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HAZMAT/HAZWASTE ASSESSMENT

Client Name: Sample Company

Facility Location: Anytown, USA

J. J. Keller® Hazmat/Hazwaste Assessment
Provides Comprehensive Compliance Review

J. J. Keller® Consulting provides the expertise of an independent consulting firm to determine your facility's compliance level in the management of hazardous materials and waste. This sample report demonstrates the same type of full report you'll receive, including recommendations for addressing areas of non-compliance.

ACTIVITY SUMMARY

The following report details the observations and corrective action recommendations resulting from the Hazmat/Hazwaste Assessment.

This audit included a review of current written policies, procedures, and training documentation. In addition to the policies and procedures review and the walk-through of the facilities, employee interviews were conducted.

AUDIT METHODOLOGY

[Consultant Name] conducted opening and closing meetings for this audit. During the opening meeting, the overall goals and objectives were confirmed.

The following pages contain the results of our Hazmat/Hazwaste Assessment, including the overall scoring and Regulatory Compliance Risk Rating. During the audit process, the information applicable to [Facility Name] was reviewed for compliance with The Joint Commission (TJC), EPA, Occupational Safety and Health Administration (OSHA), and State Department of Environment & Conservation.

AUDIT RESULTS

Overall compliance was rated in individual compliance items across one category. The applicable category, Environment of Care, specifically related to hazardous waste compliance and had 11 individual compliance items. Each individual compliance item was identified as one of the following: Compliant, Minor Gap, Major Gap, Absent, or Not Applicable. The score for that category was then compiled and a compliance percentage was assigned to each category relative to how well [Facility Name] performed in that category.

The overall results of the audit produced an overall compliance percentage of 49%, for a Regulatory Compliance Risk Rating of SERIOUS. A risk rating of SERIOUS indicates that [Facility Name] has multiple gaps that lead to increased risk to the hospital. As noted above, only one category was assessed for this audit.

It is recommended that [Facility Name] set an objective to reach at least 85% regulatory compliance on their next audit to reduce overall regulatory risk.

ASSESSMENT	
Regulatory Compliance Risk Rating	Color
CRITICAL	Grey
SEVERE	Red
SERIOUS	Orange
MODERATE	Yellow
LOW	Light Yellow
MINIMAL	Green

Custom matrix provides a rating system for the severity of your risks.

FINDINGS AND RECOMMENDATIONS

The audit observations identified within this report are recommended to be an extension of the ongoing internal safety management and monitoring process. The observations documented in this section of this report were acquired during the documentation review and facility walk-through. New safety regulatory requirements or safety hazards may occur at any time.

Environment of Care – Building Tour

The observations documented in this section of the report were acquired during the facility walk-through and are documented with the applicable regulation standard (e.g., Public Health, OSHA, EPA, ANSI, etc.) for reference.

No.	Finding	Recommendation	Regulatory Reference	Photos
1	In the lab, it was noted that the eyewash station in the pathology department did not meet ANSI/ISEA installation standards. Activation required multiple motions, the cap cover was missing, and the water pattern was misaligned.	Install a new eyewash station that fully complies with ANSI/ISEA standards.	ANSI/ISEA Z358.1-2024 EC.02.02.01 EP5 OSHA 29 CFR 1910.151(c)	
2	In the boiler plant, it was observed that the eyewash station located at the sink behind the new boiler was not functioning properly. The left	Install a standalone eyewash station and remove the existing one from the sink to ensure proper functionality and accessibility. Ensure the new eyewash station is installed in	ANSI/ISEA Z358.1-2024 EC.02.02.01 EP5 OSHA 29 CFR	

Areas of non-compliance or risk are categorized and itemized for at-a-glance review.

Findings are accompanied by facility photos (as applicable) for easy identification.

