The Joint Commission for the Accreditation of Healthcare Organizations (JCAHO) requires health care facilities to meet performance standards in specific areas. The standards are set to achieve maximum performance for activities affecting the quality of care at the facility. To meet standards, health care facilities must develop performance improvement initiatives. These initiatives help the facility continuously improve and remain competitive.

Pollution prevention (P2) activities make great performance improvement initiatives. They can help you achieve JCAHO standards and meet rules, regulations and goals. They also promote the health of the public—keeping in line with the basic premise of health care. Meeting JCAHO Standards with Pollution Prevention, developed by the Minnesota Technical Assistance Program (MnTAP), outlines pollution prevention activities that achieve JCAHO standards included in the Comprehensive Accreditation Manual for Hospitals (CAMH)—JCAHO’s most frequently used accreditation program—and the rules regulations and goals listed below.

JCAHO CAMH Standards
The following standards have been condensed. For complete standards, refer to your CAMH, or contact JCAHO at 630/792-5000.

**EC.1, EC.1.2:** The organization plans for a safe environment and implements its plan.

**EC.1.3, EC.2.3:** The organization plans for managing hazardous materials and waste and implements its plan.

**EC.1.5, EC.2.5:** The organization plans for fire prevention and implements its plan.

**EC.2, EC.2.2:** The organization plans for employee safety and implements its plan.

**EC.2.8:** Personnel have appropriate knowledge and skills regarding the proper management and disposal of hazardous materials.

**EC.4:** The organization improves conditions in the environment.

**GO.2:** Performance improvement is financially sound.

**PI.1:** Performance improvement is system wide.

**PI.1.2:** Performance improvement is consistent with the organization’s mission as it relates to community health.

**PI.2:** Improved and new processes are well designed and consider patient safety.

**RI.1.2.2:** Patient understands outcomes of care including unanticipated outcomes.

**TX.3.4.2:** Medication recall system provides for safe disposal of recalled and discontinued medications.

**Rules, Regulations and Goals**
- Clean Air Act
- Clean Water Act
- Community Right to Know
- Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)
- Food and Drug Administration (FDA) public health notification: PVC devices containing the plasticizer DEHP
- Hazardous Materials Transportation Act
- Hazardous Spill Response (HAZWOPER)
- Hospitals for a Healthy Environment (H2E) goal: Nearly eliminate mercury by 2005.
- H2E goal: Reduce volume and toxicity of all types of waste 30 percent by 2005 and 50 percent by 2010.
- Occupational Safety and Health Administration (OSHA) Hazard Communication/Employee Right to Know
- P2 Act of 1990
- Resource Conservation and Recovery Act (RCRA)
- Spill Prevention Control Countermeasure (SPCC) Plans
- State Infectious/Regulated Medical Waste Regulations
- State requirements for pesticide applicators
- Universal Waste Rule

The first column of this document lists a P2 activity that can be adopted as a performance improvement initiative. This column gives tips on how to accomplish the initiative and outlines why the activity is important. The middle column describes how the initiative meets JCAHO standards. The third column lists rules, regulations and goals that your facility may meet by carrying out the performance improvement initiative.

**Assistance**
For help meeting JCAHO standards using pollution prevention, contact Catherine Zimmer, MnTAP health care specialist, at 612/624-4635 or 800/247-0015 from greater Minnesota.
## Pollution Prevention Activities...

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| Eliminate Mercury                             | EC.1, EC.1.2: *The organization plans for a safe environment and implements its plan.*  
Eliminating mercury provides for a safe environment by lowering the risk of spills and risk to employees, patients and visitors associated with exposure to mercury. |
|                                               | EC.4: *The organization improves conditions in the environment.*  
Eliminating mercury improves conditions in the environment by lowering the risk of spills, risk of employee, patient and visitor exposure, and reducing pollution in the community. |
|                                               | GO.2: *Performance improvement is financially sound.*  
Eliminating mercury reduces costs associated with employee, patient and visitor exposure, and waste management, storage, disposal and liability. |
|                                               | PI.1.2: *Performance improvement is consistent with the organization’s mission as it relates to community health.*  
Eliminating mercury improves community health by reducing pollution to the air, water and land. |
|                                               | PI.2: *Improved and new processes are well designed and consider patient safety.*  
Eliminating mercury improves patient safety by reducing the risk of patient exposure. |
|                                               | **Clean Water Act**, National Pollution Discharge Elimination System (NPDES) 40 Code of Federal Regulations (CFR) 122 and 403  
- Hospital wastewater, 40 CFR 460  
- Local wastewater permits. Restrict discharge of certain chemicals, heavy metals and high biological loads to sanitary sewer. |
|                                               | **RCRA**, 40 CFR 261-263  
- Requirements for hazardous waste management  
- Waste minimization sec 3002(b)  |
|                                               | **Universal Waste Rule**. Reduced regulatory requirements for batteries and mercury-containing equipment if they are recycled.  |
|                                               | **H2E goal**: Nearly eliminate mercury by 2005. |

