

Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
 RYDER MEMORIAL HOSPITAL INC - HUMACAO
 PRR000026997



US Environmental Protection Agency – Region 2
 Caribbean Environmental Protection Division (CEPD)
 Response and Remediation Branch (RRB)

Resource Conservation and Recovery Act (RCRA)
 Compliance Evaluation Inspection (CEI)

Facility Name:	RYDER MEMORIAL HOSPITAL INC - HUMACAO						
EPA ID Number:	PRR000026997						
Completion Date:	August 29, 2023						
Generator Status in Record:	Non-Notifier ¹						
RCRA Permitted:	No						
Corrective Action:	No						
Project ID	CEPD-RCRA-23-0437						
Basis for Inspection:	Core Program (COVID-19 protocols were in place while conducting this CEI) ^{2 3}						
Facility Personnel:							
Name:	Title:	Email:	Phone:	Attend to:			
				OM ⁴	FW ⁵	DR ⁶	CM ⁷
Mr. Edgardo X. González	Safety and Security Director	egonzalez@HRYDER.org	787-852-0768	√	√	√	√
Ms. Lourdes Martínez	Hospital Manager	lomartinez@HRYDER.org	787-852-0768 x 4923			√	
EPA Personnel:							
Inspector's Name		EPA Region 2-CEPD	Enforcement Officer	phone/email			
Ms. Rosana Caballer-Cruz		EPA Region 2-CEPD	Enforcement Officer	787-977-5880/ caballer.rosana@epa.gov			
Status:	FINAL						
EPA Inspector Signature/Date	X ROSANA CABALLER- CRUZ Digitally signed by ROSANA CABALLER-CRUZ Date: 2023.10.31 15:57:48 -04'00'						

¹ At the time of the inspection, the facility already classified itself as a Small Quantity Generator.

² May 11, 2023, the federal COVID-19 PHE declaration ended.

Reference: <https://www.cdc.gov/coronavirus/2019-ncov/your-health/end-of-phe.html>

³ Although the federal COVID-19 PHE declaration ended; the facility inspected is a hospital. Hence, the use of a mask was highly recommended.

⁴ Opening Meeting

⁵ Facility Walkthrough

⁶ Documents Review. For additional information related to this item, please refer to Sections 3 and 5 of this Report.

⁷ Closing Meeting

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Supervisor Signature/Date	DAVID CUEVAS- MIRANDA Digitally signed by DAVID CUEVAS-MIRANDA Date: 2023.11.01 06:45:29 -04'00' David N. Cuevas Miranda, Ph.D.
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1 FACILITY SUMMARY

Facility Physical Location: (Municipality, PR, zip code)	355 FONT MARTELO AVE – HUMACAO, PUERTO RICO, 00792.
Geographical Coordinates:	18.156122, -65.835545
Facility Information:	RYDER MEMORIAL HOSPITAL INC - HUMACAO 787-852-0768 Mailing address: PO BOX 363328, HUMACAO, PUERTO RICO, 00792.
NAICS:	621491 - HMO MEDICAL CENTERS
Previously inspected:	NO
Area:	TWO (2) BUILDINGS
Employees	APPROXIMATELY 650
HW ⁸ transferred via pipeline?	NO ⁹
UST ¹⁰ available at the facility?	NO ¹¹
NRC ¹² orientation provided?	YES

2 INTRODUCTION

On August 29, 2023, a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (inspection) was conducted at Ryder Memorial Hospital, INC - Humacao (the facility), pursuant to Section 3007 of RCRA. As part of the inspection, I explained to the facility representative that an opening meeting, walkthrough, and document review, would be conducted to evaluate the facility's compliance with the requirements that govern hazardous waste generators, universal waste handlers, and used oil generators, as applicable.

According to records, the facility had never been inspected by the EPA prior to this inspection, however, it was identified by the Agency as part of the Non-notifiers initiative¹³. I arrived at the facility around 9:40 a.m. The weather conditions outside the facility that remained through the CEI were partially cloudy with hot temperatures and humidity. Nevertheless, cool temperatures conditions remained inside the Hospital.

2.1 NON-NOTIFIERS INITIATIVE

This facility was one of the facilities identified as part of the Non-notifiers initiative. Those

⁸ Acronym stands for hazardous waste.

