Overview
The NYC Department of Environmental Protection (DEP) oversees the use and storage of hazardous substances that pose a threat to public health and the environment in New York City through its Right-to-Know (RTK) Program. The RTK Program requires businesses and facilities to file an annual Tier II report detailing the quantity, location, and chemical nature of every hazardous substance stored within their facilities throughout the five boroughs. The DEP then conducts annual inspections for each site reporting hazardous chemicals.

EHS is available to aid with inspections, but Practice Managers and staff at clinical locations must be knowledgeable and know how to respond to a DEP inspector and assist with the annual RTK inspection.

Frequently Asked Questions

- Who reports chemical inventories to the DEP?
  - Each practice is responsible for keeping a Salute inventory log of chemicals (e.g., anything flammable, corrosive, toxic, etc.) and compressed gasses (e.g., oxygen) kept on site.
  - EHS files the annual DEP-RTK report based on the Salute inventory record.

- What clinical locations does EHS currently report for?
  - As of 2021, EHS has reported inventories for the following clinical locations:

<table>
<thead>
<tr>
<th>Building Code</th>
<th>Building Name</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>CL</td>
<td>Chelsea Clinic</td>
<td>53 West 23rd Street</td>
</tr>
<tr>
<td>DV</td>
<td>DV Building</td>
<td>425 East 61 Street</td>
</tr>
<tr>
<td>EP</td>
<td>East Side Phys Expansion</td>
<td>215 East 85th Street</td>
</tr>
<tr>
<td>ES</td>
<td>East Side Physician Office</td>
<td>211 East 80th Street</td>
</tr>
<tr>
<td>LM*</td>
<td>Wellness Center</td>
<td>170 William Street</td>
</tr>
<tr>
<td>MR</td>
<td>MRI Center</td>
<td>416 East 55th Street</td>
</tr>
<tr>
<td>WM</td>
<td>156 William Street</td>
<td>156 William Street</td>
</tr>
<tr>
<td>WO</td>
<td>Worth Street Building</td>
<td>40 Worth Street</td>
</tr>
<tr>
<td>WP</td>
<td>West Side Practice</td>
<td>2315 Broadway</td>
</tr>
<tr>
<td>WS</td>
<td>West Side Physician Office</td>
<td>12 West 72nd Street</td>
</tr>
<tr>
<td>WE</td>
<td>232 West 80th Street</td>
<td>232 West 80th Street</td>
</tr>
</tbody>
</table>

*The practice at LM building has closed and EHS will no longer report for 2022.

- What is involved in the inspection?
  - Every year, the DEP inspects each reporting site.
  - This is a quality assurance inspection to check our reports for accuracy and chemical storage conditions.
  - Inspectors are escorted by practice managers, head nurses, or EHS.
  - Inspectors are shown where and how chemicals are stored (e.g., practice room, storage closet, etc.).
  - Inspectors may ask how staff has access to SDS (Chemwatch).

- When do inspections occur?
  - Inspections are unannounced. If EHS gets an advanced warning, we will notify you.
CONTINUED: DEP-RTK Inspections of Clinical Locations

- You can call EHS for assistance with an inspection (646-962-7233).
- DEP inspectors should introduce themselves and show identification.
- You can call 212-490-4179 to confirm this is a real inspection.

**What happens after the inspection?**
- The DEP will send a follow-up email summarizing the results to EHS after an inspection is complete.
- If no violation is issued, there is no follow-up needed.

**What if there is a problem?**
- DEP can issue fines for improper reporting, storage, or being denied entry to a facility.
- First Violation: $250-$2,500. Second Violation: $1,750-$5,000. Subsequent Violation: $3,750-$10,000

**What can you do to be prepared for a DEP inspection?**
- Log in to Salute, check your chemical inventory for accuracy, and make edits as needed.
- Contact EHS (ehs@med.cornell.edu) for help with access to Salute or creating a new inventory.
- Consult the EHS Update: Chemical Storage and Segregation.
- Educate Staff on access to Safety Data Sheets (SDS) and how to escort an inspector.
- Notify EHS of any changes in Practice Managers or site locations.
- Contact EHS if you have any questions or would like to arrange training:
  - 646-962-7233 (immediate attention or inspector is on-site)
  - ehs@med.cornell.edu (request training)