Mercury—a toxin associated with nervous system disorders—is especially toxic to newborn babies, children and pregnant women. It can also have an adverse effect on wildlife.

H2E’s Mercury Elimination Plan provides information and resources on eliminating mercury.

Pollution Prevention Activities...
## Pollution Prevention Activities...

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<tr>
<td><strong>Reduce Solid Waste</strong></td>
<td><strong>EC.1, EC.1.2:</strong> The organization plans for a safe environment and implements its plan. Reducing solid waste provides for a safe environment by lowering the risk of pests and risk to employees, patients and visitors associated with solid waste management. <strong>EC.4:</strong> The organization improves conditions in the environment. Reducing solid waste improves conditions in the environment by lowering the risk of pests, risk of employee, patient and visitor exposure, and reducing pollution in the community. <strong>GO.2:</strong> Performance improvement is financially sound. Reducing solid waste reduces costs associated with employee, patient and visitor exposure and solid waste management, storage, disposal and liability. <strong>PI.1:</strong> Performance improvement is system wide. Reducing solid waste system-wide will improve conditions throughout the organization. <strong>PI.1.2:</strong> Performance improvement is consistent with the organization’s mission as it relates to community health. Reducing solid waste improves community health by reducing pollution to the air, water and land.</td>
<td><strong>P2 Act of 1990,</strong> <a href="#">USC Title 43 the Public Health and Welfare Chapter 133. Established P2 as a national policy and developed a hierarchy of waste management.</a> <strong>H2E goal:</strong> Reduce volume and toxicity of all types of waste 30 percent by 2005 and 50 percent by 2010.</td>
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H2E has waste reduction plans and resources available to help. [See Resources Available Online.](#)

When solid waste is incinerated pollutants that are potentially toxic are released into the air. When solid waste is landfilled chemicals may leach into the soil and ground water, potentially contaminating drinking and recreational waters.

Meeting JCAHO Standards with Pollution Prevention • Minnesota Technical Assistance Program • 612/624-1300 • 800/247-0015 • www.mntap.umn.edu • May 2003
### Pollution Prevention Activities...

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| **Reduce Infectious Waste**                   | EC.1, EC.1.2: *The organization plans for a safe environment and implements its plan.*  
Reducing infectious waste provides for a safe environment by lowering the risk to employees, patients and visitors associated with infectious waste management.  
**EC.2.8:** *Personnel have appropriate knowledge and skills regarding the proper management and disposal of hazardous materials.*  
All personnel that handle potentially infectious waste should be trained to appropriately identify, segregate and manage it.  
**EC.4:** *The organization improves conditions in the environment.*  
Reducing infectious waste improves conditions in the environment by lowering the risk of employee, patient and visitor exposure, and reducing pollution in the community.  
**GO.2:** *Performance improvement is financially sound.*  
Reducing infectious waste reduces costs associated with employee, patient and visitor exposure, and waste management, storage, disposal and liability.  
**PI.1:** *Performance improvement is system wide.*  
Reducing infectious waste system-wide will improve conditions throughout the organization.  
**PI.1.2:** *Performance improvement is consistent with the organization’s mission as it relates to community health.*  
Reducing infectious waste improves community health by reducing pollution to the air, water and land. | Clean Air Act, medical waste incinerator rules  
P2 Act of 1990, USC Title 43 the Public Health and Welfare Chapter 133. Established P2 as a national policy and developed a hierarchy of waste management.  
State Infectious/Regulated Medical Waste Regulations. Defines and describes appropriate management of infectious waste.  
**H2E goal:** Reduce volume and toxicity of all types of waste 30 percent by 2005 and 50 percent by 2010. |
## Reduce Hazardous Chemicals and Waste

To the extent possible eliminate hazardous chemicals and waste in the organization such as disinfectants, ethylene oxide, formalin, mercury, oil-based paints and paint thinner, pesticides and sterilants.

