

Results of Recent HW Inspections of Healthcare Facilities

NEWMOA

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Env-Hw 1300 & 40 CFR 266 Subpart P

- NHDES adopted Env-Hw 1300 & 40 CFR 266 Subpart P (Pharmaceutical Rules) on July 23, 2022; incorporated by reference with amendments.
- All healthcare facilities that already have an EPA ID number are required to notify in accordance with the Pharmaceutical Rules by September 21, 2022.
- All healthcare facilities that do not have an EPA ID number are required to notify by September 21, 2022, or within 60 days of being subject to the Pharmaceutical Rules.
- A healthcare facility that is a very small quantity generator (VSQG) that had previously notified per the Pharmaceutical Rules can elect to withdraw from the Healthcare Rules but will need to manage its hazardous waste pharms in accordance with the applicable hazardous waste rules.



Notifications

- As of December 12, 2022, NHDES has received 117 Notifications as required by the Pharmaceutical Rules.
 - 5 Large Quantity Generators (LQG)
 - 30 Small Quantity Generators (SQG)
 - 63 VSQGs
 - 19 Notified as None- Not a generator of hazardous waste other than hazardous waste pharmaceuticals.
 - 5 healthcare facilities (4LQGs/1SQG) have not notified as required by the Pharmaceutical Rules.



NH Hospital Inspection

- Two LQG hospitals inspected; the first approximately one month after NHDES adopted the Healthcare Rules and the other last week.
- Overall went well. Both hospitals had minor compliance issues with Pharmaceutical Rules.
- Education and outreach



Education & Outreach

- NHDES Hazardous Waste Coordinator Certification program sent an email to all LQGs and SQGs once the Healthcare Rules were adopted.
- NHDES Reporting Information Management Section sent a reminder to all LQG and SQG healthcare facilities to submit the Notification.
- Presentation to the NH Hospital Association
- Fact Sheets
- Healthcare Facility Checklist



Challenges

- Some healthcare facilities, because it is new, would rather comply with the previous rules and keep doing what they were doing.
- DOT shipping requirements for potentially creditable hazardous waste pharmaceuticals.
- Getting the healthcare facilities to correctly complete their Notification forms.
 - Identify hazardous waste pharmaceuticals separate from other hazardous waste they generate.



Challenges

D. Pharmaceutical Activities

<input type="checkbox"/> Y <input type="checkbox"/> N	1. Operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals—if “Yes”, mark only one. Note: See the item-by-item instructions for definitions of healthcare facility and reverse distributor.
<input type="checkbox"/>	a. Healthcare Facility
<input type="checkbox"/>	b. Reverse Distributor
<input type="checkbox"/> Y <input type="checkbox"/> N	2. Withdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of your hazardous waste, including hazardous waste pharmaceuticals.

EPA ID No. [REDACTED]		
10. Description of Hazardous Wastes. Please list the waste name (excluding universal wastes and used oil for recycling), waste numbers and estimated monthly volume of the hazardous waste handled at your site. Use all waste codes for each waste stream. Please use an additional page if more spaces are needed. A health care facility operating under Env-Hw 1300 is not required to list the waste numbers for its hazardous waste pharmaceuticals below.		
Waste Name	EPA/State Hazardous Waste Numbers	Estimated Monthly Volume (include unit of measure)
FLAMMABLE WASTE	D001	150 lbs
CORROSIVE WASTE	D002	150 lbs
PHARMACEUTICALS	[REDACTED]	[REDACTED]

Chromium Silver	D007 D011	10 lbs
Lead	D008	2.5 lbs
Barium	D005	200 lbs
Chemo	U010 U035 U050 U058 U150 U059	20 lbs
Medicine, Toxic (EG Insulins)	D010 D011 D024	35 lbs
Warfarin, Nicotine	P001 P075	0.5 lbs

What's Next?

- FFY 2023
 - 2 LQG hospital inspections
 - 1 LQG Pharmacy
 - Two facilities have not re-notified
- FFY 2024
 - 0 LQG hospital inspections



Questions

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