

INSPECTION REPORT

Inspection Entry Date/Time	09/12/2023 08:48 AM (AKT)	Announced: No
Inspection Exit Date/Time	09/12/2023 02:00 PM (AKT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Company Name	Bartlett Regional Hospital	
Facility or Site Name	Bartlett Regional Hospital	
Facility/Site Identifier	AKR000210302	
Facility/Site Physical Address	3260 Hospital Dr.	
City, State, Zip Code	Juneau, AK 99801	
County/Borough	City and Borough of Juneau	
Generator Status	Very Small Quantity Generator (VSQG)	
NAICS	62211 – General Medical and Surgical Hospitals	
Type of Operation	Hospital	
Geographic Coordinates	58.32902777, -134.46644722	
Mailing Address/Secondary Address	Mr. Nathan Overson, CHC Compliance noverson@bartlettshospital.org 3260 Hospital Dr. Juneau, AK 99801	
City, State, Zip Code	Juneau, AK 99801	
Permit Number (If Applicable)	Not Applicable	
Lead Inspector:		
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2023.12.13 09:47:51 -09'00'
	EPA Region 10	Jones.Jon@epa.gov (907) 227-4316
Supervisor Review:		
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2023.12.14 14:55:45 -08'00'
	EPA Region 10	Quarterman.matthew@epa.gov (206) 553-2146

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Bartlett Regional Hospital Facility (the “Site” or “Facility”), located at 3260 Hospital Dr., Juneau, AK 99801, at 08:48 AM (AKT) on 09/12/2023 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Mr. Nathan Overson, CHC Compliance, that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA). The facility was inspected to ensure compliance with standards for hazardous waste generators and universal waste management (40 C.F.R. Part 262 through 273). The inspection

was conducted as part of a Core Program requirement for FY 2023. This report is based on information supplied by Bartlett Regional Hospital Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility including, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 10	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
CBJ Safety Officer/City and Borough of Juneau (CBJ)	Daniel Blount			Yes	Yes
CHC Compliance/Bartlett Regional Hospital	Nathan Overson	(907) 796-8578	noverson@bartletthospital.org	Yes	Yes
Grounds Keeper/Bartlett Regional Hospital	Shawn Nolan			Yes	Yes
Maintenance Supervisor/Bartlett Regional Hospital	Kelvin Schubert			Yes	No
Staff Safety Officer/Bartlett Regional Hospital	Evan Price			Yes	Yes
Acting CEO/Bartlett Regional Hospital	Nate Rumsey			Yes	Yes
Chief Operating Officer/Bartlett Regional Office	Kim McDowell			Yes	Yes
RCRA Inspector/ADEC	Alan Pefley			Yes	Yes
RCRA Inspector/ADEC	Emily Vannortwick			Yes	Yes
Lab Director/Bartlett Regional Hospital	John Fortin			No	Yes

Opening Conference

After arriving at the hospital, we entered the Administration Building. I walked up to a customer service window, where I spoke to Admin personnel and explained the purpose of our visit. We were then directed to go upstairs and once there we were met by additional Admin staff as well as the CEO, and Safety personnel. We informed staff that we were there to perform a hazardous waste inspection. We were then escorted to a conference room where we met with the hospital staff listed above in the Attendees table, in Section I of this report.

I presented my inspector credentials to and informed Mr. Nathan Overson, CHC Compliance, that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA). I provided business cards to the other hospital staff members at the opening conference.

During the opening conference, we explained that the focus of the RCRA inspection was to identify types of wastes generated, points of waste generation, methods of waste management, and review relevant documents.

Mr. Overson asserted that the facility was a very small quantity generator. I asked how the facility was managing their waste and we were told that it was being taken to the City and Borough of Juneau (CBJ) Household Hazardous Waste (HHW) facility. I asked if they maintained disposal records and Mr. Nolan, Grounds Keeper, told me they did. I asked to see the disposal records and Mr. Nolan left the conference room to retrieve the documents. Mr. Nolan returned a short time later with a binder that contained disposal records going back to 2017. I explained that I wanted to see the records of hazardous waste disposal to try and make an accurate determination of the hospital's generator status. During this preliminary review of the facility's hazardous waste disposal records, I saw that there were several times each year for multiple years, going back to 2017, when the hospital was an SQG, generating more than 220 pounds in a calendar month. I also saw that three pounds of P-listed waste had been disposed of through the HHW, indicating that the facility had accumulated more than 1 kg of P-listed waste at the facility making them a large quantity generator (LQG).

Only those areas in which we observed areas of concern or noted other pertinent issues are discussed in this inspection report.

Photo(s)

1. [IMG_1680.jpg](#)

Facility/Site Information

Bartlett Regional Hospital (BRH) is a hospital serving Juneau, Alaska, the capital city of Alaska and the largest city in Southeast Alaska, with a population of approximately 32,000. The hospital is owned by the CBJ. BRH is the only hospital in Juneau and provides the only emergency department in the city. In addition, BRH operates the adjacent Rainforest Recovery Center, an inpatient and outpatient drug and alcohol treatment center.

BRH is licensed for a total of 57 inpatient beds, 16 residential substance-abuse treatment facility beds in the Rainforest Recovery Center, and 61 residential beds in Wildflower Court. The hospital serves a 15,000-square-mile region in the northern part of Southeast Alaska. Approximately 55,000 people reside in their service area, with most communities inaccessible by road.

Length of Facility at Location	Since 1965
Operating Hours	Hospital operates seven days a week, 24 hours a day. Administrative Staff, Monday through Friday from 8:00 a.m. to 5:00 p.m.
Safety Training Provided to Inspector(s)?	No

What type of generator facility notified?	Non-Notifier, operating as a Very Small Quantity Generator (VSQG)
What type of generator facility verified as?	Verified as VSQG on the day of the inspection, however; based on facility records, the facility was a Small Quantity Generator (SQG) several times a year since 2017.
Weather Conditions	Rainy and overcast

Process Description

During the opening conference, Mr. Shawn Nolan, Grounds Keeper, told us that wastes generated at the hospital included the following:

- Waste fluorescent lamps and batteries
- Waste paint related material
- Waste aerosols
- Pharmaceutical waste
- Various flammable/toxic wastes – Ethyl Alcohol waste and Paraffin Wax waste with traces of xylene
- Various P-listed wastes – Warfarin, and nicotine related products
- Waste diesel fuel
- Medical waste – Red bag waste and trace chemotherapy waste

Mr. Nolan told us that he takes the waste to the local HHW facility on a monthly basis. According to Mr. Nolan, the HHW facility is located at the CBJ Landfill.

