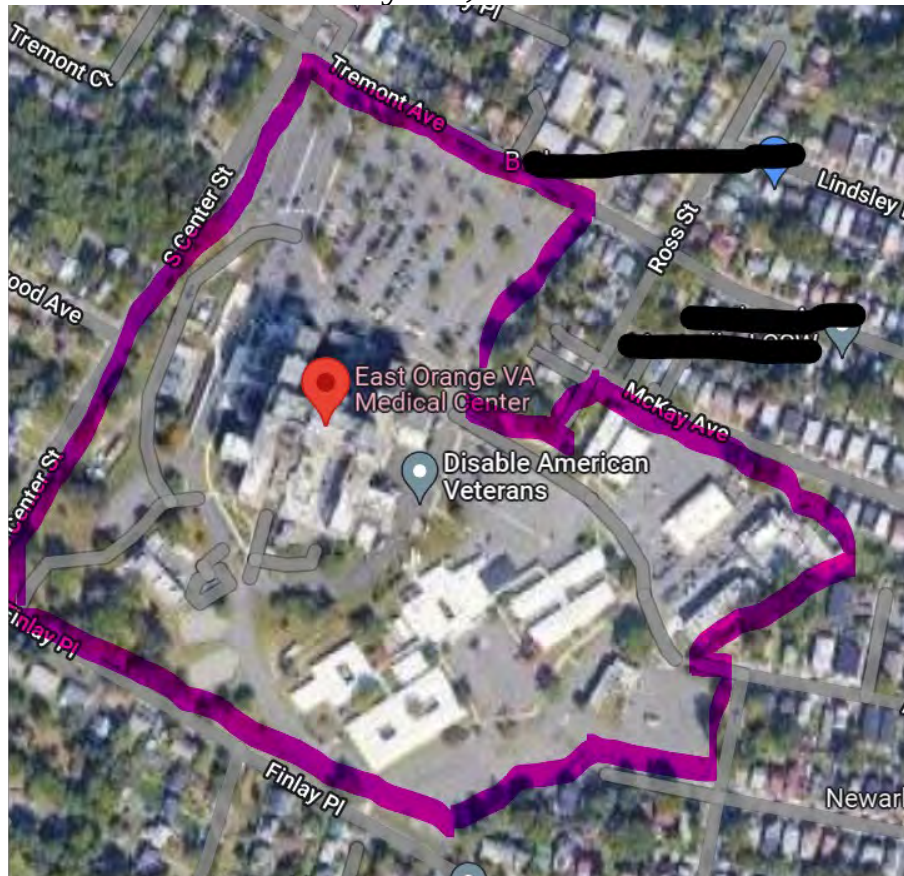


Compliance Evaluation Inspection Report

VA New Jersey Health Care System

East Orange Campus

July 21, 2022



Written by:

**James
X Sullivan**

Digitally signed by James
Sullivan
Date: 2022.08.12
09:18:24 -04'00'

Enforcement Officer
ECAD-CAPSB-CASS USEPA R2

Approved by:

**KATHLEEN
MALONE-
X BOGUSKY**

Digitally signed by KATHLEEN
MALONE-BOGUSKY
Date: 2022.08.12 09:58:34
-04'00'

Chief - Compliance Assistance Section
ECAD-CAPSB-CASS USEPA R2

This page has intentionally been left blank

COMPLIANCE EVALUATION INSPECTION REPORT

U.S. Environmental Protection Agency, Region 2
Enforcement and Compliance Assurance Division
290 Broadway, 21st floor
New York, New York 10007-1866

Locational Information:

Facility Name: VA New Jersey Health Care System (East Orange Campus)
Facility Address: 385 Tremont Ave, East Orange, NJ 07019
Latitude & Longitude: 40.753849; -74.234245

Environmental Sensitivity Information:

Potential EJ Concerns: Yes (See Appendix B: EJ SCREEN)
Potential Flood-Prone Area: No (See Appendix C: Flood Map)
Sole Source Aquifer: No (See Appendix D: Sole Source Aquifer Map)

Sector Information:

Federal Facility: Yes
NAICS Codes: 923140 - Administration of Veterans' Affairs

ICIS & other Program ID Codes:

FRS ID: 110017310266
RCRA ID: NJ0360010375

Inspection Information:

Date of Inspection: July 21, 2022
Inspector(s): Jim Sullivan

Facility Representative(s):

Name	Title	Phone	Email
Kedesch E. Altidor-Dorcély	GEMS Program Manager	973-676-1000 ext. 20-2224	Kedesch.Altidor@va.gov
Wilson Robles-Gonzalez	Environmental Protection Specialist		

Corrections/Updates for EPA Databases: None

Table of Contents

1. INTRODUCTION.....	5
2. FACILITY TOUR	5
3. RECORD REVIEW.....	6
4. REGULATORY CONCERNS	7
5. ENVIRONMENTAL ASSISTANCE	7
APPENDICES:.....	7
A: Photographs.....	7
B: EJ Screen	7
C: FEMA Flood Map.....	7
D: Sole Source Aquifer Map	7