⁹ Information provided by the facility representative.

¹⁰ Acronym stands for underground storage tanks.

¹¹ Information provided by the facility representative.

¹² Acronym stands for National Response Center.

¹³ For additional information on this item, please refer to Section 2.1 of this Report.

facilities identified as Non-notifiers, such as Ryder Memorial Hospital, INC - Humacao, are facilities that EPA has a reason to believe that is a generator of hazardous waste, based on EPA's review of eManifests(s). As a generator of hazardous waste, Ryder Memorial Hospital, INC - Humacao, is subject to Sections 3002 and 3010 of RCRA, 42 U.S.C. §§ 6922 and 6930, and the regulations set forth at 40 C.F.R. Parts 262 and/or 270, or the authorized State equivalent. Henceforth, the facility was identified and included to be inspected as soon as the COVID-19 Pandemic health situation allowed us to physically visit it.

2.2 SUBPART P – HAZARDOUS WASTE PHARMACEUTICALS

On August 21st, 2019, the final rule, Hazardous Waste Pharmaceuticals, was effective¹⁴. Part 266 subpart P only applies to the management of hazardous waste pharmaceuticals at healthcare facilities and reverse distributors. The Regulation citation of Subpart P – Hazardous Waste Pharmaceuticals can be found at 40 CFR part § 266 subpart P: healthcare facilities and reverse distributors. Here, 40 CFR § 266.500(2) defines a Healthcare facility as “*means any person that is lawfully authorized to Distribute, sell, or dispense pharmaceuticals, including over-the-counter pharmaceuticals, dietary supplements, homeopathic drugs, or prescription pharmaceuticals. This definition includes, but is not limited to... hospitals...*” The rule also established that “healthcare facilities that generate above VSQGs amounts of hazardous waste (i.e., SQG or LQG) must manage their hazardous waste pharmaceuticals under 40 CFR part § 266 subpart P. Healthcare facilities that generate VSQG amounts of hazardous waste are subject to the hazardous waste generator regulations for VSQGs in 40 CFR section § 262.14, as well as three sections of part 266 subpart P: 40 CFR section §§ 266.505, 266.507, and 266.504”, respectively, in order to comply with hazardous waste pharmaceutical requirements. As a result, since the facility classified itself as an SQG^{15 16} the facility is subject to the standard RCRA generator regulations found in the Subpart P – Hazardous Waste Pharmaceuticals rule, as reference in 40 CFR 266.501(d)¹⁷

2.3 FACILITY PHYSICAL DESCRIPTION AND OPERATION

Ryder Memorial Hospital, INC - Humacao (RYDER) was established at this location about 109 years ago. It consists of two (2) buildings: the hospital building per se, and a second building which encompasses the parking lot and medical offices. According to the facility representative, this hospital provides services for human clients such as, but not limited to in-patient treatment, surgery rooms, radiology services, emergency rooms, “centro de imagenes”, “medicina nuclear”, physical therapists, laboratory services, etc. Mr. González explained to me that this hospital is a community hospital non-profit organization, and its lot consists of approximately 230,000 ft². Likewise, I was told by the facility representative that approximately 650 employees work at this location and the facility is open for business 24 hours, 7 days per week.

¹⁴ Reference: <https://www.epa.gov/hwgenerators/frequent-questions-about-management-standards-hazardous-waste-pharmaceuticals-and#app1>

¹⁵ Acronym stands for Small Quantity Generator.

¹⁶ As a SQG when counting all of its hazardous waste, including both its hazardous waste pharmaceuticals and its non-pharmaceutical hazardous waste.

¹⁷ Regulation applicable: subject to the hazardous waste generator regulations for VSQGs in 40 CFR section § 262.14, as well as three sections of part 266 subpart P: 40 CFR section §§ 266.505, 266.507, and 266.504.