We were accompanied throughout the inspection by Mr. Nolan and Mr. Overson and for a portion of the inspection by Mr. Fortin. During the inspection we looked at the facility's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous. We also observed the facility's universal waste and used oil management.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Main Building		Yes
Basement Shop	Accumulation of waste batteries	No
Old Well Room	Accumulation of waste lamps and batteries	No
Central Accumulation Area (CAA)		Yes
Rm #1115 Medical Waste Storage	Accumulation of flammable/toxic waste	Yes
Chemo Infusion		No
Critical Care Unit (CCU) Room	Patient room with a wall mounted collection container for RCRA hazardous waste and non-toxic pharmaceutical waste	No
Rm #2809 Medicine Room	SAA	No
Histology Lab		No
Rm #2433A Chemical Storage Room	SAA	No
Medical Surgery		No

Nurses Station	SAA	No
Rm #3360 Medication Room	SAA	No
Mental Health Nurses Station		No
Rm #3126 Serenity Room	SAA	No
OBGYN (Obstetrics and Gynecology) Area		No
Nurses Station adjacent to Rm #2752 Procedure Room	SAA	No
Operating Room Area		No
SAA	SAA in each operating room	No
Pharmacy (3rd floor) Rm #3483		No
SAA		No

SECTION II – OBSERVATIONS

Building: Main Building/Central Accumulation Area (CAA)/Rm #1115 Medical Waste Storage			
Observation #: JJ1-OB-001	Date: 09/12/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Shawn Nolan		Title: Grounds Keeper	
While at the CAA, we observed containers of non-RCRA waste, including sharps, red bag waste, non-hazardous waste, and chemotherapy waste. We also observed three, 2.5 - gallon "Rx Destroyer" containers. There were two "Rx Destroyer" containers on a shelf that were not labeled with the words "Hazardous Waste" and were not dated. There was one "Rx Destroyer" container that was labeled with the words "Hazardous Waste," a hazard indicator, but not dated, and in an open blue, poly container that was adjacent to the shelf where the other two "Rx Destroyer's" were located. According to the "Rx Destroyer" website which I researched following the inspection, these containers are for pharmaceuticals that are controlled substances. The "Rx Destroyer" renders pharmaceuticals non-retrievable. At the time of the inspection, the facility was managing the "Rx Destroyer" containers as hazardous waste. I suggested to Mr. Nolan that he take a closer look at the "Rx Destroyer's" to make a waste determination, as this waste might not be hazardous. We also saw a one-gallon container that was labeled with the words "Ethyl Alcohol Waste," with trace amounts of xylene and a one-gallon container that was labeled with the words "Paraffin Wax Waste," with trace amounts of xylene on the same shelf. Both containers were marked with hazard indicators. According to Mr. Nolan, the ethyl alcohol and paraffin wax wastes were being managed by the facility as flammable/toxic waste.			
Photo(s) 1. IMG_1682.jpg 2. IMG_1683.jpg 3. IMG_1681.jpg			

Building: Main Building/Critical Care Unit (CCU) Room			
Observation #: JJ1-OB-002	Date: 09/12/2023	Contains AOC: No	Contains CBI: No
Person Interviewed: Shawn Nolan		Title: Grounds Keeper	
While in the CCU, we went into a vacant patient room with facility personnel. While there we saw a wall mounted collection box that held a ~1.5-quart SAA container, at the top of the box, for the accumulation of			

flammable/toxic waste, and a ~1.5-quart container, at the bottom of the box, for the collection of non-toxic pharmaceutical waste. At the time of the inspection, the SAA container was labeled with the words "Hazardous Waste" and a hazard indicator. The wall mounted collection box is just for waste generated in that room. At this point in the inspection, we met Mr. John Fortin, Lab Director, and he joined us for the remainder of the inspection.

Photo(s)

1. [IMG_1684.jpg](#)

Building: Main Building/Critical Care Unit (CCU) Room/Rm #2809 Medicine Room

Observation #: JJ1-OB-003 **Date:** 09/12/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Shawn Nolan **Title:** Grounds Keeper

While at the CCU, we inspected another SAA located in Medicine Room #2809. At this SAA, we saw one, black, five-gallon container being used to accumulate non-hazardous pharmaceutical waste, and a 2.5 gallon "Rx Destroyer." We also saw a five-gallon SAA container being used to accumulate flammable/toxic waste. At the time of the inspection, the SAA container was labeled with the words "Hazardous Waste" and marked with a hazard indicator.

Photo(s)

1. [IMG_1685.jpg](#)

Building: Main Building/OBGYN (Obstetrics and Gynecology) Area/Nurses Station adjacent to Rm #2752 Procedure Room

Observation #: JJ1-OB-004 **Date:** 09/12/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Shawn Nolan **Title:** Grounds Keeper

While at the Nurse's Station, we inspected another SAA. In this SAA, we saw a sharps container and another 2.5 gallon "RX Destroyer." We also saw a black, five-gallon container marked with the words "Highly Flammable." The container was not labeled with the words "Hazardous Waste."

Photo(s)

1. [IMG_1688.jpg](#)
2. [IMG_1687.jpg](#)
3. [IMG_1686.jpg](#)
4. [IMG_1689.jpg](#)

Building: Main Building/Histology Lab/Rm #2433A Chemical Storage Room

Observation #: JJ1-OB-005 **Date:** 09/12/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Shawn Nolan **Title:** Grounds Keeper

While at the lab, we inspected the SAA. Mr. Nolan took us to a yellow flammable storage cabinet that contained four, one-gallon containers that were labeled with the words "Ethyl Alcohol waste" (these were the same containers as seen in the CAA). We told Mr. Nolan that the containers should probably be moved to the

CAA. At the time of the inspection, all four containers were marked with hazard indicators, but none were labeled with the words "Hazardous Waste."

Photo(s)

1. [IMG_1692.jpg](#)
2. [IMG_1691.jpg](#)
3. [IMG_1690.jpg](#)

Building: Main Building/Histology Lab/Rm #2433A Chemical Storage Room

Observation #: JJ1-OB-006 **Date:** 09/12/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Shawn Nolan **Title:** Grounds Keeper

The information in Observation JJ1-OB-005 was inadvertently entered into Smart Tools a second time, creating Observation JJ1-OB-006 which is N/A.

Building: Main Building/Operating Room Area/SAA

Observation #: JJ1-OB-007 **Date:** 09/12/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Shawn Nolan **Title:** Grounds Keeper

While in the Operating Room Area, we were told that each operating room has a SAA container for the accumulation of flammable/toxic waste as well as a 2.5 gallon "Rx Destroyer." We did not enter an operating room during the inspection in an effort to maintain the sterile environment, however; an on-duty nurse brought out a red, three-gallon container with a black strip for what the facility identifies as a SAA container for the accumulation of flammable/toxic waste which is handled as hazardous waste. At the time of the inspection, the SAA container was labeled with the words "Hazardous Waste" and marked with a hazard indicator.

