

EPA REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Entry Date/Time	05/06/2024 08:43 AM (AKT)	Announced: No	
Inspection Exit Date/Time	05/06/2024 04:07 PM (AKT)	Access: Granted	
Regulatory Program	Resource Conservation and Recovery Act (RCRA)		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	Providence Alaska Medical Center		
Facility or Site Name	Providence Alaska Medical Center		
Facility/Site Identifier	AKD083350751		
Facility/Site Physical Address	3200 Providence Drive		
City, State, Zip Code	Anchorage, AK 99508		
County/Borough	Municipality of Anchorage		
Generator Status	Very Small Quantity Generator (VSQG)		
NAICS	622110 – General Medical and Surgical Hospitals		
Type of Operation	Hospital – Level 2 Trauma Center Adult and Pediatric care and the following clinics: Diabetes & Nutrition, Forensic Nursing, Providence Breakthrough, Cancer Center, Outpatient Wound Care, and Rehabilitation Services		
Geographic Coordinates	61.18979, -149.8191		
Mailing Address/Secondary Address	John Bolstridge, RN, BSN, MBA-HM Principal Safety Officer Providence Alaska 3200 Providence Dr. Anchorage, AK 99508 Office Phone (907) 212-5129 Cell Phone (907) 854-2092 E-mail: John.Bolstridge@providence.org		
City, State, Zip Code	Anchorage, Alaska 99508		
Permit Number (If Applicable)	Title V Air Quality Permit Number AQ0486TVP03 Per the Alaska Department of Environmental Conservation Division of Water, Providence Hospital is authorized to discharge non-contact cooling water per the Alaska Pollutant Discharge Elimination System (APDES) Non-Contact Cooling Water General Permit AKG250000, authorization number AKG250001.		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2024.10.28 08:29:48 -08'00'	
	EPA Region 10	Jones.Jon@epa.gov	(907) 227-4316

Supervisor Review:			
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2024.10.29 15:53:27 -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 Providence Alaska Medical Center Facility (the “Site” or “Facility”), located at 3200 Providence Dr., Anchorage, AK 99508, at 08:43 AM (AKT) on 05/06/2024 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed John Bolstridge, Principal Safety Officer that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

This was a Resource Conservation and Recovery Act (RCRA) inspection. The facility was inspected to ensure compliance with standards for hazardous waste generators, universal waste management, hazardous waste pharmaceuticals (40 C.F.R. Part 262 through 273) and used oil management (40 C.F.R. Part 279). The inspection was conducted as part of a Core Program requirement for fiscal year (FY) 2024.

This report is based on information supplied by Providence Alaska Medical Center Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility 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 after 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
Alaska Department of Environmental Conservation (ADEC) Inspector	Sable McGovern	(907) 269-4556	sable.mcgovern@alaska.gov	Yes	Yes
ADEC Inspector	Alan Pefley	(907) 269-4567	alan.pefley@alaska.gov	Yes	Yes
ADEC Inspector	Vanessa Schmidt	(907) 269-4581	vanessa.schmidt@alaska.gov	Yes	Yes
Pharmacy Compliance Officer/Providence	Casey Erdrich	(907) 212-2254	casey.erdrich@providence.org	No	Yes

Senior Manager of Risk Management/Providence	Siena Vanucci			No	Yes
Laundry Manager	Joseph Price			No	Yes
Director of Nursing Excellence	Savannah Courtwright	(907) 212-3321	savannah.courtright@providence.org	Yes	Yes
Director of EOC/Providence Alaska Medical Center	Carl Cartwright	(907) 212-6019	carl.cartwright@providence.org	Yes	Yes
Emergency Manager	Michael Kubler	(907) 212-2305	michael.kubler@providence.org	Yes	Yes
Facilities Manager	Kevin Bonney			Yes	Yes
Principal Safety Officer/Providence Alaska Medical Center	John Bolstridge	(907) 854-2092	john.bolstridge@providence.org	Yes	Yes

Opening Conference

Upon arriving at the hospital, we entered the Main Building. We walked up to a customer service desk and spoke to an administrative staff member explaining who we were with and the purpose of our visit. We were then directed by the customer service staff member to another part of the building where we could locate the point of contact. We were then escorted to a conference room where we met with the hospital staff listed above in the Attendees table in Section I of this report. All the inspectors presented credentials and the facility staff at the opening conference were informed that we were at the facility to conduct an inspection to determine compliance with the Resource Conservation and Recovery Act (RCRA). Business cards were exchanged between the inspectors and hospital staff. During the opening conference, it was 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. Only those areas in which we observed areas of concern or noted other pertinent issues are discussed in this inspection report.

Facility/Site Information

What type of generator facility notified?	Very Small Quantity Generator (VSQG)
What type of generator facility verified?	VSQG
Size of Facility	Facility is approximately 2 million square feet and has 401 beds
Safety Training Provided to Inspector(s)?	No
Operating Hours	24 hours seven days per week, Administrative Hours: 8:00 AM to 5:00 PM Monday through-Friday
Length of Facility at Location	62 Years
Number of employees	5,000

Weather Conditions	Day 1 – Cloudy, Average Temperature 42 degrees Fahrenheit
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Process Description

Hospital - Emergency, in-patient care, out-patient care, and clinics for diabetes & nutrition, forensic nursing, substance use treatment, cancer, outpatient wound care, and rehabilitation services. The facility has laboratories located in Forensic/AK Cares clinic, substance use treatment clinic, and the Providence Alaska Medical Center (main hospital), a pharmacy, and some doctor's offices on-site. Routine wastes streams for this facility consists of hazardous waste pharmaceuticals managed in accordance with Subpart P, used oil, and waste batteries managed as universal waste.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Providence		Yes
Central Pharmacy		Yes
Microbiology Lab		Yes
Boiler room	Accumulation of used oil	No
Boiler Room/Oil Room		Yes
East mechanical		Yes
Facilities Loading Dock	Generation of alkaline and lithium batteries	Yes
Inpatient Laboratory		No
Oncology Nursing		Yes
5 th Floor Medical Surgical Nursing station		Yes
Pathology lab		Yes
Pharmacy Admin.	Accumulation of creditable pharms	No
Waste Handling Area		Yes

SECTION II – OBSERVATIONS

Building: Providence/Facilities Loading Dock			
Observation #: JJ1-OB-001	Date: 05/06/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: John Bolstridge		Title: Principal Safety Officer	
We inspected the Facilities Loading Dock, which is where the facility collects spent batteries.			
While in this area, we observed the following:			
• One (1) container of waste alkaline batteries that also held one battery labeled nickel metal hydride. The container was not labeled or marked clearly with any one of the following phrases: “Universal Waste – Battery(ies),” “Waste Battery(ies),” or “Used Battery(ies).” (Photo Nos. 4, 5, 6, 7, 8,) • One (1) container marked UNKNOWN had what looked to be alkaline batteries in it. (Photo No. 14) • None of the containers were marked with the earliest date that any of the batteries contained within became a waste. (Photo No. 3)			

- All containers holding batteries not marked or labeled as “Universal Waste – Batteries”, “Waste Batteries”, or “Used Batteries” were labeled “Universal Waste Batteries” by Providence staff before we left the area. (Photo Nos. 9)

Building: Providence Hospital Building /Waste Handling Area

Observation #: JJ1-OB-002 **Date:** 05/06/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: John Bolstridge **Title:** Principal Safety Officer

We inspected the facility’s waste handling area. In this area, the facility was storing black containers that we were told held non-creditable hazardous waste pharmaceuticals (HWPharms). We also observed a used controlled substance disposal container inside a 55-gallon drum. Controlled substance disposal containers are used at this facility for the purpose rendering drugs that are regulated by the Drug Enforcement Agency (DEA) unusable. The containers were stacked on pallets in a chain link fence cage area that is 144 square feet.

In this area we saw 23 containers that held HWPharms and we observed the following:

- All 23 HWPharms containers were labeled incorrectly. We observed a label on the containers with the words "Universal Pharmaceutical Waste Container." A healthcare facility must label or clearly mark each container of non-creditable hazardous waste pharmaceuticals with the phrase “Hazardous Waste Pharmaceuticals.” (Photo Nos. 11, 15)
- We observed that ten (10) of the 23 containers were not marked or labeled with the date that the non-creditable hazardous waste pharmaceuticals became a waste and there was nothing in the cage area that identified the earliest date that any of the non-creditable hazardous waste pharmaceuticals became a waste. The facility did not appear to maintain, nor did they demonstrate that they have an inventory system that identified the date the non-creditable hazardous waste pharmaceuticals being accumulated first became waste.
- We observed that thirteen (13) of the 23 containers were marked with the date that the non-creditable hazardous waste pharmaceuticals became a waste and 11 of those dated containers were marked with dates that demonstrated they had been on site for greater than one year without a permit or interim status.
 - Seven (7) containers were dated 3/8/2023 and had been accumulated on site for approximately a year and 2 months (Photo No. 12)
 - One (1) container was dated 8/27/2022 and had been accumulated on site for approximately a year and 8 months (Photo No. 10)
 - Two (2) containers were dated 8/6/2022 and had been accumulated on site for approximately a year and 9 months (Photo No. 13)
 - One (1) container was dated 2/10/2023 and had been accumulated on site for approximately a year and 3 months

Building: Providence Hospital Building /Boiler Room/Oil Room

Observation #: JJ1-OB-003 **Date:** 05/06/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: John Bolstridge **Title:** Principal Safety Officer

While we inspected the facility’s Boiler Room, we went into the Oil Room. The facility accumulates used oil generated at this facility in the “Oil Room.” During the inspection, facility personnel stated that an oil pick up would need to be scheduled and that the used oil is picked up by U.S. Ecology for recycling. In the Oil Room we saw:

- One (1) full 55-gallon drum we were told this drum contained used oil. The drum was not labeled or marked clearly with the words "Used Oil." (Photo No. 16)
- Two (2) Five-gallon pails, that held used oil were not labeled or marked clearly with the words "Used Oil." (Photo Nos. 17, 22)
- Spill pallets for the used oil drums contained some used oil but were not labeled or marked with the words "Used Oil." (Photo Nos. 24, 29)
- Facility staff marked the containers and spill pallets as discussed above with the words "Used Oil" during the inspection. (Photo Nos. 2, 26, 27, 28, 32, 33)
- We noted that there was used oil on the floor, demonstrating that there had been a release of used oil that, at the time of the inspection, had not been cleaned up and managed properly. No spill kits were observed in the Oil Room. (Photo No. 23)

The facility provided photo documentation after the inspection, on 5/9/2024, of the Oil Room floor, showing that the used oil had been cleaned up. (Photo No. 1)

Building: Providence/Boiler Room

Observation #: JJ1-OB-004 **Date:** 05/06/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: John Bolstridge **Title:** Principal Safety Officer

While inspecting the Boiler Room we saw an aerosol can on a cart outside of the oil room. I picked up the aerosol can, shaking it, and determined that it was an empty waste aerosol can. We asked how waste aerosol cans were being managed and a staff member took us to a work area and described the facility's current method of management for waste aerosol cans. The procedure, according to facility personnel, is to dispose of aerosol cans by clamping the aerosol can in a bench vise and puncturing it with a cold chisel with blows from a hammer while ensuring that any material ejected does not go into the employee's face. Punctured cans are then tossed in the trash. At the time of the inspection, we informed facility staff that this was improper management of waste aerosol cans. (Photo Nos. 34, 35)

Building: Providence/East Mechanical

Observation #: JJ1-OB-005 **Date:** 05/06/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: John Bolstridge **Title:** Principal Safety Officer

We inspected the East Mechanical area where the facility collects various waste lamps. The facility manages their waste lamps as universal waste.

While in East Mechanical we observed the following:

- A cardboard cylinder, containing 14 each four (4) foot used fluorescent light tubes, that was not closed and was not labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)." The container was also not marked or labeled with the earliest date that any universal waste in the container became a waste or was received. (Photo Nos. 30, 31)
- A blue plastic bin that held two (2) waste compact fluorescent lamps (CFLs) was not closed and was not labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," "Waste

Lamp(s)," or "Used Lamp(s)." At the time of the inspection, the bin was improperly marked with the words "Compact Fluorescent" and not marked or labeled with the earliest date that any universal waste in the container became a waste or was received. (Photo No. 38)

- One (1) light fixture on the floor that contained fluorescent lamps. The fixture was laying on the floor covered in dust and dirt and appeared to be out of service and the lamps no longer in use. It wasn't clear if these lamps were a waste or not, so we told facility personnel they needed to make a waste determination. (Photo No. 39)
- Five (5) cardboard containers of older high mercury fluorescent lamps. We were told the lamps were still usable and that the facility was phasing out their use. The Facilities Manager stated he would see if they could be used somewhere in the hospital. We told facility personnel if they didn't have a use for the lamps, they could give them to a facility that still used them or donate them to a re-use store. Otherwise, they would need to make a waste determination. (Photo Nos. 36, 37)
- Two (2) waste lamps that were either fluorescent or LED and two (2) waste bulbs that were fluorescent or LED observed in a trash can. The lamps and bulbs were not in a container or packaging that was adequate to prevent breakage and was not closed. The waste lamps and bulbs were also not labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)." (Photo No. 40)

Building: Providence/ Central Pharmacy

Observation #: JJ1-OB-006

Date: 05/06/2024

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Casey Erdrich

Title: Pharmacy Compliance Officer and Technician Supervisor

We inspected the facility's pharmacy and while there we met with Casey Erdrich, Pharmacy Compliance Officer. The facility accumulates HWPharms in the pharmacy as well as controlled substance waste.

During the inspection we observed the following:

Two (2) black containers with translucent lids that held HWPharms. At the time of the inspection, they were closed; however, they were not labeled or clearly marked with the phrase "Hazardous Waste Pharmaceuticals" and were not marked with the date that the non-creditable HWPharms became a waste. Both containers were improperly labeled "Incompatible Pharmaceutical Wastes- Corrosives." We explained the labeling requirement to facility personnel and were told that pharmacy staff would label the containers with the words "Hazardous Waste Pharmaceuticals." (Photo Nos. 46, 47) One (1) black container with a translucent lid was closed and labeled "Hazardous Waste Pharmaceuticals," but was dated 3/8/2023 demonstrating that it had been on site for greater than one year without a permit or interim status. (Photo Nos. 43, 45) One (1) black container with a white lid was closed but was not labeled or clearly marked with the phrase "Hazardous Waste Pharmaceuticals." This container was also dated 3/8/2023, demonstrating that it had been on site for greater than one year without a permit or interim status. Both HWPharms containers, dated 3/8/23, had been accumulated on site for approximately a year and 2 months. (Photo No. 41)

Building: Providence/Pharmacy Administration**Observation #:** JJ1-OB-007**Date:** 05/06/2024**Contains AOC:** No**Contains CBI:** No**Person Interviewed:** Casey Erdrich**Title:** Pharmacy Compliance Officer and Technician Supervisor

We asked about any potentially creditable pharmaceuticals and how they were being managed. We were told that they were accumulated in the administrative office. We went to the administrative office and saw that there were two (2) containers that held these potentially creditable pharmaceuticals for reverse distribution. According to facility personnel, there are two pick-ups by the reverse distributor, once in May and once at the end of October or the first of November. The facility also ships off creditable pharmaceuticals every few weeks for credit. (Photo Nos. 44, 54)

Building: Providence/Inpatient Laboratory**Observation #:** JJ1-OB-008**Date:** 05/06/2024**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Stephanie Randrup**Title:** Lab Supervisor

We were joined by Lisa Robinett, Director of Laboratory and Stephanie Randrup, Core Lab Supervisor upon arriving at the Inpatient Laboratory.

Staining is performed in this lab both manually and using an automated machine (Sysmex Slide Maker model number SP-50 serial number 11470). The facility has used the Sysmex slide maker for six years. We asked how waste from the manual staining is managed. The lab supervisor stated that no waste is generated from this process as the chemicals "evaporate" and are then refilled as necessary from fresh product. She stated that the only real waste is from the water used in the last step of the process and that this is placed down the lab drain. We asked how waste from the automated staining is managed. The lab supervisor stated that methanol and "Color Wright" are the chemicals used and that the waste from the machine is discharged weekly to the lab drain. She said she was unaware of where the drain leads to. She stated that the vendor for the machine told the lab that this waste was able to go down the drain. It is believed that the drain goes to the city sewer. We requested Safety Data Sheets (SDS) for the staining reagents and Standard Operating Procedures (SOPs) for the staining processes. We requested SOP documents directing employees to discharge waste from the Sysmex machine to the drain and any analytical testing demonstrating that the facility was not discharging hazardous waste down the drain. The facility was requested to provide a quantitative estimate of the amount of waste placed down the drain. The facility provided the following information shown in the tables below.

SP-50 Usage Inputs	Value
Slides/day	60
Days/week	7
Weeks/Year	52
Slides/year	21,840

Annual Reagent Consumption	QTY	%
CELLPACK DCL (20L)	480	.7%
Methanol (1 L)	15,000	23%
Staining Solution (1 L)	8,160	12%
Concentrated Buffer (1 L)	900	1%
Deionized Water (1 L)	42,000	63%

Total annual waste would be 66,540 Liters or 1,279 L/week (Total volume estimate including the deionized water).

(Photo Nos. 50, 51, 52, 53, 55)

Building: Providence/Pathology Lab

Observation #: JJ1-OB-009 **Date:** 05/06/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Heather Jacobs **Title:** Pathology Lab Supervisor

We met with Heather Jacobs, Pathology Lab Supervisor upon arriving at the Pathology Lab.

Ms. Jacobs provided an explanation of processes and chemicals used throughout the process of tissue staining. She told us formalin and xylene are used in the tissue processor. She told us xylene clears tissues and formalin fixes tissues. She also said the xylene is recycled. Ms. Jacobs said that waste xylene is placed in the recycling machine and when it is refreshed it then goes to a hood for use. The supervisor said the waste from the xylene recycler is paraffin and ethanol and that the ethanol is put down the sink. Per Ms. Jacobs waste formalin is placed in a bag in a five (5)-gallon box and is then treated with Aldex to neutralize the formalin. We observed a box labeled "Aldex added 4/22/24." Per Ms. Jacobs this waste is then placed down the drain. We asked if the facility has a wastewater pre-treatment permit with the municipality, we were informed that they do not. Manual staining is also performed in this lab. The lab supervisor states that xylene is placed in a container which appeared to be a plastic carboy type container capable of holding approximately 5 gallons for recycling, and that all other reagents (water, alcohols) are placed down the drain at the end of the week. The pathology lab discharges about 50ml alcohol per week to the drain. SDS were requested for all reagents and SOPs for all the processes discussed during the inspection. We requested SOP documents directing employees to discharge waste from the Pathology Lab to the drain. During the inspection we requested the quantity of waste disposed of to the drain. The facility did not make this information available during the inspection (Photo Nos. 48, 49, 56, 61)

Building: Providence/Microbiology Lab

Observation #: JJ1-OB-010 **Date:** 05/06/2024 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Elora DeGreef	Title: Medical Laboratory Technician
We met with Elora DeGreef, Medical Laboratory Technician for the Microbiology Lab. This laboratory performs Gram staining for the hospital. Per Ms. DeGreef, reagents used include crystal violet, methanol, safranin, acetone, and iodine. Per Ms. DeGreef waste from this process is placed down the drain. We requested SDS for all reagents and SOPs for processes discussed. We requested guidance documents directing staff to put waste down the drain and analytical results demonstrating that the waste going down the drain is not hazardous. During the inspection we requested the quantity of waste disposed of to the drain. The facility did not make this information available during the inspection <u>(Photo Nos. 60, 62,)</u>	