2.4 AERIAL PHOTOGRAPH

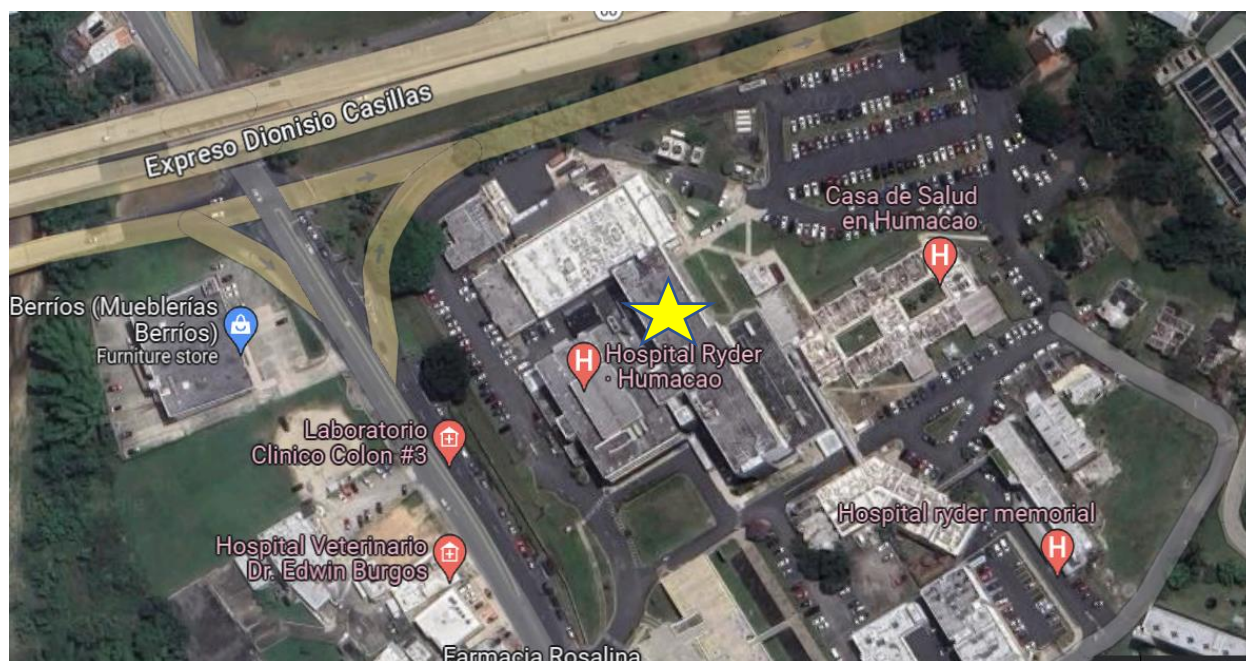


Figure 1: Facility Location - Ryder Memorial Hospital, INC - Humacao

2.5 SOLID AND HAZARDOUS WASTE GENERATION

I asked Mr. Gonzalez about the hazardous waste, universal waste, and used oil generation of this facility, in order to know the facility's handling, storing, and/or disposal activities. He told me that the RCRA Program started to be implemented at this location approximately in April 2021. Likewise, related to the generation of hazardous waste on-site, Mr. González told me that hazardous waste is generated as a result of sampling activities in the laboratory area¹⁸. The hauler company is Stericycle and the last disposal activity prior to this CEI was conducted in June 2023. In addition, I asked him about their universal waste and used oil generation, handling, and/or disposal activities. According to him, the facility is under negotiations with Stericycle to receive their services for the fluorescent lamps. Likewise, the battery backups generated at this location are recycled by the E-cycling company. Related to used oil, Mr. Gonzalez told me that this location does not generate used oil. He told me that, although the facility has available a hospital fleet, the maintenance for such equipment is provided outside the hospital premises. For the generators¹⁹ available on site, ATM is the one that provides maintenance for such equipment and, after maintenance is conducted, they take the used oil with them. In addition, information related to any spills and/or chemical releases in his facility was asked. According to him, spills nor chemical releases in their facility have occurred. Finally, I provided the facility representatives with an orientation and information related to NRC, such as but not limited to the phone number.

¹⁸ For additional information of this item, please refer to Section 4.1 of this Report.

¹⁹ According to Mr. Gonzalez, six (6) generators are available at this location.

