

Joint Commission's Hazardous Materials Booster Pack

November 6, 2012



3 Questions We Will Address Today

1. What is a hazardous materials booster pack?
2. How will it impact your next Joint Commission survey?
3. How can you be prepared for your upcoming survey?



But First...A Question for You

How prepared are you if the Joint Commission and EPA visit your hospital together to inspect your hazardous waste program?

- Completely prepared
- Very prepared
- Prepared
- Somewhat prepared
- Not at all prepared

About Triumvirate Environmental

- Founded in Boston, MA in 1988 and currently provides regulatory consulting and environmental services from Maine to Florida.
- Guiding principles include strict regulatory compliance, safety, cost-optimization, waste-minimization and green & sustainable programs.
- 4 vertical markets – **healthcare, higher education, life-sciences and industry.**
- Major service lines include: **Hazardous Waste Disposal, Onsite Support Services, Consulting, Field Services, Wastewater Management, Lab Services, and Engineering**

About Our 1st Subject Expert



Tom Salamone - Mr. Salamone is a Joint Commission regulatory compliance “guru”. He has been working with the healthcare industry for more than 30 years with expertise in Accreditation, Preparation, Continuous Readiness and Environment of Care/Life/Safety Emergency Manager Coordinator.

Hazardous Materials and Waste and the Joint Commission



Thomas Salamone
“Theresa and Frank’s son”

Coach Wooden

- “Failing to prepare is preparing to fail”
- “If you don’t have time to do it right, when will you have time to do it over”
- “It isn’t what you do, but how you do it”

Overview

- Hazardous Materials and Waste Overview
 - Can Cause....
 - When Not.....
 - What is a
 - Waste Stream Overview
 - EP Overview*

Focus on Hazardous Waste

- Extra Attention Being Given
 - To things we were not used to
 - Hazardous energy sources; Hazardous gases and vapors; Labels
 - EC.02.02.01
 - EP's 3, 4, 5
 - EP's 6 and 7
 - Eyewash Stations
 - EC.04.01.01
 - EP 1-Monitoring
 - EP 3 thru 9-Reporting and Investigation
 - Visual Observations
 - Document Review
 - Questions Asked
- PPE
- Energy Sources
- Medication Disposal

Focus on Radioactive Materials

- Are you in compliance?
- NRC Requirements
- Federal regulation 10 CFR 20.1802
- Federal regulation 10 CFR 1801
- Section 8.40 of the NRC

Documentation

- MP
- AE
- Minutes
- Program Docs
- Tracer Topics
- Assessment Questions
- Policies and Procedures
 - Be careful

Booster Packs

- Understanding
- Medication
 - Storage
 - Security
 - Labeling

Tracer Talk

- What You Could Expect
 - Scenario Example(s) that include
 - Summaries
 - Routes
 - Interview Question Samples

Asbestos-A Real Life Incident

OSHA Violations From Recent Major
Renovation Project Received From CMS,
DOH and OSHA

To Come- Stay Tuned For Our Next Webinars

➤ AHJ Findings

- The Joint Commission

- Including Element of Performance “Onion Peeling”

➤ EPA

About Our 2nd Subject Expert



Steve Todisco - Steve is one of Triumvirate's most senior healthcare account managers and he has become an industry-expert in the management of highly-complex and multi-disciplinary waste-management programs for Triumvirate's healthcare practice.

