

PWGC Spring Newsletter



*Helping You Make Your Hospital
the Best for the Community and
the Environment!*

New RCRA Subpart K for Laboratories - What Does it Mean?

The Environmental Protection Agency (EPA) published a new Subpart K to the Resource Conservation and Recovery Act (RCRA) 40 CFR 262, but many are either not aware or unfamiliar with the subpart. This subpart is an optional, alternative and more flexible set of generator requirements for hazardous waste generated or accumulated in laboratories at eligible academic entities in lieu of existing generator requirements which is under the satellite accumulation area (SAA) regulations of 40 CFR 262.34(c). Eligible academic entities are defined as: (1) colleges and universities; (2) non-profit research institutes owned or affiliated with a college or university; or (3) teaching hospitals owned or affiliated with a college or university.

One of the biggest changes in the rule involves when and where the eligible laboratories may determine whether a waste is hazardous. Currently under RCRA rules, this determination must be made where the waste is generated in the laboratory. New subpart K gives institutions greater flexibility, allowing the determination to be made in laboratory, at an on-site RCRA facility that treats, stores, or disposes of hazardous waste, or at an on-site central waste collection area.

Each eligible academic entity must develop a laboratory management plan (LMP). The LMP must have two main elements: (1) describe procedures for container labeling and identify whether unwanted material will be removed from the lab on a regular interval not to exceed 6 months and (2) describe the seven best management practices addressing specific chemical management (container labeling and management; providing training to laboratory workers and students commensurate with their duties; removing unwanted materials from laboratories, including procedures for regularly scheduled removals and, if they are to be used, laboratory clean-outs; and procedures for emergency prevention and response). The procedures specifying the requirements of Subpart K detailed in the plan are enforceable. Once every twelve (12) months, each laboratory will have thirty (30) days to conduct a clean-out of unused commercial chemical products (listed or characteristic) and will not have to count towards the entity's generator status. However, used chemicals must count toward generator status.

Contact PWGC for further assistance.



Hospitals and Televisions - Energy Labeling Requirements on the Way!

Most of us when we think of hospitals don't think televisions; however, the hospital industry has many for both patient care stay and for teaching! As of the final rule (January 6, 2011) The Federal Trade and Commission (FTC) now requires that all televisions manufactured after May 11, 2011 bear an energy label that discloses the annual energy cost in dollars, annual energy use is kilowatt hours and an energy cost comparison with televisions with similar screen size. The final rule requires a black on yellow color scheme label. Having such using energy information affixed to the television can assist with lowering energy costs for the facility.

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neighborhoods and our
society!"*



**STRATEGIC
ENVIRONMENTAL
SOLUTIONS**

*Happy Spring! PWGC's
hospital newsletters are
designed to assist
Facilities Engineering and
other departments within
the hospitals to stay
updated on ever
changing environmental
rules, regulations, and
other pertinent issues
related to
the healthcare industry.*

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Are You a Title V Facility?

If you answered yes to the above question then you are in the midst of preparing your annual emission statement which is due annually by April 15th. This year marks the first year that greenhouse gas reporting is required per revisions to 6NYCRR 202. The GHG emissions inventory will assist with the development of a more complete and accurate inventory of GHG emissions generated in New York State. The inventory data collected will be used in the planning for and development of additional global warming reduction programs. The six (6) GHGs to be added to the emissions statement and part of 6NYCRR 202-2.3(c) include; carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These GHGs are not regulated air contaminants and therefore will not be included in the calculations for the annual operating permit program fee for affected sources.

The NYSDEC has deferred to EPA protocols for greenhouse gas reporting. 40 CFR 98.33 should be used when calculating emissions for stationary combustion sources.

Note that this requirement is for major facilities and currently does not include facilities which have an Air Registration or State Facility Permit.

Contact PWGC for further assistance.



Nurses Taking the Lead! Blue - Wrap Recycling Helps Reduce Hospital Waste

According to the March 2010 issue of the journal *Academic Medicine*, hospitals dispose of more than 4 billion pounds of waste each year. This astounding number felt all too close to home for nurse Christine Collins, RN, an OR nurse at Kaiser Permanente's Roseville (Calif.) Medical Center who throws away on a daily basis blue wrap that is used to cover, wrap and store sterilized equipment and to outfit nurses and surgeons during operations on a daily basis. She can also recall a time where the instruments were covered in cloth material. This nurse along with others nurses stepped in and developed a recycling program for this waste stream.

The Blue-wrap recycling program was spear headed in 2009 and in 2010 with the help of staff the success of the recycling program recycled an average of 2,500 lbs. each month and recycled 32,500 lbs. of blue wrap in 2010! For tips for nurses and others who want to get a program like this started visit <http://news.nurse.com/article/20110110/CA02/101100056>. However, the first step is to find a local recycler that accepts polypropylene or #5 plastics. Not all recycling centers accept blue wrap. The next step is get hospital staff on board, develop a team and the recycling strategy. Recycling does work!

EARTH DAY 2011!



Health Care without Harm and Practice Greenhealth are encouraging Earth Day activities in hospitals and health care settings such as tree planting, park clean up, lectures, farmer's markets, fairs, departmental green competitions and more!

To assist hospitals and healthcare facilities these two organizations will be hosting two free Climate Literacy webinars entitled *Climate Change and the Role of the Health Care Clinician: Education, Mitigation and Adaptation*; one is intended for administrator use and one for clinical use. The webinars will feature a new PowerPoint presentation, which focuses on the health effects of climate change and the role of the health care sector.

The webinars are scheduled for 1PM EST on April 12th and April 14th, the week before Earth Day. In addition, both webinars will also be recorded and available for your use anytime during Earth Week.

Visit <http://www.practicegreenhealth.org/earthday> for more information and promote your Earth Day Activities!