No.	Finding	Recommendation	Regulatory Reference	Photos
3	In the lower level of the boiler plant, it was observed that the emergency eyewash/shower station was not properly maintained. The eyewash station had visible dirt in the bowl, and the water ports were missing protective cap covers. Additionally, the shower was visibly dirty and appeared to not have been activated or tested for an extended period.	Thoroughly clean the emergency eyewash/shower station and ensure it is in proper working order. The station should be tested weekly to confirm it is ready for use in the event of an emergency. Additionally, follow the organization's eyewash policy to ensure compliance with established requirements.	ANSI/ISEA Z358.1-2024 EC.02.02.01 EP5 OSHA 29 CFR 1910.151(c)	
4	In the lab, it was observed that all three emergency shower station heads were visibly dirty, with apparent rust and/or signs of bio-growth. These could be seen as a water management concern by The Joint Commission (TJC).	Thoroughly clean the shower heads to remove calcification, rust, and biofilm. Additionally, educate department staff responsible for weekly testing to ensure they wipe the shower heads dry after each test to prevent unwanted buildup. Annual maintenance should be conducted to provide a more thorough cleaning of these stations.	ANSI/ISEA Z358.1-2024 EC.02.02.01 EP5 OSHA 29 CFR 1910.151(c)	
5	The spill kit in the pathology lab was open and contained minimal absorbent material, insufficient for the volume of formalin used in the area.	Replace the used spill kit with a new one and ensure it is fully stocked. Verify that an adequate supply of absorbent material and appropriate cleaning equipment is readily available for staff to effectively manage spills.	EC.02.02.01 EP3 OSHA 29 CFR	No Photo
6	In the pathology lab, 5-gallon formalin cubes were placed	Purchase a formalin spill containment cube for this	EC.02.02.01 EP3	No Photo

Expert recommendations provide clear direction for addressing areas of risk and non-compliance.

Environment of Care – Document Review

The observations documented in this section of the report were acquired during the document review and are documented with the applicable regulation standard (e.g., Public Health, OSHA, EPA, ANSI, etc.) for reference.

No.	Finding	Recommendations	Regulatory Reference
1.	[Facility Name] was unable to provide hazardous waste manifests for flammable waste solvents and paints collected from the facility over the past three years. No documentation was made available during the on-site review. Additionally, during the document review of waste manifests, it was noted that the EVS department is responsible for managing the hazardous waste manifests for pharmaceutical waste collected by a third party. However, they were unable to provide the waste manifests for the past 3 years.	Collaborate with the hazardous waste vendor to ensure they can provide copies of the manifests and Certificates of Destruction (COD). Develop a filing system to ensure these documents are readily available for review by TJC, EPA, or the State Department of Environment & Conservation. Consider designating one department to maintain all waste manifest. According to RCRA and Tennessee state hazardous waste regulations, the disposal facility must provide the COD within 60 days. If it is not received, [Facility Name] is required to contact the facility and submit an exception report to the state. Additionally, the individual responsible for signing off on these waste manifests for the organization must have the required Department of Transportation (DOT) training.	EPA 40 CFR §262.40 EC.02.02.01 EP11
2.	The following policies were unavailable for review: <ul style="list-style-type: none"> •Hazardous Waste Awareness Training •Spill Response Plan •Annual Waste Summary with accumulated weights broken down by month •Management of Pharmaceutical Waste •Management of Hazardous and Regulated Medical Waste 	Review the policy system to determine if these policies and procedures have been created, as they are documents that TJC may request during an on-site survey. The only way to determine the company's generator status with the EPA and the state is by tracking the monthly weight of hazardous waste disposal. This information can be obtained from the monthly waste manifests. If the hospital exceeds 220 pounds of hazardous waste in any given month, then they must notify the state and comply with the regulations for Small Quantity Generators.	EC.02.02.01 EP3 EC.02.02.01 EP19 OSHA 29 CFR 1910.1200

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Regulatory references allow you to quickly research the compliance area for the exact compliance requirements.

POLICIES AND PROCEDURES

Development of a new hazardous waste management plan or updates to the existing plan should be performed to reflect the current business. The Findings and Recommendations section contains some recommendations related to policies and procedures. Additional documentation recommendations for Environment of Care include:

- Update training and training records, and document training that occurs
- Create and implement a policy for disposal of hazardous and regulated medical waste
- Provide hazard communication training
- Create and implement a spill response plan
- Conduct an eyewash and emergency shower risk assessment
- Provide DOT training for staff that sign off on waste manifests
- Create an annual waste summary broken down by month

Additionally, improvements within the facility should be considered to ensure that all the identifiable safety hazards have been discovered, and then eliminated or protected against using the most appropriate hazard control. The standard operations of work performed within all areas should be reviewed.

CLOSING

The observations and recommendations within this report are intended for use as a process review summary only. Continued and ongoing vigilance from management is extremely important to the ongoing effectiveness of a workplace safety and compliance program. The findings and recommendations contained in this report are solely based on the items observed during the time that the consultant was on-site. Additional applicable information may be made available later that would impact on this report's recommendations.

J. J. Keller®

Hazmat/Hazwaste Assessment

Let our experts determine your facility's compliance level in the management of hazardous materials and waste.

This includes a waste stream review, policies and procedures evaluation, hazardous materials inventory, labeling process examination, employee training verification, and waste collection and accumulation site inspection.

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