

INSPECTION REPORT

Inspection Entry Date/Time	08/08/2023 08:40 AM (AKT)	Announced: No
Inspection Exit Date/Time	08/08/2023 09:33 AM (AKT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Company Name	Alpine Surgicenter, LLC	
Facility or Site Name	Alpine Surgery Center	
Facility/Site Identifier	AKR000209585	
Facility/Site Physical Address	3801 Lake Otis Parkway	
City, State, Zip Code	Anchorage, AK 99508	
County/Borough	Anchorage Borough	
Generator Status	Very Small Quantity Generator (VSQG)	
NAICS	621493	
Type of Operation	Freestanding Ambulatory Surgical and Emergency Centers	
Geographic Coordinates	61.185814, -149.837201	
Mailing Address/Secondary Address	Ms. Danna Grant, BSN, RN, CASC, CAIP danna.grant@hcahealthcare.com Administrator 3801 Lake Otis Parkway Anchorage, AK 99508	
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: 2023.08.15 15:04:29 -08'00'
	EPA Region 10	Jones.Jon@epa.gov (907) 227-4316
Supervisor Review:		
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2023.08.16 10:31:44 -07'00'
	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 Alpine Surgery Center (ASC) Facility (the “Site” or “Facility”), located at 3801 Lake Otis Parkway, Anchorage, AK 99508, at 08:40 AM (AKT) on 08/08/2023 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Ms. Danna Grant, Administrator, that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

Inspection Date(s):

08/08/2023 - 08/08/2023

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 ASC 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) 227-4316	Jones.Jon@epa.gov	Yes	Yes
ASC Administrator	Danna Grant	(907) 563-1555	danna.grant@hcahealthcare.com	Yes	Yes
RCRA Inspector-in-training/ADEC	Grace Tapulgo			Yes	Yes
RCRA Inspector-in-training/ADEC	Emily Vannortwick			Yes	Yes

Opening Conference

Shortly after arriving at ASC, we were met by Ms. Danna Grant, ASC Administrator and taken to a facility conference room where I held the opening conference.

During the opening conference, I 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.

Ms. Grant told us that in 2019 ASC was bought by HCA Health Care. I asked about the facility's notification as a LQG and Ms. Grant said that she initially counted the red bag medical waste as hazardous. Ms. Grant said that the amount of hazardous waste/HWPharms generated was well below 220 pounds in any calendar month. I inspected the hazardous waste/HWPharms that has been accumulated onsite since last fall and based on the quantity accumulated, the facility is a very small generator (VSQG) with greater than 220 pounds in accumulation. The facility notified under Subpart P however, at the time of the inspection the facility was not managing their waste as HWPharms. Based on the amount of HWPharms generated per month (VSQG) the facility is not required to manage their hazardous waste pharmaceuticals under Subpart P.

Only those areas in which we observed potential compliance concerns or noted other pertinent issues are discussed in Section III of this inspection report.

Facility/Site Information

Operating Hours	5:00 a.m. to 5:00 p.m., Monday through Friday
Length of Facility at	Since March 2015

Location	
Number of employees	80
Safety Training Provided to Inspector(s)?	No
Size of Facility	~18,779 Square feet
What type of generator facility notified?	Large Quantity Generator (LQG)
What type of generator facility verified as?	Verified as VSQG by Ms. Grant
Weather Conditions	Rainy

Process Description

According to Ms. Grant, a pharmacist comes once a quarter to manage the pharmaceutical inventory. Expired vials of crash cart medications and routine pharmaceutical waste is accumulated in a black, 18-gallon capacity hazardous waste container located in Pre/Post Op. Red bag medical waste is picked up every day and disposed of locally through Entech. The facility is in the process, which started last fall, of setting up service with Stericycle to manage the facility's hazardous waste/hazardous waste pharmaceuticals (HWPharms).

I reviewed Stericycle's Master Service Agreement that HCA has for their surgery centers in Alaska and the "Services to be Provided" were marked as hazardous waste disposal and not pharmaceutical waste disposal.

We were accompanied during the inspection by Ms. Grant. We looked at the facility's processes, hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Main Bldg		No
Biohazard room	Accumulation of red bag medical waste and hazardous waste/HWPharms	No
Pre/Post Op	Generation of hazardous waste/HWPharms	No

SECTION II – OBSERVATIONS

We inspected the areas listed above and everything observed was found to be consistent with that of a VSQG.

SECTION III – RECORDS REVIEW

The facility was determined to be a VSQG and there were no records to be reviewed.

SECTION IV – AREA OF CONCERN

No areas of concern were observed during the inspection of the facility.

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 Ms. Grant for her time and cooperation during the inspection. I told Ms. Grant that I observed no areas of concern 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.

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-2023080808572157212385378.jpg
08/08/2023 08:57 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Main Bldg/Pre/Post Op			61.18561367, -149.83772096
View of 18-gallon container of hazardous waste/HWPharms.			



[Title]			IMG-202308080911081181639292.jpg
08/08/2023 09:11 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Main Bldg/Biohazard room			61.18589684, -149.83744557
View of black containers of hazardous waste/HWPharms.			



[Title]			IMG-2023080809111811181603566.jpg
08/08/2023 09:11 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
Main Bldg/Biohazard room			61.18595345, -149.83736643
Another view of black containers of hazardous waste/HWPPharms.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Service Agreement	Stericycle Service Agreement	No	No	Jon Jones	08/09/2023
Flow Chart	Summary of Pharmaceutical Waste Streams	No	No	Jon Jones	08/09/2023