Building: Providence/Oncology Nurses Station			
Observation #: JJ1-OB-011	Date: 05/06/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: John Bolstridge		Title: Principal Safety Officer	
We observed one (1) hazardous waste pharmaceuticals container present in this nursing station. The container is labeled incorrectly with the words "Hazardous Pharmaceutical Waste." It was dated 3/8/23 and has been in accumulation for greater than one year. We observed a controlled substance disposal container which is used to neutralize DEA regulated drugs. (Photo Nos. 57, 58, 59)			

Building: Providence/5th Floor Medical Surgical Nursing station			
Observation #: JJ1-OB-012	Date: 05/06/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: John Bolstridge		Title: Principal Safety Officer	
• We observed one (1) hazardous waste pharmaceuticals container present in this nursing station. This container was not labeled “Hazardous Waste Pharmaceuticals.” It was dated 9/16/23 and is within one year of accumulation. We pointed out to the hospital staff that the containers used for hazardous waste pharmaceuticals have lids hinged near the middle, the construction of the lid appears to prevent it from maintaining a full seal when closed. It is recommended that the facility consider using other containers. (Photo No. 63) • We observed a controlled substance disposal container which is used to neutralize DEA drugs. (Photo No. 64)			

SECTION III – RECORDS REVIEW

Record: Manifests	AOC: No
Reviewed By: Jon Jones Reviewed Date: 05/16/2024 Ref #: JJ1-RR-001	
Reviewed the previous three years of hazardous waste manifests from April 28, 2021 through October 30, 2023.	
Document(s) 1. Manifest_012646095FLE.pdf	

2. Manifest_012646328FLE.pdf
3. Manifest_012646335FLE.pdf
4. Manifest_012646360FLE.pdf
5. Manifest_012646353FLE.pdf
6. Manifest_012646374FLE.pdf
7. Manifest_012646385FLE.pdf
8. Manifest_012646401FLE.pdf
9. Manifest_012646424FLE.pdf
10. Manifest_012646425FLE.pdf
11. Manifest_012646426FLE.pdf
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96. Manifest_015976460FLE.pdf
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100. Manifest_015976467FLE.pdf
101. Manifest_015976470FLE.pdf
102. Manifest_015976471FLE.pdf
(Photo No. 65)

SECTION IV – AREA OF CONCERN

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

Building: Providence	Area: Facilities Loading Dock	Sub-area:
JJ1-OB-001		
Nickel metal hydride battery manufactured by Symbol Technologies, Incorporated, mixed with alkaline batteries. Used Battery container not labeled "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries," and not marked with the earliest date that any of the batteries contained within became a waste.	Regulations:	Sections:
Building: Providence	Area: Waste Handling Area	Sub-area: Cage Area
JJ1-OB-002		
23 containers that held non-creditable hazardous waste pharmaceuticals were not labeled with the words "Hazardous Waste Pharmaceuticals." Ten (10) of the 23 containers were not marked with the date that the non-creditable hazardous waste pharmaceuticals became a waste and there was nothing in the specific Cage Area, that identified the earliest date that any of the non-creditable hazardous waste pharmaceuticals in the area became a waste. The facility did not appear to maintain, nor did they demonstrate that they have an inventory system that identified the date the non-creditable hazardous waste pharmaceuticals being accumulated first became waste.	Regulations:	Sections:

13 of the 23 containers were marked with the date that the non-creditable hazardous waste pharmaceuticals became a waste and 11 of those dated containers were marked with dates that demonstrated they had been on site for greater than one year without a permit or interim status.		
Building: Providence	Area: Boiler Room	Sub-area: Oil Room
JJ1-OB-003		
One (1) 55-gallon container of used oil was not labeled with the words "Used Oil." Two (2), five-gallon pails containing used oil were not labeled with the words "Used Oil." Spill pallets for the used oil drums contained some used oil but were not labeled or marked with the words "Used Oil." A spill of used oil on the floor of the Oil Room had not been properly managed and cleaned up.	Regulations:	Sections:
Building: Providence	Area: Boiler Room	Sub-area:
JJ1-OB-004		
Waste aerosol cans are being held in place with a bench vise and punctured using a cold chisel, and hammer.	Regulations:	Sections:
Building: Providence	Area: East Mechanical	Sub-area:
JJ1-OB-005		
Fluorescent lamps in open container, container not labeled "Universal Waste—Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." Container not marked with the earliest date that any of the bulbs contained within became a waste.	Regulations:	Sections:

Building: Providence	Area: East Mechanical	Sub-area:
JJ1-OB-005		
Fluorescent bulbs in open blue container. Container was not labeled "Universal Waste—Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." Container was not marked with the earliest date that any of the bulbs contained within became a waste.	Regulations:	Sections:
Building: Providence	Area: East Mechanical	Sub-area:
JJ1-OB-005		
Five (5) boxes of older mercury fluorescent tubes while still usable we were told they are no longer being used at the facility. The facility needs to decide if they use can them. If they are not going to use them then they need to either manage them as hazardous waste or as universal waste lamps.	Regulations:	Sections:
Building: Providence	Area: East Mechanical	Sub-area:
JJ1-OB-005		
Two (2) waste lamps that were either fluorescent or LED and two (2) waste bulbs that were fluorescent or LED observed in a trash can. The lamps and bulbs were not in a container or packaging that was adequate to prevent breakage and was not closed. The waste tubes and bulbs were also not labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)."	Regulations:	Sections:
Building: Providence	Area: East Mechanical	Sub-area:
JJ1-OB-005		
Light fixture by a wall with five (5) fluorescent lamps within the fixture.		

The facility needs to make a hazardous waste determination.		
Building: Providence	Area: Central Pharmacy	Sub-area:
JJ1-OB-006		
Two (2) black containers with translucent lids for hazardous waste pharmaceuticals they were closed but not dated and improperly labeled "Incompatible Pharmaceutical Wastes- Corrosives".	Regulations:	Sections:
Building: Providence	Area: Central Pharmacy	Sub-area:
JJ1-OB-006		
One (1) black container with a white lid not labeled "Hazardous Waste Pharmaceuticals" dated 3/8/2023. The container was closed.	Regulations:	Sections:
Building: Providence	Area: Central Pharmacy	Sub-area:
JJ1-OB-006		
Observed a black container with a translucent lid used for collecting hazardous waste pharmaceuticals that is dated 3/8/23 and has been accumulated for over a year this is a violation of the one-year accumulation limit for hazardous waste pharmaceuticals.	Regulations:	Sections:
Building: Providence	Area: Inpatient Lab	Sub-area:
JJ1-OB-008		
Waste from the manual staining performed in the Inpatient Laboratory is put down the drain, facility needs to make a hazardous waste determination.	Regulations:	Sections:
Building: Providence	Area: Inpatient Lab	Sub-area:
JJ1-OB-008		

Waste from the Sysmex machine (automated staining machine) that is generated in the Inpatient Laboratory is put down the drain. The facility needs to make a hazardous waste determination		
Building: Providence	Area: Pathology Lab	Sub-area:
JJ1-OB-009		
In the Pathology Laboratory waste formalin treated with "Aldex" is poured down the drain. The facility needs to make a hazardous waste determination.	Regulations:	Sections:
Building: Providence	Area: Microbiology Lab	Sub-area:
JJ1-OB-010		
Water, alcohol, reagents crystal violet, methanol, safranin, acetone, and iodine used in manual staining when they become waste, they are poured down the drain. The facility needs to make a hazardous waste determination.	Regulations:	Sections:
Building: Providence	Area: Oncology Nurses Station	Sub-area:
JJ1-OB-011		
Container of hazardous waste pharmaceuticals not labeled "Hazardous Waste Pharmaceuticals." Container is dated 3/8/23 the inspection occurred on 5/6/2024 this is a violation of the one-year accumulation limit for hazardous waste pharmaceuticals.	Regulations:	Sections:
Building: Providence	Area: 5th Floor Medical Surgical Nursing station	Sub-area:
JJ1-OB-012		
Hazardous waste pharmaceuticals container not labeled "Hazardous Waste Pharmaceuticals."	Regulations:	Sections:
Building: Providence	Area:	Sub-area:

JJ1-OB-013

Hazardous waste manifest (Manifest Tracking Number 012646519 FLE) showing that the facility shipped hazardous waste pharmaceuticals without typing "PHARMS" or PHRM in item 13 "Waste Codes" of EPA Form 8700-22.

Regulations:**Sections:****SECTION V – CLOSING CONFERENCE AND FOLLOW UP****Closing Conference**

At the conclusion of the inspection, we conducted a closing conference that was attended by those listed in the Attendees Table, in Section I of this report. We thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section IV – Areas of Concern) that were observed during the inspection of the facility. Jon Jones also went over the records request, the documents and follow-up information requested is shown below in the section titled "Follow Up". Jon Jones then explained the follow-up process that would take place once the report was finished. Jon Jones explained they would receive a copy of the report as would a case officer. The facility staff were told that a case officer would review the report to determine if any of the areas of concern resulted in determinations of violation.

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



Photo No. 1			Used Oil Room 5.9.24.jpg
05/09/2024 09:44 AM	No CBI	No PII	Photographer: Facility
Main Hospital /Oil Room			[Geographic Coordinates]
Photo of the oil room provided by the facility showing that the oil spill on the floor has been cleaned up. Photo no. IMG-2024050610344034401341876 shows the spilled oil before it was cleaned up.			



Photo No. 2			Clean used oil 5.9.24.jpg
05/09/2024 09:44 AM	No CBI	No PII	Photographer: Facility
Main Hospital /Oil Room			[Geographic Coordinates]
This photo was sent by the facility showing that this 55-gallon closed top style drum of used oil that previously had not been labeled or marked "Used Oil" has now been marked "Used Oil."			



Photo No. 3			IMG-202405060930083081346063.jpg
05/06/2024 09:30 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Facilities Loading Dock			[Geographic Coordinates]
Container marked used batteries with a mix of various alkaline batteries. Container is not marked with the accumulation start date.			



