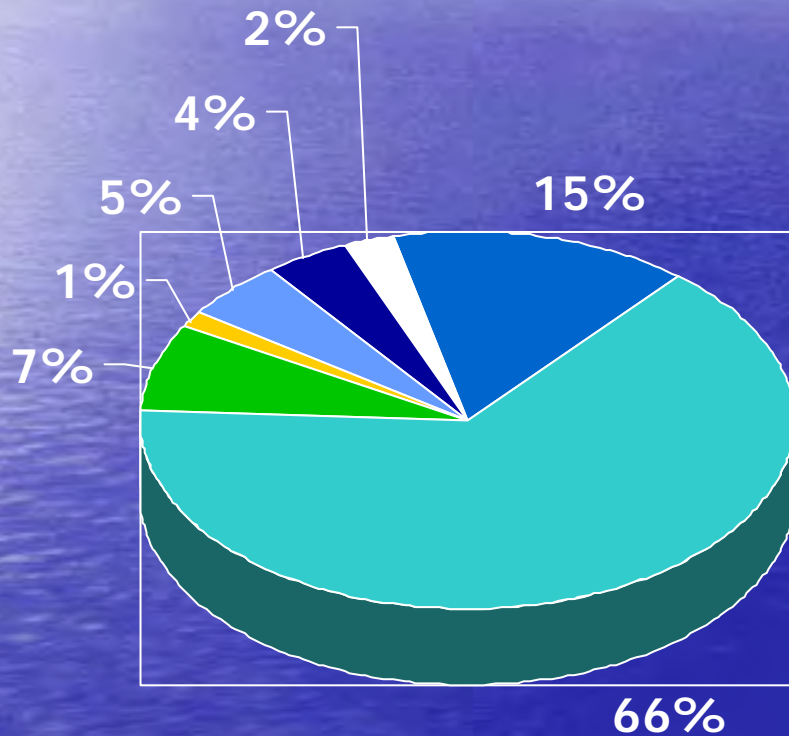


# EPCRA Violations





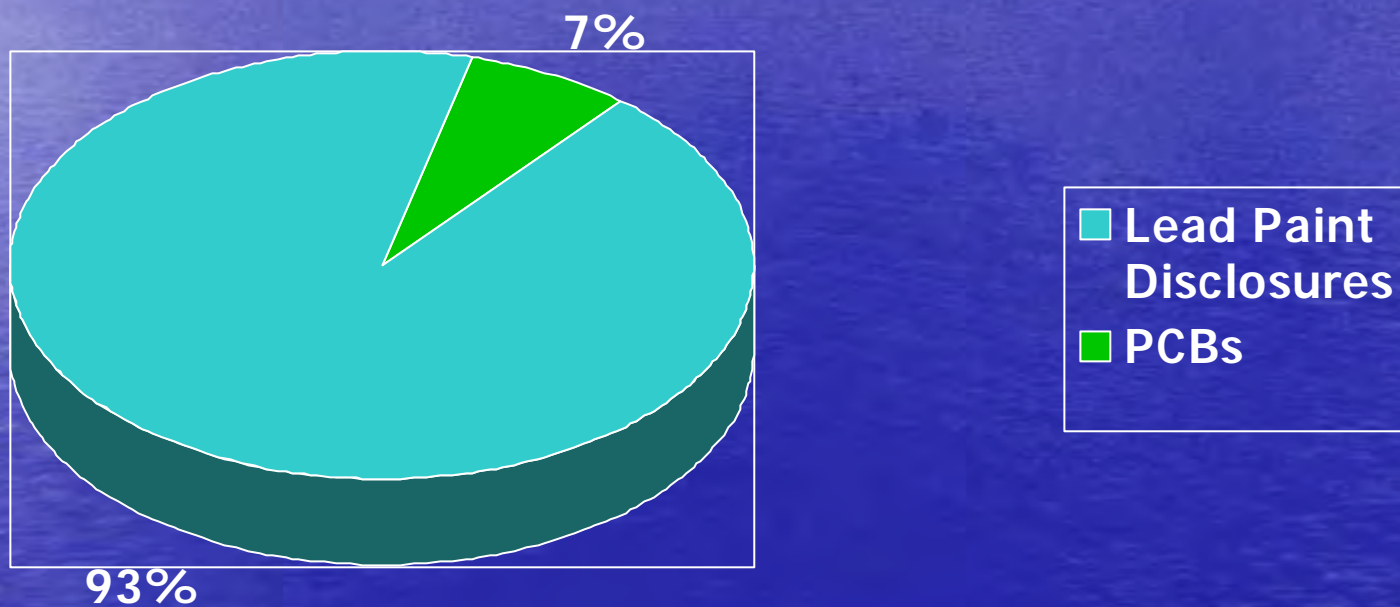
# RCRA Violations



- 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](http://www.dec.ny.gov/docs/permits_ej_operations_pdf/esahcf.pdf)