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P. W. GROSSER CONSULTING, INC.

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# Hospital Waste

## Solvent-Contaminated Wipes

In the Fall of 2019, Department of Ecology published "Focus on: Conditional exclusions for solvent-contaminated wipes". The final rules effective on April 28, 2019 replaced the *Focus on Used Shop Towels Policy*.

The new rule allows for solvent–contaminated wipes to be excluded from generator status and not be reported on the dangerous waste annual reports provided the conditions in the rules are met.

So what defines a solvent-contaminated wipe? Per Ecology a wipe "means a woven or nonwoven shop towel, rag, pad, or swab made of wood pulp, fabric, cotton, polyester blends, or other material." Wipes such as paper towels, cloth rags or shop towels that are used for clean up and spills may be contaminated with flammable or toxic solvents.

Contaminated wipes that qualify for the exclusions must:

- Contain one or more of the F001 through F005 solvents listed in WAC 173-303-082 or the corresponding P– and U– listed solvents that include:

| | |
|---|---|
| Acetone | Methyl isobutyl ketone |
| Benzene | Ethyl benzene |
| n-Butanol | Toluene |
| Chlorobenzene | Xylenes |
| Creosols | Methanol |
| Ethyl Acetate | Isobutyl alcohol |
| Cyclohexanone | Methyl ethyl ketone |
| 1,1,2- Trichloroethane | |
| 2-Ethoxyethanol | |
| Methylene chloride | |
| Tetrachloroethylene | |
| 1,2-Dichlorobenzene | |
| Trichloroethylene* | |

- Exhibit a dangerous waste characteristic of ignitability or toxicity found in WAC 173-303-090 resulting from a solvent listed in WAC 173-303-080.
- Exhibit the characteristic of ignitability (D001) due to nonlisted solvent(s).
- Designate only for dangerous waste criteria of state-only toxicity and persistence.

To meet the exclusions, certain management standards for solvent-contaminated wipes must be met. The wipes that qualify for the exclusion must be accumulated, stored and transported in non-leaking, closed containers that will contain any potential free liquids. The containers must be labeled with "Excluded Solvent-Contained Wipes" and may only be accumulated up to 180 days from the start date of the accumulation prior to being sent for cleaning or disposal. Prior to any laundering or disposal, the wipes as well as the containers holding the wipes, must contain no free liquids before off-site transport.

Disposable wipes must be sent to a dangerous waste combustor boiler, an industrial furnace federally regulated (40 CFR 26,265, 0r 266 Subpart H), or has the option to be send them to a permitted dangerous waste or hazardous waste landfill (not a municipal landfill).

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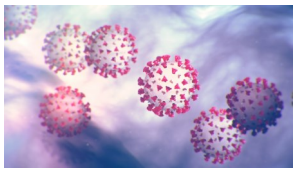
## Solvent-Contaminated Wipes

As a generator of such wipes, record keeping is required. Documentation to be maintained includes: (1)the name and address of the laundry facility, dry clean dangerous waste landfill or combustor, (2) paperwork demonstrating the 180-day accumulation time limit is being met, and (3) a description of the process the generator is using to meet the "no free liquids" condition.

It should be noted that contaminated wipes that meet the criteria below DO NOT qualify for exclusions:

- Contain listed dangerous waste other than solvents.
- Exhibit the federal characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents (such as rags contaminated with TCLP metals).
- Solvent-contaminated wipes that are dangerous waste due to the presence of trichloroethylene (TCE) are not eligible for the disposal exclusion.



## COVID-19 Adapting to Work Environments

PWGC would like to extend our gratitude to the healthcare industry for their services as you have the most vital role in combating the covid -19 that has spread rapidly throughout the world.

As we all navigate through tackling the coronavirus, PWGC would like to continue to assisting our clients' needs as best as possible without compromising risk and exposure. Advanced technology has allowed for remote access. Training and/or presentations can be done remotely using Google Meet (Google hangout for Business) or via other forms for live feed.

During these times it's important to maintain reporting requirements and training to the extent possible. As we move forward PWGC hopes to continue ways to adapt and meet our clients' needs.