Building: Main Building/Pharmacy (3rd floor) Rm #3483/SAA

Observation #: JJ1-OB-008 **Date:** 09/12/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Shawn Nolan **Title:** Grounds Keeper

While inspecting this area, we met with and were accompanied by Mr. Carlo Rip, Pharmacy Purchaser. While in Room #3483, we saw the following SAA containers:

- Two full, black, five-gallon containers of flammable/toxic waste which, according to facility personnel, were ready to be transferred the CAA. These two containers were labeled with the words "Hazardous Waste" and hazard indicators, but no accumulation start date (ASD).
- Two, black, five-gallon containers labeled with the words "Non-Toxic Pharmaceutical Waste."
- One, black, five-gallon SAA container of flammable/toxic waste which waste was still be accumulated. The container was labeled with the words "Hazardous Waste" and marked with a hazard indicator.
- One, black, five-gallon container of waste aerosols (almost full and was estimated to be a 6-month accumulation). This container was labeled with the words "Aerosols: (Anything that is propelled)." The container was neither labeled with the words "Hazardous Waste" and marked with a hazard indicator nor was it being managed as universal waste and labeled with either the phrase, "Universal Waste - Aerosols," "Waste Aerosols," or "Used Aerosols."

- One, white, five-gallon container of waste nicotine products (2/3 full estimated to be a 1-year accumulation) and labeled with the words "P-List." The container was not labeled with the words "Hazardous Waste" or marked with a hazard indicator.

Mr. Rip showed us a shelving unit of potentially creditable pharmaceuticals for reverse distribution. According to Mr. Rip, the reverse distributor (Inmar) makes the determination as to what pharmaceuticals they will take for credit, and anything not taken gets wasted. The reverse distributor comes every three months and according to Mr. Rip, on average 2% of what the pharmacy deems as potentially creditable isn't taken by Inmar and ends up leaving the facility as hazardous waste.

Photo(s)

- [IMG_1693.jpg](#)
- [IMG_1697.jpg](#)
- [IMG_1695.jpg](#)
- [IMG_1696.jpg](#)
- [IMG_1694.jpg](#)
- [IMG_1698.jpg](#)
- [IMG_1699.jpg](#)
- [IMG_1703.jpg](#)
- [IMG_1702.jpg](#)
- [IMG_1701.jpg](#)
- [IMG_1704.jpg](#)
- [IMG_1700.jpg](#)

Building: Main Building/Medical Surgery /Rm #3360 Medication Room

Observation #: JJ1-OB-009

Date: 09/12/2023

Contains AOC: No

Contains CBI: No

Person Interviewed: Shawn Nolan

Title: Grounds Keeper

While in the Medication Room #3360 SAA, we saw a five-gallon container that held non-toxic pharmaceutical waste and was labeled as such. We also saw a five-gallon SAA container that held flammable/toxic waste. The container was labeled with the words "Hazardous Waste" and marked with a hazard indicator. We also saw a three-gallon container of P-listed waste. At the time of the inspection, the three-gallon container was marked with the words "Hazardous Waste," but was not marked with a hazard indicator.

Photo(s)

- [IMG_1706.jpg](#)
- [IMG_1705.jpg](#)

Building: Main Building/Medical Surgery /Nurses Station

Observation #: JJ1-OB-010

Date: 09/12/2023

Contains AOC: No

Contains CBI: No

Person Interviewed: Shawn Nolan

Title: Grounds Keeper

While still in Medical Surgery, we inspected the SAA at the Nurses Station. While there we saw a five-gallon container that was labeled with the words "Non-Toxic Pharmaceutical Waste" and a five-gallon SAA container

being used to accumulate flammable/toxic waste. At the time of the inspection, the container was labeled with the words "Hazardous Waste" and marked with a hazard indicator.

Photo(s)

1. [IMG_1707.jpg](#)

Building: Main Building/Mental Health Nurses Station/Rm #3126 Serenity Room

Observation #: JJ1-OB-011 **Date:** 09/12/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Shawn Nolan **Title:** Grounds Keeper

While at the Nurses Station, we saw another 2.5 gallon "Rx Destroyer" and a seven-gallon SAA container being used to accumulate flammable/toxic waste. At the time of the inspection, the SAA container was labeled with the words "Hazardous Waste," but was not marked with a hazard indicator.

Photo(s)

1. [IMG_1709.jpg](#)
2. [IMG_1708.jpg](#)

Building: Main Building/Chemo Infusion

Observation #: JJ1-OB-012 **Date:** 09/12/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Shawn Nolan **Title:** Grounds Keeper

While inspecting the SAA, we saw that there was no hazardous waste being accumulated. The only container we saw in this area was a five-gallon container that was labeled with the words "Non-Hazardous Pharmaceutical Waste."

Building: Main Building/Basement Shop

Observation #: JJ1-OB-013 **Date:** 09/12/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Shawn Nolan **Title:** Grounds Keeper

While inspecting the Basement Shop, we saw a step-can style trash receptacle that was being used to accumulate waste Lithium batteries. At the time of the inspection, the container being used to accumulate the waste lithium batteries was labeled with the words "HAZ WASTE LITHIUM BATTs." We looked inside the container and saw that it held one, button style, waste lithium battery. While there, we took the time to discuss the management of waste lithium batteries as universal waste vs hazardous waste. The container was neither labeled as "Hazardous Waste" and marked with a hazard indicator nor was it being managed as universal waste and labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."

Photo(s)

1. [IMG_1711.jpg](#)
2. [IMG_1710.jpg](#)

Building: Main Building/Basement Shop/Old Well Room

Observation #: JJ1-OB-014	Date: 09/12/2023	Contains AOC: No	Contains CBI: No
Person Interviewed: Shawn Nolan		Title: Grounds Keeper	
While in the Old Well Room, we saw a small blue tray that held four waste compact fluorescent lamps (CFLs). Neither the waste CFLs nor the tray that held them was labeled. We also saw a gray tray that held some waste batteries, including at least one waste Ni-Cad battery. Neither the waste batteries nor the tray that held them was labeled. We also saw a large gray, open, wheeled trash receptacle that Mr. Nolan said the facility was using to accumulate waste fluorescent (linear type) lamps. At the time of the inspection, the container was not labeled in any way and held one small waste CFL.			
Photo(s) 1. IMG_1715.jpg 2. IMG_1713.jpg 3. IMG_1712.jpg 4. IMG_1716.jpg			