Preparing for The Joint Commission's Hazardous Waste Management Booster Pack

**Steve Todisco, HEM, CHMM
Triumvirate Environmental**

Mock Tracer Case Study

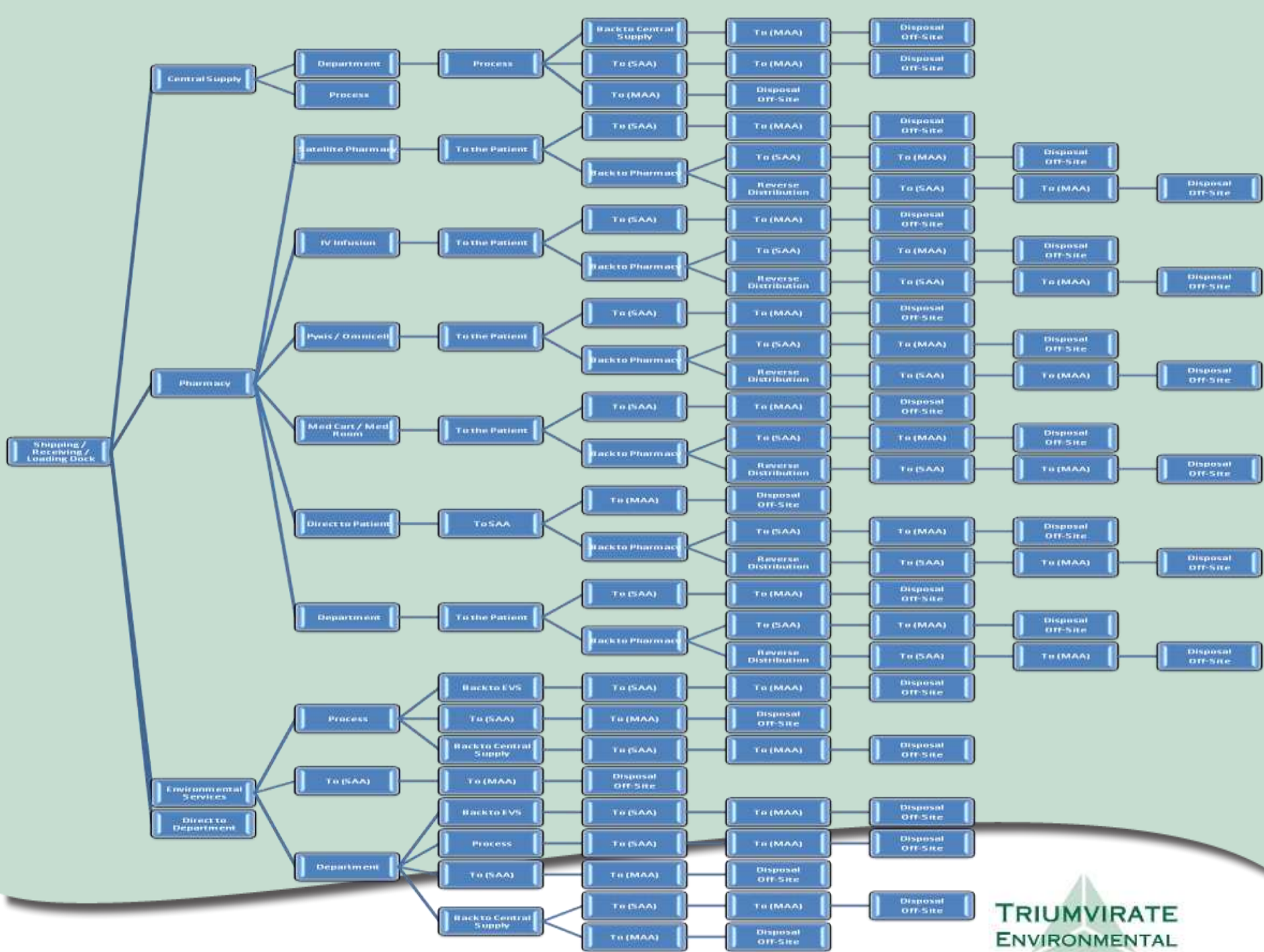
- Opening Conference
- Goals
- Interviews
- Hazardous Materials Tracer
- Identification
- Challenges