3 OPENING MEETING

I met at the facility with Mr. Edgardo González, Safety and Security Director, for the opening meeting. I identified myself as an EPA RCRA enforcement officer and told the facility representative that the purpose of my visit was to conduct a CEI at the facility to evaluate its hazardous waste, universal waste, and used oil management practices and compliance. In addition, I told him that RCRA, universal wastes, and/or used oil documents would be requested as part of this CEI. As part of the inspection, I told him that I needed to take photos related to any RCRA-related issues. He allowed me to take photos during the inspection. Finally, I also explained that we needed to visit the waste generation areas in the facility.

4 FACILITY WALKTHROUGH

Just after the opening meeting, we started the facility walkthrough. The areas inspected were (i) the Clinic Laboratory Area, and (ii) the 180-day Hazardous Waste Accumulation Area. The observations for the areas inspected are described below:

4.1 CLINIC LABORATORY AREA

Description of the Area	This was the first area inspected and was located on the first floor, near the hospital's main entrance. Mr. González told me that this laboratory is used to conduct various tests, such as PCR, COVID-19, and CBC, among others. At this area, Mr. Virgilio López, Laboratory Auxiliar, and Ms. Glenda Rodríguez, Chemical Supervisor, joined us in this area. Additional information about the latter is as follows.
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According to the facility representatives, the tests identified above are conducted for patients in the emergency room, hospitalized patients, and/or outsiders²⁰. Mr. González told me that this area is where the laboratory reactivities generated²¹. This area consists of a room inside the laboratory area per se. Here, I observed laboratory staff working on running tests for hospital's patients and, as a result, I conducted the inspection from the outside of the room²². At the time of the inspection, hazardous waste was not observed stored at this room. Nevertheless, I asked the facility representatives how they store, handle, and dispose of the hazardous waste generated at this location, when hazardous waste is, indeed, generated. Mr. González explained to me that since hazardous waste is generated, he is currently working on identifying an area for a future SAA at this location, even before our inspection activity. As a result, I explained and shared with them information about SAA requirements.

I told the facility representatives the following:

SAA – Since an SAA was not observed either found at this area, and in order to comply with the

²⁰ This term was used to identify and/or describe walk-in patients.

²¹ For additional information of this item, please refer to Section 2.5 of this Report.

²² The information gathered from this area was provided by Mr. González, who was also outside of the room, as well.

SAA requirements, they need to reference the RCRA Regulation, at 40 C.F.R. § 262.15. As explained above, this information was shared during the facility walkthrough, but in addition, I told the facility representatives, that additional information would be sent, via email, for their future reference.

4.2 180-DAY HAZARDOUS WASTE ACCUMULATION AREA

Description of the Area	This was the last area inspected. It was located outside the main building, at the backside of concrete stairs. Here, I observed six (6) 55-gallon black steel containers (Picture #1). Additional information is as follows.
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This area has a concrete floor and a concrete ceiling. Nevertheless, it was observed that no physical barrier protects the area from unauthorized personnel. Likewise, the area was not labeled as hazardous waste and did not have the emergency contact phone numbers posted. In addition, this area lacks emergency equipment. I told Mr. González about this, and he told me that he would take action and would ask for a fire extinguisher²³. Likewise, as in the previous area inspected, I provided Mr. González with the RCRA Regulation citation for future reference. Finally, I asked Mr. González about the containers observed in this area. He replied that all containers observed at this location were empty.

I told the facility representatives the following:

SQG Requirements for the 180-day Hazardous Waste Accumulation Area (HWAA) - I told him that a review of the RCRA Regulation, for the SQG, available at 40 C.F.R. § 262.16 is needed. In addition, as described in the previous area inspected, additional information would be sent, via email, for their future reference.

5 DOCUMENTS

5.1 DOCUMENT REQUEST

I explained to the facility representative that, as part of the CEI activities, an evaluation of documents would be conducted. I asked him for the following documents for review: (1) job description, (2) training records, (3) basic contingency plan, and (4) manifests. The information requested was provided for evaluation on-site. Information related to each document is presented below:

Documents Requested	Requested during CEI	Available during CEI?	Description
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²³ During the CEI conducted in this area, Mr. González called “Extintores del Este” and requested a fire extinguisher for this area. The company committed to provide the latter the day after this CEI.

