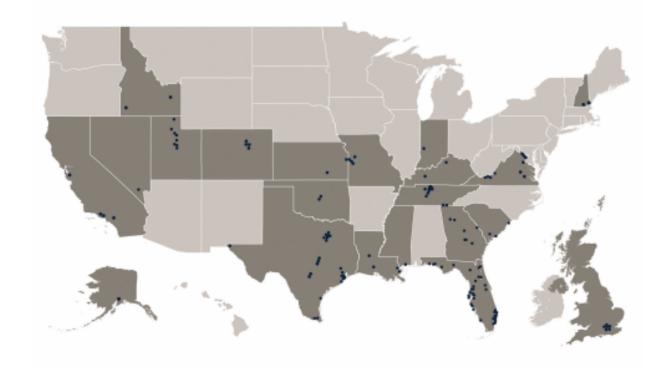
Environmental Sustainability Considerations in Healthcare Waste Streams Management

A HealthTrust Sustainability Program March 23, 2017

Anna Ward, Sustainability Manager, HCA
Chair, HCA's Waste Stream Task Force
Member, HealthTrust's ESN



171 hospitals and 118 surgery centers located in 20 states and the United Kingdom



HCA is one of the nation's leading providers of healthcare services, comprised of locally managed facilities that include 171 hospitals and 118 freestanding surgery centers in 20 states and the United Kingdom. With its founding in 1968, Nashvillebased HCA created a new model for hospital care in the United States. R. Milton Johnson is the company's chairman and CEO.

HCA Environmental Sustainability

ECHO – Environmentally Conscious Healthcare Operations

- Environmental Sustainability is an Everyday Focus at HCA
- HCA continues its comprehensive program of environmental sustainability to promote energy and water conservation, green buildings, and increase recycling and environmentally conscious purchasing
- HCA's environmental policies produce efficiency and savings



Organizational Structure

Sustainability Steering Committee provides overall guidance

- Chair is Alan Yuspeh, SVP and Chief Ethics and Compliance Officer
- Includes Operations, Facility Management, Quality, Risk and Insurance, HR, Communications, Finance, HealthTrust

Four Task Forces

- Environmentally Preferable Purchasing
- Construction and Major Renovation
- Energy & Water
- Waste Stream

Also, Sustainability Coordinators at hospitals

Sustainability Plan Updated Annually

HCA Sustainability Plan

Overall Policy

HCA is a responsible and concerned citizen of all communities where it operates. Therefore, the minimum standard for HCA's environmental stewardship is meeting or exceeding all environmental legal and regulatory standards. In addition, HCA will protect and preserve the environment through, at a minimum, the following practices:

- HCA will encourage the recycling of materials where recycling is commercially practical and the minimization, consistent with the law, of waste streams which require additional processing.
- HCA facilities will consider the effect on the indoor environment before introducing a new product into the facility.
- HCA will encourage the continued reduction of energy usage throughout its facilities.
- HCA will evaluate, and where appropriate, incorporate environmentallypreferable alternatives when designing new construction and major renovations.

Standards

HCA Sustainability Plan

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Working With the Healthcare Sector

- All HCA facilities are members of Practice Greenhealth (PGH)
- HCA facilities contribute to PGH's Annual Sustainability Benchmark Report
- HCA joined six other large health systems to form the three-year Healthier Hospitals Initiative
- HCA facilities take part in the Healthier Hospitals (HH) Less Waste Challenge
- HCA facilities contribute to HH's Sustainability Milestone Report
- HCA is a founding sponsor of the Greening the Operating Room initiative – seeks to identify key interventions that can reduce waste, energy and worker exposure to hazardous chemicals

Possible Ways to Include Environmental Sustainability in Waste Stream Discussions

- Environment of Care Committee (EOC)
- CEO appointed liason to EOC
- Sustainability Coordinators
- Green Teams
- Engaged employees
- Local projects
- Projects in a larger setting
- In some cases, vendors work directly with facilities
- Communication

Examples of Communicating Collective Impact





Examples of Communicating Waste Stream

- Between 2012 and 2014
 HCA facilities recycled
 - 119 million pounds of cardboard, paper, aluminum and wood waste
 - 58,977 pounds of rechargeable batteries
 - 229 million pounds of construction debris, an amount similar to more than 64,000 mid-size cars
 - And diverted 3.1 million pounds of waste from landfills by reprocessing single-use devices

Many types of waste disposal are regulated by the U.S. Environmental Protection Agency, yet that includes less than five percent of pharmaceutical waste generated at HCA facilities. HCA's proactive pharmaceutical waste program reduces the drugs going into the water supply by at least 90 percent.

