



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
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Hazardous Waste Consultation Report

I have read the explanation of the on-site technical assistance program and agree to participate in the program. I also agree to correct any and all violations of the Hazardous Waste Regulations (20NMAC 4.1) identified by the Hazardous and Radioactive Materials Bureau (HRMB), within the time period(s) agreed for each violation. I also certify that I am a responsible party (owner or manager) to the facility listed below.

Arthur Ortiz Manager 5-7-98
Signature Title Date

Facility

Facility Name: Lovelace Health Systems EPA #: NM0075769000
Facility Contact(s): Art Ortiz
Title(s) Safety Manager
Phone: 262-07505 Phone: _____
Address: 5400 Gibson Blvd. SE
Mailing Address: _____
City: Albuquerque Co.: _____ Zip: 87108
Notification Status (circle) CESQG SQG LQG TSD
Transporter Recycler Other _____

NMED/HRMB
Lead Contact: Debby Brunerhoff
Other Representatives: _____
Time On Site: 8:15 (AM/PM) Time Off Site: _____ AM/PM

Facility History & Nature

History & Nature of Business: Hospital - patient care facility, 2000 employees - since 1935

Facility LoveLace Health Systems

EPA# NM0075769.000

Process Information Page ①

Process That Generates Waste	Waste(s) Identified	Management location/how collected /ultimate destination	Waste Code	Amount Per Month
Hematology - biology filter to where? how often		Mixed chemo therapy chemicals - go to biowaste. Hood not vented - hepa filter - changed out? Filter goes to biowaste - med waste		—
		Hood cleaned out 4 x a day with alcohol & sterile water to biowaste wipe		—
Laboratory	Alcohol Formalin	Down sink - Ethyl Alcohol 72 gal/month 10% solution 30-50 gal (premixed & filled) / per week	D001 U122 40 gal/week	→ 12 gal/month → 50 gal/month → 16 gal/month
	Xylene Acetone	container - open w/ funnel - not labeled hazwaste 1-5 gal container filled every 2 days, amounts from manifests	F003 D001	68.75 gal/month 481.25 lbs/month
	D009 Mercury waste	Ethyl Alcohol - Isopropyl - Methanol - 8-10 gal. open 5 gal container 5% solution - labeled	D009	2.5 gal/month → 25 lbs/month 5 gals every 1-2 months
	Xylene	Gauge - to trash		?
	Reagents			—
Dialysis - Hemo Unit	Cleaning Machines	Dialysis - Formaldehyde 1.5 - 2 gal for 17 machines cleaning 1x a month - directly plumbed to sewer	U122	—
	Cleaning Artificial Kidneys	37% to 4% 1 gal per day (37%) - (down drain)		—
	Acetic Acid	Diluted - down to sewer		—
				—

Process That Generates Waste	Waste(s) Identified	Management location/how collected /ultimate destination	Waste Code	Amount Per Month
Anesthesia		Fluothane - Anesthetics are poured into Enflurane) containers. No spills or wipes		no waste
		Isoflurane used. Becomes a gas - no Halothane) waste		no waste
		Alcohol wipes - some discarded into biowaste bags in operating rooms		biowaste
		In Pre Op area alcohol/wipes go into trash cans -		—
Doctor Offices		Doctor offices - alcohol wipes go into trash		—

Facility Lovelace Health EPA# NM10075769000

Gibson

Process Information Page (3)

Process That Generates Waste	Waste(s) Identified	Management location/how collected /ultimate destination	Waste Code	Amount Per Month
Power Plant Engineering	Sodium Hydroxide	- Boilers drained once a year for inspection NaOH - Tetra Potassium pyrophosphate - pH - 10.0		—
	acid			—)
	CFC	3 people certified - R12 machine only never had to waste any gas R12 - R22 - 502 (no refrigerant oil)		—
	PCB ballasts	- none - except in fluorescent fixtures		—
	Cooling Tower Treatment	2-phosphonobutane 1,2,4 tricarboxylic acid (Hazardous) Sodium polytriazole (Hazardous) non-combustible, pH 10.5	D002	—
	Microbiocid	2,2 dibromo-3-nitrilo propionamide glycol, sodium bromide, tetraethyleneglycol or polyethylene		—
	Return Line Treatment	Diethylaninoethanol - Flashpoint 150°F		—
	Closed System Treatment	Sodium nitrate Sodium tetroborate decahydrate Sodium metasilicate Tolytriazole pH 11.5		—)
	Used Oil	Open - empty - 2 barrels - Amigo Petroleum Co. 3209 Broadway Blvd. SE. 1 labeled dirty oil, 1 labeled junk oil.		3 or 4 barrels a year
	4-30 gal containers	- unknown liquids - outside Bldg 11 2-55 gal (3-30 gal in small shed - N-side)		?
Solvent pants washer	Dipropylene Glycol Methyl Ether	Open - 5 gals 110°F flashpoint Aliphatic petroleum distillate	D001	Used - 5 gals 1x in 4 years