SECTION III – RECORDS REVIEW

Record: Shipping Documents/Tolling agreements	AOC: Yes																																																									
Ref #: JJ1-RR-001	Reviewed By: Jon Jones																																																									
Reviewed Date: 09/12/2023																																																										
At the time of the inspection, the facility believed they met the criteria of being a Very Small Quantity Generator (VSQG). As such, they have been managing their hazardous waste in accordance with the requirements of a VSQG and taking it to the CBJ HHW facility which is operated by Clean Harbors. Following the facility walk-through portion of the inspection, we returned to the conference room and inspected the disposal records for waste that the facility had taken to the HHW facility, for the period of 2017 through 2023, and identified the following months when the amount of hazardous waste generated at the facility exceeded 220 pounds: <table border="1"> <thead> <tr> <th><u>Date</u></th> <th><u>Waste</u></th> <th><u>Quantity</u></th> </tr> </thead> <tbody> <tr><td>04/05/23</td><td>Flammable/Toxic</td><td>240 pounds</td></tr> <tr><td>04/26/23</td><td>Flammable/Toxic</td><td>228 pounds</td></tr> <tr><td>05/26/22</td><td>Flammable/Toxic</td><td>515 pounds</td></tr> <tr><td>07/08/21</td><td>Flammable/Toxic</td><td>249 pounds</td></tr> <tr><td>11/18/21</td><td>Flammable/Toxic</td><td>249 pounds</td></tr> <tr><td>03/12/20</td><td>Flammable/Toxic</td><td>391 pounds</td></tr> <tr><td>06/18/20</td><td>Flammable/Toxic</td><td>259 pounds</td></tr> <tr><td>02/02/19</td><td>Flammable/Toxic</td><td>272 pounds</td></tr> <tr><td>06/13/19</td><td>Flammable/Toxic</td><td>261 pounds</td></tr> <tr><td>09/26/19</td><td>Flammable/Toxic</td><td>333 pounds</td></tr> <tr><td>11/07/19</td><td>Flammable/Toxic</td><td>344 pounds</td></tr> <tr><td>12/12/19</td><td>Flammable/Toxic</td><td>288 pounds</td></tr> <tr><td>03/08/18</td><td>P-listed</td><td>3 pounds</td></tr> <tr><td>07/12/18</td><td>Flammable/Toxic</td><td>283 pounds</td></tr> <tr><td>09/06/18</td><td>Flammable/Toxic</td><td>258 pounds</td></tr> <tr><td>10/25/18</td><td>Flammable/Toxic</td><td>228 pounds</td></tr> <tr><td>12/13/18</td><td>Flammable/Toxic</td><td>224 pounds</td></tr> <tr><td>05/18/17</td><td>Flammable/Toxic</td><td>360 pounds</td></tr> </tbody> </table>		<u>Date</u>	<u>Waste</u>	<u>Quantity</u>	04/05/23	Flammable/Toxic	240 pounds	04/26/23	Flammable/Toxic	228 pounds	05/26/22	Flammable/Toxic	515 pounds	07/08/21	Flammable/Toxic	249 pounds	11/18/21	Flammable/Toxic	249 pounds	03/12/20	Flammable/Toxic	391 pounds	06/18/20	Flammable/Toxic	259 pounds	02/02/19	Flammable/Toxic	272 pounds	06/13/19	Flammable/Toxic	261 pounds	09/26/19	Flammable/Toxic	333 pounds	11/07/19	Flammable/Toxic	344 pounds	12/12/19	Flammable/Toxic	288 pounds	03/08/18	P-listed	3 pounds	07/12/18	Flammable/Toxic	283 pounds	09/06/18	Flammable/Toxic	258 pounds	10/25/18	Flammable/Toxic	228 pounds	12/13/18	Flammable/Toxic	224 pounds	05/18/17	Flammable/Toxic	360 pounds
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08/31/17 Flammable/Toxic 360 pounds
 10/26/17 Flammable/Toxic 288 pounds

Based on this information, the facility failed to notify EPA and obtain an EPA Identification Number (The EPA I.D.# AKR000210302 was issued internally as a result of the inspection).

The facility also failed to ship the hazardous waste, listed above, to a permitted TSDF, using uniform hazardous waste manifests and land disposal restriction notices.

Document(s)

1. Waste Log 2017.pdf
2. Waste Log 2018.pdf
3. Waste Log 2019.pdf
4. Waste Log 2020.pdf
5. Waste Log 2021.b.pdf
6. Waste Log 2021.pdf
7. Waste Log 2022.pdf
8. Waste Log 2023.pdf

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Building: Main Building	Area: Central Accumulation Area (CAA)	Sub-area: Rm #1115 Medical Waste Storage
JJ1-OB-001		
At the time of the inspection, the facility was managing the "Rx Destroyer" containers as hazardous waste. I suggested to Mr. Nolan that he take a closer look at the "Rx Destroyer's" to make a waste determination, as this waste might not be hazardous.	Regulation:	Sections:

Record: Shipping Documents/Tolling agreements

JJ1-RR-001

We inspected the disposal records for waste that the facility had taken to the HHW facility, for the period of 2017 through 2023, and identified the following months when the amount of hazardous waste generated at the facility exceeded 220 pounds: 04/05/23 04/26/23	Regulation:	Sections:
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05/26/22 07/08/21 11/18/21 03/12/20 06/18/20 02/02/19 06/13/19 09/26/19 11/07/19 12/12/19 07/12/18 09/06/18 10/25/18 12/13/18 05/18/17 08/31/17 10/26/17 Based on this information, the facility failed to notify EPA and obtain an EPA Identification Number. The facility also failed to ship the hazardous waste, listed above, to a permitted TSDF, using uniform hazardous waste manifests and land disposal restriction notices. On 03/08/18, three pounds of P-listed waste was disposed of at the HHW facility after having accumulated greater than 1 kg of the acute hazardous waste which made the facility a Large Quantity Generator (LQG).		
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SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

At the conclusion of the inspection, we conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. We thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that we observed during my inspection of the facility.

I told everyone, from what I saw while inspecting the facility, the wastes that are routinely managed by other facilities as universal waste, such as waste lamps, batteries, and aerosols, are not managed that way. I said that based on my findings, if what I observed in the way of waste lamps, batteries, and aerosols were added to the hazardous wastes I observed, their facility's hazardous waste generator status would be that of a VSQG. Based on that, the container labeling or lack of that we observed was not an area of concern as a VSQG.

I also told everyone present that it appeared as though the facility didn't really have a good understanding of the hazardous waste regulations, the management of hazardous waste, universal waste, or the waste determination process.

I told them that our inspection of the disposal paperwork indicated that on more than one occasion, their facility generated more than 220 pounds of hazardous waste and their generator status was SQG. I explained that at that time, they should have notified EPA and obtained an EPA I.D. number. I also told them the disposal paperwork indicated that on one occasion, 3 pounds of P-Listed Waste was delivered to the HHW facility which indicated that greater than 1 kg of P-listed waste had been accumulated on-site and the facility should have complied with the requirements of an LQG.