Photo No. 4			IMG-2024050609313631361249341.jpg
05/06/2024 09:31 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Facilities Loading Dock			[Geographic Coordinates]
View of nickel metal hydride battery mixed with alkaline batteries.			



Photo No. 5			IMG-2024050609321132111214276.jpg
05/06/2024 09:32 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Facilities Loading Dock			[Geographic Coordinates]
View of container for collecting batteries not labeled or marked as “Universal Waste – Batteries,” “Waste Batteries,” or “Used Batteries” and is not dated. (Side 1)			



Photo No. 6			IMG-2024050609322532251167841.jpg
05/06/2024 09:32 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Facilities Loading Dock			[Geographic Coordinates]
Picture showing container for collecting batteries was not labeled and did not have an accumulation start date on it. (Side 2) Different view of same container.			



Photo No. 7			IMG-2024050609315631561363757.jpg
05/06/2024 09:31 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Facilities Loading Dock			
Close up photo showing the nickel metal hydride battery mixed with alkaline batteries.			



Photo No. 8			IMG-2024050609323832381216569.jpg
05/06/2024 09:32 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Facilities Loading Dock			[Geographic Coordinates]
Picture showing container for collecting batteries was not labeled and did not have an accumulation start date on it. (Side 3)			

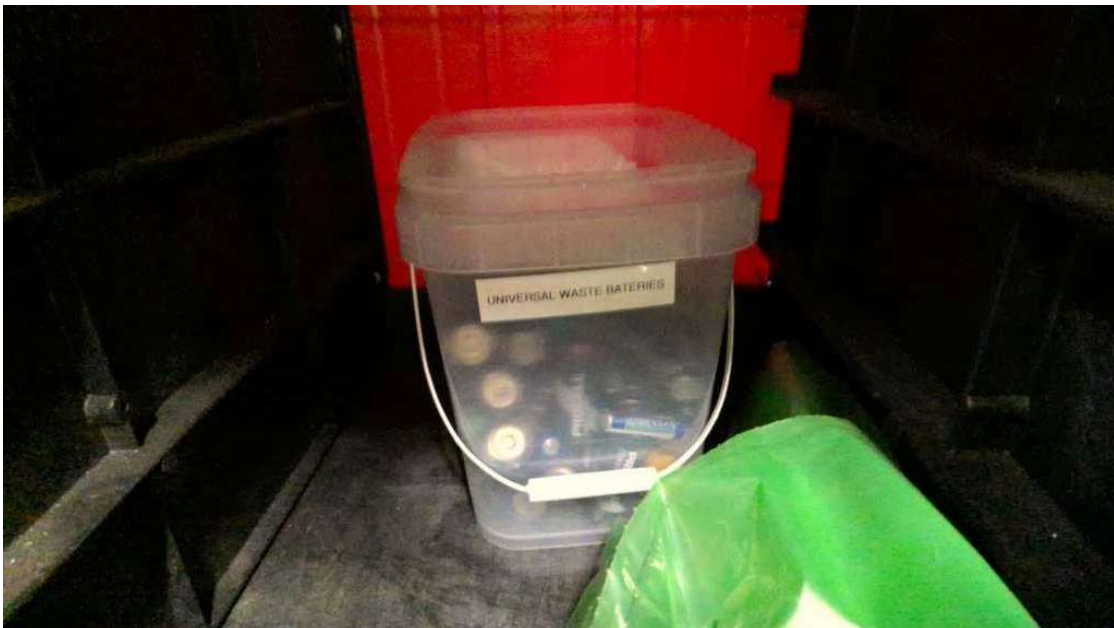


Photo No. 9			IMG-2024050609451045101012958.jpg
05/06/2024 09:45 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Facilities Loading Dock			[Geographic Coordinates]
Container for collecting batteries with a contents label of "Universal Waste Batteries" was applied and witnessed by the inspection team			

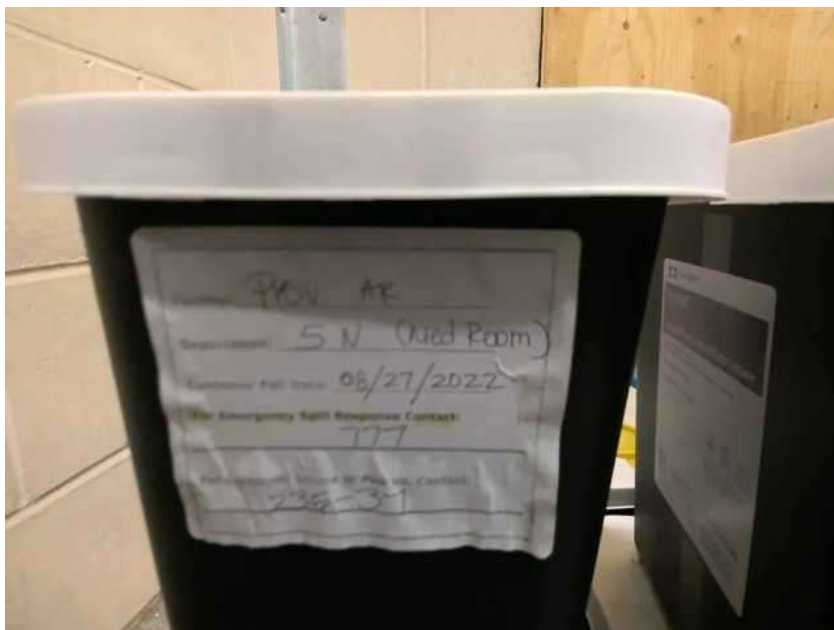


Photo No. 10			IMG-202405061005025242942.jpg
05/06/2024 10:05 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /Waste handling Area & Cage Area			[Geographic Coordinates]
Black and white container of hazardous waste pharmaceuticals with an accumulation start date of 8/27/2022.			



Photo No. 11			IMG-2024050610042742779586.jpg
05/06/2024 10:04 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /Waste handling Area & Cage Area			[Geographic Coordinates]
This photo is another view of the black and white containers of hazardous waste pharmaceuticals.			

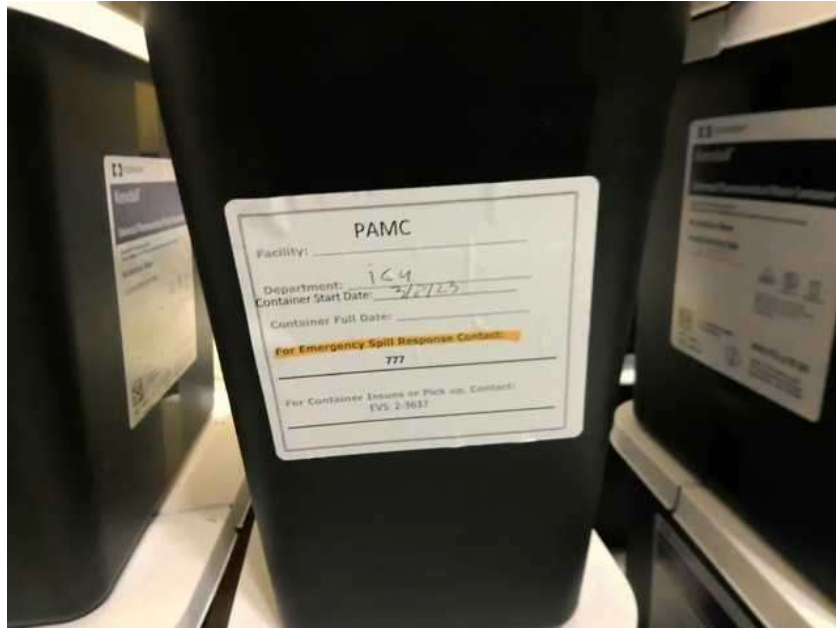


Photo No. 12			IMG-2024050610043643647488.jpg
05/06/2024 10:04 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /Waste handling Area & Cage Area			[Geographic Coordinates]
Black and white container of hazardous waste pharmaceuticals with an accumulation start date of 3/8/2023.			

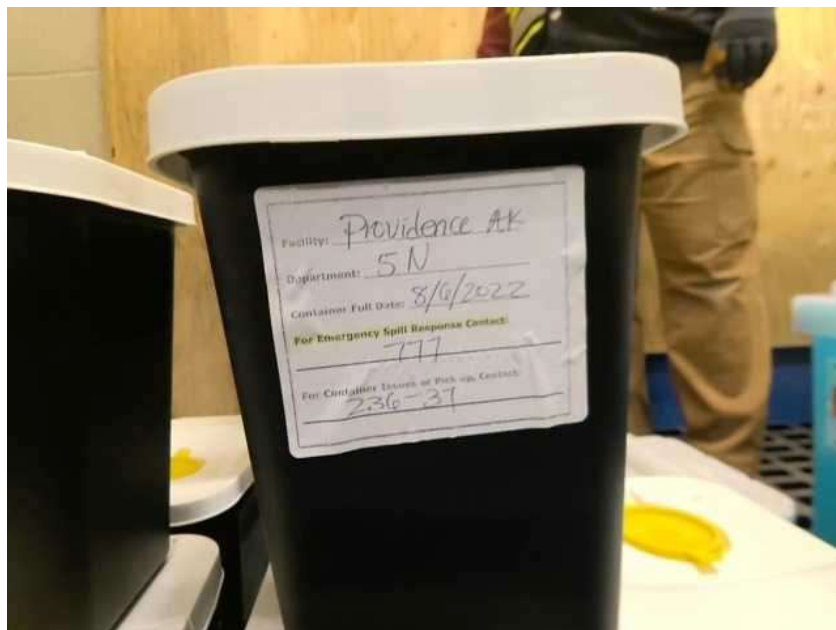


Photo No. 13			IMG-2024050610044544549231.jpg
05/06/2024 10:04 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /Waste handling Area & Cage Area			[Geographic Coordinates]
Black and white container of hazardous waste pharmaceuticals with an accumulation start date of 8/6/2022.			



