

INSPECTION REPORT

Inspection Entry Date/Time	01/05/2023 09:45 AM (AKT)	Announced: No
Inspection Exit Date/Time	01/05/2023 01:49 PM (AKT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	CEI - Compliance Evaluation Inspection	
Company Name	The Alaska Native Tribal Health Consortium (ANTHC)	
Facility or Site Name	Alaska Native Medical Center	
Facility/Site Identifier	AKR000209999	
Facility/Site Physical Address	4315 Diplomacy Dr.	
City, State, Zip Code	Anchorage, AK 99508	
County/Borough	Anchorage	
Generator Status	Very Small Quantity Generator (VSQG)	
NAICS	62211 – General Medical and Surgical Hospitals	
Type of Operation	Hospital	
Geographic Coordinates	61.182875, -149.800531	
Mailing Address/Secondary Address	Valerie Herrera, REHS, MPH vsherrera@anthc.org Alaska Native Tribal Health Consortium (ANTHC) Alaska Native Medical Center (ANMC) VP of Support Services 4315 Diplomacy Dr. Anchorage, AK 99508 (907) 729-7526	
City, State, Zip Code	Anchorage, AK 99508	
Permit Number (If Applicable)	Not Applicable	
Lead Inspector:		
Jon Jones	JONATHAN JONES	Digitally signed by JONATHAN JONES Date: 2023.03.01 07:58:48 -09'00'
	EPA Region 10	Jones.Jon@epa.gov (907) 271-6329
Supervisor Review:		
Jen Sullivan	Jennifer A Sullivan	Digitally signed by Jennifer A Sullivan Date: 2023.03.02 08:21:30 -08'00'
	EPA Region 10	Sullivan.Jennifer.A@epa.gov (206) 553-6978

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: CEI - Compliance Evaluation Inspection

The inspection at the Alaska Native Medical Center Facility was a multi-media inspection to determine compliance with Clean Air Act (CAA) and Resource Conservation and Recovery Act (RCRA). This report covers

the RCRA portion of the inspection. A separate report will document the CAA portion of the inspection.

This report is based on information supplied by Alaska Native Medical Center Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility and its HQ 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
CAA Inspector/EPA	John Pavitt	(907) 271-3688	pavitt.john@epa.gov	Yes	No
CAA Inspector/ADEC	Rachel McKenna	(907) 269-7698	rachel.mckenna@alaska.gov	Yes	No
Vice President of Support Services/ANMC	Valerie Herrera	(907) 519-4839	vserrera@anthc.org	Yes	Yes
Senior Safety Technician/ANMC	Javier Meraz			Yes	Yes
Accredited Campus Safety Officer/ANMC	Erin Keith			Yes	Yes
Institutional Environmental Health Manager/ANMC	Keith Cook			Yes	Yes
Vice President of Professional Services/ANMC	Vivian Echavarria			Yes	Yes
Pharmacy Quality Improvement Manager/ANMC	Sara Doran-Atchison			Yes	No
Interim Hospital Administrator/ANMC	Alan Vierling			No	Yes

Opening Conference

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Alaska Native Medical Center Facility (the “Site” or “Facility”), located at 4315 Diplomacy Dr., Anchorage, AK 99508, at 09:45 AM (AKT) on 01/05/2023 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Valerie Herrera that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

Facility/Site Information

The Alaska Native Medical Center (ANMC) is a non-profit health center and Level II Trauma Center based in Anchorage, Alaska, United States, which provides medical services to 158,000 Alaska Natives and other Native Americans in Alaska. It acts as both the secondary and tertiary care referral hospital for the Alaska Region of the Indian Health Service (IHS). Established in 1997, ANMC is jointly owned and managed by the Alaska Native Tribal Health Consortium and Southcentral Foundation as well as tribal governments, and their regional health organizations.

Number of employees	~1,200
Length of Facility at Location	May 1997
Operating Hours	8:00 am to 5:00 pm
Safety Training Provided to Inspector(s)?	No
Size of Facility	The hospital is a 380,635 sq ft, 167-bed facility
What type of generator facility notified?	Non-Notifier
What type of generator facility verified as?	Verified Very Small Quantity Generator by facility personnel and supported by monthly waste generation records.
Weather Conditions	Cloudy and cold

Process Description

During the opening conference, facility representatives, present during the opening conference, provided the following information:

