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Technical Assistance for Institution Building of the Ministry of Environment in Enforcing Environmental and Climate Acquis

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Hospital Waste Management Inspection Checklist

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Introduction

One of the requirements of the terms of reference for the IBECA project was to facilitate inter agency co-operation between the State Inspectorate for Environment and Forests (SIEF) and other relevant State Inspectorate bodies.

One of the more obvious synergies between the inspectorates centres around the Law of Healthcare Waste Management and the roles of the SIEF and the State Health Inspectorate (ISHSH). These two inspection bodies share a common interest in the compliance with the DCM on healthcare waste management. This is an important area for the SIEF as it is an area of work where they are not always working within the permitted regime and in the case of healthcare facilities the SIEF draw their powers from the HCWM DCM.

During 2016, IBECA project organised two training session with the State Environmental and Forest Inspectorate HQ inspectors together with inspectors from the State Health Inspectorate HQ. The purpose of these two sessions was to strengthen links between the two inspectorates who were engaged in inspections of hospitals and their waste management systems.

During these two training sessions the inspectorate teams were actively engaged on formal joint inspections at healthcare facilities and healthcare waste treatment facilities. The healthcare facilities have unfortunately been the subject of the environmental permitting system, which is totally inappropriate as they are NOT industrial installations. Healthcare facilities as waste producers should be inspected under the DCM on healthcare waste management.

At **Annex 1** the project team has provided both the ISHSH and SIEF with a checklist to be used during inspections at health care institutions.

This checklist can be used in conjunction with, the Ministry of Health, Healthcare Waste Management Guidance Document, which although not mandatory is a good assessment tool for determining compliance with national legislation.

The IBECA project team undertook these training sessions and the preparation of the HCWM Checklist as part of Component B.2. of the terms of reference – Development of the Competencies of the State Inspectorate for Environment and Forests.

Background

The GoA approved for the first time the National Strategy and National Plan on Waste and later that year on 22.09.2011 approved the Law no. 10463 “On integrated management of waste”. All these documents present a clear picture of the whole process of integrate waste management from the generation sources to the disposal facility, where clear responsibility tasks are stated for all stakeholders’ part of the process.

The law clearly defines these type of waste as the main, where respective DCMs (Decision of the Council of Ministers) on specific type of waste have been approved during these last 6 years to fulfill the legal frame on integrated waste management: i) solid waste; ii) bio waste; iii) non-hazardous/hazardous waste; iv) household waste; v) inert waste; vi) liquid waste; vii) packaging waste; viii) waste from used tires.

When it comes to hospital waste, in the law they are not classified and considered as a separate category, but based on their content they can be considered as non-hazardous or hazardous waste. The law explains all the procedures that the producers and treatment facilities should follow when it comes to dealing with hazardous waste. On the other side in 2010, prior to the law being approved, it was approved the DCM no. 798, date 29.09.2010 “On approval of the regulation for the administration of hospital waste”. This regulation defines procedure, rules, and technical standards for the administration of hospital waste to protect public health and the environment.

Annex 1: Hospital Waste Management Inspection Checklist

Name of Hospital:			Date of Inspection:
Address of Hospital:			Name of Inspectors:
Name of HCW Manager:			
Number of Staff at Hospital	Total:	Medical:	Non-Medical:
Number of beds:		Bed Occupancy Rate:	
No. of Outpatients:	Daily:	Monthly:	Annually:
Name of Hospital Departments: Total No.			
Name of all Hospital waste contractors:	Contractor Name:	Waste Type:	Address/Phone:

Material Inputs to the Hospital	Yes	No	Unsure	Comments
Does the Hospital purchase all materials with hazardous properties centrally?				
Are adequate records kept of all hazardous substances purchased in the Hospital?				
Are Material Safety Data Sheets (MSDS) for hazardous substances purchased by the Hospital kept centrally or individually by the user of the substance?				