I told them they needed to manage their waste lamps, batteries, and aerosols as universal waste as this would reduce the amount of hazardous waste they generate. I also told them they needed to do better waste determinations because some of the hazardous wastes they think they're generating might turn out to be non-hazardous, like the "Rx Destroyer's." I explained that once that's done, if they were still a VSQG, counting both pharmaceutical and nonpharmaceutical waste, they would not have to opt into Subpart P for managing their hazardous waste pharmaceuticals.

I explained that if they ended up being a SQG or LQG, they would also need to comply with the hazardous waste pharmaceuticals (HWPharms) regulations in Subpart P.

During the closing conference there was discussion regarding 40 gallons of waste diesel fuel that was taken to the HHW collection site. There was discussion about this waste possibly being a hazardous waste, so we requested a copy of the Safety Data Sheet (SDS) for the diesel fuel. We also requested electronic copies of the waste disposal records for the waste delivered to the HHW collection site.

I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report as would a case officer. I told them the case officer would review the report to determine if any of my areas of concern resulted in determinations of violation.

Following the Inspection

The requested documents were provided following the inspection, in emails dated 9/13/23 and 9/21/23, and are included in the Document Log, in Section VII – List of Appendices.

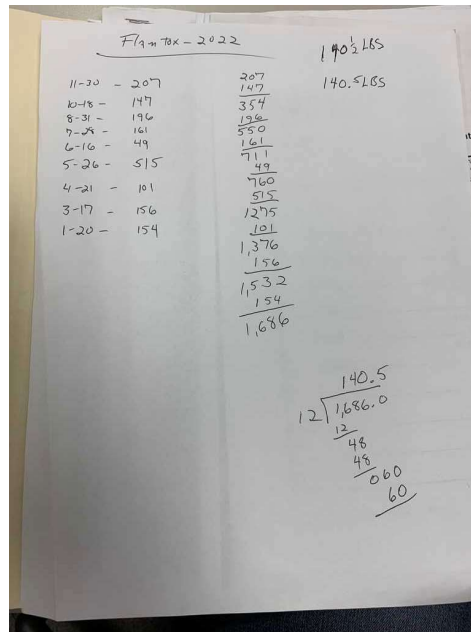
Mr. Overson emailed the SDS for the diesel fuel on 9/21/23. In that email he states that, "It looks like the flashpoint is ~125°F." I reviewed the SDS which indicated the waste diesel fuel was hazardous for ignitability (D001).

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



[Title]			IMG_1680.jpg
09/12/2023 09:26 AM	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			58.32902777, -134.46644722
View of documentation, seen during the opening conference, showing the amounts of Flammable/Toxic wastes that were managed through the local HHW facility in 2022.			



[Title]			IMG_1681.jpg
09/12/2023 09:54 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Central Accumulation Area (CAA)			58.32894166, -134.46414166
View of Rx Destroyer containers in the CAA.			



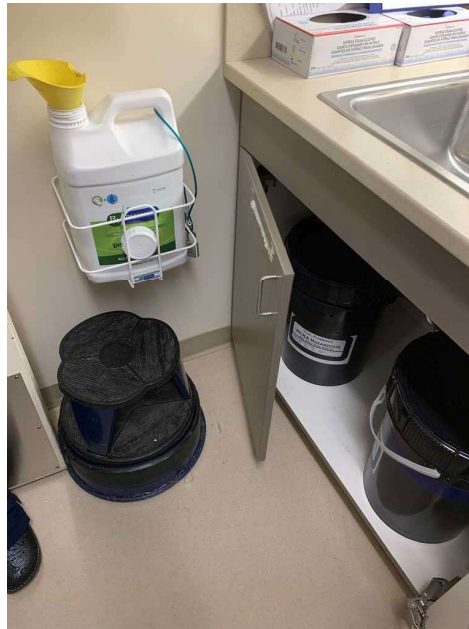
[Title]			IMG_1682.jpg
09/12/2023 09:54 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Central Accumulation Area (CAA)			58.328975, -134.46412777
View of an Rx Destroyer container that has been labeled as "RCRA Hazardous Waste Flammable/Toxic."			



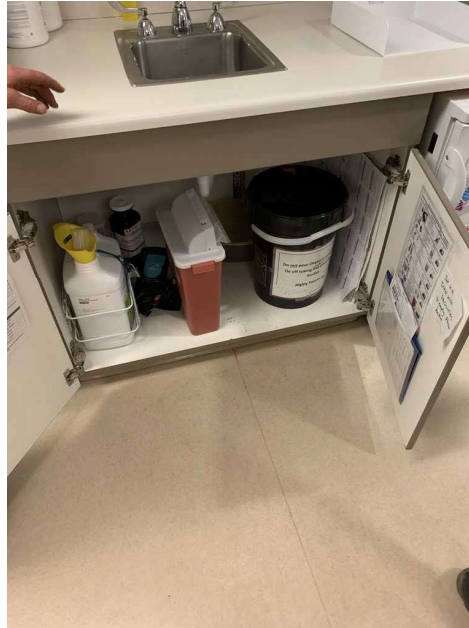
[Title]			IMG_1683.jpg
09/12/2023 09:54 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Central Accumulation Area (CAA)			58.328925, -134.46414166
View of two, one-gallon containers of waste. One containing "Ethyl Alcohol Waste" and one containing "Paraffin Wax Waste" that contains traces of xylene.			



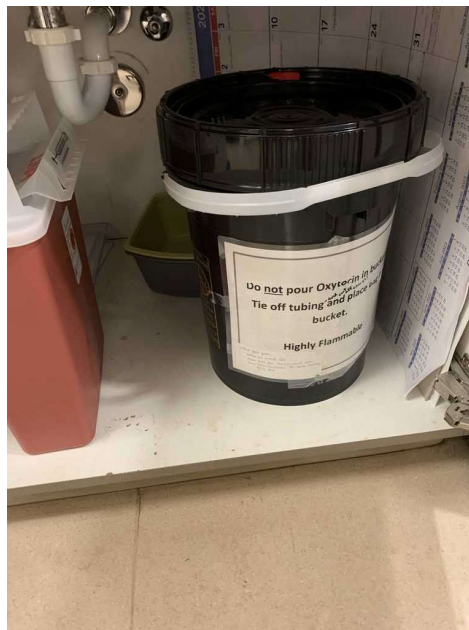
[Title]			IMG_1684.jpg
09/12/2023 10:04 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Critical Care Unit (CCU) Room			58.32872777, -134.46539444
View of wall mounted waste collection container in a patient room within the facility's CCU.			



