DEP Right to Know Inspections of Clinical Locations



Overview

The NYC Department of Environmental Protection (DEP) oversees the use and storage of hazardous substances that threaten 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 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 <u>practice is responsible for keeping a Salute inventory</u> 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 2022, EHS has reported inventories for the following clinical locations:

Building Code	Building Name	Address
CL	Chelsea Clinic	53 West 23rd Street
DV	DV Building	425 East 61st Street
EP	East Side Phys Expansion	215 East 85th Street
ES	East Side Physician Office	211 East 80th Street
MR	MRI Center	416 East 55th Street
OX	Oxford Building	428 East 72nd Street
WM	156 William Street	156 William Street
WO	Worth Street Building	40 Worth Street
WP	West Side Practice	2315 Broadway
WS	West Side Physician Office	12 West 72nd Street
WE	232 West 80th Street	232 West 80th Street

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.
- \circ Inspectors are escorted by practice managers, head nurses, or EHS.
- o Inspectors are shown where and how chemicals are stored (e.g., practice room, storage closet, etc.).
- o Inspectors may ask how the staff can access SDS (Chemwatch).

When do inspections occur?

- Inspections are unannounced. If EHS gets an advanced warning, we will notify you.
- You can call EHS for assistance with an inspection (646-962-7233).



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- 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.
 - o If no violation is issued, no follow-up is 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 edit as needed.
 - Contact EHS (ehs@med.cornell.edu) to help access Salute or create 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)