Wastes Produced by the Hospital	Yes	No	Unknown	Comments
Has a complete list of wastes requiring off site disposal with preferred disposal options been compiled?				
Are any of the following wastes produced by the Hospital:				
<input type="checkbox"/> Acids/caustics				
<input type="checkbox"/> Animal waste				
<input type="checkbox"/> Batteries				
<input type="checkbox"/> Biological waste				
<input type="checkbox"/> Biochemical waste				
<input type="checkbox"/> Catering waste				
<input type="checkbox"/> Clinical wastes				
<input type="checkbox"/> Compressed gas cylinders				
<input type="checkbox"/> Computer equipment				
<input type="checkbox"/> Drums / containers				
<input type="checkbox"/> Electrical equipment (other)				
<input type="checkbox"/> Explosive wastes				
<input type="checkbox"/> Fertilisers				

<input type="checkbox"/> Flammable wastes				
<input type="checkbox"/> Fluorescent tubes				
<input type="checkbox"/> Food wastes				
<input type="checkbox"/> Furniture and furnishings				
<input type="checkbox"/> Glass				
<input type="checkbox"/> Grounds waste				
<input type="checkbox"/> Herbicides				
<input type="checkbox"/> Laboratory wastes				
<input type="checkbox"/> Oils (mineral)				
<input type="checkbox"/> Oils (vegetable)				
<input type="checkbox"/> Paper and cardboard				
<input type="checkbox"/> Polychlorinated biphenyls (PCB's)				
<input type="checkbox"/> Pesticides				
<input type="checkbox"/> Photographic wastes				
<input type="checkbox"/> Plastics				
<input type="checkbox"/> Poisons				
<input type="checkbox"/> Printer/photocopier toner cartridges				
<input type="checkbox"/> Protective clothing				
<input type="checkbox"/> Radioactive wastes				
<input type="checkbox"/> Redundant machinery				
<input type="checkbox"/> Sanitary waste				
<input type="checkbox"/> Scrap metals				
<input type="checkbox"/> Sharps contaminated				
<input type="checkbox"/> Sharps uncontaminated				
<input type="checkbox"/> Solvents				
<input type="checkbox"/> Tyres				

<input type="checkbox"/> Textiles				
<input type="checkbox"/> White goods (refrigerators, freezers etc.).				
<input type="checkbox"/> Wood / wood shavings				
<input type="checkbox"/> Other significant wastes - please specify:				

Hospital Waste Disposal	Yes	No	Unknown	Comments
<p>Does the Hospital dispose of waste through waste contractors or local authority waste collection service?</p> <p>If yes please give details:</p>				
<p>Are records kept of these wastes leaving the Hospital?</p> <p>For how long?</p> <p>For which wastes are there few/no records?</p>				
<p>Are waste transfer notes and waste consignment notes properly completed for all wastes shipped?</p>				
<p>Have you checked that the waste disposal contractor has necessary licenses?</p>				
<p>Has anyone visited the disposal sites of waste contractors (e.g. Duty of Care visit)?</p>				

Waste Storage	Yes	No	Unknown	Comments
<p>Are any solid or liquid Hazardous Wastes stored within the Hospital?</p> <p>Please specify types / quantities / locations</p>				
<p>Are there any other significant wastes apart from Special wastes stored in the Hospital?</p> <p>Please specify types / quantities / locations</p>				
<p>Are inventories kept of all wastes to ensure that volumes are kept to a minimum, length of storage is recorded and that incompatible wastes are segregated?</p>				

Spillage's	Yes	No	Unknown	Comments
<p>Have there been any significant spillages of materials classified as hazardous within the Hospital?</p> <p>If so please give full details?</p>				
<p>Has an emergency spill control plan been developed within the Hospital?</p>				

If yes please attach copy with completed audit				
Does the Hospital have "Spill Kits" to contain/clean up spills within the building? If so where are they located?				
Does the Hospital have any decontamination showers? Please state location				

Resources, Procedures and Training	Yes	No	Unknown	Comments
Is someone directly responsible for maintaining compliance with waste management and disposal regulations within the Hospital? If so who?				
Are there any written Hospital procedures covering the handling, transportation, storage and disposal of wastes produced in the Hospital?				
What procedures are in place to ensure research students / staff do not leave unidentified wastes within the Hospital?				
Do written procedures and methodologies for experiments within the Hospital include details on correct disposal routes for waste materials produced? Please include copies of such with completed questionnaire.				

Has an analysis of waste management training needs been carried out for Hospital staff, students, contractors etc?				

Annex 2: Hospital Waste Management of Specific Materials

Asbestos	Yes	No	Unknown	Comments
Please specify any equipment in the Hospital that may contain asbestos? (E.g. kilns, ovens, heat tiles etc.)				