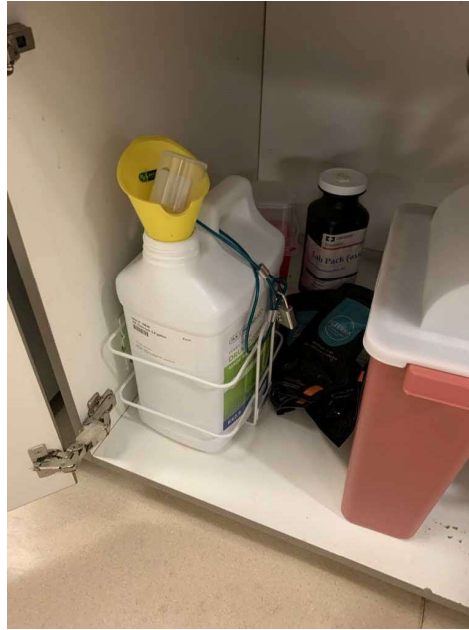
[Title]			IMG_1685.jpg
09/12/2023 10:16 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Critical Care Unit (CCU) Room			58.32863333, -134.46565277
View of five-gallon container for non-hazardous waste, five-gallon container for flammable/toxic waste, and 2.5-gallon Rx Destroyer.			



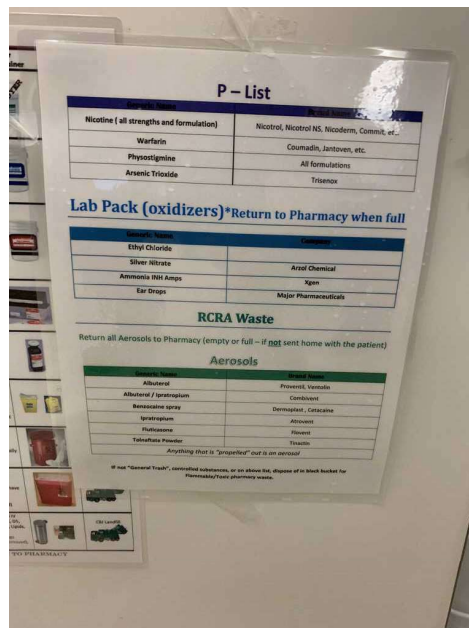
[Title]			IMG_1686.jpg
09/12/2023 10:22 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/OBGYN (Obstetrics and Gynecology) Area			58.32879166, -134.46562222
View of black, five-gallon container labeled "Highly Flammable," red sharps container, and 2.5-gallon RX Destroyer.			



[Title]			IMG_1687.jpg
09/12/2023 10:22 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/OBGYN (Obstetrics and Gynecology) Area			58.32877777, -134.46556111
Close-up view of black, five-gallon container in SAA that is labeled as "Highly Flammable."			



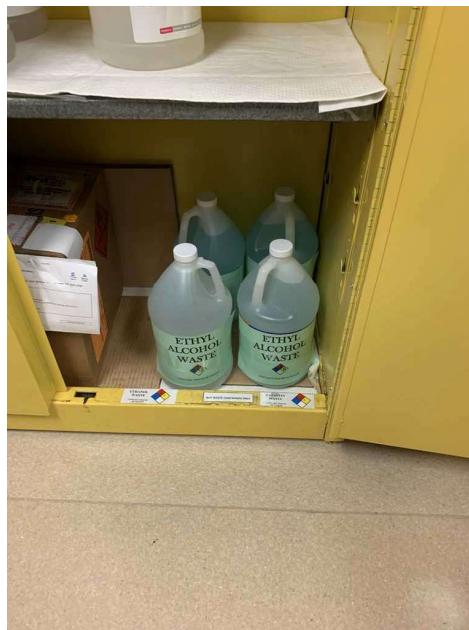
[Title]			IMG_1688.jpg
09/12/2023 10:22 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/OBGYN (Obstetrics and Gynecology) Area			58.32880277, -134.46562222
Close-up view of the Rx Destroyer in the SAA.			



[Title]			IMG_1689.jpg
09/12/2023 10:23 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/OBGYN (Obstetrics and Gynecology) Area			58.32886944, -134.46560555
View of process/flow diagram chart for the disposal of waste, located on the inside of the SAA cabinet door.			



[Title]			IMG_1690.jpg
09/12/2023 10:27 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Histology Lab			58.32880833, -134.46528611
View of four, one-gallon containers of Ethyl Alcohol waste (these were the same wastes seen in the CAA).			



[Title]			IMG_1691.jpg
09/12/2023 10:27 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Histology Lab			58.32880833, -134.46528611
Close-up view of four, one-gallon containers of Ethyl Alcohol waste.			



[Title]			IMG_1692.jpg
09/12/2023 10:28 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Histology Lab			58.32884166, -134.46531666
Another close-up view of four, one-gallon containers of Ethyl Alcohol waste.			



[Title]			IMG_1693.jpg
09/12/2023 10:48 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Pharmacy (3rd floor) Rm #3483			58.32908888, -134.46430833
View of two, black, five-gallon containers of flammable/toxic waste which were ready to be transferred to the CAA. Two, black, five-gallon containers of non-toxic pharmaceutical waste, and one, black, five-gallon container of flammable/toxic waste which an active SAA container.			



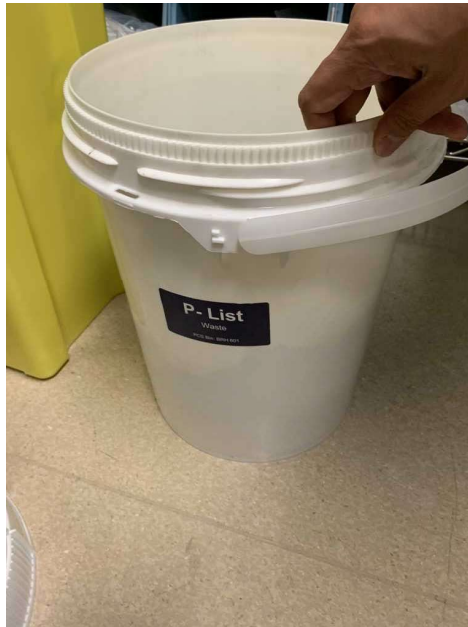
[Title]			IMG_1694.jpg
09/12/2023 10:48 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Pharmacy (3rd floor) Rm #3483			58.32908333, -134.464325
Another view of the containers seen in IMG_1693.jpg, and a black, five-gallon container of waste aerosols (almost full and estimated to be a 6-month accumulation) can be seen here on the right and on top of a white, five-gallon container of P-List nicotine products (2/3 full estimated to be a 1-year accumulation).			



[Title]			IMG_1695.jpg
09/12/2023 10:49 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Pharmacy (3rd floor) Rm #3483			58.32905277, -134.46426388
Close-up view of the label on the waste aerosol container.			