1. INTRODUCTION

The Region 2 Office of the Environmental Protection Agency (EPA) conducted an on-site inspection at the Veterans Administration New Jersey Health Care System's East Orange Campus (VA-EOC) on July 21, 2022. The purpose of this inspection was to evaluate the facility's compliance with the Resource Conservation and Recovery Act (RCRA) requirements for hazardous waste management. The inspection was unannounced. None of the photographs contained in this report disclose any proprietary/confidential business information. Due to the information desk's inability to locate anyone on site able to represent VA-EOC during a RCRA hazardous waste inspection, I waited about an hour and a half until appropriate personnel were located at the Veterans Administration New Jersey Health Care System's facility in Lyons, New Jersey and were able to drive to East Orange.

Per its website, VA-EOC is a hospital that provides "primary care and specialty health services, including skin care (dermatology), dental care, digestive care (gastroenterology), cardiology, eye health and vision care (ophthalmology and optometry), and more". The facility representative, Ms. Altidor, describes the facility as a full-service hospital with an operating room, an emergency room, extensive blood testing facilities, oncological chemotherapy and radiation therapy, research capabilities and a morgue.

The most frequent hazardous waste streams generated at VA-EOC was described as coming from laboratories and containing guanidinium thiocyanate (GT), methanol, xylene, alcohol, 3,3'-diaminobenzidine (DAB) and various waste stains from instruments such as the HistoCore PELORIS 3 tissue processing system. The facility is generating hazardous waste at the rate of a small quantity generator (SQG.)

2. FACILITY TOUR

We began the tour at VA-EOC's satellite accumulation area located in Room A-143 within the Pathology and Laboratory Medical Services section. The Room A-143 satellite accumulation area is a locked room across the hall from Room A-141 and Room A-140, which are the two labs that provide waste to the satellite accumulation area. At the time of the inspection, it had 15 small containers placed on two spill pallets (See, Photographs #3 and #4). The capacity of the combined containers is less than 55 gallons. The waste at this satellite accumulation area are primarily specimen waste, GT, DAB, methanol, xylene, alcohol, and waste stains. These wastes were brought to this area from Rooms A-141 and A-140. The satellite accumulation area had an inspection log that was filled out by local lab technicians, spill kits and a list of emergency contacts.

We then visited the nearby laboratories, A-141 and A-140, and saw the containers of hazardous waste kept under lab hoods that are poured into the containers in the satellite accumulation area. These containers were kept closed and labeled as hazardous waste (See, Photograph #6).

We then visited the Electrical Shop which was accumulating PCB and non-PCB lighting ballast and batteries. Each container was labeled and closed (See, Photographs #8 and #9). Next, we visited the Plumbing Shop and there were no waste being accumulated. From there we went to

the Maintenance & Repair Shop. This shop had an area used for the accumulation of spent lamps. The spent lamps were classified as universal waste and were properly labeled; however, four of these universal waste containers were not kept closed (See, Photograph #10). This was pointed out to Ms. Altidor and she supplied photographic evidence, via e-mail after the inspection, that the containers were closed and returned to compliance (See, Photograph #22).

We then left the main hospital building and proceeded to the boiler house (See, Photograph #12). There was no hazardous waste at that location. Outside of the boiler house are four underground storage tanks containing fuel oil as backup to the natural gas that is the primary fuel (See, Photograph #13). Nearby there was a building marked as the motor pool; however, Ms. Altidor indicated that no vehicle servicing takes place at the building anymore. All servicing of government owned vehicles takes place offsite under contract.

Next, we visited the universal waste shed where batteries and oily rags are currently being stored. The shed is labeled as a “Universal Waste Storage Area”. There were no violations observed at this shed (See, Photographs #14 and #15).

Lastly, we visited the hazardous waste storage shed. The shed is kept locked and labeled on the outside as “Hazardous Waste Storage Area” (See, Photograph #16). There is a phone at the shed and a posting of all emergency numbers at that phone (See, Photograph #17). Inside the shed waste is segregated as either toxic, corrosive, flammable, non-regulated or as RCRA Subpart P pharmaceutical waste. All containers are properly labeled with the words “Hazardous Waste” and their accumulation start date (See, Photographs #18 - #21). There were no compliance issues at the hazardous waste storage shed.

3. RECORD REVIEW

I reviewed three (3) years’ worth of hazardous waste manifests. As noted above, the facility is generating hazardous waste at the rate of an SQG. Hazardous wastes are sent to Republic Services (RCRA ID No. PAD085690592) of Hatfield, Pennsylvania. Universal wastes - spent lamps, batteries, and dry oil-based paint cans (i.e., a universal waste in New Jersey) - are sent to National Bulb Recycling of Avon-by-the Sea, New Jersey. E-waste and mixed metals are sent to Sunnking, a New York based scrap metal recycler.