Use H2E’s Chemical Minimization Plan to help reduce hazardous chemicals and waste in the organization.

For non-hazardous alternatives the following Web resources are available:
- Sustainable Hospitals
- U.S. Environmental Protection Agency’s (EPA) Environmentally Preferable Purchasing (EPP)

### Batteries

Batteries contain heavy metals such as cadmium, lead, mercury and nickel. Reduce or eliminate the use of batteries. Use rechargeable items such as IV pumps and pagers, or use rechargeable batteries.

Recycle spent batteries where possible.

### EC.1, EC.1.2: The organization plans for a safe environment and implements its plan.

Reducing hazardous chemicals and waste provides for a safe environment by lowering the risk of spills and risk to employees, patients and visitors associated with hazardous chemicals and waste management.

### EC.2, EC.2.2: The organization plans for employee safety and implements its plan.

Reducing hazardous chemical use improves employee safety by lowering the risk of spills and risk to employees associated with hazardous chemicals and waste.

### EC.2.8: Personnel have appropriate knowledge and skills regarding the proper management and disposal of hazardous materials.

All personnel that handle potentially hazardous chemicals and waste should be trained to appropriately identify, segregate and manage them.

### EC.4: The organization improves conditions in the environment.

Reducing hazardous chemicals and waste improves conditions in the environment by lowering the risk of spills, risk of employee, patient and visitor exposure, and reducing pollution in the community.

### PI.2: Improved and new processes are well designed and consider patient safety.

Reducing hazardous chemicals and waste improves patient safety by reducing the risk of patient exposure.

### Clean Air Act, public law 101-549
- Title V permits may be required for ethylene oxide

### Clean Water Act, NPDES, 40 CFR 122 and 403
- Hospital wastewater, 40 CFR 460
- Local wastewater permits. Restrict discharge of certain chemicals, heavy metals and high biological loads to sanitary sewer.

### FIFRA. Basis for disposal, distribution, regulation, sale and use of pesticides—including algicides, disinfectants, germicides, sterilants and swimming pool compounds—in the U.S.

### P2 Act of 1990, USC Title 43 the Public Health and Welfare Chapter 133. Established P2 as a national policy and developed a hierarchy of waste management.

### RCRA, 40 CFR 261-263
- Requirements for hazardous waste management
- Waste minimization sec 3002(b)

### H2E goal: Reduce volume and toxicity of all types of waste 30 percent by 2005 and 50 percent by 2010.

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See Resources Available Online.
### Make Great Performance Improvement Initiatives

#### Reduce Hazardous Chemicals and Waste (cont.)

**Electronics, Computers, Brown Goods**

Many electronic items, such as computers, contain heavy metals like cadmium, lead and mercury in their circuit boards, casing and monitors.

Purchase products with the end in mind. Develop programs for updating old equipment and develop purchasing policies that provide for the take back of equipment.

Recycle old equipment with a reputable vendor.

Hazardous chemicals may cause or significantly contribute to increased mortality, or an increase in serious incapacitating illness.

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<td><strong>GO.2:</strong> Performance improvement is financially sound. Reducing hazardous chemicals and waste reduces costs associated with employee, patient and visitor exposure, and waste management, storage, disposal and liability.</td>
<td><strong>Universal Waste Rule.</strong> Reduced regulatory requirements for batteries and mercury-containing equipment if they are recycled.</td>
</tr>
<tr>
<td><strong>PI.1.2:</strong> Performance improvement is consistent with the organization’s mission as it relates to community health. Reducing hazardous chemicals and waste improves community health by reducing pollution to the air, water and land.</td>
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[See Resources Available Online.](#)
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| **Reduce Hazardous Chemical Spills and Exposure** | **EC.2, EC.2.2:** The organization plans for employee safety and implements its plan.  
Reducing hazardous chemical use improves employee safety by lowering the risk of spills and risk to employees associated with hazardous chemical spills and exposure. | **Clean Water Act**, NPDES, 40 CFR 122 and 403  
• Hospital wastewater, 40 CFR 460  
• Local wastewater permits. Restrict discharge of certain chemicals, heavy metals and high biological loads to sanitary sewer. |
|  | **EC.2.8:** Personnel have appropriate knowledge and skills regarding the proper management and disposal of hazardous materials.  
All personnel that handle potentially hazardous chemical spills should be trained to appropriately identify, segregate and manage them. | **Community Right to Know**, 40 CFR 302-304, 311, 312. Plan for and report to local emergency planning committee extremely hazardous substances and certain hazardous materials. |
|  | **EC.4:** The organization improves conditions in the environment.  
Reducing hazardous chemical spills improves conditions in the environment by lowering the risk of employee, patient and visitor exposure, and reducing pollution in the community. | **HAZWOPER**, 29 CFR 1910.120. Standards for safety and health protection of employees engaged in hazardous waste operations and emergency response. |
|  | **GO.2:** Performance improvement is financially sound.  
|  | **PI.1.2:** Performance improvement is consistent with the organization’s mission as it relates to community health.  
Reducing hazardous chemical spills improves community health by reducing pollution to the air, water and land. | **RCRA**, 40 CFR 261-263  
• Requirements for hazardous waste management  
• Spill residues  
• Waste minimization sec 3002(b) |
|  | **PI.2:** Improved and new processes are well designed and consider patient safety.  

