



**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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DANGEROUS WASTE COMPLIANCE AND COVID-19

During the COVID-19 pandemic, WA's Department of Ecology (DOE) recognizes the strain this crisis we are facing has had on businesses and communities. DOE has stated that although they cannot waive statutory or regulatory requirements they will exercise enforcement discretion during these challenging times. In an effort to assist with compliance issues during this time the DOE has provided some information in the Q&A below to answer question dangerous waste generators may have. These and more may be found on their website <https://ecology.wa.gov/Waste-Toxics/Business-waste/Manage-your-waste/covid-19-dw-compliance>

Q: What required guidelines are dangerous waste generators expected to follow?

A: We expect dangerous waste generators to follow these guidelines:

1. Closely adhere to all federal, state, and local public health and safety guidelines.
2. We expect all generators to comply to the best of their ability, as protection of human health and the environment continues to be of essential importance.
3. Report dangerous waste complaints or any imminent threat to human health or the environment, such as a [spill or release](#), to us immediately or to your regional office:

Central Regional Office: 509-575-2490

Eastern Regional Office: 509-329-3400

Northwest Regional Office: 425-649-7000

Southwest Regional Office: 360-407-6300

You may also call the Washington Emergency Management Division at 1-800-258-5990.

4. If your operations are impacted by COVID-19 and compliance is not reasonably practical, facilities with environmental compliance obligations should:
 - a. Act responsibly under the circumstances and take all practical steps in order to minimize the effects and duration of any noncompliance caused by COVID-19;
 - b. Identify the specific nature and dates of the noncompliance;
 - c. Identify how COVID-19 was the cause of the noncompliance, and the

decisions and actions taken in response, including best efforts to comply and steps taken to come into compliance at the earliest opportunity;

- d. Return to compliance as soon as possible; and
- e. Document and retain the information, action, or condition specified in a. through d. and, after you return to compliance, provide it to your Ecology regional office if requested.

5. Large and medium quantity generators may request extensions of dangerous waste storage time limits. Please see the “Can I get an extension on my 90-day or 180-day accumulation time limit?” question (below)

6. These guidelines do not apply to criminal (knowing and willful) acts.

7. These guidelines do not apply to Treatment, Storage and Disposal Facilities (TSDFs) or RCRA Corrective Action enforcement.

8. These temporary guidelines regarding enforcement discretion are only related to COVID-19. These guidelines are not regulation and do not change any rules or laws.

Q: Can I get an extension on my 90-day or 180-day accumulation time limit?

A: If your facility is unable to ship dangerous wastes within the required timeframe, [contact your regional Ecology office](#) to request an extension. Ask for a dangerous waste compliance specialist when you call.

The dangerous waste regulations (WAC 173-303-172(3) and -200(2)) allow facilities to request extensions for on-site storage due to unforeseen, temporary, and uncontrollable circumstances.

Since Ecology issues extensions on a case-by-case basis, please provide the following information to help inform our decision:

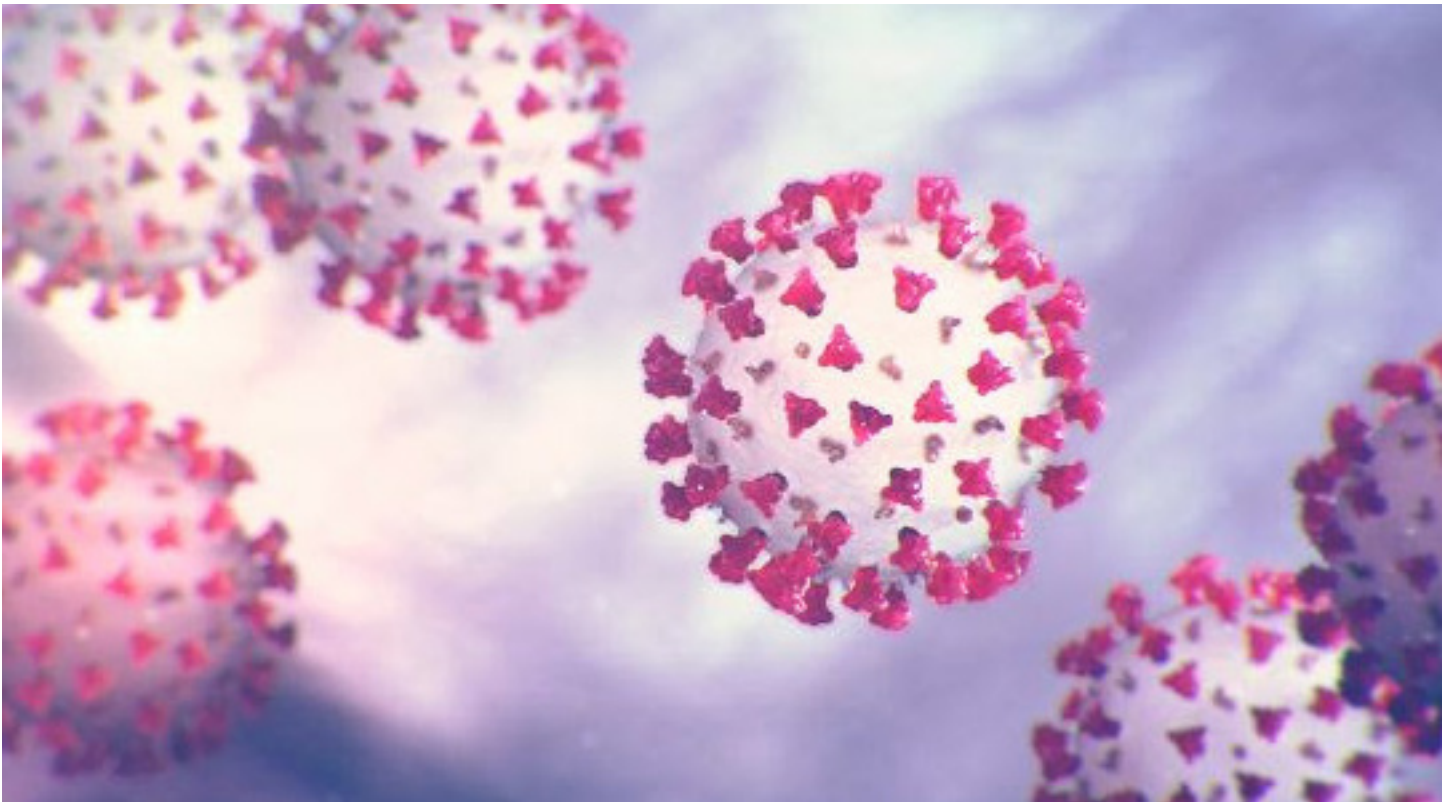
- Number and size of containers approaching the 90-day or 180-day accumulation time limit.
- A general description of the waste.
- The accumulation start date of the waste.
- The specific location (accumulation area) of the waste.
- Documentation of efforts made to schedule a waste pickup and explanation why the dangerous waste must remain on-site due to unforeseen, temporary, and uncontrollable circumstances.
- A copy of the most recent weekly inspection log.
- Name and phone number for the on-site emergency coordinator.