VA-EOC ships hazardous waste off site on at least a quarterly basis such that there is no issue with exceeding the 180-day accumulation time limit or the 6,000-kilogram accumulation weight limit. The facility has spill kits and fire extinguishers strategically placed and personnel have access to a communication device where hazardous waste is managed. Emergency contact information is posted for quick access in the event of a release.

VA-EOC contracts with AEG Environmental of Essex Maryland to provide its annual refresher training. Lab technicians, housekeeping staff, researchers, safety staff and the facility’s Green Environmental Management System (GEMS) Committee receive the refresher training. The last training event was on February 25, 2022.

4. REGULATORY CONCERNS

Based on observations made during the inspection, the following regulatory concern was identified:

REGULATORY, STATUTORY OR PERMIT REFERENCE	FIELD OBSERVATION
Pursuant to 40 C.F.R. § 273.13(d)(1) and N.J.A.C 7:26A-7.1, a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.	At the time of the inspection, there were four open containers of universal waste lamps in Maintenance & Repair Shop (See, Photograph #9). <u>Corrective Action Taken</u> - In a July 21st email, Ms. Altidor provided photographic documentation that the universal waste containers had been closed. No further action is required.

5. ENVIRONMENTAL ASSISTANCE

To increase the Federal community's understanding and compliance with applicable environmental requirements, EPA, along with other Federal agencies, sponsor Fed Center, the Federal government's home for comprehensive environmental stewardship and compliance assistance information for Federal facility managers and their agencies. Fed Center can be accessed via the worldwide web at <https://www.fedcenter.gov/>.

APPENDICES:

A: Photographs

B: EJ Screen

C: FEMA Flood Map

D: Sole Source Aquifer Map

Appendix A – Photographs

Photograph #1 – View of main hospital building



Photograph #2 – Facility map



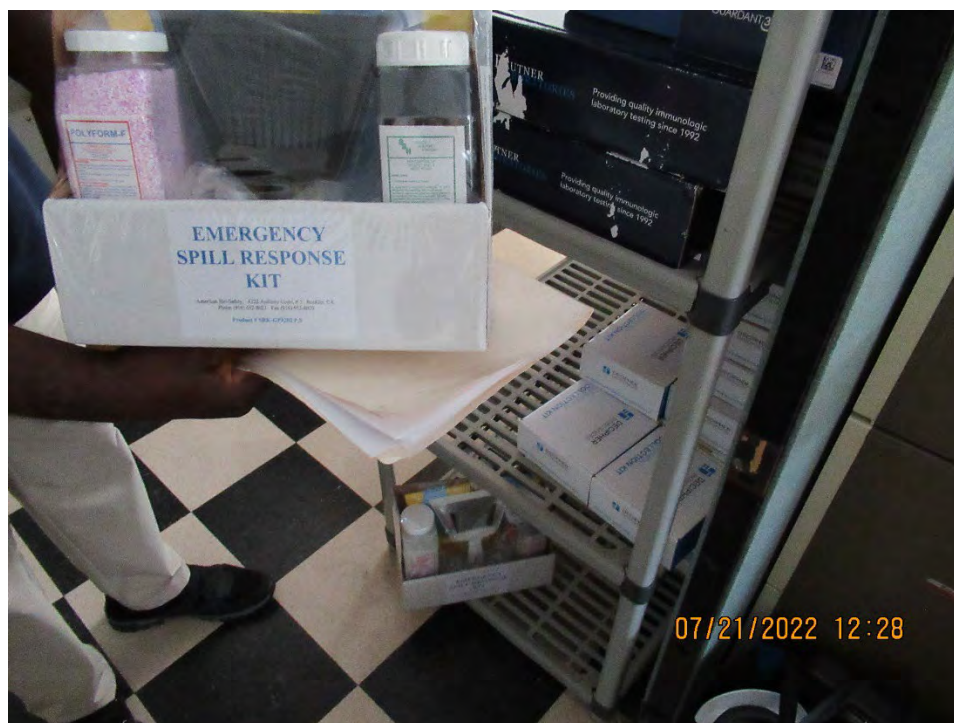
Photograph #3 - Satellite accumulation area in Room A-143



Photograph #4 - Satellite accumulation area in Room A-143



Photograph #5 - Spill kit at satellite accumulation area in Room A-143



Photograph #6 - Point of generation in lab (Room A-141)



Photograph #7 - Point of generation in Histology Lab (Room A-142)