Facility Lovelace Health
Gibson

EPA# NM D075769000

Process Information Page (5)

Process That Generates Waste	Waste(s) Identified	Management location/how collected /ultimate destination	Waste Code	Amount Per Month
Waste Storage Area	Xylene Acetone	Romic Environment - pours xylene + hauls off 1x a month - hauled off - pour weekly (acetone) 2-55 gal drums - almost full - labeled but no start date.	F003 D001	68.75 gal/month 481.25 lbs/month
	Xylene	Brought down from lab in 5 gal drums When 5 drums accumulated brought in. not labeled haz waste no start date.		—
	2-5 gal Containers	Back of Haz waste area full of liquid - unknown components		10 gal
	Waste Area	- 2 way radios - everyone who enters has one. Romic has cell phone, no posted phone numbers.		—
See records		Training program. Sparkle maintenance. Trains employees on Safety Procedures		—
XRay - Radiographics How often		SW Radiographics - pumps out fixer solution waste stored in basement - labeled - no start accumulation date, contained - phone/fire extinguisher 30 feet away	Silver	476.25 gal/month 3810 lbs/month
		Developing machines - 2 - all automatic, Waste thru floor. Diagnostic Imaging		
Waste films How often + weight.	Waste films	Put into cardboard drums in radiology Basement bldg 2. Diagnostic Imaging not handled as hazardous - no manifests		280.75 lbs.

Conditions Not in Compliance Page (1)

Condition	Location	Recommended Corrective Action	Due Date
1. Formaldehyde solution off of histology samples is poured down sink	Laboratory	Either test formalin with TCLP test to see if hazardous or presume it is & handle as such	7/28 1998
2. Lab xylene-acetone containers not labeled or closed (mercury container also)	Laboratory per 262.34(e)(1) - labeled 265.173 - closed	Keep lab waste containers of xylene + acetone closed & labeled (mercurials)	7/28 1998
3. Xylene - gauze or wipes thrown away in trash	Laboratory dispose of as haz. waste	Xylene is a hazardous waste - must be collected in a closed metal container, labeled.	7/28 1998
4. Used oil drums open	Power Plant	Used oil drums must be kept closed & labeled used oil or waste oil	7/28 1998
5. X Ray films must be tested to determine if hazardous waste	X Ray (can use Total metals test which is cheaper)	Test films for silver to see if hazardous & handle correctly if positive	7/28 1998

Pollution Prevention & Waste Minimization Suggestions, Technical Assistance Referrals

- The difference between the handling of formaldehyde is if the machines are plumbed to the sewer (dialysis) then the POTW regulations apply to the waste + it is exempt from haz waste regulations (266(a)(1)(i)) Lovelace may treat formaldehyde waste on site without a permit (except thermal treatment) (several treatment methods are available) (for wipes)
- If alcohol used in Pre-Op + doctor offices has a flash point of less than 140°F - must be collected as hazardous waste or biomedical waste - check MSDS.
- Determine contents of 4 - 30 gal drums, 2 - 55 gal drums outside of Power Plant/Engineering, 3 - 30 gal drums in small shed north side of Power Plant bldg, 2 - 5 gal drums in back of Hazardous Waste Storage area (less than 90 day storage area) south side of bldg
- ~~Questions, Concerns, Comments~~ small cinder block bldg. If hazardous dispose of contents appropriately. Should be labeled + stored less than 90 days.
- Xylene waste disposal costs can be reduced by purchasing solvent still and reusing xylene.