1. Job Description	YES	YES	The information was available for review at the facility.
2. Training Records	YES	NO	The information was available for review at the facility. Also, after evaluation, additional documents were requested and agreed to be provided, via email, at a later date.
3. Contingency Plan	YES	YES	The information was available for review at the facility.
4. Manifests	YES	YES	The information was available for review at the facility. Also, after evaluation, the latter was requested to be provided, via email, at a later date ²⁴ .
5. “Procedimiento para el manejo de desperdicios biomédicos regulados y desperdicios universales de la Junta de Calidad Ambiental de Puerto Rico”			This document was provided by Mr. González for Evaluation. According to him, it was generated in April 2012, the date which the RCRA Program started at the facility.

5.2 DOCUMENTS REVIEW

5.2.1 JOB DESCRIPTIONS

One (1) six (6) page document was provided for evaluation. Additional information is as follows: The document is for the “Director de Seguridad y Programas Institucionales” which is currently been conducted by Mr. Gonzalez. The effective date of the latter was March 1st, 2019. After evaluation, the hazardous waste component information was available in the document provided.

5.2.2 TRAINING RECORDS

I asked Mr. Gonzalez about the training records. He provides information related to the OSHA 30 hrs General Industry Safety and Health Training. Additional information is as follows: The training was provided by Ms. Migdalia Ruiz-Valle on May 26, 2018. According to Mr. González, the latter is provided every ten (10) years. In addition, he always carried his training certification, which is an id-card-like document. After evaluation of this document, it was discussed that additional training information is available. As a result, they were requested to be sent via email, at a later date.

²⁴ For additional information on this item, please refer to Section 5.2.4 of this Report.

5.2.3 BASIC CONTINGENCY PLAN

Mr. González provided two (2) for evaluation. The last version of the latter was signed by Ms. Carmen Colón, Director, in May 2022²⁵. The document evaluated includes the external emergency phone numbers²⁶, evacuation plan narrative by floor²⁷, the facility representatives' responsibilities during the evacuation situations, the location map, and the "Manejo de derrames" document²⁸. Likewise, the document includes the first responder's evidence, which is provided below:

RECIPIENT	DATE
1. "Cámara de Representantes de Puerto Rico"	May 20, 2022
2. "SENADO DE Puerto Rico"	May 20, 2022
3. ASPR ^{29 30}	February 25, 2022

In addition, the Municipal Certification for the Hospital document was included in the mentioned document, which was dated November 6, 2019. Mr. González told me that they are currently working on updating the document in order to receive the new Municipal Certification.

5.2.4 MANIFESTS

At the time of the inspection, the facility's manifests were available to be reviewed at Mr. González computer. After evaluation of the latter, I told Mr. González that, although the documents were available for review, all the documents evaluated missed the Certification of receipt of hazardous materials³¹. As a result, he told me that this information is available, but not at this office. He explained to me that this document is currently being received at the Hospital but in another office. As a result, I request Mr. González the manifests from 2021 to 2023, via email. He agreed to provide the documents, via email, at a later date.

5.2.5 PROCEDIMIENTO PARA EL MANEJO DE DESPERDICIOS BIOMÉDICOS REGULADOS Y DESPERDICIOS UNIVERSALES DE LA JUNTA DE CALIDAD AMBIENTAL DE PUERTO RICO

²⁵ Mr. González told me that they already are working on the next version of the document.

²⁶ i.e. Agencies

²⁷ i.e. Third floor, identified as Surgery, which includes information such as the number of beds, location of emergency stairs, and exits, among others.

²⁸ Information was available at Appendix L, tomo 11.

²⁹ Acronym stands for Assistant Secretary for Preparedness and Response.

³⁰ According to Mr. González, this notification also includes an active exercise at this location. This activity includes State and Federal partners.

³¹ This is the item 20 of each manifest. This item needs to be signed not later (NLT) 45 days of each disposal activity.

The document provided, which was dated April 2021, includes the following: The SDSs³², the 8700-12 document, which was dated June 29, 2021, which includes information related to the facility's generator classification³³, and the waste profiles. In addition, information related to the "Dispensa general de materiales secundarios peligrosos, date on May 26, 2015, the Hospital Compliance Initiative RCRA requirements³⁴, the re-certification of the 8700-12 document, date on June 29, 2021, and the Reglamento para el manejo y disposición de los desperdicios biomédicos regulados, date on July 15, 2016, were also included.

