



**PWGC'S Healthcare
Facilities Management
Newsletter**

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ABOUT

HEALTHCARE FACILITIES MANAGEMENT

PWGC's Healthcare Facilities Management Newsletter is published quarterly for hospital, clinical and medical laboratory waste and hazardous material managers to assist them in managing these materials.

You can download .pdf copies of past issues of Hospital Waste from our website at <https://www.pwgrosser.com/newsletters>. Click on the Healthcare (Seattle/WA) arrow. Issues from the past five years are downloadable as portable document format (.pdf) files.

If you wish to receive this free quarterly newsletter, please notify us by telephone, fax or e-mail (contact information is shown adjacent). You will receive the newsletter as an e-mail on your smartphone with a hyperlink to a .pdf file on our website that you can download.

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NIOSH HAZARDOUS DRUG LIST (HAZARDOUS MATERIALS) AND RCRA HAZARDOUS WASTE PHARMACEUTICALS (HAZARDOUS WASTE)

As stated in a previous newsletter, these two terms continue to be interpreted as synonymous; however, are not. Hazardous materials are raw materials or products that you may use at your facility which pose hazards to worker safety. Nationally, OSHA oversees the rules that govern the management of hazardous materials. In Washington the Department of Labor & Industries does the same. Healthcare hazardous materials include alcohol wipes, aerosol solvents, formalin, hand sanitizer and iodine disinfectants. Hazardous waste is reserved for materials with very specific criteria spelled out in the federal Resource, Conservation & Recovery Act (RCRA). Hazardous waste rules are developed and overseen nationally by the U.S. Environmental Protection Agency and in Washington by the Department of Ecology (DOE).

The distinction between the two is most often confused in the pharmacy with NIOSH listed hazardous drugs verses RCRA hazardous waste pharmaceuticals. The National Institute for Occupational Safety and Health (NIOSH) is a federal agency that performs research in the field of occupational safety and health and makes recommendations for prevention of injury and illness in the workplace. The NIOSH hazardous drug list was developed for healthcare workers who work with or are potentially exposed to hazardous drugs. This would include but are not limited to workers in the pharmacy, nursing, environmental services, and operating room personnel. Federally, the OSHA communication standard requires employers to develop a hazardous communication program to establish a list of hazardous chemicals in the workplace and convey the list to relevant personnel. In the hospital setting this includes hazardous drugs. The list assists workers in employing measures when handling the drugs to reduce potential exposure.

Congress enacted the Resource Conservation and Recovery Act (RCRA) law to allow EPA to oversee hazardous waste (not material) from cradle to grave which is from the generation point of the hazardous waste through transport, storage, treatment and disposal of the waste. RCRA has created lists of drugs that are considered hazardous waste pharmaceuticals. In Washington, dangerous waste includes all hazardous waste and additional toxic and persistent (in the environment) waste. Note that EPA has delegated the authority of primary responsibility of implementing the RCRA hazardous waste program to Washington DOE. Therefore, at a minimum, Washington must adhere to federal regulations but can be, and is, more stringent.



EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA) TIER 2

The Emergency Planning and Community Right-to-Know Act (EPCRA) was created to help communities plan for emergencies involving hazardous substances. EPCRA requires hazardous chemical emergency planning by federal, state and local governments, Indian tribes, and industry. It also requires industries to report on the storage, use and releases of hazardous chemicals to federal, state, and local governments.

One of the main requirements under EPCRA is the Tier 2 annual reporting. Facilities that store hazardous materials over specific thresholds must provide state and local officials and local fire departments with information on the chemicals that are used and stored at their facilities.

The threshold of underground petroleum fuel storage tanks is often overlooked and must be counted towards the threshold. Most healthcare facilities have large petroleum fuel storage tanks needed for boilers and/or emergency generators. If the tank stores diesel, approximately 1,400 gallons of storage will trip the threshold requiring Tier 2 reporting.

In Washington the forms must be submitted to:

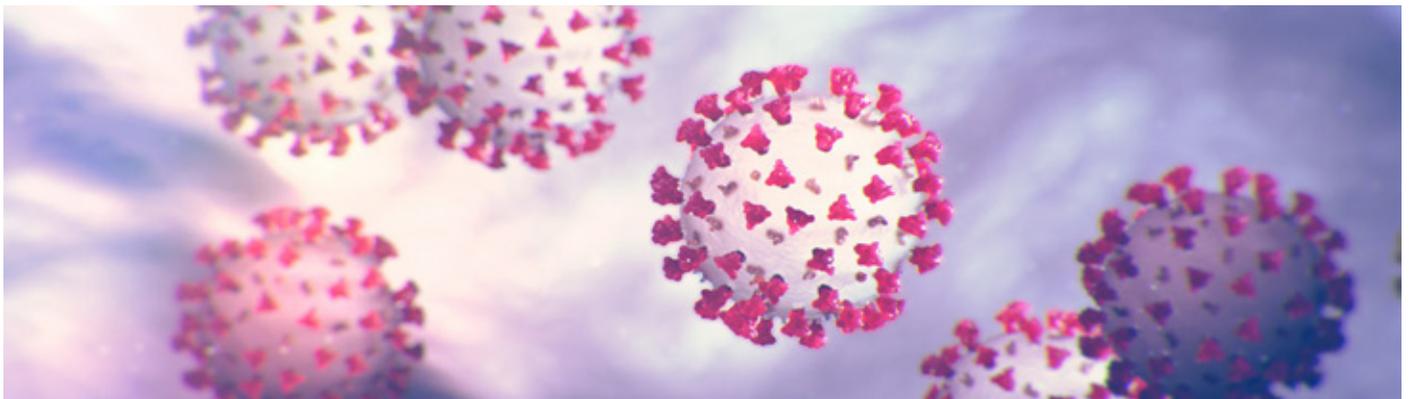
- Washington State Emergency Response Commission (SERC)
- Local Emergency Planning Committee (LEPC)
- Local fire department

The forms can be submitted online to the SERC via Secure Access Washington (SAW). The form can then be printed and mailed to the LEPC and local fire department. These forms allow emergency responders access to hazardous materials stored in large quantities at your facilities so that proper precautions may be taken in responding to emergencies.



MAINTAINING COMPLIANCE IN A CHANGING ENVIRONMENT

2020 changed many things and as individuals, communities, and businesses we've adapted and continue to adapt to the ever-changing environment. The saying "expect the unexpected" has certainly taken on greater weight. In such a busy time reporting deadline and training schedules often get missed. To continue with maintaining environmental regulatory compliance PWGC can help. Emergency Response (Code Orange) training per WAC 296-824 is now being provided remotely via Microsoft teams. Other trainings such as dangerous waste assistance and formaldehyde training is also being provided remotely.





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