Photograph #8 – PCB and non-PCB stored in Electrical Shop



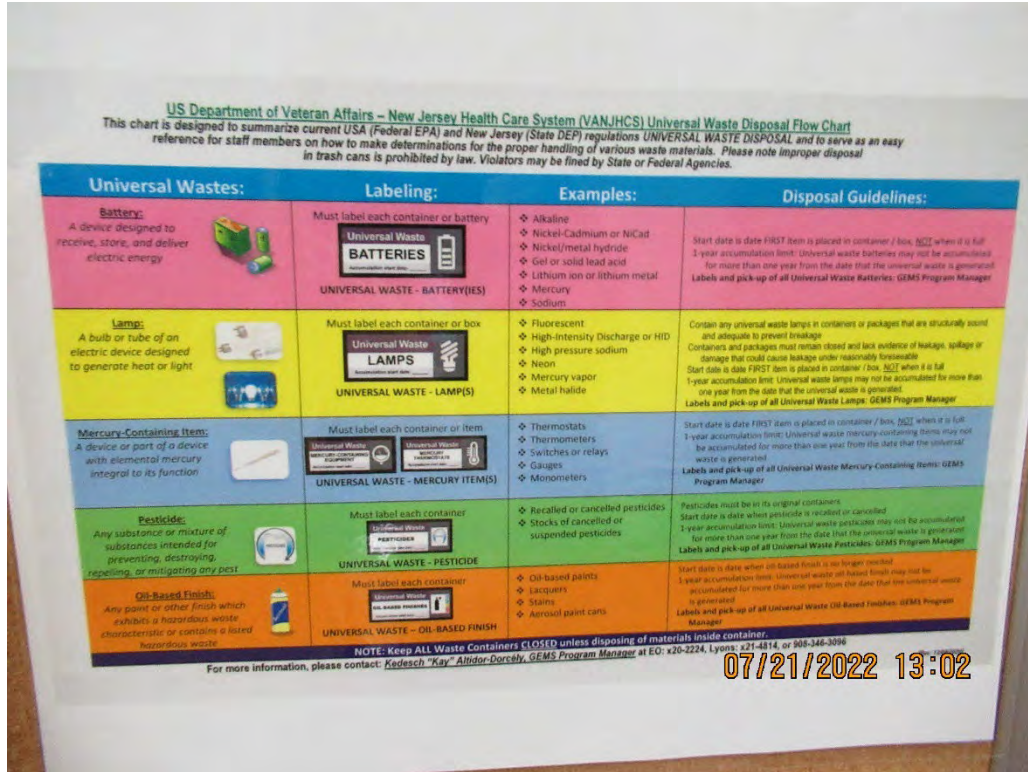
Photograph #9 - Container of Universal Waste batteries in Electrical Shop



Photograph #10 - Open containers of universal waste bulbs



Photograph #11 - Informational posting on how to handle universal waste



Photograph #12 – Facility boiler house



Photograph #13 – Two of four underground storage tanks at facility boiler house



Photograph #14 – Universal waste storage shed



Photograph #15 – Interior of universal waste storage shed



Photograph #16 – Hazardous waste storage building



Photograph #17 – Phone at hazardous waste storage building



Photograph #18 – Interior of hazardous waste storage building (Toxics)



Photograph #19 – Interior of hazardous waste storage building (Flammables)



Photograph #20 – Interior of hazardous waste storage building (Non-Regulated)



Photograph #21 – Interior of hazardous waste storage building (Pharmaceutical waste)



Photograph #22 – Closed universal waste containers



EJScreen Report (Version 2.0)

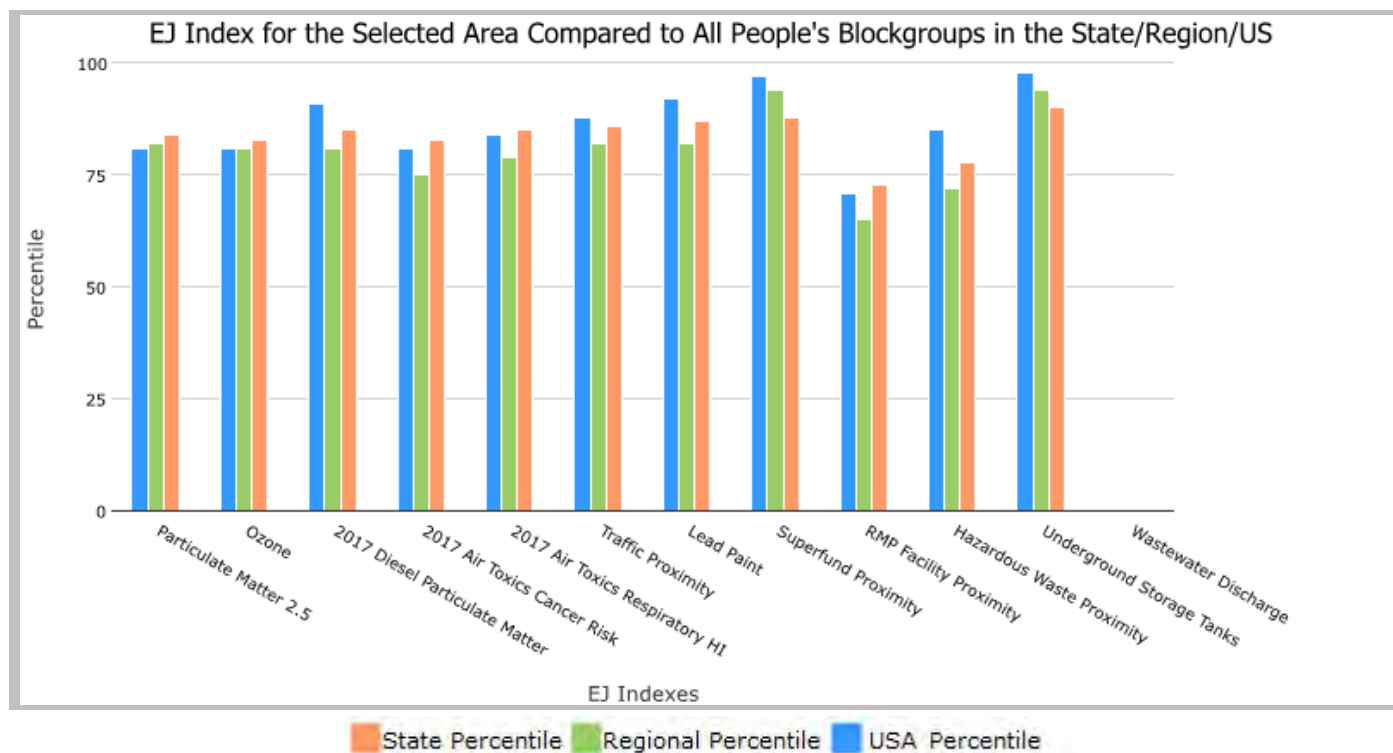
1 mile Ring Centered at 40.752593,-74.236159, NEW JERSEY, EPA Region 2

