



RCRA COMPLIANCE EVALUATION INSPECTION

Columbia Memorial Hospital
71 Prospect Avenue
Hudson, New York 12534
NYD080481708

Report Prepared by:

MOLLY
HILLENBRAND

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MOLLY HILLENBRAND
Date: 2025.01.22
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Molly Hillenbrand, Life Scientist

Report Approved by:

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Phil Cocuzza,
Monitoring Operations Section Supervisor

OBJECTIVE

An unannounced Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) was conducted at Columbia Memorial Hospital on December 19, 2024. The purpose of the inspection was to obtain information on the facility's hazardous waste management program. This information will be used to determine compliance with the regulations pertaining to RCRA.

2.0 KEY PARTICIPANTS

U.S. Environmental Protection Agency

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Columbia Memorial Hospital

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Facility Description

Columbia Memorial Hospital is part of Columbia Memorial Health, a multi-campus health care organization and an affiliate of the Albany Med Health System. Columbia Memorial Hospital, located at 71 Prospect Avenue, Hudson New York, 12534, an acute care hospital began operations at its current address in 1900. The hospital is open 24 hours per day, seven days a week, and has a staff of 1700 employees. The hospital provides a variety of services including emergency services, general surgeries, and psychiatric care.

Sector Information

NAICS Code: NAICS - 62211- General Medical and Surgical Hospitals

Wastewater

There is no process wastewater discharge. Sanitary wastewater is discharged to the local Publicly Owned Treatment Works (POTW).

Solid and Hazardous Waste Management

Columbia Memorial Hospital's hazardous waste is generated in its pharmaceutical rooms, wholesale room and the IV room. In the intensive care unit's pharmaceutical room, pharmaceutical waste was placed in black hazardous waste containers. On the day of inspection one black 8-gallon hazardous waste container labeled "Pharmaceutical Waste Only RCRA Hazardous Waste" (Photograph #1) was observed. In the wholesale room, pharmaceutical waste is sorted. Applicable expired or unsold medications are returned for credit. Pharmaceutical waste not returned for credit is separated into hazardous waste containers based on compatibility. At the time of inspection there were two 2-gallon containers labeled "RCRA Hazardous Waste Pharmaceutical Aerosol/ Inhaler Waste"; one 2-gallon container labeled "Pharmaceutical Corrosive Waste"; and one 2-gallon container labeled "Pharmaceutical Oxidizer Waste" (Photograph #2). P-listed waste is periodically generated from the packaging of Warfarin. The packaging is placed in a sealed plastic bag and labeled as P-listed hazardous waste. Less than 2.2 lbs of P-listed hazardous waste were recorded to have been accumulated on site at the time of the inspection. In the IV room where pharmaceutical compounding occurs, the waste is placed in an 8-gallon container and labeled RCRA Hazardous Waste. At the time of inspection, 2 black 8-gallon containers were observed. Containers are collected from each room and transferred to the hazardous waste accumulation room.

The hospital stores its biohazardous and RCRA hazardous waste in its Hazardous Waste Central Accumulation Area. On the day of inspection, one 55-gallon plastic drum labeled as "RCRA Hazardous Waste Containing Waste Medicine, liquid, flammable, toxic N.O.S (Ethanol, insulin)3(6.1).PGII" (Photograph # 3) was observed. The 55-gallon drum was in good condition, with waste codes: D001, D005, D007, D009, D010, D011, D022, D024, D026, U010, U188, U205, U236. The container was sealed and labeled with the accumulation start date December 12, 2024.

A walkthrough of the hospital's laboratory was conducted. No RCRA hazardous waste was observed. All waste observed was medical/biohazardous waste.

Both biohazardous waste and RCRA hazardous waste is managed by Advant-Edge Solutions. Advant-Edge Solutions removes biohazardous waste from the hazardous waste accumulation area weekly; they remove RCRA hazardous waste as needed. RCRA hazardous waste is shipped using Approved Storage & Waste Hauling II, Inc to Northland Environmental, which is located in Providence, Road Island.

Records Review

The Uniform Hazardous Waste Manifests, from January 1, 2024, to December 19, 2024, were reviewed; training documentation was also reviewed. A review of the hazardous waste manifests indicated that Columbia Memorial Hospital is a Small Quantity Generator of hazardous waste, with an estimated average of 180 kg generated per month. Hazardous waste safety training is provided two times a year to the employees that handle hazardous waste. Applicable employees, including the director of environmental services, have completed Department of Transportation (DOT) training.

In addition, Columbia Memorial Hospital maintains a Hazmat management system plan to address the risks associated with hazardous material. Weekly inspections of the hazardous waste accumulation area are conducted, and records were maintained.

Observations

Inconsistencies and discrepancies were noted in the reviewed manifests. The pre-printed information on the paper manifest forms was consistently crossed out. Additionally, the units reported for the quantity of hazardous waste shipped deviates between pounds and gallons. Inconsistencies in manifest documentation may lead to errors. For transported hazardous waste on May 23, 2024, manifest tracking number 026555324JJK, the manifest reports a shipment of 5 gallons of UN1950 Waste Aerosols; under special handling instructions and additional information, it is noted that only 2 gallons of UN1950 Waste Aerosols was shipped.

Manifest 026555323JJK, signed by the transporter on June 27, 2024, does not have a date included with the generator's certification signature in item 15. According to 40

CFR 262.27 Waste Minimization Certification, a generator who initiates a shipment of hazardous waste must certify the waste minimization statement. According to the EPA hazardous waste manifest instructions for the completion of form 8700-22, in Item 15 of the uniform hazardous waste manifest, the generator must read, sign, and date the waste minimization certification statement.