Photo No. 14			IMG-2024050609464246421010603.jpg
05/06/2024 09:46 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Facilities Loading Dock			[Geographic Coordinates]
One (1) container marked “unknown battery type to be sort” had what appeared to be alkaline batteries in it. Container is not marked with the accumulation start date. Contents label of “Universal Waste Batteries” was applied and witnessed by the inspection team.			



Photo No. 15			IMG-202405060958475847984173.jpg
05/06/2024 09:58 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Facilities Loading Dock			[Geographic Coordinates]
View of 23 black containers holding HWPharms that were not labeled or marked with the words “Hazardous Waste Pharmaceuticals.”			



Photo No. 16			IMG-20240506103357335762263.jpg
05/06/2024 10:33 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /Oil Room			[Geographic Coordinates]
One (1) each full 55-gallon closed top style drum of used oil drum was not labeled or marked "Used Oil."			



Photo No. 17			IMG-20240506103352335275340.jpg
05/06/2024 10:33 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /Oil Room			[Geographic Coordinates]
View of a five-gallon container of used oil. The container seen here is full and not labeled or marked with the words "Used Oil."			



Photo No. 18			IMG-202405061025392539779397.jpg
05/06/2024 10:25 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oil Room			[Geographic Coordinates]
Open top style drum and the words "Used Oile" (actual wording) written on the ring. Marking is acceptable, facility staff improved the marking on the drum which can be seen in Photo No. IMG-20240506104140414079675.			



Photo No. 19			IMG-202405061025222522950094.jpg
05/06/2024 10:25 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oil Room			[Geographic Coordinates]
One (1) each 55-gallon open top drum of used oil with the words "Used Oile" (actual wording) written on the ring. Marking is acceptable, facility staff improved the marking on the drum which can be seen in Photo No. IMG-20240506104140414079675			



Photo No. 20			IMG-20240506103358335863348.jpg
05/06/2024 10:33 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /Control Room			[Geographic Coordinates]
One (1) each full 55-gallon closed top style drum of used oil drum was not labeled or marked "Used Oil."			



Photo No. 21			IMG-20240506104131413196787.jpg
05/06/2024 10:41 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /Control Room			[Geographic Coordinates]
Picture of used oil on the floor of the oil room.			



Photo No. 22			IMG-2024050610350835869717.jpg
05/06/2024 10:35 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /Control Room			[Geographic Coordinates]
One (1) each five (5) gallon Home Depot container with a small amount of used oil in it, not labeled or marked "Used Oil."			



Photo No. 23			IMG-2024050610344034401341876.jpg
05/06/2024 10:34 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oil Room			[Geographic Coordinates]
This is another view of the used oil on the floor of the oil room. This picture also shows a five (5) gallon container of used oil that is not labeled or marked with the words "Used Oil."			



Photo No. 24			IMG-20240506104140414079675.jpg
05/06/2024 10:41 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /Control Room			[Geographic Coordinates]
One (1) each 55-gallon drum containing used oil with an open top style drum. Facility staff wrote the words "Used Oil" on the drum as witnessed by the inspection team. This picture also shows that the spill containment pallet is not labeled or marked "Used Oil."			



Photo No. 25			IMG-20240506104148414889743.jpg
05/06/2024 10:41 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /Control Room			[Geographic Coordinates]
One (1) each 55-gallon drum containing used oil with a closed top style drum. Facility staff wrote the words "Used Oil" on the drum as witnessed by the inspection team.			



Photo No. 26			IMG-202405061045584558960325.jpg
05/06/2024 10:45 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oil Room			[Geographic Coordinates]
View of container after facility personnel marked it with the words "Used Oil."			



Photo No. 27			IMG-202405061046264626883377.jpg
05/06/2024 10:46 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oil Room			[Geographic Coordinates]
Additional photo of the One (1) each 55-gallon drum containing used oil with an open top style drum. Facility staff wrote the words "Used Oil" on the drum as witnessed by the inspection team.			



Photo No. 28			IMG-202405061046564656984677.jpg
05/06/2024 10:46 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oil Room			[Geographic Coordinates]
One (1) each five (5) gallon pail Home Depot container with a small amount of used oil. Facility staff wrote the words "Used Oil" on the container as witnessed by the inspection team.			



Photo No. 29			IMG-2024050610472847281389001.jpg
05/06/2024 10:47 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oil Room			[Geographic Coordinates]
This picture shows that the spill containment pallet does not have the words "Used Oil" written on the outside, the pallet had a small amount of used oil in it.			



Photo No. 30			IMG-2024050611082582568176.jpg
05/06/2024 11:08 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /East mechanical			[Geographic Coordinates]
Cardboard cylinder with 14 each four (4) foot used fluorescent lamps, no lid on container, and the container was not labeled or marked "Universal Waste-Lamps," "Waste Lamps", or "Used Lamps," and not marked with the earliest date that any of the lamps contained within became a waste.			

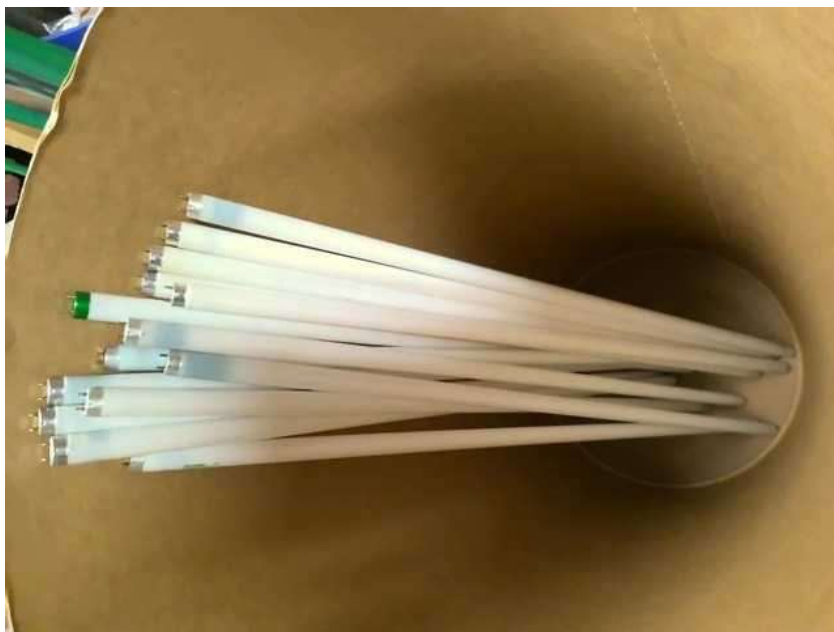


Photo No. 31			IMG-20240506111011101145951.jpg
05/06/2024 11:10 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /East mechanical			[Geographic Coordinates]
Picture taken of the inside of the aforementioned cardboard cylinder showing the used fluorescent lamps inside.			



Photo No. 32			IMG-2024050610492849281086042.jpg
05/06/2024 10:49 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oil Room			[Geographic Coordinates]
The spill containment pallet had some oil in it but was not labeled or marked with the words "Used Oil." This picture shows the pallet after staff had labeled it as witnessed by the inspection team.			



Photo No. 33			IMG-2024050610494349431232173.jpg
05/06/2024 10:49 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oil Room			[Geographic Coordinates]
The spill containment pallet had some oil in it but was not labeled or marked with the words "Used Oil." This picture shows the pallet after staff had labeled it as witnessed by the inspection team.			



Photo No. 34			IMG-20240506110002021176256.jpg
05/06/2024 11:00 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oil Room			[Geographic Coordinates]
View of a waste aerosol can, found on a cart, in the boiler room outside of the oil room.			



Photo No. 35			IMG-202405061101141141337539.jpg
05/06/2024 11:01 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oil Room			[Geographic Coordinates]
View of the waste aerosol can along with the tools that are used to punch a hole in the can before the can is put in the trash.			



Photo No. 36			IMG-20240506112346234668326.jpg
05/06/2024 11:23 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /East mechanical			[Geographic Coordinates]
Five (5) cardboard containers of older high mercury content fluorescent tubes, employee says they still useable, but they are a type of fluorescent lamp that the facility is phasing out. Facility needs to make a waste determination.			



Photo No. 37			IMG-20240506112355235565678.jpg
05/06/2024 11:23 AM (AKT)	No CBI	No PII	Photographer: Sable McGovern
Main Hospital /East mechanical			[Geographic Coordinates]
Close up picture of one of the fluorescent lamps that the inspection team was told were still usable but are being phased out of service.			



Photo No. 38			IMG-2024050611194719471268413.jpg
05/06/2024 11:19 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /East Mech.			[Geographic Coordinates]
View of a blue plastic bin, containing two waste compact fluorescent light (CFL) bulbs that are not packaged to prevent breakage, labeled or marked "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps", and not marked with the date they became a waste.			



Photo No. 39			IMG-2024050611302730271203312.jpg
05/06/2024 11:30 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /East Mech.			[Geographic Coordinates]
View of a discarded lighting fixture that still contains fluorescent tubes.			