H2E’s Chemical Minimization and Mercury Elimination Plans can help.

Reducing spills minimizes exposure to potentially hazardous chemicals, minimizes the potential for falls, and cuts waste disposal and labor costs due to cleanup.

[See Resources Available Online.]
# Pollution Prevention Activities...

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<td><strong>Reduce Ignitable Chemicals</strong></td>
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<tr>
<td>To the extent possible, eliminate ignitable chemical in the organization.</td>
<td><strong>EC.1, EC.1.2:</strong> The organization plans for a safe environment and implements its plan. Reducing and eliminating ignitable materials provides for a safer environment by reducing fire hazards.</td>
<td>National Fire Protection Association, 101-1997, Life Safety Code</td>
</tr>
<tr>
<td>Refer to H2E’s Chemical Minimization Plan or Material Safety Data Sheets to identify ignitable chemicals.</td>
<td><strong>EC.1.3, EC.2.3:</strong> The organization plans for managing hazardous materials and waste and implements its plan. Reducing ignitable materials makes managing hazardous materials and waste simpler. Ignitable materials are considered hazardous waste when disposed of.</td>
<td>RCRA, 40 CFR 261-263</td>
</tr>
<tr>
<td>Ignitable chemicals increase fire risk and can create indoor air quality problems.</td>
<td><strong>EC.1.5, EC.2.5:</strong> The organization plans for fire prevention and implements its plan. Reducing ignitable chemicals helps prevent fires.</td>
<td>• Requirements for hazardous waste management</td>
</tr>
<tr>
<td></td>
<td><strong>GO.2:</strong> Performance improvement is financially sound. Reducing fire risk reduces costs associated with liability.</td>
<td>• Waste minimization sec 3002(b)</td>
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<td><strong>PI.1.2:</strong> Performance improvement is consistent with the organization’s mission as it relates to community health. Fire prevention improves community health by protecting the health and property of the community.</td>
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| **Integrated Pest Management**                | EC.1, EC.1.2: *The organization plans for a safe environment and implements its plan.*  
Reducing pesticide use provides for a safe environment by lowering the risk of spills and the risk to employees, patients, and visitors associated with pest management.  
EC.2, EC.2.2: *The organization plans for employee safety and implements its plan.*  
Reducing pesticide use improves employee safety by lowering the risk of spills and risk to employees associated with pest management.  
EC.4: *The organization improves conditions in the environment.*  
Reducing pesticide use improves conditions in the environment by lowering the risk of spills, risk of employee, patient, and visitor exposure, and reducing pollution in the community.  
GO.2: *Performance improvement is financially sound.*  
Reducing pesticides reduces costs associated with employee, patient, and visitor exposure, and waste management, storage, disposal, and liability.  
PI.1.2: *Performance improvement is consistent with the organization’s mission as it relates to community health.*  
Reducing pesticide use improves community health by reducing pollution to the air, water, and land.  
PI.2: *Improved and new processes are well designed and consider patient safety.*  
Reducing pesticide use improves patient safety by reducing the risk of patient exposure. | FIFRA. Basis for disposal, distribution, regulation, sale and use of pesticides—including algicides, disinfectants, germicides, sterilants, and swimming pool compounds—in the U.S.  
P2 Act of 1990, USC Title 43 the Public Health and Welfare Chapter 133. Established P2 as a national policy and developed a hierarchy of waste management.  
State requirements for pesticide applicators.  
H2E goal: Reduce volume and toxicity of all types of waste 30 percent by 2005 and 50 percent by 2010. |
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</table>
| **Pharmaceutical Management**                 | **EC.1.3, EC.2.3:** *The organization plans for managing hazardous materials and waste and implements its plan.*  
Managing waste pharmaceuticals makes managing hazardous materials and waste simpler.  
Many waste pharmaceuticals are considered hazardous waste when disposed of.  
**EC.2.8:** *Personnel have appropriate knowledge and skills regarding the proper management and disposal of hazardous materials.*  
All personnel that handle medication should be trained to appropriately manage waste medication. | **Clean Water Act**, NPDES, 40 CFR 122 and 403  
- Hospital wastewater, 40 CFR 460  
- Local wastewater permits. Restrict discharge of certain chemicals, heavy metals and high biological loads to sanitary sewer.  
**RCRA**, 40 CFR 261-263  
- Requirements for hazardous waste management  
- Waste minimization sec 3002(b) |

