

# Medical Waste Management Act Training

CUPA Program and Stormwater Workshop 2021

November 18, 2021

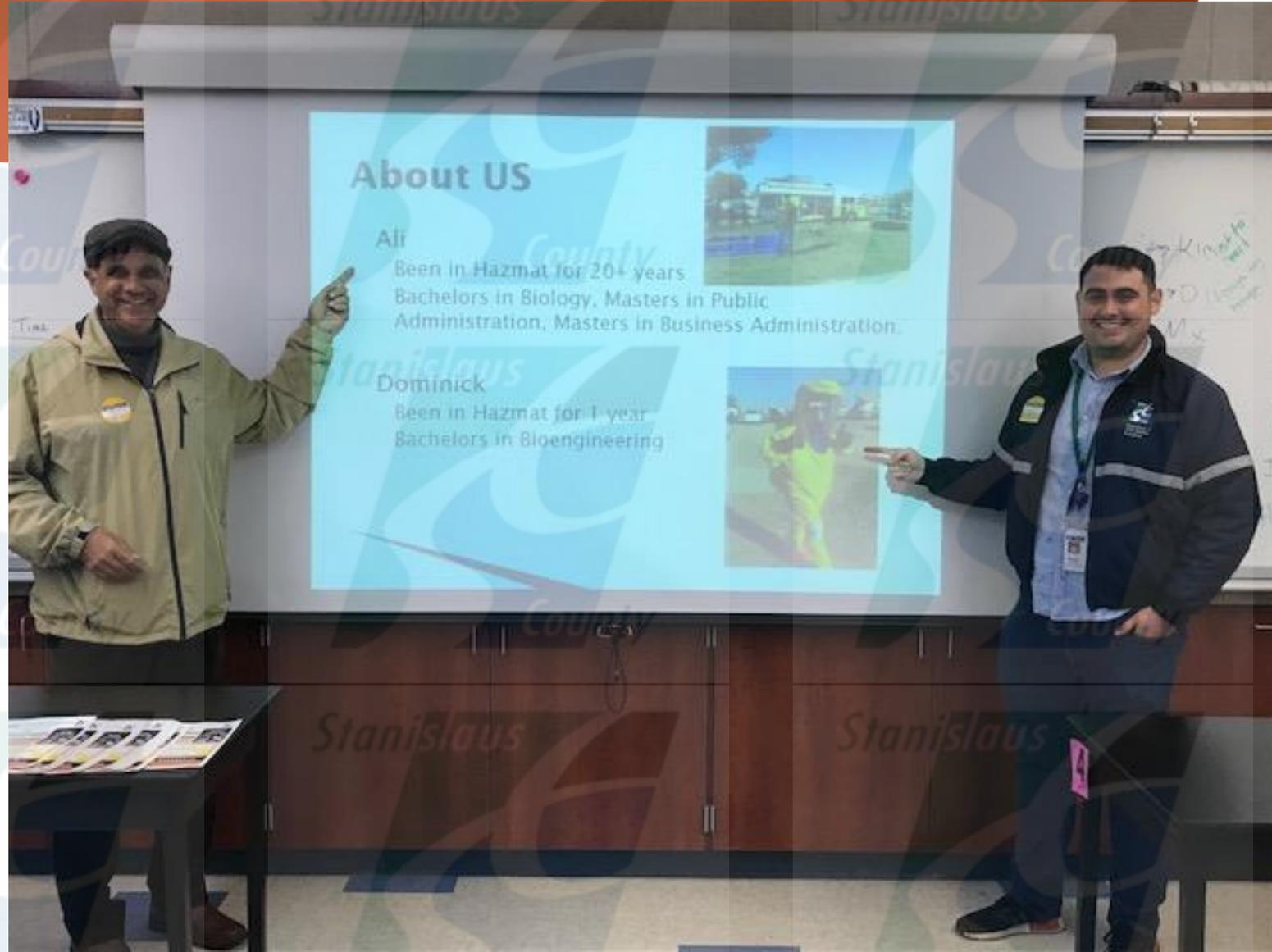
Stephanie Freier and Ali Arshad



# Prepared By:

- ▶ **Ali Arshad and Dominick Salazar** (left to right in photo) from “**Medical Waste Inspection Training**”, August 2021 for Stanislaus County Hazardous Materials Division.
- ▶ Edited by Stephanie Freier.

