

HEALTH CARE ENVIRONMENTAL RESOURCE CENTER

www.hercenter.org

A comprehensive web guide to environmental compliance and pollution prevention

ENVIRONMENTAL COMPLIANCE AND IMPROVEMENT GUIDE

To improve compliance with JCAHO Environment of Care Standards

What is this resource?

JCAHO standards address an organization's performance in key functional areas. Each standard is presented as a series of "Elements of Performance" (EP) -- expectations that establish the broad framework that JCAHO surveyors use to evaluate a facility's performance.

Some of the standards refer to environmental issues. Many of the environmentally relevant Elements of Performance fall under the "Environment of Care" (EC) standard, but others are included in the Human Resources (HR) and Leadership (LD) standards.

This Guide relates each JCAHO Element of Performance to specific federal regulations, to help facilities be in compliance with both. The Guide also suggests steps that facilities can take to encourage environmental performance improvements. A comprehensive environmental program, including waste minimization and pollution prevention initiatives, can not only ensure compliance, but can also help reduce the costs of compliance.

How does it work?

Each page starts with the actual language of the JCAHO Element of Performance, supplemented by a series of specific statements that refers either to evidence that the organization is **complying** with the standard, or to evidence that the organization is **improving** its practices. Where appropriate, the guide provides links, tips and tools that enumerate specific management practices, materials, regulatory requirements, and facility infrastructure relevant to that EP.

Environmental issues are inherently complex, and the web of regulations and practices that have evolved to deal with them can seem overwhelming to the non-specialist. To help make the information more user-friendly, each page is organized using the following symbols to denote the type of information available for each standard or Element of Performance:

	Evidence of Standards Compliance. These are statements and direct links* to applicable federal environmental and workplace regulations.
	Evidence of Environmental Improvement. These performance improvement initiatives go beyond what is absolutely required, but typically ease the burden of compliance, often save money, and satisfy JCAHO's accreditation requirements.
	A recommended set of Tools and Resources that may be particularly helpful for those looking for additional information on specific topics, sample policies, or guidance on how to deal with a particular problem.

Please contact us

This resource was created by [Hospitals for a Healthy Environment](#). We are very interested in your comments, and in finding ways to improve this resource. Please direct your questions and suggestions to:

- Laura Brannen. (603) 795-9966

SAMPLE PAGE from Environmental Compliance and Improvement Guide—
www.hercenter.org/jcaho3.10.3.html

Environment of Care Standard 3.10: The organization manages hazardous materials and waste risks

Element of Performance 3. Implementation of Hazardous Material and Hazardous Waste Program

The organization establishes and implements processes for selecting, handling, storing, transporting, using and disposing of hazardous materials and wastes from receipt or generation through use and/or final disposal, including managing the following: chemicals, chemotherapeutic materials, pharmaceuticals, radioactive materials and infectious and regulated medical waste including sharps.

This page provides a set of criteria for evaluating how well a facility has implemented its procedures for managing hazardous materials and waste. The criteria have been grouped into the following categories:

- Hazardous Materials Management
 - Purchasing
 - Handling labeling and storage
 - Spills
 - Training
- Hazardous Waste Management
 - Recordkeeping and reporting
 - Hazardous waste determination
 - Storage
 - Satellite accumulation
 - Spills
 - Disposal and transportation
 - Contingency planning
 - Training
- General Waste Management
 - Regulated Medical [Infectious] Waste
 - Universal Waste
 - Nonhazardous solid waste
- Materials of concern
 - Asbestos
 - CFCs
 - Ethylene oxide
 - Glutaraldehyde
 - Mercury
 - Pesticides
 - Petroleum Products
 - Pharmaceuticals and Chemotherapeutic Materials
 - Polychlorinated Biphenyls (PCB)
 - HERC
 - Radioactive Materials and Waste
 - Used Oil
- Facilities and Equipment
 - Recordkeeping and reporting
 - Boilers, generators
 - Incinerators
 - Tanks
 - WW

Click here to take you to the section listed below

Hazardous Waste Management

Recordkeeping and reporting



The facility has obtained an EPA Identification Number ([40 CFR 262.12](#)).



Generator status is determined and reviewed annually ([40 CFR 262.40](#)).



Facility is working toward moving to smaller quantity generator status by minimizing hazardous materials present on site.

- H2E's Chemical Minimization Plan has department-specific hazardous chemical minimization tips.



The basis for hazardous waste determinations is documented ([40 CFR 262.40](#)).



Facility submits Biennial Reports on EPA Form 8700-13A each even numbered year ([40 CFR 262.41](#))



Manifest copies are managed properly, e.g. appropriate copies are received from treatment facility and routed to the regulatory authority ([40 CFR 262.20, 262.40](#)).



Manifests, Biennial Reports, and records of test results and analyses are kept on site for a minimum of three years ([EC.3.10.7](#) and [EC.3.10.8](#), [40 CFR 262.40](#)).



Land Disposal Restriction notices are kept for a minimum of three years ([40 CFR 268](#), [EC.3.10.7](#)).



Weekly inspections of hazardous waste storage areas are documented according to written procedures to check for leaks, corroded containers or other problems ([EC.3.10.4](#), [40 CFR 65.174](#))

Suggested environmental improvements ease the burden of compliance

Links take users to actual citations RCRA, OSHA, DOT, etc.