Approximate Population: 44,961

Input Area (sq. miles): 3.14

VA East Orange - EJScreen Report - Appendix B

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Environmental Justice Indexes			
EJ Index for Particulate Matter 2.5	84	82	81
EJ Index for Ozone	83	81	81
EJ Index for 2017 Diesel Particulate Matter*	85	81	91
EJ Index for 2017 Air Toxics Cancer Risk*	83	75	81
EJ Index for 2017 Air Toxics Respiratory HI*	85	79	84
EJ Index for Traffic Proximity	86	82	88
EJ Index for Lead Paint	87	82	92
EJ Index for Superfund Proximity	88	94	97
EJ Index for RMP Facility Proximity	73	65	71
EJ Index for Hazardous Waste Proximity	78	72	85
EJ Index for Underground Storage Tanks	90	94	98
EJ Index for Wastewater Discharge	N/A	N/A	N/A



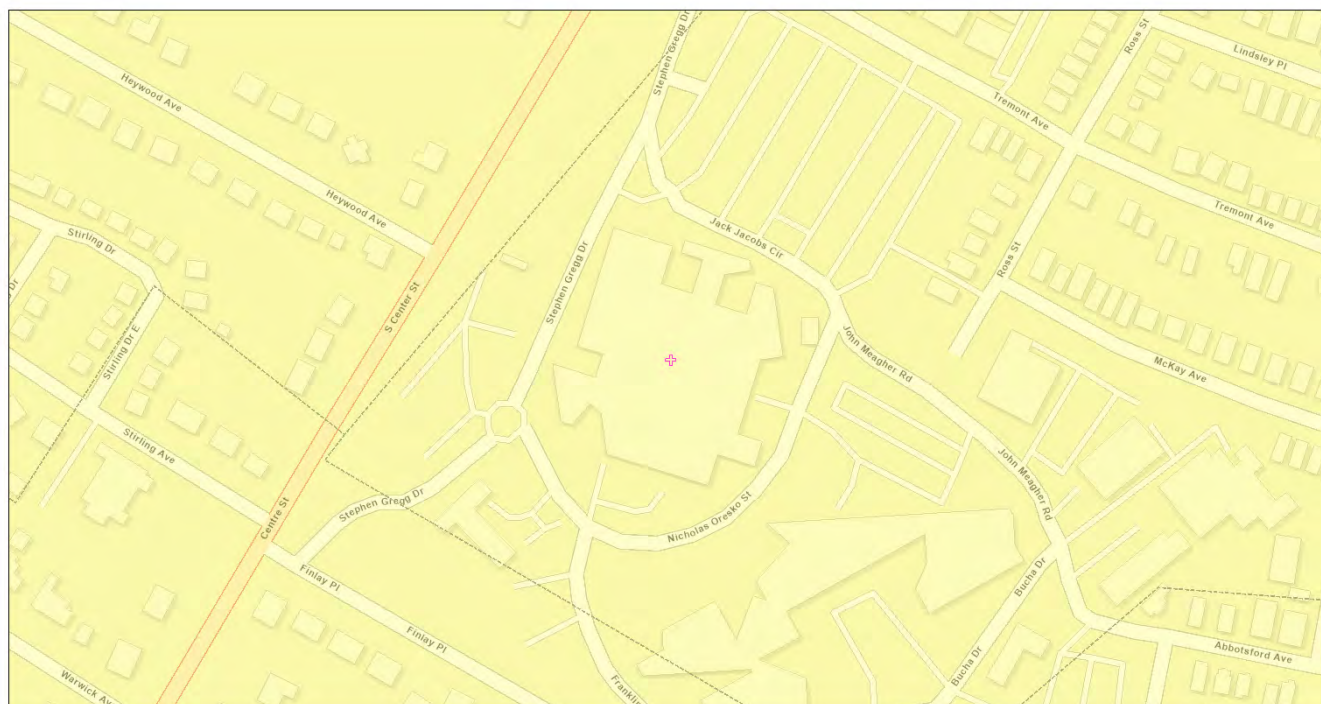
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