Example Waste Streams

- Integrated Waste Management
- Pharmaceutical Waste
- Hazardous Waste, Universal Waste
- Infectious Waste
- Mercury Reduction
- Rechargeable Battery Recycling and alkaline
- Cardboard/duplex printing
- Food Waste, increasing composting
- Category A Waste (Ebola)

Example Industry Waste Disposal Volumes



Identifying Items - Simplified and Streamlined

- Recyclables
- Hazardous, Universal Waste
- Non-hazardous pharmaceutical waste
- Original Equipment Manufacturer (OEM) designated Single
 Use Devices reprocessing
- Food waste vs. composting (and food donation before waste!)
- Pharmaceutical waste vs. Regulated Medical Waste (RMW)



Examples – Considering Environmental Sustainability

Solid Waste or Universal Waste

- Cardboard & Pallets
- Kitchen Grease/Oil
- Remaining food, food waste, composting
- Shredded documents & mixed paper
- Batteries & Electronic-waste
- Cans-aluminum & mixed plastics
- Fluorescent tubes
- Blue Wrap

Reprocessing – different, but more than one use!

In Motion



How Do You Address Electronics?



How Do You Address Organics?





How Do You Address Reprocessing?



These could include items such as blood pressure cuffs and pulse oximeter probes, as well as diagnostic catheters and multiple devices used in the operating room.

All reprocessed items are FDA-approved, which means that they meet the same standards as other equipment. Facilities collect and send for reprocessing some of the medical devices they have used, which reduces waste and lowers costs for hospitals.

Tips: Planning Effective Waste Management

Selecting locations for bins – considering facilities needs

- Walk the facility get to know people
- Teams & individual responsibilities
- Policies & implementation tools
- Dock space
- Internal space at facility
- Access during work flow
- Access to others?



Tips: Supporting Effective Waste Management

Education and Communication

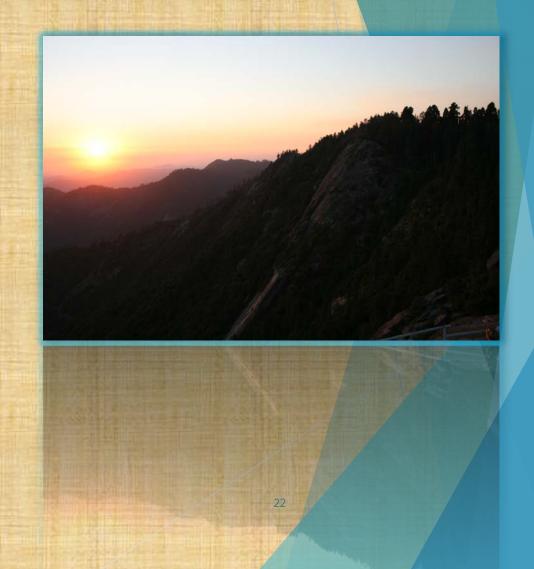
- Define and use communication standards
- Policies and implementation tools
- Train staff which staff and department(s)
- On all items?
- Request feedback



Tips: Continuing Effective Waste Management

Quality Assurance and Compliance

- Walk the floors get to know people
- Test, conduct audits and assessment
- Provide results
- Request feedback
- Be able to respond to feedback
- Adjust as needed



Addressing Waste From the Operating Room

Types of Recycled Plastics

- Irrigation bottles
- Blue wrap
- Skin prep solution bottles
- Trays
- Basins

- Rigid Inserts
- Overwraps
- Tyvek
- Urinals/bedpans
- · Other?

Regulated Medical Waste (RMW)

Pharmaceutical Waste

Example Pharmaceutical Waste Standards

- Environmental (EPA)
- Drug Enforcement (DEA)
- Transportation (DOT)
- Safety and Health (DOL –
 OSHA)

- Safety and Health Illness (CDC – NIOSH)
- Food and Drug (FDA)
- Pharmacopeil Convention (UPS Chapter 800)
- State and Local and Community

Environmental Protection Agency (EPA)

The Resource Conservation and Recovery Act (RCRA).

