

Root Causes Of Noncompliance

Systemic violations appear to stem from:

- Inadequate resources for people, equipment and training to carry out environmental activities;
- Limited or no environmental compliance accountability for individual departments, laboratories, and staff;
- Limited authority vested in environmental compliance officials;

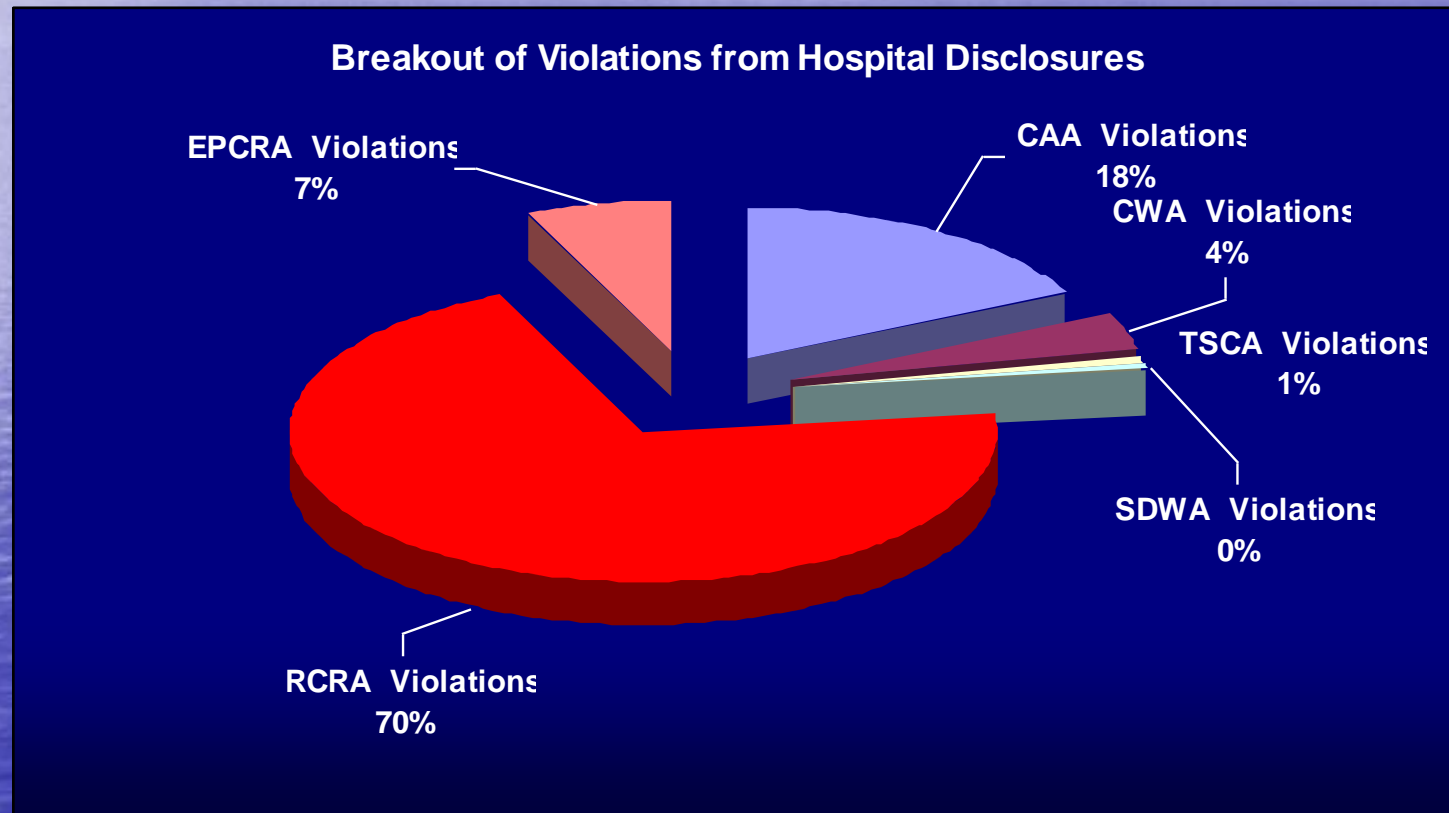
2006 Update on Healthcare Compliance Initiative

- This presentation is a modification on one given by John Gorman in 2006.