Batteries	Yes	No	Unknown	Comments
Does the Hospital use any of the following batteries and how are they disposed of? <input type="checkbox"/> Lead acid <input type="checkbox"/> Nicad (rechargeable) <input type="checkbox"/> Lithium <input type="checkbox"/> Mercury				

Clinical Wastes	Yes	No	Unknown	Comments
Are wastes classed as 'clinical' produced by the Hospital?				
From what operations / processes?				
How are they disposed of?				
Does the Hospital have its own written procedures in place to advise staff on Clinical Waste handling, transportation and disposal? If so please attach a copy				

Cleaning and Degreasing	Yes	No	Unknown	Comments
<p>Is any equipment contaminated with mineral oils cleaned or degreased in the Hospital?</p> <p>Please specify equipment and cleaner/ degreaser used:</p>				
<p>Does any effluent leaving the Hospital contain mineral oil equal to or greater than 0.1%?</p> <p>From what operations?</p>				
<p>Are paper towels, rags etc., contaminated with mineral oils or other substances classified as Special Wastes produced by the Hospital?</p> <p>How are they disposed of?</p>				

Compressed Gas Cylinders	Yes	No	Unknown	Comments
<p>Does the Hospital use compressed gas cylinders?</p> <p>Please list types?</p>				
<p>Where are they stored prior to use/disposal?</p>				
<p>Does the Hospital have any redundant cylinders which require disposal (other than by return to supplier)?</p>				

Drum/Container Disposal	Yes	No	Unknown	Comments
How are empty containers that contain residues of their former contents disposed of?				
Do all of these drums/containers still have their correct labelling e.g. contents, hazard data info etc?				
Are any containers which contained hazardous substances flushed out with water, solvents etc., to remove residues prior to disposal? Please specify and where the flushing effluent is disposed to:				
Are any drums/containers in poor condition (rusty, blown ends etc.)?				

Equipment: Computer Hardware	Yes	No	Unknown	Comments
How is redundant Hospital computer hardware disposed of?				
Are "Duty of Care" / WEEE notes produced for disposal?				
If computer equipment is disposed off-site, are hard disks (if present) wiped clean?				

Equipment White Goods (fridges, cookers, washing machines etc.)	Yes	No	Unknown	Comments
How does the Hospital dispose of redundant 'white goods'?				
Are "Duty of Care" notices raised for their disposal?				
Are 'scrap' refrigerators transferred to waste managers who remove the refrigerant before final disposal?				

Equipment: Other Electrical	Yes	No	Unknown	Comments
How is electrical equipment other than 'white goods' or computer hardware disposed of?				
Is equipment ever donated e.g. to a charity organisation or school?				
Are "Duty of Care" notices raised for equipment disposal?				

Equipment: General	Yes	No	Unknown	Comments
Other than 'white goods' or computer hardware, what types of waste equipment does the Hospital produce? Please specify:				
How is this equipment disposed of?				
Is equipment ever donated e.g. to a charity organisation? If yes please give details				
Are "Duty of Care" notices raised for equipment disposal?				

Emissions to Air	Yes	No	Unknown	Comments
Does the Hospital produce any specific emissions to air? Please specify and from what operations / processes they result from:				
Have all release points been identified for all emissions?				
Has any attempt been made to measure and record emissions?				

Fluorescent Tubes	Yes	No	Unknown	Comments
Does the Hospital dispose of any redundant fluorescent tubes?				
If so how are they disposed of?				

Glass Ware	Yes	No	Unknown	Comments
Is contaminated and non-contaminated waste glass segregated prior to disposal?				
Are sharps boxes that comply with British Standard BS 7320 and UN3291: Specification for Sharps Containers used for the disposal of glassware?				
How is non-contaminated waste glass disposed of in the Hospital?				
How is contaminated waste glass disposed of in the Hospital?				

Laboratory Sharps	Yes	No	Unknown	Comments
How are laboratory sharps contaminated with Special Wastes disposed of?				
How are uncontaminated laboratory sharps disposed of?				
Are sharps boxes that comply with British Standard BS 7320 and UN3291: Specification for Sharps Containers used for the disposal of glassware?				

Medicines	Yes	No	Unknown	Comments
Does the hospital use any “prescription only” medicines? Please specify:				
How are medicines stored prior to use and disposal in the Hospital?				
How are they disposed of?				