Attachments

Attachment 1: May 23, 2024, manifest tracking number 026555324JJK, the manifest reports a shipment of 5 gallons of UN1950 Waste Aerosols while description reports 2 gallons of UN1950 Waste Aerosols shipped

Attachment 2: Manifest 026555323JJK, signed by the transporter on June 27, 2024, does not have a date included with the generator's certification signature in item 15

Photographs

Photograph 1: 8-gallon satellite container of pharmaceutical waste located in ICU pharmaceutical room

Photograph 2: RCRA hazardous waste categorized satellite containers located in wholesale room.

Photograph 3: 8-gallon hazardous waste satellite containers located in IV room for pharmaceutical waste

Photograph 4: The Hazardous Waste Central Accumulation Area observed 55-gallon plastic drum labeled as RCRA hazardous waste containing waste medicine, liquid, flammable, toxic N.O.S (Ethanol, insulin)3(6.1).PGII

ATTACHMENTS

Please print or type. **689599**

326423-24

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD080481708	2. Page 1 of 1	3. Emergency Response Phone 800-424-9300	4. Manifest Tracking Number 026555324 JJK		
5. Generator's Name and Mailing Address 006990-0001 Generator's Phone: (302) 533-6858				Generator's Site Address (if different than mailing address) Columbia Memorial Hospital 71 Prospect Ave Hudson, NY 12534-2927			
6. Transporter 1 Company Name Approved Storage & Waste Hauling II Inc.				U.S. EPA ID Number NYR000237487			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address (401) 781-6304 ext 0 Facility's Phone:				U.S. EPA ID Number RID040098352 Northland Environmental 275 Aliens Ave Providence, RI 02905			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
X	1. UN3248, WASTE MEDICINE LIQUID, FLAMMABLE, TOXIC NOS (ETHANOL,INSULIN) 3(L) (PGI)	1	DF	55	G	D024	
X	2. UN1950, WASTE AEROSOLS, 2.1	1	DF	5	G	R015	
	3. UN3249, WASTE MEDICINE, SOLID, TOXIC, N.O.S. (WARFARIN) 3, (PGI)		DF		G	P001	
	4.						
14. Special Handling Instructions and Additional Information 9b.1 - 0130008-02 (1x55gal) ERG 131-F 9b.2 - 1843224-01 (1x2gal)							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offorer's Printed/Typed Name Stacey Craig				Signature Stacey Craig		Month Day Year 15 23 24	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name Antonio Lopez C.				Signature 		Month Day Year 15 23 24	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number: _____ U.S. EPA ID Number _____							
18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____							
Facility's Phone: _____							
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H141		2. H141		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Nicole Estrella				Signature 		Month Day Year 6 19 24	

Please print or type. **689599** **359143-24** **5661378** Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD080484708		2. Page 1 of 1		3. Emergency Response Phone 800-424-8300		4. Manifest Tracking Number 026555323 JJK							
		5. Generator's Name and Mailing Address 006990-0001 Columbia Memorial Hospital 71 Prospect Ave Hudson, NY 12534-2827 Generator's Phone: (302) 533-6858								Generator's Site Address (if different than mailing address)					
6. Transporter 1 Company Name Approved Storage & Waste Hauling II Inc.								U.S. EPA ID Number NYR000237487							
7. Transporter 2 Company Name								U.S. EPA ID Number							
8. Designated Facility Name and Site Address (401) 781-6304 ext 0 Northland Environmental 275 Aliens Ave Providence, RI 02805 Facility's Phone:								U.S. EPA ID Number RID040088352							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes					
	X	1. UN3248, WASTE MEDICINE LIQUID, FLAMMABLE, TOXIC NOS (ETHANOL, INSULIN) 3(a.1)PGH				1	DF	55	G	D024	D001	D005			
		2. UN1950, WASTE AEROSOLS, 2.1				Ø	DF	Ø	G	R015					
		3. UN3249 WASTE MEDICINE, SOLID, TOXIC, N.O.S. (WARFARIN) 6.1, PGI				Ø	DF	Ø	G	PU01					
		4.													
14. Special Handling Instructions and Additional Information ERG 131-F 9b. 1 - 2400005350-08 (1x55gal) Additional Listed Codes: D011 D022 D036 U010 U188 U205 U236 0130008-02															
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.															
Generator's/Offeror's Printed/Typed Name K Koname Nani								Signature 		Month 6		Day 27		Year 24	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____															
17. Transporter Acknowledgment of Receipt of Materials															
Transporter 1 Printed/Typed Name JOSE RODRIGUEZ								Signature 		Month 6		Day 27		Year 24	
Transporter 2 Printed/Typed Name								Signature		Month		Day		Year	
18. Discrepancy															
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection															
18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____															
18c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____															
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)															
1. HMI			2.			3.			4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								Signature 		Month 7		Day 3		Year 24	

PHOTOGRAPHS

Photograph #1: 8-gallon satellite container of pharmaceutical waste located in ICU pharmaceutical room



Photograph #2: RCRA hazardous waste categorized satellite containers located in wholesale room.



Photograph 3: 8-gallon hazardous waste satellite containers located in IV room for pharmaceutical waste



Photograph 4: The Hazardous Waste Central Accumulation Area observed 55-gallon plastic drum labeled as RCRA hazardous waste containing waste medicine, liquid, flammable, toxic N.O.S (Ethanol, insulin)3(6.1).PGII