Root Causes Of Noncompliance

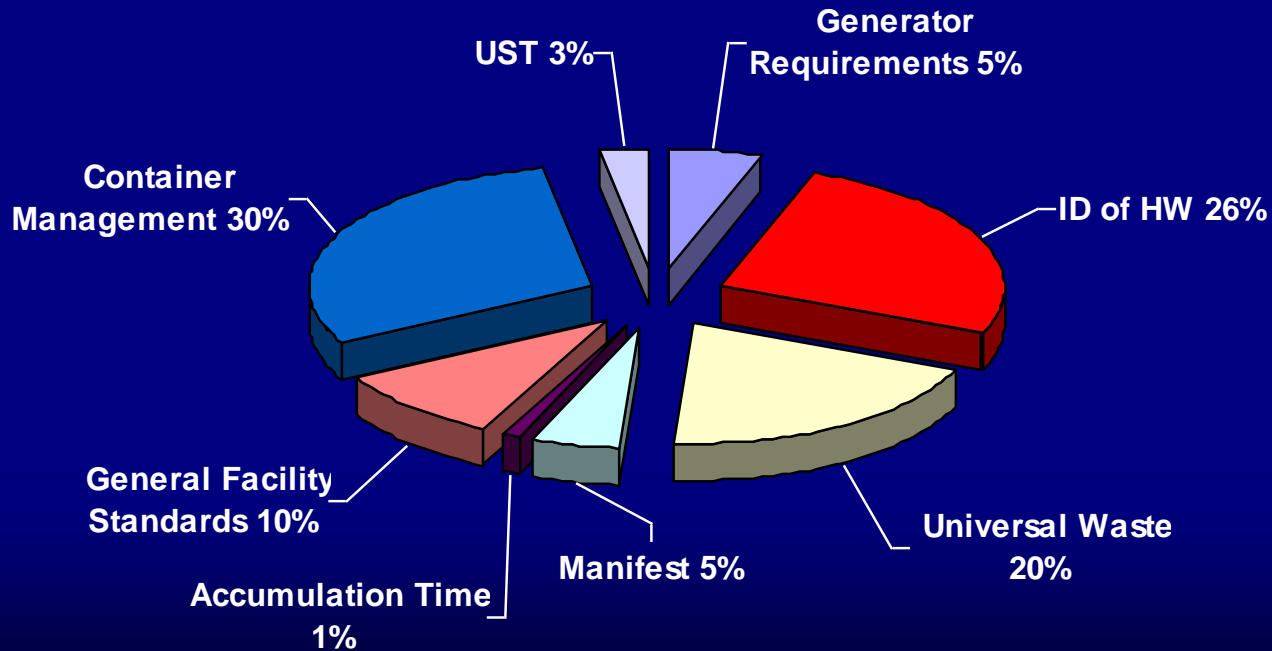
- No clear environmental compliance chain-of-command;
- Scattered, incomplete, and missing environmental compliance documentation;
- Incomplete institutional knowledge regarding environmental regulatory requirements; and
- Broad use of hazardous materials when effective substitutes exist

