

Hospital Self Audit Risk Assessment

Environmental Services Audit: Mark the response that most closely represents the waste management practices and procedures at your hospital.

Policies and Contracts: HAZARDOUS Waste

1. The HAZARDOUS waste generation status of the organization is:

- O. Large quantity or small quantity and documented as such, including pharmaceutical waste
- A. Small quantity but undocumented
- B. Conditionally Exempt Small Quantity Generator but undocumented

Action Item: Begin documenting the amount of P-listed waste generated, which cannot exceed 1 Kg (2.2 lb) per calendar month. Alternatively, begin the process of meeting the requirements of a large quantity generator of hazardous waste.

2. The organization has documentation on the amount and kinds of hazardous waste that are generated and on how that determination was made.

Yes No

Action Item: Determine if solid waste generated is a hazardous waste as defined in subpart D of 40 CFR Part 261 of the Federal Register, and the State Hazardous Waste rules.

Environmental Services Audit:

3. If SQG or LSQ, EPA has been notified and a waste ID number received.

Yes No

Action Item: Once the hazardous waste generation status of your hospital has been determined, apply for a waste generation ID number from your state Environmental Agency.

4. Hazardous waste manifests are complete and in order. Copies are retained for 3 years.

Yes No None Exist

Action Item: Assemble all hazardous waste manifests in one binder or folder by date. Ensure that all waste codes and shipping names are properly listed, along with other required information. Ensure that the facility receiving the hazardous waste returns the signed top copy within 45 days for large quantity generators or within 60 days for small quantity generators. Maintain a “tickler file” to ensure filing required reports to the EPA Regional Administrator if these deadlines are missed. Check state hazardous waste regulations for additional deadlines and reporting requirements.

5. Contracts for hazardous waste disposal are complete and current.

Yes No

Action Item: If no contract exists or the current contract is outdated, negotiate a contract with a hazardous waste vendor for removal and appropriate disposal of hazardous waste. Ensure that the vendor has all relevant licenses, permits, and registrations to accept hazardous pharmaceutical waste. Work with the purchasing department or other appropriate contracting agent to ensure that a contract with appropriate legal indemnifications is in place.

Environmental Services Audit:

Storage Accumulation: HAZARDOUS WASTE

6. The organization manages a dedicated storage accumulation area for HAZARDOUS waste.

Yes No

Action Item: Refer to state and federal regulations regarding the requirements of a storage accumulation area. Ensure sufficient space for proper segregation of incompatible wastes, such as acids and bases. (RCRA).

7. The hazardous waste storage accumulation area provides the following required safety features.

a. Hazardous waste in the storage accumulation area is properly labeled with the type of waste and a storage accumulation start date

Yes No

b. Secondary containment: (i.e. pigs, berms, trays, etc)

Yes No

c. Spill response materials: (i.e. spill kits, absorbents, etc)

Yes No

d. Emergency contact information and telephone

Yes No

e. Segregation of incompatible wastes:

Yes

No

f. Entry restricted to authorized personnel:

Yes

No

g. The weekly inspection log is complete and up to date.¹

Yes

No

No log exists

Satellite Accumulation:

8. Satellite accumulation procedures for hazardous pharmaceutical waste are well defined in pharmacy, nursing units, clinics, etc

Yes

No

9. Hazardous waste containers in satellite accumulation are labeled “Hazardous Waste”

Yes

No

Priority Action Item: (Questions 10 and 11) Determine with Pharmacy and Nursing which hazardous waste containers are to be used and where they will be placed. Insure that the label Hazardous Waste is placed on the containers along with an auxiliary label containing all possible waste codes. (RCRA)

¹ For information on weekly inspection requirements, see 40 CFR 265.15(a) and 40 CFR 265.174