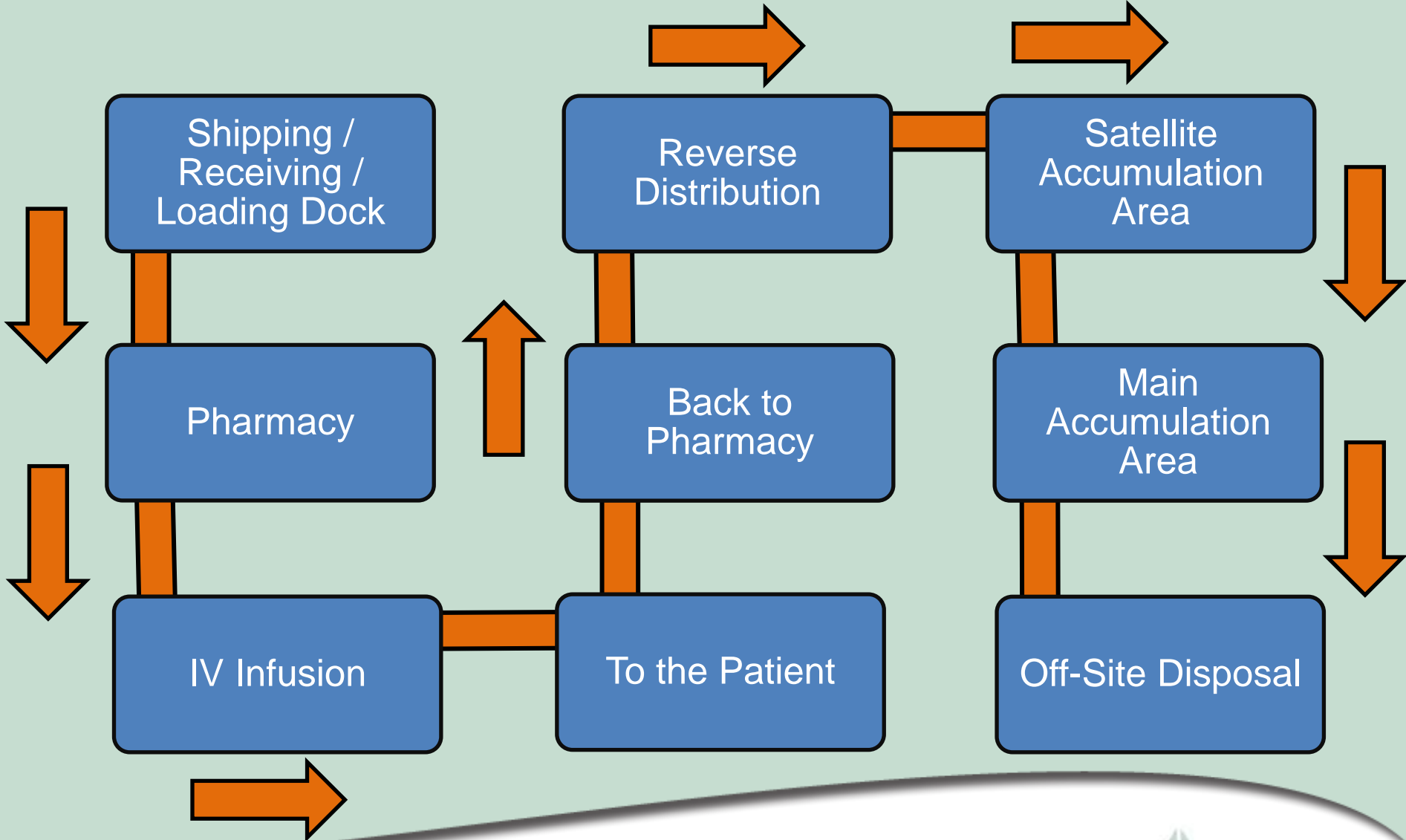
Opening Conference/Goals/Interviews

- Why we're here (Joint Commission's New Booster Pack)
- What's new with the Joint Commission?
- What kind of info were we looking to collect?
- Who we would like to interview today?
- Questions we would like to ask?
- Policies and Procedures
- Internal transportation
- Staff Insight





Tracer Specifics



Findings and Challenges

- ✓ Training and Education
 - Identification
 - Personal Protective Equipment
 - Research
- ✓ Spill Kit Access and Identification
- ✓ Off – Hours
- ✓ Sitting Periods
- ✓ Communication (English as 2nd language)
- ✓ Storage
- ✓ Patient Safety
- ✓ Transportation and “Touch points”
- ✓ Reverse Direction Movement