**Disclaimer: This training is for informational purposes only and includes no endorsement of products or services.**



# Overview

- ▶ Overview of the Medical Waste Management Act
- ▶ Medical Waste Definitions
- ▶ Medical Waste Generator requirements
- ▶ Large vs. Small Quantity Generators
- ▶ Types of Medical Waste streams
- ▶ Containment, storage and disposal requirements
- ▶ Medical Waste Management Plan
- ▶ Inspection process
- ▶ Common violations



# Medical Waste Management Act

- ▶ California Health and Safety Code Sections 117600 – 118360
- ▶ Governs medical waste management at the **facility where waste is generated, transfer stations, and treatment facilities.**
- ▶ Chapters that are most important for Medical Waste Generators and CUPA Inspectors are:
  - ▶ Chapters 1-5, 9 (Most inspections only deal with these)
  - ▶ Chapters 7 and 8 (Medical waste treatment)

## MEDICAL WASTE MANAGEMENT ACT

**JANUARY 2017**

CALIFORNIA HEALTH AND SAFETY CODE  
SECTIONS 117600 - 118360

CALIFORNIA DEPARTMENT OF PUBLIC HEALTH  
MEDICAL WASTE MANAGEMENT PROGRAM  
1616 CAPITOL AVENUE, MS-7405  
P. O. Box 997377  
SACRAMENTO, CA 95899-7377

# Medical Waste Definition

## HSC §117690

- ▶ (a) “Medical Waste” - **any biohazardous, pathology, pharmaceutical, or trace chemotherapy waste...sharps...wastes generated in:**
  - ▶ **health care setting in the diagnosis, treatment, immunization, or care of humans or animals**
  - ▶ **waste generated in autopsy or necropsy**
  - ▶ **waste generated during preparation of a body for final disposition such as cremation or interment**
  - ▶ **waste generated in research pertaining to the production or testing of microbiologicals**

# Medical Waste Definition

## HSC §117690

- ▶ waste generated in **research using human or animal pathogens**
- ▶ sharps and laboratory waste that **poses a potential risk of infection to humans generated in the inoculation of animals in commercial farming operations**
- ▶ waste generated from the **consolidation of home-generated sharps**
- ▶ waste generated in the **cleanup of trauma scenes**

# Not Medical Waste

## HSC § 117700

### “Not Medical Waste”

▶ Medical waste **does not include any of the following:**

- ▶ (a) Waste generated in **food processing or biotechnology that does not contain an infectious agent** as defined in Section 117675.
- ▶ (b) Waste generated in **biotechnology that does not contain human blood or blood products or animal blood or blood products suspected of being contaminated with infectious agents known to be communicable to humans.**
- ▶ (c) **Urine, feces, saliva, sputum, nasal secretions, sweat, tears, or vomitus, unless it contains fluid blood**, as provided in subdivision (d) of Section 117635.