Hazardous wastes cradle to grave:

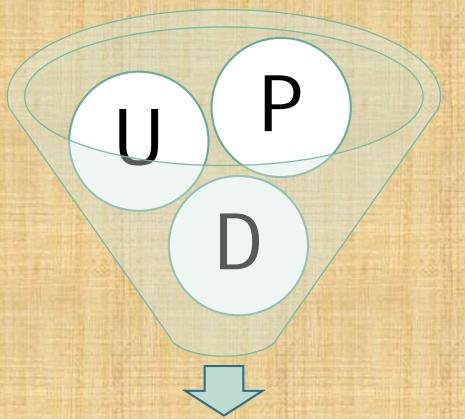
- Generation
- Storage
- Transportation
- Treatment
- Disposal



Pharmaceutical Waste Under RCRA

- U-listed (toxicity) and example
- Sole active ingredient; unused
- Choloral hydrate
- P-listed (acutely hazardous) and examples
- Unused, and empty packaging
- Warfarin >0.3%, nicotine, physostigmine, arsenic trioxide
- D codes (characteristic hazardous waste)
- Ignitability creating or exacerbating a fire
- Corrosivity highly acidic or highly basic
- Reactivity unstable under normal conditions
- Toxicity Toxicity Characteristic Leaching Procedure (TCLP)

Percentage of Hazardous Pharmaceutical Waste Under RCRA?



Likely to be less than 5%

Tips From Earlier Slides Are Applicable Here

Tips: Planning Effective Waste Management

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Quality Assurance and Compliance . Walk the floors – get to know people

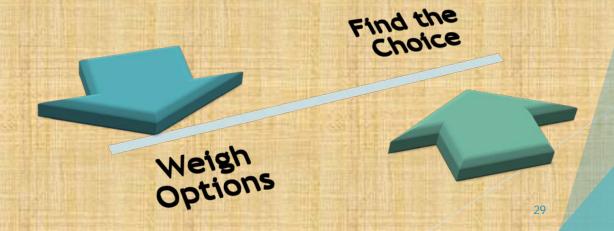
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Possible Pharmaceutical Waste Management

Considerations

- How much hazardous waste is generated?
- Inventory analysis?
- Education and implementation?
- Consultant?
- Set-up for different pharmaceutical waste generation points?



Pharmaceutical Waste Satellite Accumulation Areas

Examples:

- Pharmacy
- Nursing Stations
- Medical-Surgical Care Areas
- Inpatient Critical Care Areas
- Operating Rooms
- Emergency Room
- Different bins?

Example Waste Stream Management Options



 Hazardous pharmaceutical waste – federally permitted RCRA incinerator (separate bins for aerosols and oxidizers)



• Non-hazardous – usually municipal incinerator special waste

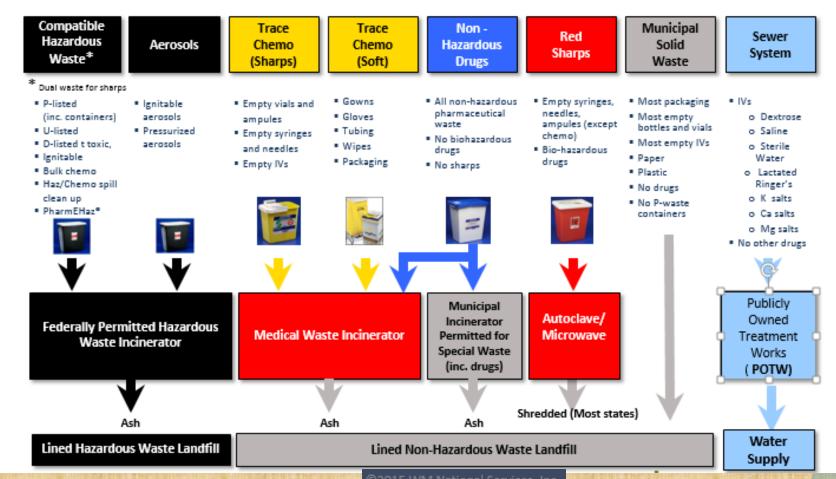


Trace chemotherapy – usually medical waste incinerator



• Biohazardous waste – autoclave, microwave, incinerator

Example Pharmaceutical Waste Disposal



Considerations for Controlled Substances

Example:

- DEA rule published Federal Register 09/09/14
- DEA 10/17/14 "Dear Practitioner"
- Is this inventory?
- Is this waste?