Healthcare Violations – All R2



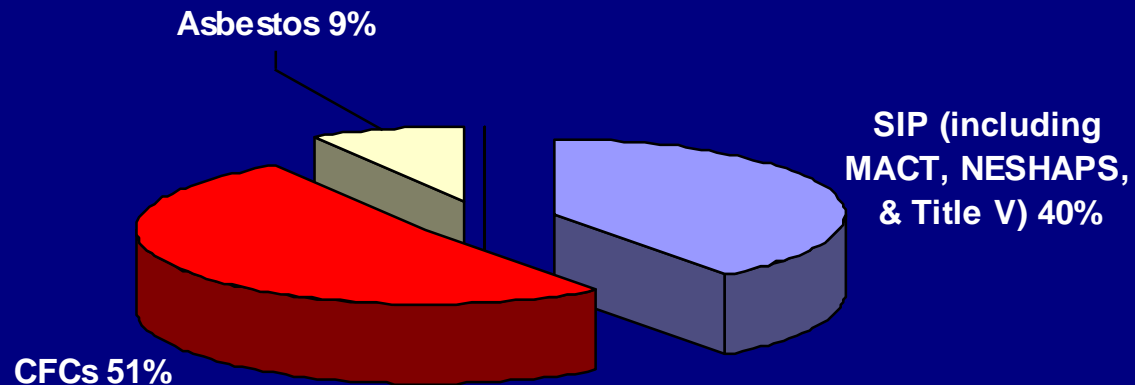
Healthcare RCRA Violations – All R2

Breakout of RCRA Violations from Hospital Disclosures



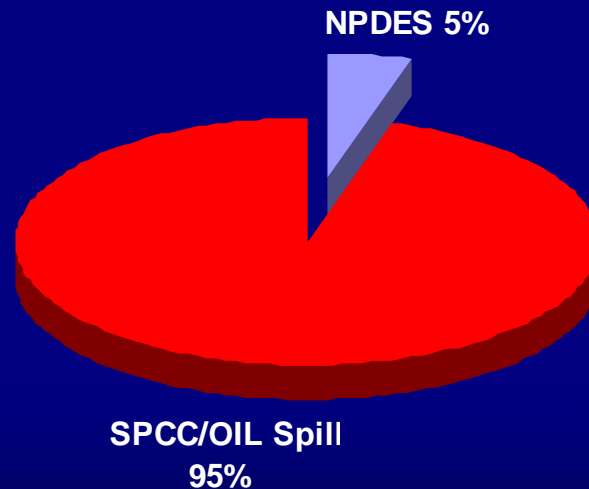
Healthcare CAA Violations – All R2

Breakout of CAA Violations from Hospital Disclosures



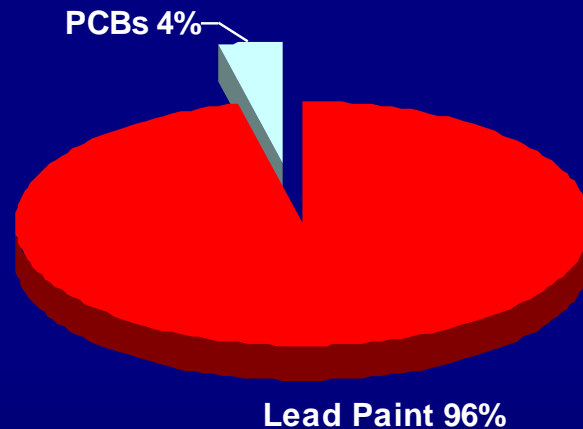
Healthcare CWA Violations – All R2

Breakout of CWA Violations from Hospital Disclosures



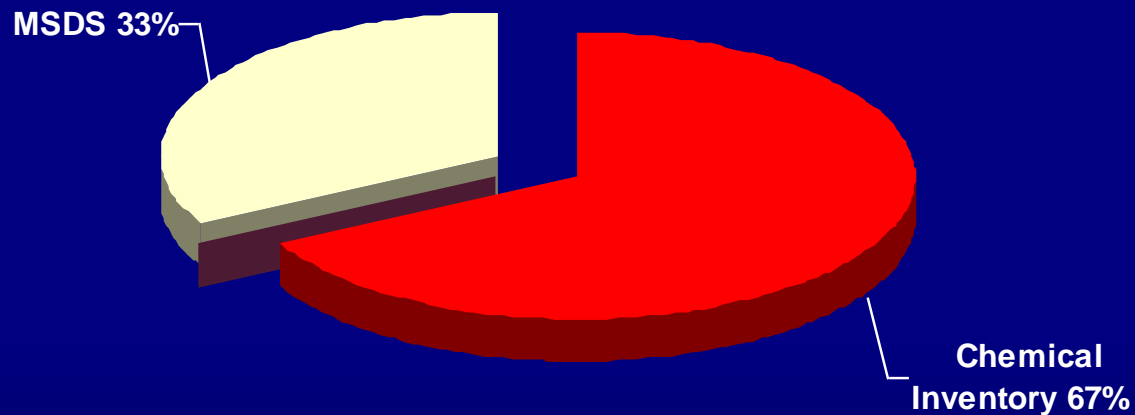
Healthcare TSCA Violations – All R2

Breakout of TSCA Violations from Hospital Disclosures



Healthcare EPCRA Violations – All R2

Breakout of EPCRA Violations from Hospital Disclosures



Top 15 Violations

(From 146 Voluntary Disclosures)

Rank	Violation	Statute	Frequency
1	ID of HW	RCRA	592
2	Universal Waste	RCRA	446
3	Container Management	RCRA	331
4	Labeling	RCRA	304
5	CFC Leak Detection Records	CAA	264

Top 15 Violations

(From 146 Voluntary Disclosures)

Rank	Violation	Statute	Frequency
6	SIP Requirements	CAA	230
7	Chemical Inventory	EPCRA	128
8	SPCC	CWA	120
9	Manifests	RCRA	115
10	Personnel Training	RCRA	97

Top 15 Violations

(From 146 Voluntary Disclosures)

Rank	Violation	Statute	Frequency
11	MSDS Records	EPCRA	69
12	Asbestos	CAA	49
13	CESQG Requirements	RCRA	42
14	Empty Containers	RCRA	40
15	UST – Leak Detection	RCRA	37

Number Of Facilities With Violations From 156 Voluntary Disclosures

Statute	Number of Facilities		Percent of Facilities	
	All R2	VA	All R2	VA
RCRA	145	11	93%	100%
EPCRA	101	3	65%	27%
CAA	115	8	74%	73%
CWA	87	9	56%	82%
SDWA	15	2	10%	18%
TSCA	27	1	17%	9%

Goals For Compliance Initiative

- ✓ Improve environmental compliance and safety at main and off-site healthcare facilities.
- ✓ Change the culture to one in which environmental compliance is a priority.
- ✓ Ensure compliance of entire sector; not just those reached through inspections.
- ✓ Ensure continued compliance by implementing permanent changes.