- ANMC is a VSQG of hazardous waste.
- ANMC manages their hazardous waste pharmaceuticals as RCRA hazardous waste as opposed to managing this waste stream under Subpart P as HWPharms.
- The facility's combined hazardous waste pharmaceuticals and RCRA hazardous waste generation rate is less than 220 pounds each month.
- Medical waste, trace chemo waste, and non-hazardous pharmaceuticals are managed through Safety Waste Incineration, Inc. where it is either incinerated or processed through an autoclave.
- Waste batteries and waste lamps (bulbs) are managed as universal waste through Total Reclaim.
- Waste lamps (Four and eight-foot fluorescent light tubes) generated at the facility are low mercury lamps and are managed in an onsite "Bulb Eater" (Drum top lamp crusher). The crushed lamps are disposed of at the local landfill and the associated filter is managed as hazardous waste.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
ANMC Main Building		Yes
Boom Room	Hazardous waste and universal waste battery accumulation area.	Yes

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Inpatient Pharmacy	-Hazardous waste accumulation area (waste pharmaceuticals) -Potentially creditable pharmaceutical accumulation area (reverse distributor)	No
Loading Dock	Biological waste accumulation area and Autoclave. The following waste streams are managed through Safety Waste Incineration, Inc. -Red bag/container (medical waste) -Yellow bag/container (trace chemo) -White bag/container (non-hazardous pharmaceuticals)	No
Third floor mechanical	-Accumulation area for universal waste lamps -Lamp crusher/bulb eater for non-hazardous/low mercury fluorescent lamps/tubes	No

SECTION II – OBSERVATIONS**Building:** ANMC Main Building/Boom Room**Observation #:** JJ1-OB-001**Date:** 01/05/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Javier Meraz**Title:** Senior Safety Technician

While inspecting the facility's waste inside the Boom Room, I saw an area where waste batteries were being accumulated. Upon closer inspection of these waste batteries, I saw that there were a total of nine waste batteries. There were four waste Lithium-ion, one waste Ni-MH, and 4 waste lead-acid batteries that were being accumulated on the top of a shelf, inside the Boom Room. I asked Mr. Meraz how his facility managed waste batteries and how long the waste batteries had been onsite, and he told me they were managed as universal waste batteries and that they had been on-site for about a week. At the time of the inspection, there were nine waste batteries in the Boom Room that were not labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."

Photo(s)

1. [IMG_0414.jpg](#)
2. [IMG_0415.jpg](#)
3. [IMG_0416.jpg](#)
4. [IMG_0417.jpg](#)
5. [IMG_0418.jpg](#)
6. [IMG_0419.jpg](#)
7. [IMG_0420.jpg](#)
8. [IMG_0421.jpg](#)
9. [IMG_0422.jpg](#)

SECTION III – RECORDS REVIEW

Record: Others		AOC: No
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 01/05/2023
The records listed in the Appendix 2: Document Log were obtained and reviewed following the inspection.		

SECTION IV – AREA OF CONCERN

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

Building: ANMC Main Building	Area: Boom Room	Sub-area:
JJ1-OB-001		
At the time of the inspection, there were nine waste batteries in the Boom Room that were not labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."	Citations:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I 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 I observed during my inspection of the facility. 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 are determined to be violations.

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.**SECTION VII – LIST OF APPENDICES**

1. Photo Log
2. Document Log

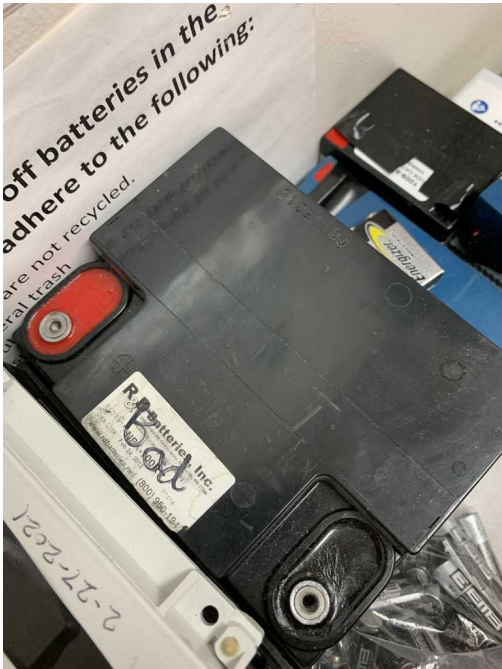
APPENDIX 1: PHOTO LOG



[Title]			IMG_0414.jpg
01/05/2023 11:52 AM	No CBI	No PII	Photographer: Jon Jones
ANMC Main Building/Boom Room			61.18334444, -149.80056666
View of waste batteries that were not labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."			