Q: What if my site exceeds on-site waste accumulation thresholds?

A: We will allow small quantity generators (SQGs) and medium quantity generators (MQGs) to retain their status, even if the amount of dangerous waste stored on-site exceeds a regulatory threshold because of a generator's inability to arrange for shipping of dangerous waste due to the COVID-19 outbreak.

If this situation applies to your site, you should:

- a. Act responsibly under the circumstances in order to minimize the effects and duration of any noncompliance caused by COVID-19;
- b. Identify the specific nature and dates of the noncompliance;
- c. identify how COVID-19 was the cause of the noncompliance, and the decisions and actions taken in response, including best efforts to comply and steps taken to come into compliance at the earliest opportunity;
- d. Return to compliance as soon as possible; and
- e. Document the information, action, or condition specified in steps a through d (above).



DANGEROUS WASTE LABELING

It is very important that generated dangerous waste be properly labeled to assist with safety for employees and assist with dangerous waste disposal management. Improper labeling is a common violation cited during inspections. In March of 2020 WA's Department of Ecology (DOE) revised their labeling guidance document to incorporate 2019 Dangerous Waste regulation changes.

So how do you label your dangerous waste properly? There are three required components to the labeling:

1. **The words "Dangerous Waste" or "Hazardous Waste must be on the container.** As a reminder "Hazardous Waste" is a federal term but in WA state the term "Dangerous Waste" is used as it includes additional waste than included in the federal "hazardous waste" definition.


2. **ALL hazards of the waste.** Labels must identify the hazards of the contents in the container either by descriptive words or pictograms. For example if the dangerous waste is flammable and toxic the words "flammable" and "toxic" must be on the container or these pictograms



3. **The Date you started putting waste into the container (except for waste in satellite accumulation areas)**

LABEL SIZE

- For most containers hazard labels or markings must be visible from a distance of 25 feet or the lettering size must be at minimum if 1/2-inch in height
- For containers less one gallon (four liters) the hazardous label, marking or lettering may be appropriate for the size of the container.
- Tank labels for medium quantity generators (MQGs) must be recognizable from at least 25 feet and for large quantity generators (LQGs) tanks must be recognizable from at least 50 feet.



Other labeling requirements could be warranted such as if a small quantity generator (SQG) or medium quantity generator (MWG) generate more waste than normal from a one-time event. This dangerous waste may be handled under episodic generation rules and not count towards generator status. The waste label must have the words “Episodic Dangerous Waste” or “Episodic Hazardous Waste”.

As indicated by DOE when transporting waste for offsite disposal make sure labels that may conflict with the US Department of Transportation labeling standards be removed.

WHICH MASK FOR WHICH TASK

On June 5, 2020 WA Labor and Industries (L&I) announced their publication “Which Mask for Which Task COVID-19 Prevention at Work: When to Use Face Coverings and Respirators”. This guidance is intended to assist in determining which face covering, mask, or respirator to don in the workplace to help limit the spread of coronavirus. This document does not apply to workers in the hospitals and clinics treating active COVID-19 patients as CDC guidance must be followed. It does include custodial staff who do and do not clean up after known COVID-19 cases and other healthcare workers.

The WA L&I guidance describes various job types based on level or risk to workers. The risk levels are: negligible risk, low risk, medium risk, high risk and extremely high risk. Under each risk level there is guidance on which face covering or mask is appropriate and provide exempt of types of jobs. The guidance can be found at https://www.lni.wa.gov/forms-publications/F414-168-000.pdf?utm_medium=email&utm_source=govdelivery.



POLLUTION PREVENTION PLANS

The WA State Department of Ecology requires facilities to prepare and submit a Pollution Prevention Plan if they

- Generate more than 2,640 pounds of dangerous waste annually; or
- Report toxic releases under Section 313 of the Emergency Planning and Community Right to Know Act.

The plan provides facilities an opportunity to:

- Decrease the amount of hazardous substances used
- Reduce the dangerous waste generated.
- Conserve water, energy, and other natural resources.
- Reduce air emissions.
- Recycle waste into usable materials.

The Department of Ecology will contact your facility if you are required to submit a plan. Plans are due by September 1st annually.

Plans can be submitted via turboplan or may qualify to use an Environmental Management System instead of completing a plan.

Even if facilities are not required to submit a Pollution Prevention Plan many facilities voluntarily prepare such a plan. Reducing waste reduces costs burdens associated with management and disposal.





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