

Hospital Self Audit Risk Assessment

Pharmacy Audit: Mark the response that most closely represents the way that pharmacy personnel discard the following items.

Concerning chemotherapy preparation in the pharmacy clean room.

1. After decontamination or cleaning procedures of the chemo preparation hood, where are decontamination materials discarded?

- O. In a yellow, white or other container for trace chemotherapy
- B. Red sharps container or regular trash

B. Priority Action Item: Dispose of all trace contaminated cleaning material etc. in either yellow or white trace chemotherapy bags or sharps containers for incineration as regulated medical waste. Any item used in the handling of chemotherapy drugs should be considered trace contaminated and identified as such to prevent inadvertent exposure to environmental services and waste management employees.

2. When a chemotherapy spill requires clean up, where are the used spill kit materials discarded?

- O. In a container labeled “Hazardous Waste – Toxic”
- B. In a yellow, white or other container for trace chemotherapy
- B. In a red container or regular trash.

B. Priority Action Item: Train all employees to dispose of spill clean-up materials in the ziplock bag provided in the spill kit. Place in the “Hazardous Waste” container. (EPA RCRA)

Pharmacy Audit:

3. Empty chemotherapy IV bags, vials and ampules are placed in:

O. Yellow or white trace chemotherapy container (NOTE: exception for arsenic trioxide containers which must be disposed of as hazardous waste)

B. Red sharps container or municipal trash.

B. Priority Action Item: Replace all red sharps containers or red bags with yellow or white trace chemotherapy containers to alert environmental services of the hazard. As a best practice, place a ziplock bag in the hood to receive all trace chemotherapy wastes before placing in the yellow or white waste container to prevent leaking. Yellow or white trace chemotherapy bags may be used for soft items. Dispose of by incineration as regulated medical waste.

4. Syringes (needles) used for chemotherapy preparation are placed in:

O. Yellow or white trace chemotherapy sharps container

B. Red sharps container

B. Priority Action Item: Replace red sharps containers with yellow or white chemotherapy sharps containers and dispose of by incineration as regulated medical waste. As a best practice, place a ziplock bag in the hood to receive all trace chemotherapy wastes before placing in the yellow waste container to prevent leaking. Red sharps containers are generally microwaved or autoclaved and then landfilled. Many are now recycled. Both of these practices could result in further chemotherapy contamination and exposure to waste management employees.

Pharmacy Audit:

5. IV bags, vials, and ampules containing chemotherapy are disposed in the following manner:

- O. In a container labeled “Hazardous Waste-Toxic”
- B. In a yellow, white or other container for trace chemotherapy
- B. In a red sharps container, municipal trash or sewer.

B. Priority Action Item: Provide a black Hazardous Waste container at the chemotherapy hood for any items that are not “RCRA empty.” If partially used vials are to be saved for future use, place them in a ziplock bag in the hood before removal. If to be discarded, as a best practice, place unused IV solutions and tubing in a ziplock bag before placing in the hazardous waste container to prevent leaking and cross contamination of waste. (RCRA, NIOSH Hazardous Drug Alert)

6. Trace contaminated chemotherapy gowns, gloves, wipes, etc. are routinely disposed:

- O. In a yellow, white or other container for trace chemotherapy
- B. In red containers or municipal trash.

B. Priority Action Item: Dispose of all trace contaminated chemotherapy gowns, gloves, wipes, etc. in either yellow trace chemotherapy bags or sharps containers for incineration as regulated medical waste. Any item used in the handling of chemotherapy drugs should be considered trace contaminated and identified as such to prevent inadvertent exposure to environmental services and waste management employees.

Pharmacy Audit:

Concerning non-chemotherapy preparation in the pharmacy clean room:

7. Empty vials from sterile product preparation are disposed as follows:

- O. In red sharps containers
- A. In municipal trash
- B. Recycled

A. Action Item: Ensure safety of environmental services personnel regarding exposure to sharps and the security of containers with respect to drug diversion.

B. Action Item: Since drug residue may be present, do not encourage recycling of empty drug vials. The opportunity for diversion of the vials and refilling with water for illegal re-sale also increases.

8. Empty IV bags (other than P waste or chemotherapy) are disposed of as follows:

- O. Municipal trash with patient ID removed
- A. Municipal trash with no patient ID removed

A. Action Item: Review HIPAA policies for your organization to ensure that the security of the waste handling does not require removal of patient related information before disposal.

Pharmacy Audit:

9. Partially used non-chemotherapy vials are disposed as follows:

- O. Hazardous waste if regulated; non-hazardous Rx incinerated
- A. Hazardous waste if regulated, non-hazardous Rx in red sharps or trash.
- B. All to red sharps

A. and B. Action Item: Evaluate and dispose of hazardous waste in a black Covidien Kendall Hazardous Waste container. (RCRA) Consider segregating non-hazardous Rx into the white/blue Covidien Kendall pharmaceutical waste container for disposal by non-hazardous incineration. This avoids landfilling and possible diversion. (Best Management Practice) Ensure adequate containers to avoid over-filling.

10. Unused non-chemotherapy IV solutions are disposed as follows:

- O. Hazardous waste if regulated; non-hazardous Rx incinerated
- A. Hazardous waste if regulated, non-hazardous Rx in red sharps or trash.
- B. No segregation, all drug containing IVs to red sharps, electrolytes sewered.

A. and B. Action Item: Evaluate and dispose of hazardous waste in a black Covidien Kendall Hazardous Waste container. (RCRA) Consider segregating non-hazardous pharmaceuticals into the white/blue Covidien Kendall pharmaceutical waste container for disposal by non-hazardous incineration. This avoids drain disposal. Dextrose, saline, electrolytes, and vitamin solutions may be discarded in the sewer system. (Best Management Practice)