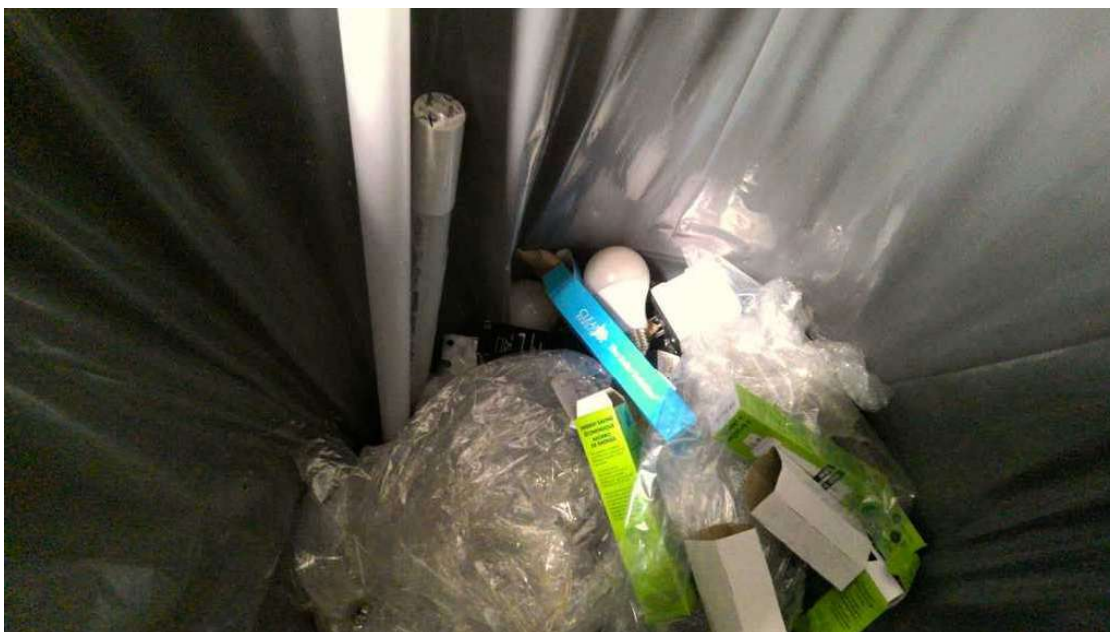


Photo No. 40			IMG-2024050611315331531215634.jpg
05/06/2024 11:31 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /East Mech.			[Geographic Coordinates]
Two (2) waste lamps that were either fluorescent or LED and two (2) waste bulbs that were fluorescent or LED observed in a trash can. The lamps and bulbs were not in a container or packaging that was adequate to prevent breakage and was not closed. The waste lamps and bulbs were also not labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)."			

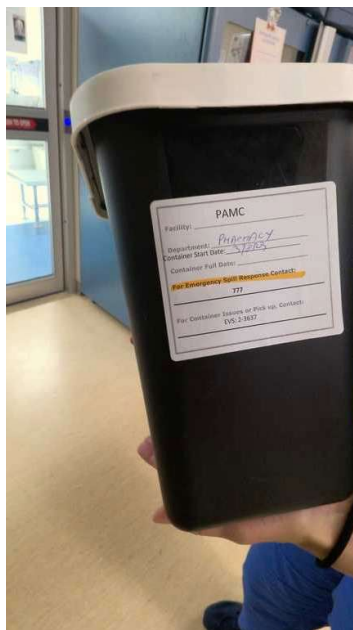


Photo No. 41			IMG-20240506120539539862649.jpg
05/06/2024 12:05 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Central Pharmacy			[Geographic Coordinates]
One (1) each black container with a white lid not labeled "Hazardous Waste Pharmaceuticals" dated 3/8/2023. The container was closed.			



Photo No. 42			IMG-202405061212351235899479.jpg
05/06/2024 12:12 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Central Pharmacy			[Geographic Coordinates]
Photo of a controlled substance disposal container used to neutralize DEA drugs.			

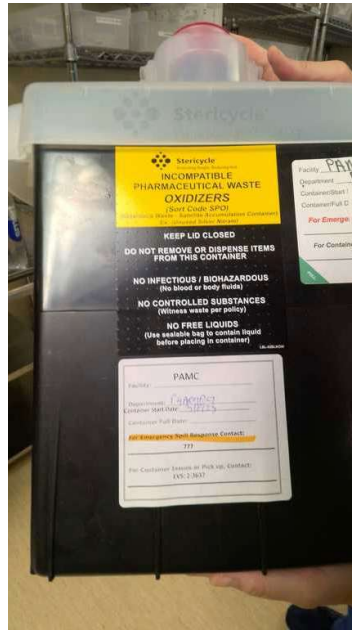


Photo No. 43			IMG-20240506120437437974321.jpg
05/06/2024 12:04 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Central Pharmacy			[Geographic Coordinates]
One (1) each black container with a translucent lid labeled Hazardous Waste Pharmaceuticals dated 3/8/2023. The container was closed. This photo shows the date, photo no. IMG-202405061204504501049842 shows the container is labeled "Hazardous Waste Pharmaceuticals."			



Photo No. 44			IMG-2024050612214621461075162.jpg
05/06/2024 12:21 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Pharmacy Admin.			[Geographic Coordinates]
One (1) of two (2) photos of containers holding pharmaceuticals for reverse distribution.			



Photo No. 45			IMG-202405061204504501049842.jpg
05/06/2024 12:04 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Central Pharmacy			[Geographic Coordinates]
One (1) each black container with a translucent lid. This photo shows the container is labeled "Hazardous Waste Pharmaceuticals." Photo No. IMG-20240506120437437974321 shows this container is dated 3/8/2023.			



Photo No. 46			IMG-2024050611564756471271764.jpg
05/06/2024 11:56 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Central Pharmacy			[Geographic Coordinates]
One (1) of two (2) black containers with translucent lids for hazardous waste pharmaceuticals they were closed but not dated and improperly labeled "Incompatible Pharmaceutical Wastes- Corrosives".			



Photo No. 47			IMG-2024050611562656261244252.jpg
05/06/2024 11:56 AM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Central Pharmacy			[Geographic Coordinates]
One (1) of two (2) black containers with translucent lids for hazardous waste pharmaceuticals they were closed but not dated and improperly labeled "Incompatible Pharmaceutical Wastes- Corrosives."			



Photo No. 48			IMG-202405061352175217778765.jpg
05/06/2024 01:52 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Pathology Lab			[Geographic Coordinates]
Photo shows a container of recycled xylene and a container of ethanol waste. We were informed that the recycled xylene is re-used while the ethanol is poured down a sink drain.			



Photo No. 49			IMG-202405061352325232980321.jpg
05/06/2024 01:52 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Pathology Lab			[Geographic Coordinates]
The inspection team was told that the waste from xylene recycler is paraffin and ethanol, and that the ethanol is put down the sink. This is a container with paraffin in it.			

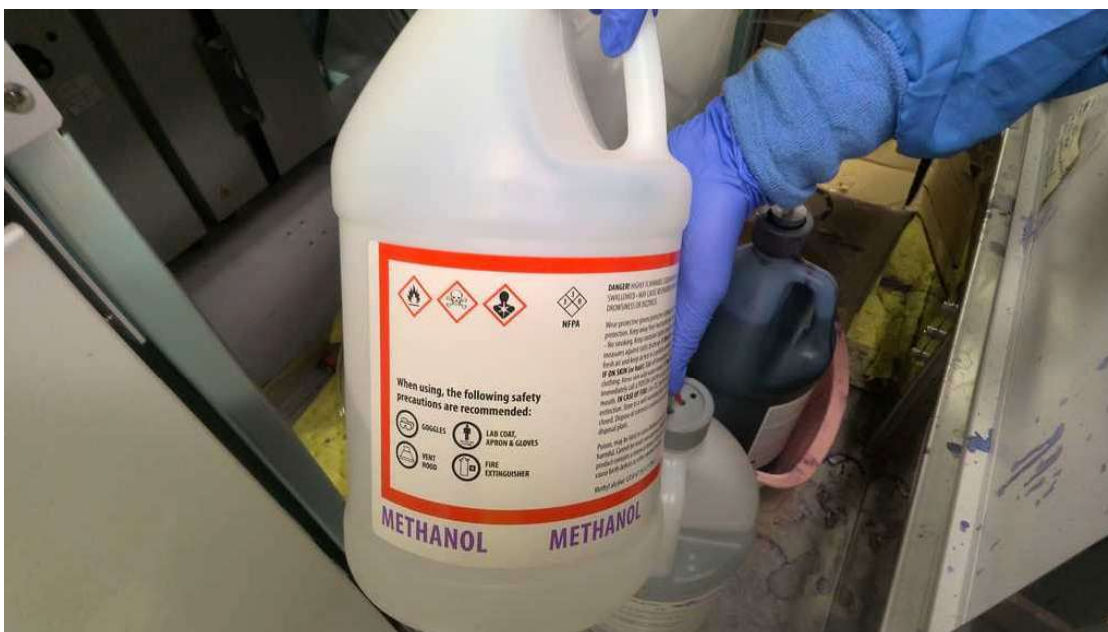


Photo No. 50			IMG-2024050613305830581000410.jpg
05/06/2024 01:30 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Providence/Inpatient Laboratory			[Geographic Coordinates]
This is a photo of the Methanol used in Sysmex slide maker.			

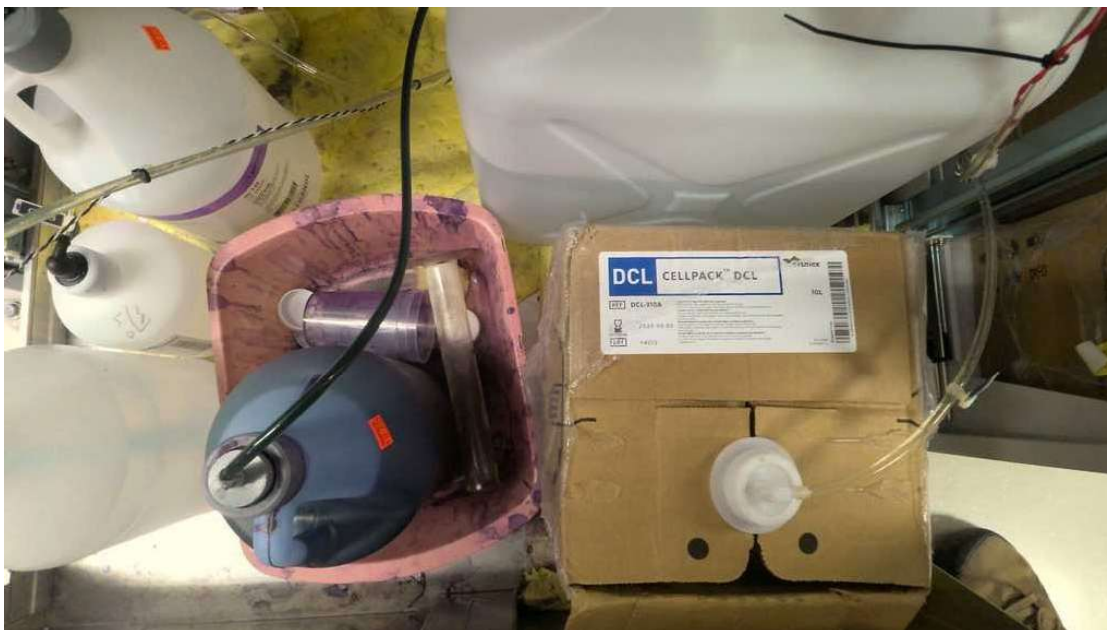


Photo No. 51			IMG-2024050613315031501030721.jpg
05/06/2024 01:31 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Providence/Inpatient Laboratory			[Geographic Coordinates]
Photo of a product called Cellpack DCL used in the Sysmex slide maker.			