EPA hazardous waste considerations

Pharmaceutical Waste Management Practices Considering Sustainability

- Managing Pharmaceutical Waste, a 10-step Blueprint for Healthcare Facilities in the U.S.
 - Practice Greenhealth and EPA
 - 2006, revised 2008
 - Referenced in EPA's Sept. 25, 2015 proposed rule for Subpart P:
 Management Standards for Hazardous Waste Pharmaceuticals

Tips: Including Waste Vendor in the Conversation

- Storage locations
- Frequency of pickup
- Who moves from rooms/floors
- Who is the contact (turnover?)
- Locating the right person for signature/approvals
- Vendor's choices?
 - Code of Conduct?
 - Training?
 - Ineligible Persons (contracting/payment)?
 - Environmental Sustainability?

Recap: Considering Environmental Sustainability in Waste Stream Management

- Generating waste cannot be completely avoided
- Discuss environmental sustainability and waste stream generating, reducing, shifting and managing
- This is not a solo effort
- Waste stream is not static
- Work with your employees get input, understand impact on operations, provide feedback about what you are doing
- Consider industry goals
- Partner with your vendors
- Communicate often

Presenter's Contact Information

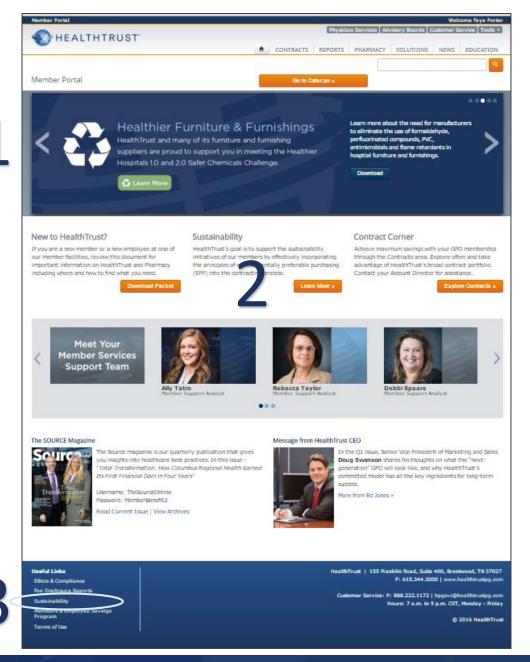
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HealthTrust Sustainability Resources https://members.healthtrustpg.com/

Member Portal

- Sustainability resources added to the Member Portal
- Three ways to find Sustainability info from the home page



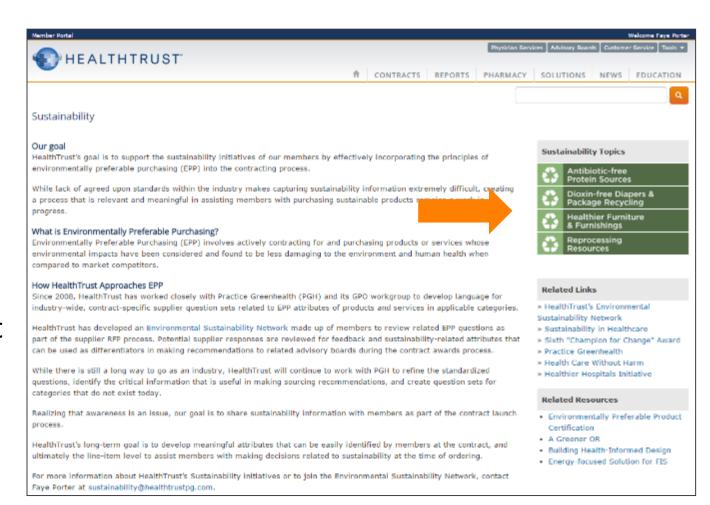






Graphic bars created for easy recognition of sustainability initiatives on:

- Sustainabilit y page
- Related contract pages (i.e., food, FIS)





HealthTrust 2017 Sustainability Webinar Series

Upcoming Sustainability Webinars:

- April 27: Safer chemicals and healthier food
- May 25: Transportation, LEED buildings, community connections
- June 7: Easy sustainability wins with EVS

Register for webinars at www.healthtrustpg.com/education

View past sustainability programs in the "On-demand" section at: www.healthtrustpg.com/education