Properly manage waste pharmaceuticals in the organization.

Many pharmaceuticals are considered hazardous waste when disposed of, including many chemotherapeutic agents, epinephrine, nicotine, nitroglycerin, physostigmine and warfarin.

Disposal of greater than 1 kg (2.2 lbs) in any calendar month of RCRA P-listed wastes such as arsenic trioxide, epinephrine, nicotine and warfarin (>0.3%), makes the organization a Large Quantity Generator of hazardous waste.

Trace chemotherapy waste is considered hazardous waste in Minnesota.

Reducing container size, quantity ordered and spills, and improving management can prevent pollution and reduce costs.

Mismanaged waste pharmaceuticals may cause or significantly contribute to increased mortality, or an increase in serious incapacitating illness.

Clean Water Act, NPDES, 40 CFR 122 and 403  
- Hospital wastewater, 40 CFR 460  
- Local wastewater permits. Restrict discharge of certain chemicals, heavy metals and high biological loads to sanitary sewer.  
RCRA, 40 CFR 261-263  
- Requirements for hazardous waste management  
- Waste minimization sec 3002(b)
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<td><strong>Patient Safety</strong></td>
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<td>FDA public health notification: PVC devices containing the plasticizer DEHP, June 2002</td>
</tr>
<tr>
<td>To the extent possible, eliminate polyvinyl chloride (PVC)/diethylhexyl phthalate (DEHP)-containing patient care devices in the organization such as gastric tubing, IV bags, and respiratory therapy items including tubing. Producing and incinerating PVC contributes to the formation of dioxin—a persistent bioaccumulative toxin (PBT). DEHP leaches from PVC items and can be toxic, especially to newborn males.</td>
<td><strong>PI.2:</strong> Improved and new processes are well designed and consider patient safety. Reducing or eliminating DEHP improves patient safety by reducing the risk of patient exposure. <strong>RI.1.2.2:</strong> Patient understands outcomes of care including unanticipated outcomes. Eliminating DEHP alleviates the need to explain to the patient unanticipated outcomes related to DEHP.</td>
<td><strong>P2 Act of 1990,</strong> USC Title 43 the Public Health and Welfare Chapter 133. Established P2 as a national policy and developed a hierarchy of waste management. <strong>H2E goal:</strong> Reduce volume and toxicity of all types of waste 30 percent by 2005 and 50 percent by 2010.</td>
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<td><strong>Environmentally Preferable Purchasing</strong></td>
<td><strong>EC.1, EC.1.2:</strong> The organization plans for a safe environment and implements its plan. Using environmentally preferable products provides for a safe environment by lowering the risk to employees, patients and visitors associated with hazardous material management. <strong>EC.2, EC.2.2:</strong> The organization plans for employee safety and implements its plan. Using environmentally preferable products improves employee safety by lowering the risk of spills and risk to employees associated with hazardous materials. <strong>EC.4:</strong> The organization improves conditions in the environment. Using environmentally preferable products improves conditions in the environment by lowering the risk of employee, patient and visitor exposure, and reducing pollution in the community. <strong>PI.2:</strong> Improved and new processes are well designed and consider patient safety. Using environmentally preferable products improves patient safety by reducing the risk of patient exposure to hazardous materials. <strong>Clean Air Act</strong>, public law 101-549  • Title V permits may be required for ethylene oxide <strong>Clean Water Act</strong>, NPDES, 40 CFR 122 and 403  • Hospital wastewater, 40 CFR 460  • Local wastewater permits. Restrict discharge of certain chemicals, heavy metals and high biological loads to sanitary sewer. <strong>Community Right to Know</strong>, 40 CFR 302-304, 311, 312. Plan for and report to local emergency planning committee extremely hazardous substances and certain hazardous materials. <strong>FIFRA.</strong> Basis for disposal, distribution, regulation, sale and use of pesticides—including algicides, disinfectants, germicides, sterilants and swimming pool compounds—in the U.S. <strong>OSHA Hazard Communication/Employee Right to Know,</strong> 29 CFR 1910.1200 <strong>P2 Act of 1990,</strong> USC Title 43 the Public Health and Welfare Chapter 133. Established P2 as a national policy and developed a hierarchy of waste management. <strong>RCRA,</strong> 40 CFR 261-263  • Requirements for hazardous waste management  • Waste minimization sec 3002(b) <strong>Universal Waste Rule.</strong> Reduced regulatory requirements for batteries and mercury-containing equipment if they are recycled. <strong>H2E goal.</strong> Reduce volume and toxicity of all types of waste 30 percent by 2005 and 50 percent by 2010.</td>
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For more information about EPP, and sample policies and requests for proposals, see the H2E Web site, or the EPA’s EPP site. EPP cuts waste and improves occupational safety.