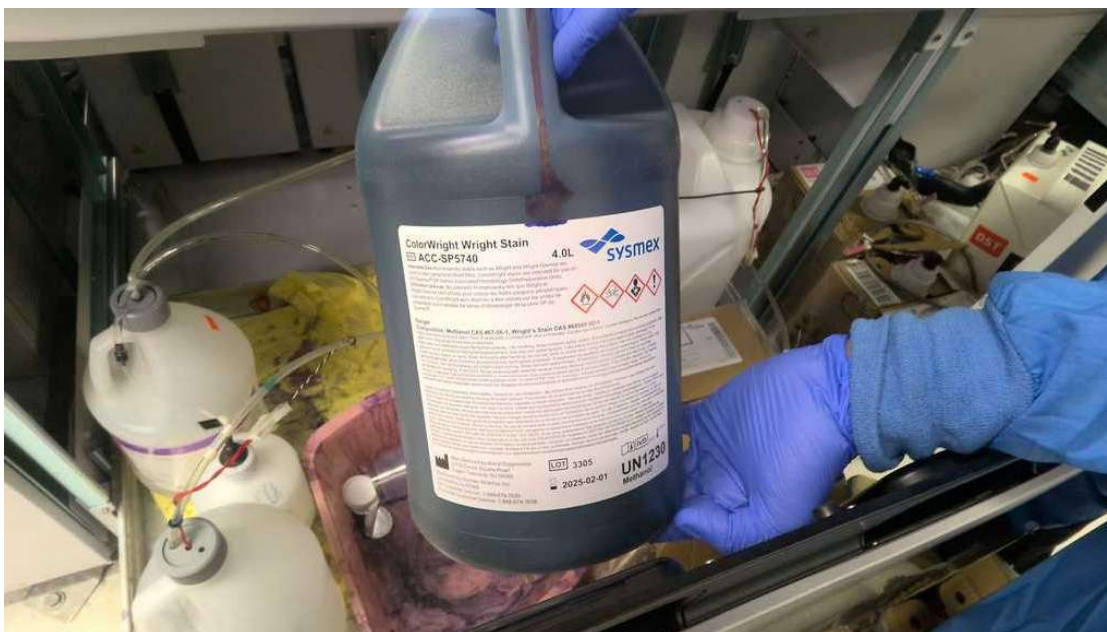


Photo No. 52			IMG-2024050613303530351152256.jpg
05/06/2024 01:30 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Providence/Inpatient Laboratory			[Geographic Coordinates]
This is a photo of the ColorWright stain used in Sysmex slide maker.			

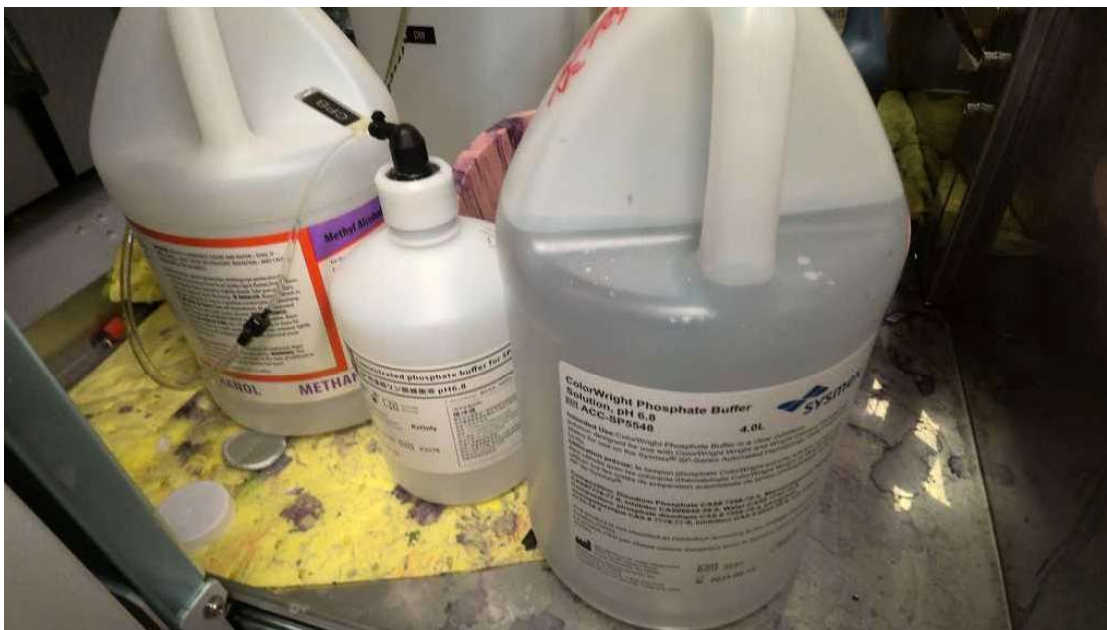


Photo No. 53			IMG-2024050613312731271049534.jpg
05/06/2024 01:31 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Providence/Inpatient Laboratory			[Geographic Coordinates]
Photo of the Phosphate Buffer used in the Sysmex slide maker.			



Photo No. 54			IMG-2024050612221322131324153.jpg
05/06/2024 12:22 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Pharmacy Admin.			[Geographic Coordinates]
Two (2) of two (2) photos of containers holding pharmaceuticals for reverse distribution.			



Photo No. 55			IMG-2024050613392139211322292.jpg
05/06/2024 01:39 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Providence/Inpatient Laboratory			[Geographic Coordinates]
Photo of the manual staining workstation.			



Photo No. 56			IMG-202405061357155715726562.jpg
05/06/2024 01:57 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Pathology Lab			[Geographic Coordinates]
Box of waste Formalin with the statement "Aldex added 4-22-24." We were told that Aldex is added to the waste Formalin to neutralize it before discharging down the drain.			

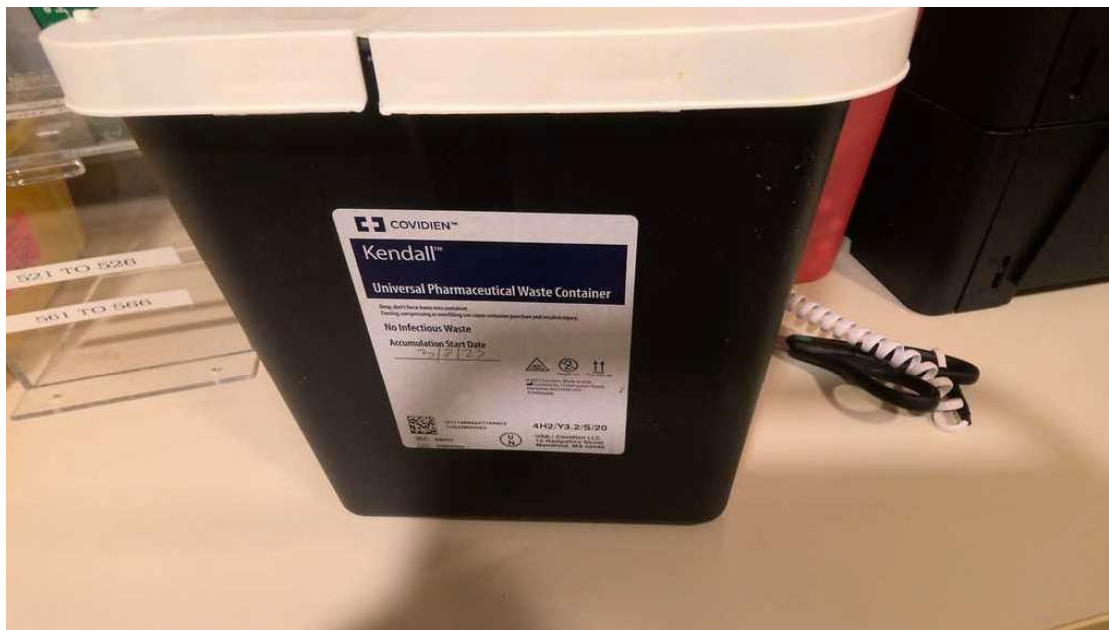


Photo No. 57			IMG-20240506141505155773992.jpg
05/06/2024 02:15 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oncology Nursing Station			[Geographic Coordinates]
One(1) of three (3) photos of a hazardous waste pharmaceuticals container present in this nursing station. The container is labeled incorrectly with the words "Universal Pharmaceutical Waste Container." The container has an accumulation start date of 3/8/2023."			