6 CLOSING MEETING

On August 29, 2023, the closing meeting was conducted with the facility representative, at the facility. I indicated that the purpose of the closing meeting was to inform him about the CEI observations raised. As part of the closing meeting, I told the facility representatives that additional information would be sent for their reference and that additional information would be requested³⁵. The latter was sent, as agreed, on August 30, 2023. For more information, please refer to Section 8 and Section 9 of this Report.

7 POTENTIAL AREAS OF CONCERN

7.1 GENERATORS

According to eManifests data, Ryder Memorial Hospital Inc. - Humacao was identified by the Agency as a potential non-notifier facility³⁶. Nevertheless, on June 15, 2021³⁷, the facility notified of its hazardous waste activities as a Large Quantity Generator³⁸. Meanwhile, on September 29, 2022, the facility then notified its hazardous waste activities as a Not a Generator. Nevertheless, at the time of the inspection, the facility representative told me that it classified itself as a Small Quantity Generator.

In addition, according to 40 CFR § 266.500 - SUBPART P – HAZARDOUS WASTE PHARMACEUTICALS, the facility, as a SQG and as a hospital, could potentially fulfill the definition of a healthcare facility. Based on the observations and information gathered during the inspection, the following area(s) of concern were identified:

7.1.1 SUBPART A - STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE GENERAL

- i. According to 40 CFR § 262.16(b)(8)(i), which states that *"A small quantity generator must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to*

³² Acronym stands for Safety Data Sheets.

³³ The facility identified itself as a Small Quantity Generator.

³⁴ Additional information was requested to Mr. González. A copy was provided.

³⁵ The due date for the latter was September 15, 2023.

³⁶ Potential non-notifier activities started back in FY'21, during the COVID-19 pandemic timeframe.

³⁷ On June 2021, Ms. Camille Vélez, from DPNR, provided an RCRA orientation support to Mr. Gonzalez.

³⁸ According to RCRA Info.

air, soil, or surface water which could threaten human health or the environment”

At the time of the inspection, the facility failed to comply with this requirement since the Clinic Laboratory Area and at the 180-day HWAA. At the Clinic Laboratory Area, the facility did not have available SAA at this location, and, in the 180-day HWAA, the area did not have the required equipment, as referenced by 40 CFR § 262.16(b)(8)(ii), and did not have access the required aisle space, as referenced by 40 CFR § 262.16(b)(8)(v).

7.1.2 § 266.500 - SUBPART P – HAZARDOUS WASTE PHARMACEUTICALS - DEFINITIONS FOR THIS SUBPART

ii. Since the CEI at Ryder Memorial Hospital Inc. - Humacao was conducted after the final rule Hazardous Waste Pharmaceuticals was effective³⁹ and, after the evaluation of the mentioned rule, the facility potentially fulfills the definition of a healthcare facility. As a result, since the facility classified itself as an SQG⁴⁰ the facility is subject to the standard RCRA generator regulations found in the Subpart P – Hazardous Waste Pharmaceuticals rule, as reference in 40 CFR 266.501(d)⁴¹.

7.1.3 § 266.502 - SUBPART P – HAZARDOUS WASTE PHARMACEUTICALS –NOTIFICATION AND WITHDRAWAL FROM THIS SUBPART FOR HEALTHCARE FACILITIES MANAGING HAZARDOUS WASTE PHARMACEUTICALS

iii. According to 40 CFR § 266.502(a)(1), which states that “A healthcare facility must notify the EPA Regional Administrator, using the Site Identification Form (EPA Form 8700-12), that it is a healthcare facility operating under this subpart. A healthcare facility is not required to fill out Box 10.B. (Waste Codes for Federally Regulated Hazardous Waste) of the Site Identification Form with respect to its hazardous waste pharmaceuticals. A healthcare facility must submit a separate notification (Site Identification Form) for each site or EPA identification number.”