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*See Resources Available Online.*
Resources Available Online

The resources below, referred to in this document, can provide additional information. These are general resources. To find out what rules and regulations your organization must meet, check local and state requirements. Find links to these resources on MnTAP’s Web page <mntap.umn.edu/health/jcaho.htm>.

- **Clean Air Act**
  - Medical waste incinerator rules
    U.S. EPA's air emission regulations for medical waste, including rules, and technical and implementation information.
  - Title V Permits
    This U.S. EPA page outlines Title V permit programs, requirements and conditions. Permit applications are also available.

- **FDA public health notification: PVC devices containing the plasticizer DEHP, June 2002**
  The FDA Department of Health and Human Services offers steps that you can take to reduce the risk of exposure to PVC devices containing DEHP.

- **FIFRA**
  Information from the Cornell Law School on environmental pesticide control including registration of pesticides, record keeping, storage, disposal, transportation and recall.

- **Hazardous Materials Transportation Act, 49 CFR 171-180**
  U.S. Department of Transportation provides information about regulations, emergency response, training and shipment requirements for transporting hazardous materials.

- **HAZWOPER, 29 CFR 1910.120**
  This U.S. OSHA page answers frequently asked questions about HAZWOPER.

- **H2E Chemical Minimization Plan**
  A source for understanding chemical hazards and how to minimize chemical use.

- **H2E EPP Information**
  A how-to guide for environmentally preferable purchasing.

- **H2E Infectious Waste Reduction Plan and Information**
  Infectious waste management resources.

- **H2E Mercury Elimination Plan**
  How to establish a mercury prevention program at your organization.

- **H2E Waste Reduction Plans and Resources**
  Waste reduction resources and an example plan.

- **OSHA Hazard Communication/Employee Right to Know, 29 CFR 1910.1200**
  - Kem Medical Products Corp.
    Information that employees have a right to know about a variety of chemicals including ethylene oxide, formaldehyde and glutaraldehyde.
  - OSHA
    OSHA outlines the Hazard Communication Standard.

- **P2 Act of 1990, USC Title 43 Chapter 133**
  This U.S. EPA page contains requirements of the act.

- **RCRA Waste Minimization Sec 3002(b)**
  U.S. EPA outlines the responsibility of waste generators to have a program in place to reduce the volume or quantity and toxicity of the waste.

- **Sustainable Hospitals**
  Resources from the Lowel Center for Sustainable Production for finding non-hazardous product alternatives, organized by product manufacturer and hazard.

- **Universal Waste Rule**
  U.S. EPA gives guidelines for dealing with waste batteries and mercury-containing equipment.

- **U.S. EPA’s EPP**
  This site provides resources for instituting EPP at your organization.

Contributors: California Health Care Pollution Prevention Group and Pier-George Zanoni, an industrial hygienist and environmental health and safety specialist for health care.