## Effective 1/1/2020 Washington House Bill 1931 Workplace Violence in Health Care Settings

PWGC strives to keep you apprised of upcoming and new rules, regulations, bills and news. Effective January 1, 2020 Revised Code of Washington (RCW) 49.19 must be followed. Per the code the definition of healthcare setting (HCS) as been revised to include ambulatory surgical facilities and updated terminology "Behavioral health programs". Per RCW 49.19.020 (1) *Every three years, each health care setting shall develop and implement a plan to prevent and protect employees from violence at the setting.*

The developed plan should outline strategies aimed at addressing workplace violence prevention.

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## Effective 1/1/2020 Washington House Bill 1931 Workplace Violence in Health Care Settings

Each HCS should annually review the frequency of incidents.

Training may include classes that provide an opportunity for interactive questions and answers, brochures, verbal training, hands-on training, and video training. Requirements of training are identified in RCW 49.49.030 and include:

- The HCS's workplace violence prevention plan;
- General safety procedure;
- Violence predicting behaviors and factors;
- The violence escalation cycle;
- De-escalation techniques to minimize violent behavior;
- Strategies to prevent physical harm with hands- on practice or role play;
- Response team processes;
- Proper application and use of restraints, both physical and chemical restraints;
- Documentation and reporting incidences;
- Debrief processes for affected employees following violent acts; and
- Resources available to employees coping with the effects of violence.

## Washington's Clean Buildings House Bill 1257

Commercial buildings contribute to roughly 30% of total U.S. greenhouse gases emissions. According to the U.S. Energy Information Administration, residential and commercial buildings account for 40 % of energy consumption.

In mid 2019 Legislative House Bill 1257 (HB 1257) was adopted to assist with efforts to reduce greenhouse gas emission in the state of Washington.

HB 1257 adopts energy standards for commercial buildings that exceed 50,000 square feet. For subject buildings, energy intensity targets (measured by energy consumption per square foot of commercial space) by building type will be adopted. As part of the rule, other requirements will be set forth. The rules will also require energy management plans that include operations and maintenance improvements, energy efficiency audits, and investment in energy efficiency measures designed to meet the energy intensity targets. To assist changes in energy consumption in the state HB 1257 along with three companion bills are in action. These bills include:

- Washington Clean Energy Transformation Act (CETA) requiring Washington's electric utilities to phase out greenhouse-gas emitting generation by 2045,
- HB 1112 restricting use of hydrofluorocarbons (HCFs). These are gases used in refrigeration and other industrial processes, and
- SB1512 and ESSB2042 aimed to encourage adoption of electric vehicle (EV) and those fueled with hydrogen and alternative fuels.

The rules are to be adopted by November 1, 2020, with the following compliance schedule: June 1, 2026, for buildings of more than 220,000 square feet; June 1, 2027, for buildings between 90,000 and 220,000 square feet; and June 1, 2028, for buildings of 50,000-90,000 square feet.

Subject buildings that do to meet the energy intensity targets will be subject to fine. Penalties of up to $5,000 plus $1 per square foot per year may be in the future. There will be incentive payments for those buildings that exceed the energy intensity targets.


PWGC
CLIENT DRIVEN SOLUTIONS

600 N. 36th St., #225
Seattle, Washington 98103

Phone: 206-706-5533
Fax: 631-589-8705
E-mail: mariem@pwgrosser.com

www.pwgrosser.com

Marie Mendes, IE

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## Federal Versus State Regulations– Universal Waste

On November 15 2019, The EPA (Federal) signed a draft to include Aerosol Cans as universal wastes.

States may chose to adopt the federal guidelines or not. Currently the state of Washington has NOT adopt ed this rule. As such, guidelines for universal waste and handling of aerosol cans remains as is.

So what is included as universal waste in State of Washington? ***Batteries, lamps and mercury containing equipment.*** Universal waste batteries include: alkaline, mercuric-oxide, alkaline-manganese, zinc-carbon, nickel-cadmium, lead acid, button cell mercuric oxide, silver oxide, lithium and zinc air.

Universal waste lamps include: fluorescent, High Intensity Discharge (HID) (e.g., mercury vapor, metal halide, high pressure sodium), neon, compact fluorescent, and any other lamps that are dangerous waste.

Universal mercury containing equipment waste include mercury containing thermometers, thermostats, switches and relays. Examples are manometers and electric switches.

Universal wastes should be properly labeled with universal waste and contents (i.e., "Universal Waste Lamps"), place the start date of accumulation on the waste container, and track accumulation limit (1 year for SQG of universal waste). A SQG of universal waste stores less than 11,000 lbs at any one time.