At the time of the inspection, the facility failed to comply with this requirement. This CEI was conducted as a result of the Non-notifiers initiative. The facilities identified in this initiative were included since the Agency had a reason to believe that is a generator of hazardous waste, based on EPA’s review of eManifests. Such notification from the facility, as required by Regulation, was not conducted in the Pharmaceuticals Activities Section in the 8700-12 document.

³⁹ “... Because the sewer prohibition is a HSWA provision, it becomes effective on August 21, 2019 in all states, territories and Indian Country regardless of whether the government is authorized to implement RCRA or has adopted Subpart P”. Reference: <https://www.epa.gov/hwgenerators/frequent-questions-about-management-standards-hazardous-waste-pharmaceuticals-and#app1>.

⁴⁰ As a SQG when counting all of its hazardous waste, including both its hazardous waste pharmaceuticals and its non-pharmaceutical hazardous waste.

⁴¹ Regulation applicable: subject to the hazardous waste generator regulations for VSQGs in 40 CFR section § 262.14, as well as three sections of part 266 subpart P: 40 CFR section §§ 266.505, 266.507, and 266.504.

8 FOLLOW-UP ACTIONS

As expressed in Section 6 of this Report, an email to the facility representative was sent on August 30, 2023. The email included direct links that provide information related to the RCRA Regulation (40 CFR §§ 260 to 265), Universal Waste (40 CFR § 273), and Used Oil (40 CFR § 279), among other direct links with specifics, such as aerosol cans, satellites accumulation areas (SAAs), aisle space, etc. In addition, the EPA Form 8700-12, and one page with additional links which provide direct links for specific items for the RCRA Regulation were sent for their future reference.

8.1 REQUESTS

Information Requested	Reason
1. <i>Additional Information: - Satellite Accumulation Area (SAA)</i>	- A narrative with information related to the future SAA at the facility was requested in order to comply with the regulation requirements.
2. <i>Training Information</i>	- Additional information/documentation related to the facility representative's hazardous waste-related training was requested. - Additional certifications and/or supportive documents related to additional hazardous waste training provided to the facility representative were requested.
3. <i>Manifests</i>	- Information related to the Certification of receipt of hazardous materials... was not available for evaluation⁴² (Section 20 of the manifests). As a result, the electronic hazardous waste manifests from the last three (3) years were requested.

8.2 INFORMATION PROVIDED TO THE FACILITY REPRESENTATIVE

Information Requested	Link	Enclosed
1. <i>RCRA (Hazardous Waste)</i>	√	

⁴² The last three (3) years of manifest were available for review in Mr. González computer.

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2. <i>Summary of Requirements for Very Small Quantity Generators (VSQGs)</i>	√	
3. <i>Summary of Requirements for Small Quantity Generators (SQGs)</i>	√	
4. <i>Summary of Requirements for Large Quantity Generators (LQGs)</i>	√	
5. <i>Universal Waste</i>	√	
6. <i>Used Oil</i>	√	
7. <i>Aerosol cans</i>	√	
8. <i>Satellite Accumulation Areas</i>	√	
9. <i>Condition of containers</i>	√	
10. <i>Aisle space</i>	√	
11. <i>Alternative Standards for Episodic Generation</i>	√	
12. <i>National Response Center</i>	√	
13. <i>Hazardous Waste Generator Regulations Compendium</i>	√	
14. <i>Defining Hazardous Waste</i>	√	
15. <i>P-waste</i>	√	
16. <i>EPA Form 8700-12</i>	√	√
17. <i>One page with additional links that provide direct links for specific items for the RCRA Regulation</i>	√	√
18. <i>Managing your Waste, English Version</i>		√
19. <i>Como manejar sus desperdicios peligrosos, Spanish version</i>		√

9 ATTACHMENTS

I. CAMERA ROLL

II. APPENDIX 1: SITE PICTURES

III. OTHER: EMAIL SENT TO FACILITY REPRESENTATIVE ON AUGUST 30, 2023.

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ATTACHMENT I: CAMERA ROLL

Caballer, Rosana > OneDrive - Environmental Protection Agency (EPA) > In response of COVID19 > FY'23 > CEIs > Hospital Ryder Memorial Inc, Humacao > Pictures



✓ DSCN1682.JPG



✓ DSCN1683.JPG