1 mile Ring Centered at 40.752593,-74.236159, NEW JERSEY, EPA Region 2

Approximate Population: 44,961

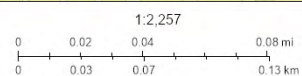
Input Area (sq. miles): 3.14

VA East Orange - EJScreen Report - Appendix B



August 11, 2022

VA East Orange - EJScreen Report - Appendix B



Esri Community Maps Contributors, City of Newark, NYC OpenData, New Jersey Office of GIS, OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	1

EJScreen Report (Version 2.0)



1 mile Ring Centered at 40.752593,-74.236159, NEW JERSEY, EPA Region 2

Approximate Population: 44,961

Input Area (sq. miles): 3.14

VA East Orange - EJScreen Report - Appendix B

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	8.9	8.32	72	8.03	74	8.74	58
Ozone (ppb)	41.8	42.1	29	41.8	41	42.6	45
2017 Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.711	0.511	77	0.558	60-70th	0.295	95-100th
2017 Air Toxics Cancer Risk* (lifetime risk per million)	30	29	90	29	70-80th	29	80-90th
2017 Air Toxics Respiratory HI*	0.46	0.38	90	0.37	70-80th	0.36	80-90th
Traffic Proximity (daily traffic count/distance to road)	740	860	69	840	68	710	77
Lead Paint (% Pre-1960 Housing)	0.6	0.4	70	0.46	61	0.28	83
Superfund Proximity (site count/km distance)	0.65	0.44	79	0.28	89	0.13	96
RMP Facility Proximity (facility count/km distance)	0.2	0.76	42	0.62	40	0.75	37
Hazardous Waste Proximity (facility count/km distance)	2.1	3.3	56	4.9	48	2.2	72
Underground Storage Tanks (count/km ²)	39	15	88	9.3	95	3.9	99
Wastewater Discharge (toxicity-weighted concentration/m distance)	N/A	0.22	N/A	2.3	N/A	12	N/A
Socioeconomic Indicators							
Demographic Index	64%	34%	86	41%	75	36%	85
People of Color	92%	45%	89	49%	77	40%	90
Low Income	37%	23%	78	32%	65	31%	65
Unemployment Rate	12%	6%	90	6%	85	5%	89
Linguistically Isolated	5%	7%	58	14%	52	5%	70
Less Than High School Education	12%	10%	68	13%	55	12%	60
Under Age 5	7%	6%	65	6%	66	6%	61
Over Age 64	14%	16%	49	16%	44	16%	48

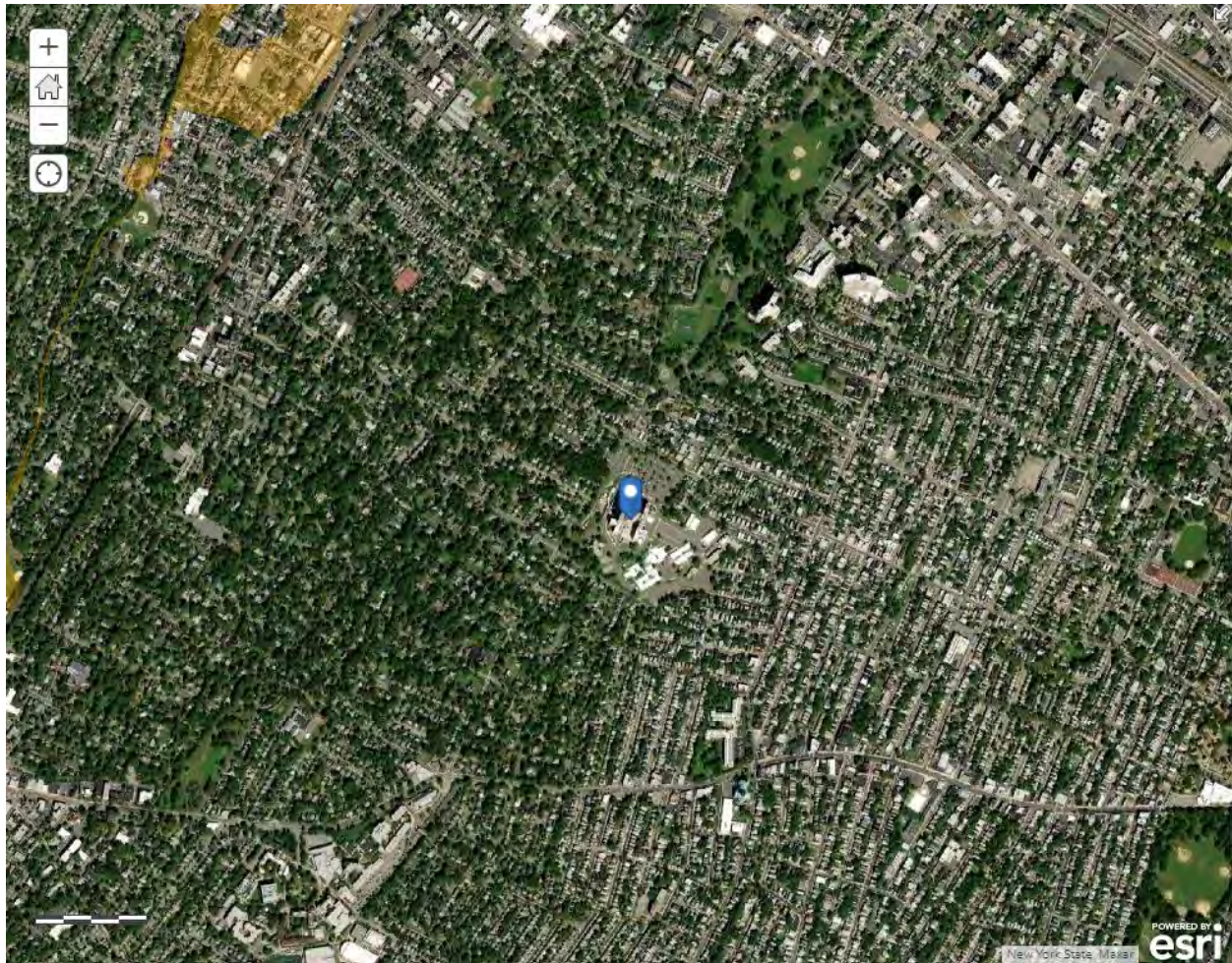
*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

