

# Top 5 RCRA Tips for Hospitals:

- 1) Visit your <90/<180 day storage area the day before your next pickup.
  - Check for aisle space, access to communication or alarm system, spill equip.
  - Make sure all containers are labeled & dated (<90 or 180 days?)
  - Make sure all containers are closed.
  - weekly inspections?
  
- 2) Make sure Universal Waste is being properly managed.
  - Bulbs - labeled? protected from breakage? bulb crusher = HW & Air permit
  - Batteries - buckets, everywhere – labeled? closed?
  - Computers/Electronics/TVs - labeled? protected from breakage?
  - All - Shipped at least once a year? Paperwork?, Training?
  
- 3) Make sure true chemo waste isn't being disposed of as RMW
  - Mixture rule (any mixture of a listed hw & a solid waste is HW)
  - Bulk vs Trace really equals Contaminated vs Not Contaminated
  - RCRA Empty = <3% by weight & emptied by all normal means
  
- 4) Make sure your Satellite Accumulation Containers are;
  - Closed
  - Labeled
  - At or Near the “point of generation”
  - How many do you have & where?
  
- 5) Visit the “other places” that generate HW in the hospital
  - The Lab - Xylenes used as tissue fixatives
  - The Morgue - Formaldehyde & Formalin
  - The Chemo outpatient areas (See #3 above)

## Websites:

Healthcare Education Resource Center - Blueprint on Pharmaceutical Waste Mgmt  
[www.hercenter.org/hazmat/tenstepblueprint.pdf](http://www.hercenter.org/hazmat/tenstepblueprint.pdf)

NJDEP Hazardous Waste Enforcement's Compliance Assistance Page  
<http://www.nj.gov/dep/enforcement/ca-intro.html>

Paul King  
Principal Environmental Specialist  
Bur. of Hazardous Waste Compliance & Enforcement  
NJ Dept. of Environmental Protection  
Phone - (609) 439-9728 Fax - (609) 292-3970