Mineral Oils (waste engine, lubricating and hydraulic oils etc.)	Yes	No	Unknown	Comments
Does the Hospital produce waste mineral or synthetic oils? Please specify: Are any waste oils disposed of as Special Waste?				
Are any waste oils recycled through a licensed contractor?				

If so where and how are they stored?				
Are Duty of Care notices produced for disposal?				
If 'no' to all above how are waste oils disposed of?				
How are empty waste mineral oil containers disposed of?				

Paints, Dyes, Inks, Enamels etc.	Yes	No	Unknown	Comments
Does the Hospital produce any waste paints, dyes, inks, enamels, etc? Please specify.				
If so how are they disposed of?				

Pesticides	Yes	No	Unknown	Comments
Does the Hospital use pesticides? Please Specify:				
Are pesticides stored according to statutory requirements (or BASIS standard)?				
How are waste pesticides and/or their				

containers disposed of?				
Are/is it suspected that the Hospital stores pesticides containing DDT? Please give details?				

Photographic Materials	Yes	No	Unknown	Comments
Does the Hospital produce any photographic waste chemicals? Please specify:				
How are they disposed of?				
Are any photographic chemicals recycled?				

Plastics	Yes	No	Unknown	Comments
Does the Hospital produce plastic wastes from any of its operations? Please specify?				
Are any plastic wastes contaminated with Special Wastes? How are they disposed of?				

Polychlorinated biphenyls (PCB's)	Yes	No	Unknown	Comments
Is there any electrical equipment (pre 1986) within the Hospital containing/suspected to contain, PCB's (e.g. oil filled electrical switch gear, transformers, capacitors, fluorescent light ballast's/transformers, power factor correction devices, power supplies for lasers and radiography equipment, oil cooled welding equipment and fractional horsepower motors)?				
If so has the unit/s ever leaked? Please give details/locations etc.?				
How often and by whom are these units inspected and maintained?				
Have any items containing PCB's ever been disposed of off-site in the past?				

Poisons	Yes	No	Unknown	Comments
Are any poisons used within the Hospital?				
Is there a dedicated poison store? How is access to it controlled?				
If no, how are poisons stored?				
Is an inventory kept of stored poisons?				
How are waste poisons disposed of?				

Printer Cartridges and Ribbons	Yes	No	Unknown	Comments
Are printer cartridges and ribbons recycled?				
If not, how are they disposed of?				

Protective Clothing	Yes	No	Unknown	Comments
Is contaminated protective clothing disposed of according to the classification of its contamination?				
If no, how is it disposed of?				

Radioactive Sources	Yes	No	Unknown	Comments
Does the Hospital have any radioactive sources? Please give details:				
How are radioactive sources / aqueous waste disposed of?				

Scrap Metals	Yes	No	Unknown	Comments
Does the Hospital produce any scrap metals? Please specify:				
If yes how are they disposed of?				
Are "Duty of Care" notices produced for materials disposed of as scrap metal?				
Are ferrous and non-ferrous metals segregated prior to disposal?				
Is a registered carrier used for disposal?				
Has the disposal site been checked to ensure that it can accept scrap metal under licence or exemption?				

Solvents (including paint thinners, anti-freeze, degreasers etc.)	Yes	No	Unknown	Comments
Does the Hospital use solvents? If so what types?				
Are different solvents segregated in storage (e.g. chlorinated and non-chlorinated)?				
Are waste solvent containers adequately labelled (including hazard data info)?				
Is any equipment cleaned using solvents? Please specify? What happens to the solvent effluent and any contaminated paper towels etc., produced by the cleaning?				
How are waste solvents disposed of?				

Hazardous Wastes Other than Solvents (see Hazardous Waste Disposal Guide for definition)	Yes	No	Unknown	Comments
Is specialist guidance on the identification of Hazardous Wastes produced by the Hospital available?				
Please specify all types of hazardous wastes used in the Hospital other than solvents listed elsewhere:				
How are Hazardous Wastes disposed of?				
Are procedures to deal with the disposal of Hazardous Wastes adequately disseminated to hospital staff?				
Are Hazardous Wastes properly identified, labelled and segregated to minimise risk during handling, storage, transportation, and disposal?				
How are wastes stored in the Hospital prior to transfer? Is a record kept of their location in the Hospital?				
How is access to this storage area controlled?				
On average how long are Hazardous Wastes stored within the Hospital before transfer or disposal? What is the best and worst case scenarios?				