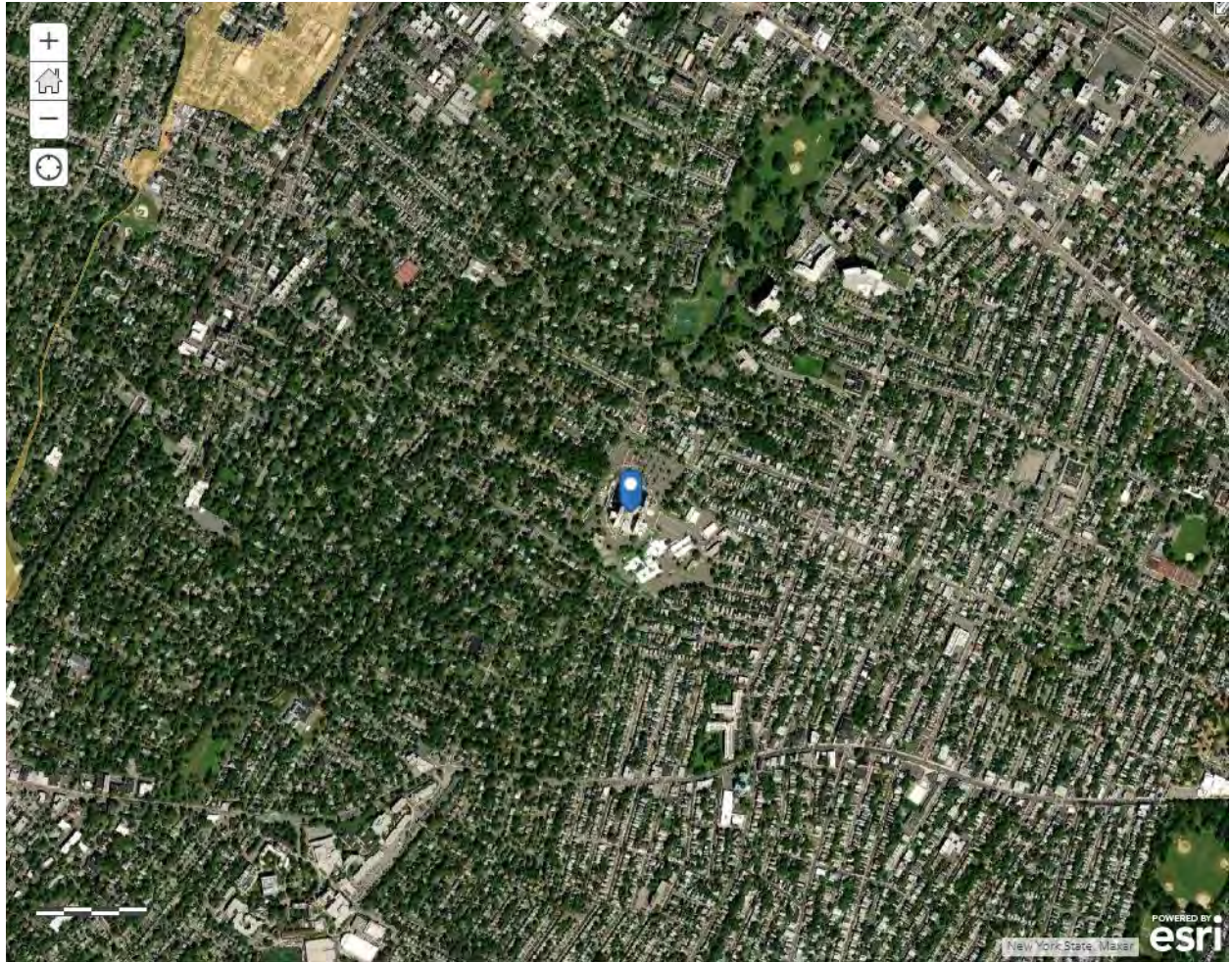
EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