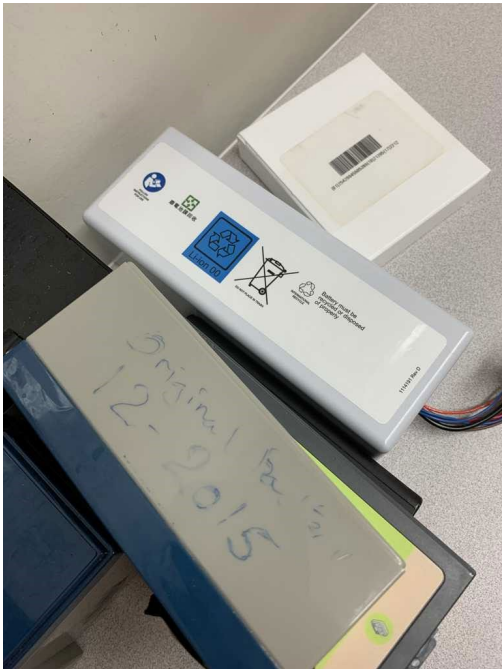
[Title]			IMG_0415.jpg
01/05/2023 11:52 AM	No CBI	No PII	Photographer: Jon Jones
ANMC Main Building/Boom Room			61.18334444, -149.80058333
Close-up view of a waste battery that was not labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."			



[Title]			IMG_0416.jpg
01/05/2023 11:52 AM	No CBI	No PII	Photographer: Jon Jones
ANMC Main Building/Boom Room			61.18334444, -149.80058333
Close-up view of a waste battery that is not labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."			



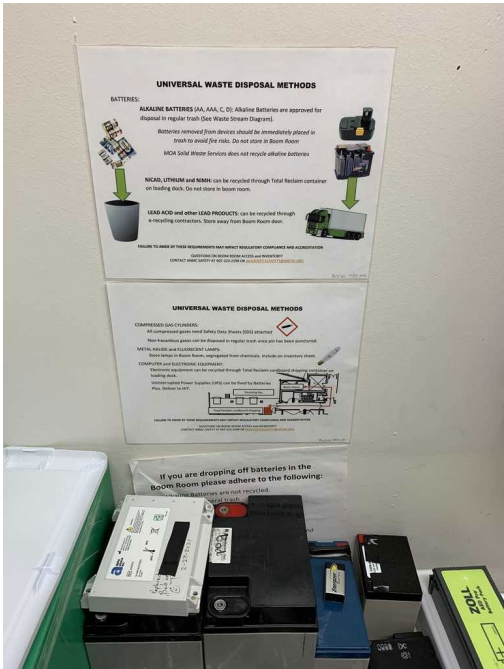
[Title]			IMG_0417.jpg
01/05/2023 11:52 AM	No CBI	No PII	Photographer: Jon Jones
ANMC Main Building/Boom Room			61.18334444, -149.80058333
Close-up view of a waste battery that is not labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."			



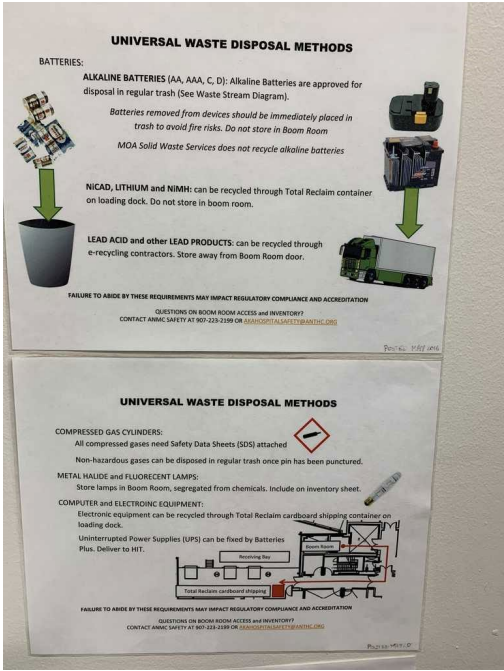
[Title]			IMG_0418.jpg
01/05/2023 11:53 AM	No CBI	No PII	Photographer: Jon Jones
ANMC Main Building/Boom Room			61.18336388, -149.80049166
Close-up view of a waste battery that is not labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."			