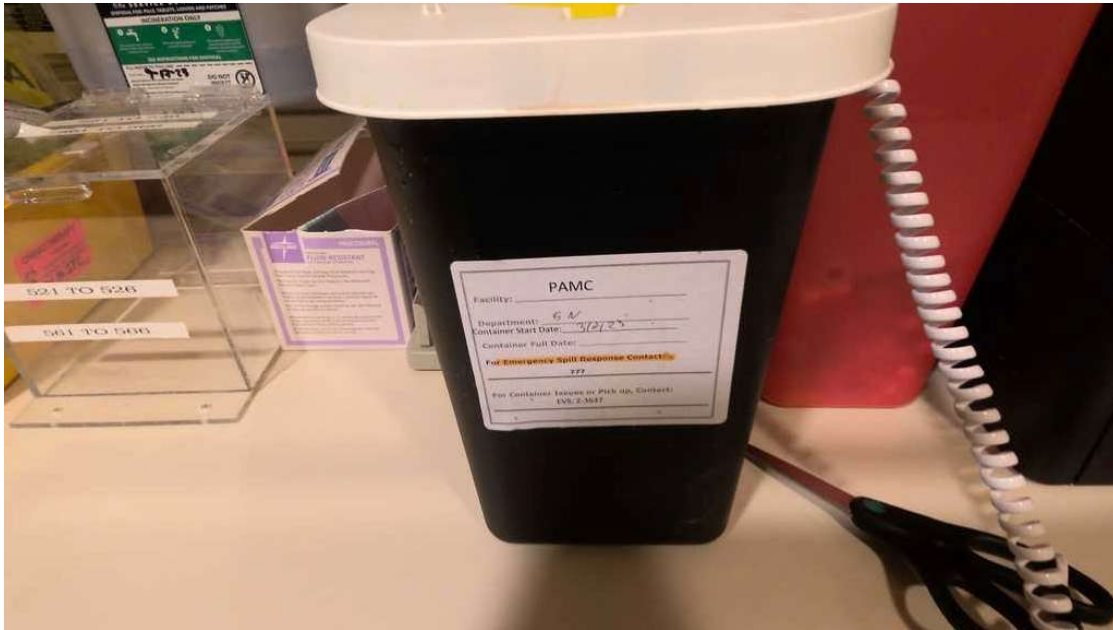


Photo No. 58			IMG-202405061414551455874367.jpg
05/06/2024 02:14 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oncology Nursing Station			[Geographic Coordinates]
Two (2) of three (3) photos of a hazardous waste pharmaceuticals container present in this nursing station. The container is labeled incorrectly with the words "Hazardous Pharmaceutical Waste". It is dated 3/8/23 and is therefore over a year of accumulation. (This photo shows the date of 3/8/2023.)			

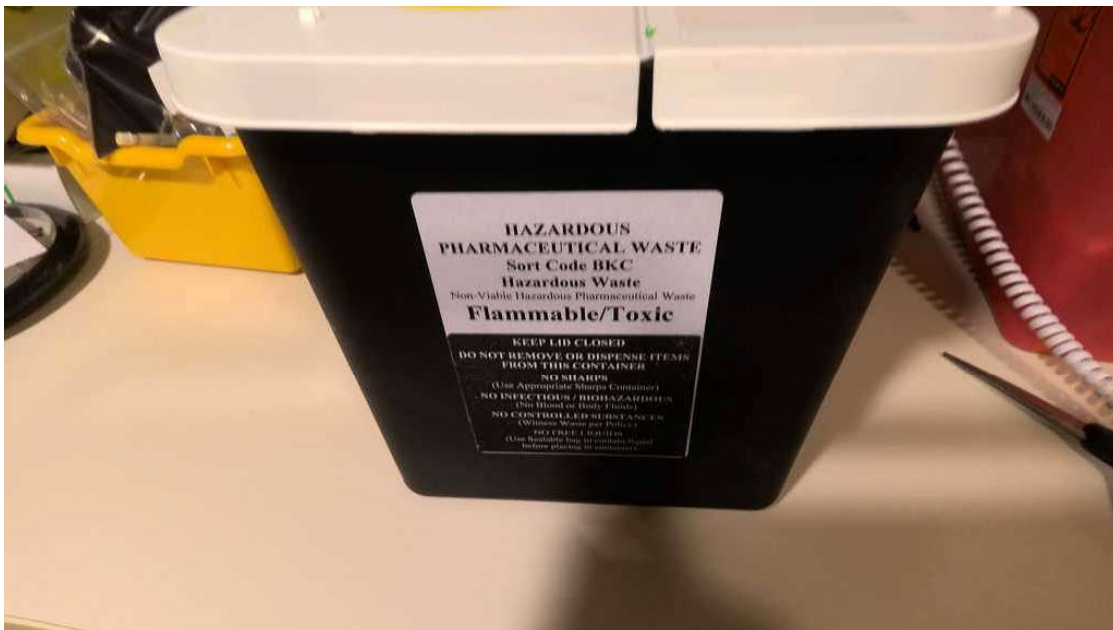


Photo No. 59			IMG-202405061415211521800523.jpg
05/06/2024 02:15 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Oncology Nursing Station			[Geographic Coordinates]
Three (3) of three (3) photos of a hazardous waste pharmaceuticals container present in this nursing station. The container is labeled incorrectly with the words "Hazardous Pharmaceutical Waste." (This photo shows the incorrect labeling.)			



Photo No. 60			IMG-202405061409159151074612.jpg
05/06/2024 02:09 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Microbiology Lab			[Geographic Coordinates]
Additional photo of the chemicals used in the Microbiology Lab to manually stain slides. Reagents used include crystal violet, methanol, alcohol, safranin, and iodine.			



Photo No. 61			IMG-2024050613573157311120478.jpg
05/06/2024 01:57 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Pathology Lab			[Geographic Coordinates]
Ethanol waste from the xylene recycling machine is poured down this drain.			



Photo No. 62			IMG-202405061408478471225551.jpg
05/06/2024 02:08 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /Microbiology Lab			[Geographic Coordinates]
This photo shows the chemicals used in the Microbiology Lab to manually stain slides. Reagents used include crystal violet, methanol, alcohol, safranin, and iodine.			



Photo No. 63			IMG-202405061426362636726777.jpg
05/06/2024 02:26 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /5 th Floor Medical Surgical Nursing station			[Geographic Coordinates]
Photos of a hazardous waste pharmaceuticals container present in this nursing station. The container is labeled incorrectly with the words "Hazardous Pharmaceutical Waste".			



Photo No. 64			IMG-202405061426432643820877.jpg
05/06/2024 02:26 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Main Hospital /5 th Floor Medical Surgical Nursing station			[Geographic Coordinates]
Photo of a controlled substance disposal container used to neutralize DEA drugs.			

Inspection Date(s):

05/06/2024 - 05/06/2024

Photo No. 65			IMG-2024050614562956291661701.jpg
05/06/2024 02:56 PM (AKT)	No CBI	No PII	Photographer: Alan Pefley
Facility Conference Room			[Geographic Coordinates]
Photo of a hazardous waste manifest (Manifest Tracking Number 012646519 FLE) showing that the facility shipped hazardous waste pharmaceuticals without writing "PHARMS" in item 13 "Waste Codes" of EPA Form 8700-22.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	Manifest_012646095FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646328FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646335FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646360FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646353FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646374FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646385FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646401FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646424FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646425FLE.pdf	No	No	Jon Jones	08/01/2024
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Records Review	Manifest_012646434FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646455FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646457FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646457FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646466FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646467FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646471FLE.pdf	No	No	Jon Jones	08/01/2024
Records Review	Manifest_012646492FLE.pdf	No	No	Jon Jones	08/01/2024
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Facility SOPs	Policy CONGO RED - AMYLOID -LAB ANP SS.pdf	No	No	Jon Jones	08/01/2024
Facility SOPs	Policy Gomori-s Modified Iron -LAB ANP SS.pdf	No	No	Jon Jones	08/01/2024
Facility SOPs	Policy Gomori-s Trichrome -LAB ANP SS.pdf	No	No	Jon Jones	08/01/2024
Facility SOPs	Policy Gram Positive and Negative -LAB ANP SS.pdf	No	No	Jon Jones	08/01/2024

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Facility SOPs	Policy Oil Red O Fat Stain -LAB ANP SS.pdf	No	No	Jon Jones	08/01/2024
Facility SOPs	Policy PAS w- Diastase- w-o Diastase & PAS Fungus -LAB ANP SS.pdf	No	No	Jon Jones	08/01/2024
Facility SOPs	Policy Rapid Wright-s Stain -LAB HEM MAN.pdf	No	No	Jon Jones	08/01/2024
Facility SOPs	Policy Reticulin -LAB ANP SS.pdf	No	No	Jon Jones	08/01/2024
Facility SOPs	Policy VVG Elastic Stain -LAB ANP SS.pdf	No	No	Jon Jones	08/01/2024
Facility SOPs	Policy Xylene -Solvent- Recycling -LAB ANP EQP.pdf	No	No	Jon Jones	08/01/2024
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Other - Safety Data Sheet	SDS Tissue Tek Formalin.pdf	No	No	Jon Jones	08/01/2024
Other - Safety Data Sheet	SDS Xylene_Pathology.pdf	No	No	Jon Jones	08/01/2024
Waste Determinations	XN and SP combined waste stream letter.pdf	No	No	Jon Jones	08/01/2024

Other - Pharmaceuticals	10-1-15 PAMC Pharmacy Rx Waste Document.pdf	No	No	Jon Jones	08/01/2024
Other - Pharmaceuticals	Aerosols.pdf	No	No	Jon Jones	08/01/2024
Other - Pharmaceuticals	Alaska Region Medical Pharmaceutical and General Waste 03252024.pdf	No	No	Jon Jones	08/01/2024
Other - Pharmaceuticals	Alaska Region Regulated Pharmaceutical Waste 03252024.pdf	No	No	Jon Jones	08/01/2024
Facility Map	PAMC Main Campus (1).pdf	No	No	Jon Jones	08/01/2024
Other - Policy	Hospital Hazardous Waste.pdf	No	No	Jon Jones	08/01/2024
Other - Policy	Hospital Hazardous Waste-Changes.pdf	No	No	Jon Jones	08/01/2024