Appendix C: Federal Emergency Management Agency (FEMA) 100 Year Flood Zone and EPA's Region 2 Composite Flood Risk Layer

Facility Name: VA East Orange



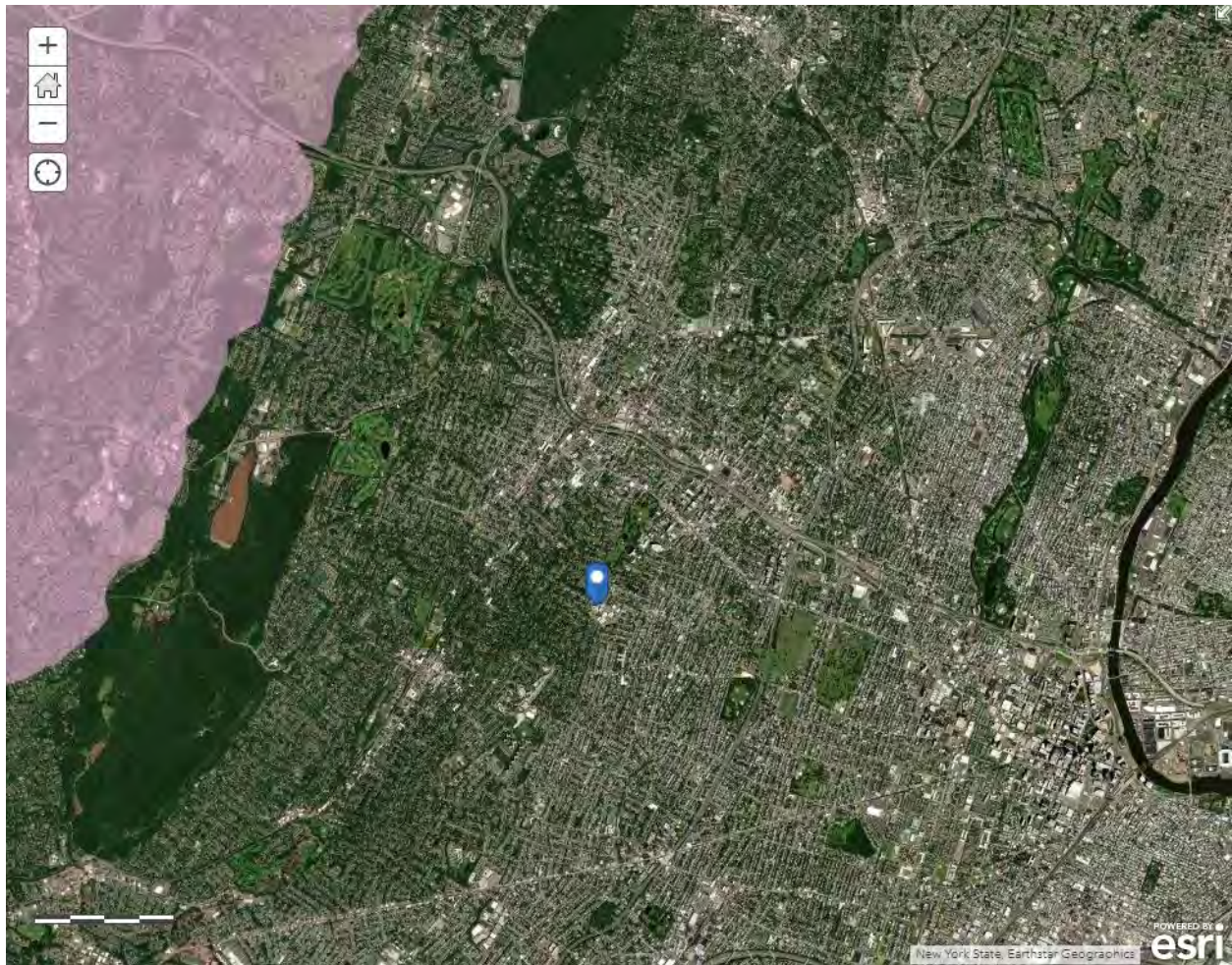
The facility is not located within a FEMA 100-year flood zone area.



The facility is not located within the EPA's Region 2 Composite Flood Risk potential risk area.

Appendix D: Sole Source Aquifer Map

Facility Name: VA East Orange



The facility is not located within a Sole Source Aquifer area.