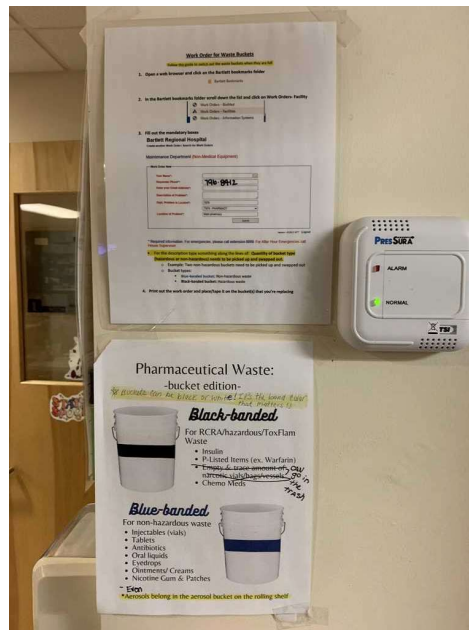
[Title]			IMG_1696.jpg
09/12/2023 10:51 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Pharmacy (3rd floor) Rm #3483			58.32908888, -134.46433888
View of the contents in the container labeled as "P-list waste."			



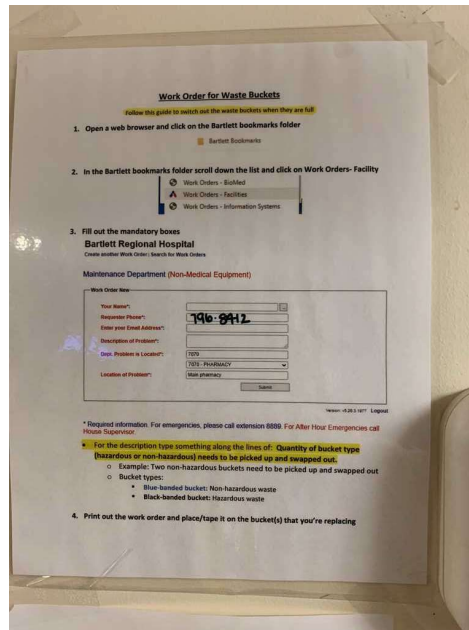
[Title]			IMG_1697.jpg
09/12/2023 10:51 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Pharmacy (3rd floor) Rm #3483			58.329075, -134.46435555
Close-up view of the label on the container of P-listed waste.			



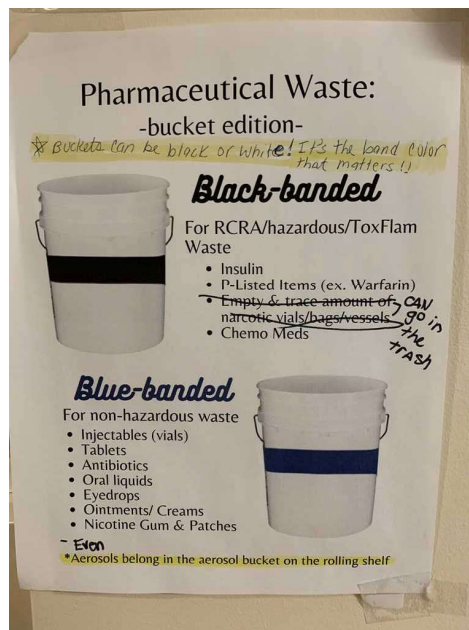
[Title]			IMG_1698.jpg
09/12/2023 10:51 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Pharmacy (3rd floor) Rm #3483			58.32910277, -134.464325
Another view of the white, five-gallon container, labeled as containing P-listed waste.			



[Title]			IMG_1699.jpg
09/12/2023 10:54 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Pharmacy (3rd floor) Rm #3483			58.32904444, -134.46438611
View of signage posted on the wall, just outside of the Pharmacy SAA.			



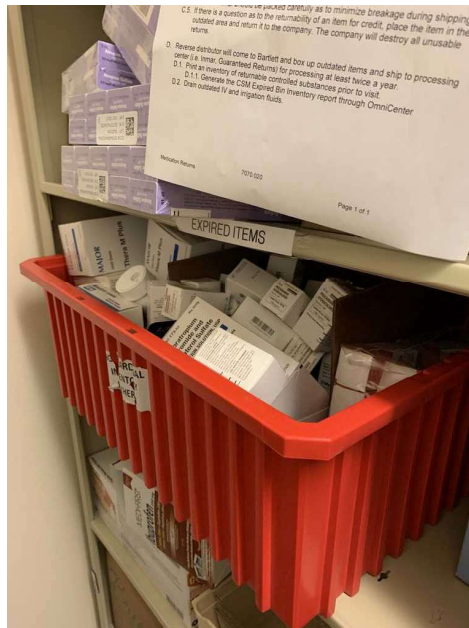
[Title]			IMG_1700.jpg
09/12/2023 10:54 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Pharmacy (3rd floor) Rm #3483			58.32904444, -134.46438611
Close-up view of the signage seen in IMG_1699.			



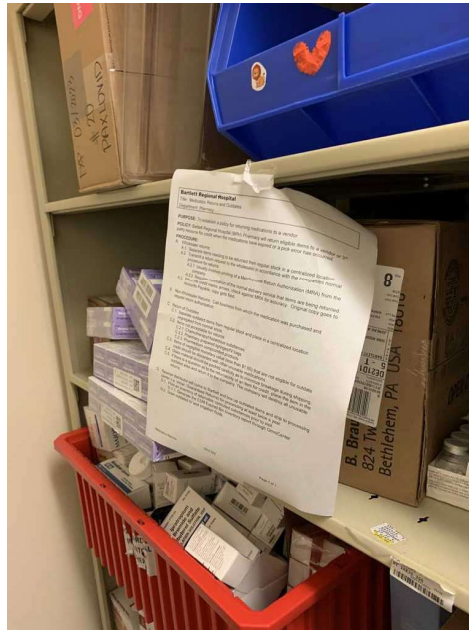
[Title]			IMG_1701.jpg
09/12/2023 10:54 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Pharmacy (3rd floor) Rm #3483			58.32905833, -134.46438611
Another close-up view of the signage seen in IMG_1699.			



[Title]			IMG_1702.jpg
09/12/2023 10:56 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Pharmacy (3rd floor) Rm #3483			58.32895, -134.46429444
View of the area where the potentially creditable HWPharms are accumulated prior to being picked up by the reverse distributor.			