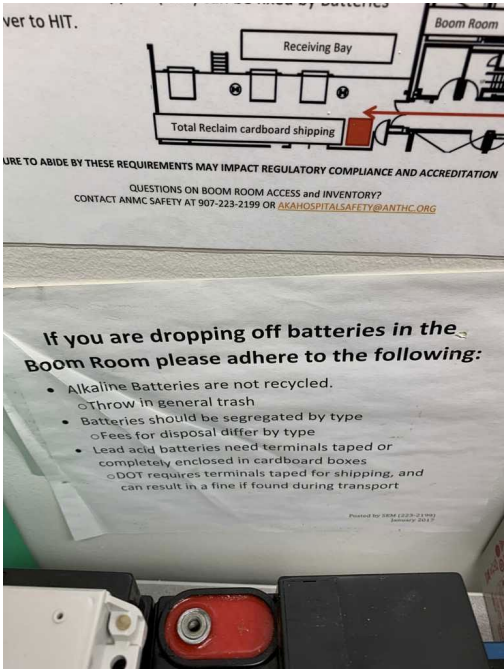
[Title]			IMG_0419.jpg
01/05/2023 11:53 AM	No CBI	No PII	Photographer: Jon Jones
ANMC Main Building/Boom Room			61.18334444, -149.80058333
Close-up view of a waste battery that is not labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."			



[Title]			IMG_0420.jpg
01/05/2023 11:56 AM	No CBI	No PII	Photographer: Jon Jones
ANMC Main Building/Boom Room			61.18335833, -149.80053611
View of the facility signage posted on the wall above the waste batteries.			



[Title]			IMG_0421.jpg
01/05/2023 11:56 AM	No CBI	No PII	Photographer: Jon Jones
ANMC Main Building/Boom Room			61.18334444, -149.80056666
View of the facility signage posted on the wall above the waste batteries.			



[Title]			IMG_0422.jpg
01/05/2023 11:57 AM	No CBI	No PII	Photographer: Jon Jones
ANMC Main Building/Boom Room			61.18334444, -149.80056666
View of the facility signage posted on the wall above the waste batteries.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Facility Map	Alaska-Native-Health-Campus-map-02.26.2020.pdf	No	No	Jon Jones	02/28/2023
Other - Opening/closing conference attendees list	Attendance List EPA Site Visit to ANMC Hospital on 05 January 2023.pdf	No	No	Jon Jones	02/28/2023
Other - Boom Room Inventory	Boom Room 2020 Inventory Logs combined.pdf	No	No	Jon Jones	02/28/2023
Other - Boom Room Inventory	Boom Room 2021 Inventory Logs combined.pdf	No	No	Jon Jones	02/28/2023
Other - Boom Room Inventory	Boom Room 2022 Inventory Logs combined.pdf	No	No	Jon Jones	02/28/2023
Other - Chem HazMat Inventory	CHEMIC~1.PDF	No	No	Jon Jones	02/28/2023
Other - Chem HazMat Inventory	CHEMIC~2.PDF	No	No	Jon Jones	02/28/2023
Other - Chem HazMat Inventory	CHEMIC~3.PDF	No	No	Jon Jones	02/28/2023
Process Description/Flow Diagram	Pharmacy ONLY Waste Stream Diagram 2022.pdf	No	No	Jon Jones	02/28/2023
Communications	Re_ ANMC EPA site visit 05 Jan 2023.pdf	No	No	Jon Jones	02/28/2023
Other - Pharmacy Reverse Distributor Report	Pharmacy 2023.01.05 2022 YTD Inmar Report SD.xlsx	No	No	Jon Jones	02/28/2023
Other - Pharmacy waste inventory	Pharmacy Expired Box Inventory 1-5-23.pdf	No	No	Jon Jones	02/28/2023
Other - RCRA pharmaceutical inventory	RCRA20~1.PDF	No	No	Jon Jones	02/28/2023
Other - RCRA pharmaceutical inventory	RCRA20~2.PDF	No	No	Jon Jones	02/28/2023
Other - RCRA pharmaceutical inventory	RCRA20~3.PDF	No	No	Jon Jones	02/28/2023
Universal Waste Disposal Receipts	Universal Waste 12 December Pick-Up	No	No	Jon Jones	02/28/2023

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	Invoice _670.pdf				
Universal Waste Disposal Receipts	Universal Waste 12.1.22 Total Reclaim. Bill of Lading pick up #39491.pdf	No	No	Jon Jones	02/28/2023
Facility Map	ANMC-Clinic-Map-Dec-2017.pdf	No	No	Jon Jones	02/28/2023
Other - Pharmaceutical contract with Stericycle	RCRA Pharmaceutical CONTRACT Stericycle_RCRA Pharmaceuticals.pdf	No	No	Jon Jones	02/28/2023
Other - Pharmaceutical contract modification	RCRAPH~1.PDF	No	No	Jon Jones	02/28/2023
Communications	1.6.23 email from ANMC.pdf	No	No	Jon Jones	02/28/2023
Process Description/Flow Diagram	Waste Stream Diagram 2019.pdf	No	No	Jon Jones	02/28/2023