EC.02.02.01 EP1

- ❑ Does the hospital maintain a written, current inventory of hazardous materials and waste that it uses, stores or generates? Are the only materials included on the inventory those who's handling, use and storage are addressed by law and regulation? (See also IC.02.01.01, EP 6; MM.01.01.03, EP 3)
 - ✓ Reoccurring Formulary Review
 - ✓ Clinical Lab Chemicals
 - ✓ Chemical Inventory
 - ✓ Hazardous Waste Main Accumulation Area
 - ✓ Large Quantity vs. Small Quantity
 - ✓ Satellite Accumulation Area

EC.02.02.01 EP3

❑ Does the hospital have written procedures, including the use of precautions and personal protective equipment, to follow in response to hazardous material and waste spills or exposures?

- ✓ Spill response plans/training
- ✓ Hazard assessment
- ✓ Spill Kit Identification / Inventory
- ✓ Internal / External Teams
- ✓ PPE



EC.02.02.01 EP4

- ❑ Response to hazardous material and waste spills or exposures?
 - ✓ Internal / External Employees or Vendors
 - ✓ Meters / Monitors
 - Appropriate Calibration
 - ✓ On Site Remediation Supplies
 - ✓ On Site Remediation Equipment



EC.02.02.01 EP5

❑ Does the hospital minimize risks associated with selecting, handling, storing, transporting, using, and disposing of hazardous chemicals?

- ✓ Engineering Controls
- ✓ Administrative Controls, PPE
- ✓ Training / Education
- ✓ Secondary Containment
- ✓ Signage / Labeling
- ✓ Transportation Methods
- ✓ Large Quantity Generator Vs. Small Quantity



EC.02.02.01 EP8

❑ Does the hospital minimize risks associated with the disposal of hazardous medications. (See also MM.01.01.03,EPs 1-3)

- ✓ Hazardous waste identification (Formulary Review)
- ✓ Reverse Distribution
- ✓ Types of Containers
- ✓ Locations for Collection
 - SAA's
 - MAA
- ✓ Waste flow process
- ✓ Manifests / LDR's
- ✓ Large Quantity Generator Vs. Small Quantity
- ✓ Off-Site Transportation



EC.02.02.01 EP11

- ❑ Does the hospital have the permits, licenses, manifests and material safety data sheets for managing hazardous materials and waste, as required by law and regulation?
 - ✓ EPA ID Number
 - ✓ Manifest Management
 - ✓ Training RCRA / DOT (For manifest signers)
 - ✓ MSDS or “SDS” Clearly identified and communicated
 - ✓ Large Quantity Generator Vs. Small Quantity

Questions Asked in a Recent Survey

1. Describe your Hazard Communication plan specific to your institution.
2. How do you identify if something is hazardous?
3. What do you do about pharmacy medications? And how are they evaluated, handled, collected and disposed of? Are NIOSH, OSHA technical manual, ASHP and others referenced and taken into account for the programs management?
4. Describe your PPE program. How do you make the determination that PPE is required?
5. What type of area is your waste stored in (SAA/MAA)? How are these areas inspected? Are materials segregated?
6. What types of signage are required on the MAA?

Triumvirate Takeaways

- ✓ **Joint Commission is currently modifying their survey approach.**
- ✓ **Fall surveys have resulted in a series of questions relating to hazardous waste management, spill response, identification, communication, training, education, Pharmaceutical Waste Management.**
- ✓ **The Joint Commission has adopted versions of EPA regulations to assist them in their efforts to survey healthcare.**
- ✓ **Tracers - slightly different look involving following hazardous materials and medications.**
- ✓ **Minimizing risk around movement and transportation will result in a safer environment with greater staff knowledge for these hazardous materials.**
- ✓ **RCRA (The Resource Conservation and Recovery Act)**

Questions??

Thank You

In the event that we do not get to your Question today, Steve and Tom can be reached at the following information:

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Full list of Questions asked during a recent survey will be forwarded to you post our webinar. For more information please contact us or visit our website:

www.triumvirate.com