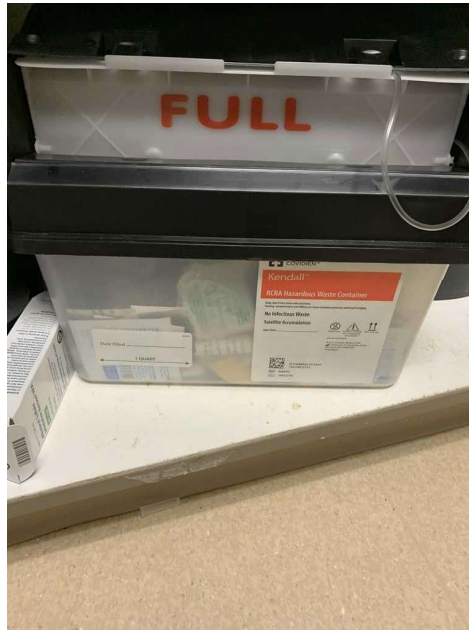
[Title]			IMG_1703.jpg
09/12/2023 10:56 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Pharmacy (3rd floor) Rm #3483			58.32896388, -134.46429444
Close-up view of the potentially creditable HWPharms in the red tote.			



[Title]			IMG_1704.jpg
09/12/2023 10:56 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Pharmacy (3rd floor) Rm #3483			58.32896388, -134.46429444
Close-up view of the posted SOP regarding Medication Returns and Outdates.			



[Title]			IMG_1705.jpg
09/12/2023 11:03 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Medical Surgery			58.32885833, -134.46482777
View of black, five-gallon container holding non-toxic pharmaceutical waste on the left, a three-gallon container of P-listed waste, and a black, five-gallon container of flammable/toxic waste.			



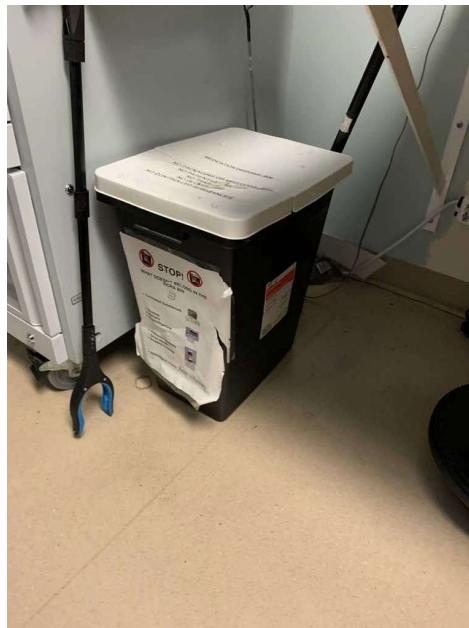
[Title]			IMG_1706.jpg
09/12/2023 11:03 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Medical Surgery			58.32885833, -134.46482777
Close-up view of the three-gallon container of P-listed waste.			



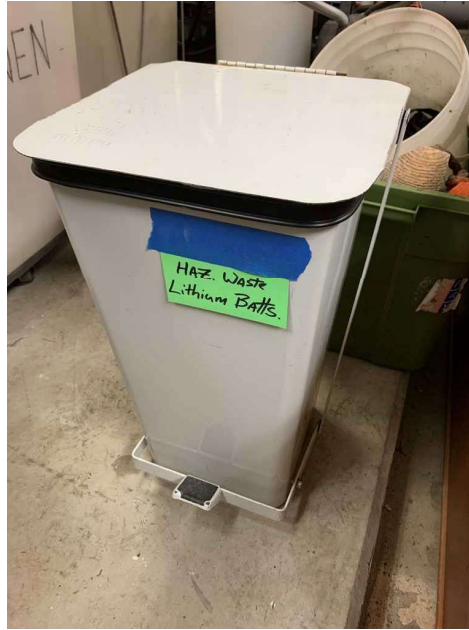
[Title]			IMG_1707.jpg
09/12/2023 11:07 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Medical Surgery			58.32909444, -134.464325
View of black, five-gallon container holding non-toxic pharmaceutical waste on the right, and a black, five-gallon container holding flammable/toxic waste on the left.			



[Title]			IMG_1708.jpg
09/12/2023 11:18 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Mental Health Nurses Station			58.32859166, -134.46571388
View of 2.5-gallon Rx Destroyer on the left, and a black, seven-gallon container of flammable/toxic waste seen on the floor.			



[Title]			IMG_1709.jpg
09/12/2023 11:18 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Mental Health Nurses Station			58.32859166, -134.46572777
Close-up view of black, seven-gallon container of flammable/toxic waste.			



[Title]			IMG_1710.jpg
09/12/2023 11:40 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Basement Shop			58.32899444, -134.46647777
View of the waste battery container.			



[Title]			IMG_1711.jpg
09/12/2023 11:40 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Basement Shop			58.32899166, -134.46647777
View of waste lithium battery in the bottom of container.			



[Title]			IMG_1712.jpg
09/12/2023 11:46 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Basement Shop			58.32881944, -134.46487499
View of fluorescent (compact type) bulbs in a blue unmarked tray, and NiCad batteries in a gray unmarked tray.			



[Title]			IMG_1713.jpg
09/12/2023 11:47 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Basement Shop			58.32880277, -134.46464444
Another view of a trash receptacle being used to accumulate waste lamps.			



[Title]			IMG_1715.jpg
09/12/2023 11:48 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Basement Shop			58.32878888, -134.46516388
View of a trash receptacle being used to accumulate waste lamps.			



[Title]			IMG_1716.jpg
09/12/2023 11:48 AM	No CBI	No PII	Photographer: Jon Jones
Main Building/Basement Shop			58.32875555, -134.46496666
View of waste CFL bulb in the bottom of the container.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	Waste Log 2017.pdf	No	No	Jon Jones	12/05/2023
Records Review	Waste Log 2018.pdf	No	No	Jon Jones	12/05/2023
Records Review	Waste Log 2019.pdf	No	No	Jon Jones	12/05/2023
Records Review	Waste Log 2020.pdf	No	No	Jon Jones	12/05/2023
Records Review	Waste Log 2021.b.pdf	No	No	Jon Jones	12/05/2023
Records Review	Waste Log 2021.pdf	No	No	Jon Jones	12/05/2023
Records Review	Waste Log 2022.pdf	No	No	Jon Jones	12/05/2023
Records Review	Waste Log 2023.pdf	No	No	Jon Jones	12/05/2023
Facility Map	BRH Map.pdf	No	No	Jon Jones	12/05/2023
Other - Safety Data Sheet	ULSD (AK)-sds.pdf	No	No	Jon Jones	12/05/2023
Communications	email9.21.23RE BRH Waste Logs.msg	No	No	Jon Jones	12/05/2023
Process Description/Flow Diagram	img20230912_12221279.pdf	No	No	Jon Jones	12/05/2023
Other - Drug Disposal Guide	Waste Poster 3-22.pdf	No	No	Jon Jones	12/05/2023