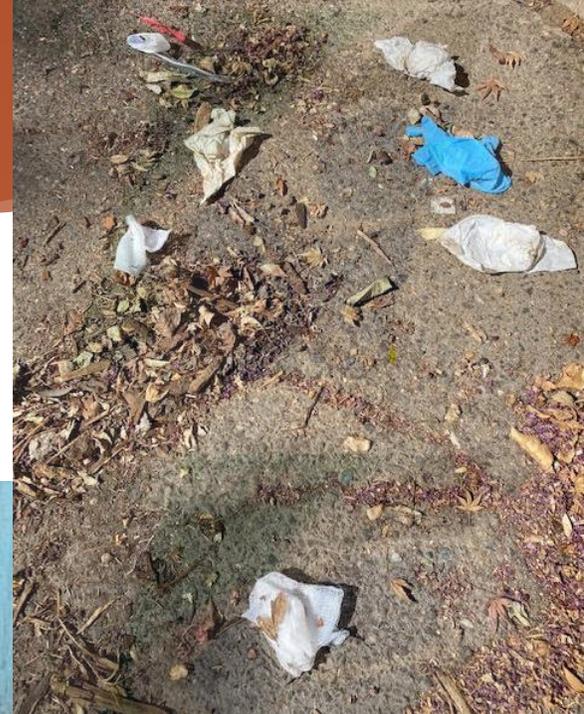
# Not Medical Waste

## HSC § 117700

- ▶ (d) Waste which is not biohazardous, such as **paper towels, paper products, articles containing non-fluid blood, and other medical solid waste products** commonly found in the facilities of medical waste generators.
- ▶ (e) **Hazardous waste, radioactive waste, or household waste**, including, but not limited to, **home-generated sharps waste**, as defined in Section 117671.
- ▶ (f) Waste generated from normal and legal veterinarian, agricultural, and animal livestock management practices **on a farm or ranch**.

# Not Medical Waste

- ▶ Waste Examples from a Medical Facility That Are Not “Medical Waste”



# Not Medical Waste



# Important Definitions (Medical Waste Management Act - Chapter 2)

- ▶ 117630 - Biohazard Bag
- ▶ 117640 - Common Storage Facility
- ▶ 117645 - Container
- ▶ 117647 - Empty
- ▶ 117695 - Treated Medical Waste
- ▶ 117705 - Medical Waste Generator
- ▶ 117710 - Medical Waste Management Plan
- ▶ 117715 - Medical Waste Permit
- ▶ 117720 - Medical Waste Registration
- ▶ 117725 - Medical Waste Treatment Facility
- ▶ 117730 - Mixed Waste
- ▶ 117747 - Pharmaceutical
- ▶ 117750 - Sharps Container
- ▶ 117765 - Storage
- ▶ 117770 - Tracking Document
- ▶ 117780 - Treatment

# Important Definition

## HSC § 117630 - Biohazard Bag

12

- ▶ (a) “Biohazard bag” means a disposable film bag used to contain medical waste. Notwithstanding subdivision (b) of Section 117605, the film bags that are **used to line the United States Department of Transportation (USDOT)-approved shipping containers** for transport from the generator’s facility onto roadways and into commerce to a treatment and disposal facility shall be marked and certified by the manufacturer as having **passed the tests prescribed for tear resistance** in the American Society for Testing Materials (ASTM) D1922, “Standard Test Method for Propagation Tear Resistance of Plastic Film and Thin Sheeting by Pendulum Method” **and for impact resistance** in ASTM D1709, “Standard Test Methods for Impact Resistance of Plastic Film by the Free-Falling Dart Method,” as those documents were published on January 1, 2014.  
The film bag shall **meet an impact resistance of 165 grams and a tearing resistance of 480 grams in both parallel and perpendicular planes with respect to the length of the bag.**

# Important Definition

## HSC § 117630 - Biohazard Bag

- ▶ (b) The biohazard bag that is used to collect medical waste within a facility shall be manufacturer certified to meet the ASTM D1709 **dart drop test**, provided that when the bag is prepared for transport offsite, it is **placed into a USDOT-approved container** lined with a biohazard bag that is ASTM D1709 and ASTM D1922 certified.
- ▶ (c) The **color of the bag shall be red, except when yellow bags are used to further segregate trace chemotherapy waste and white bags are used to further segregate pathology waste.** The biohazard bag shall be **marked with the international biohazard symbol** and may be labeled by reference as authorized by the USDOT.



## Biohazardous Waste



Red Biohazard Bag



## Trace Chemotherapy Waste

The following colored (**red**, **yellow**, and **white**) biohazard bags can be used for the following medical waste streams:



Red Biohazard Bag

Or



Yellow Biohazard Bag



## Pathology Waste



Red Biohazard Bag

Or



White Biohazard Bag



**NOTE: All outer biohazard bags shall be marked and certified ASTM 1709 and 1922 if transported offsite.**

# Terminology



## BIOHAZARD BAGS

(Red, yellow, white biohazard bag with a biohazard symbol; marked and certified ASTM 1709 and 1922 if transported offsite)

## SPECIMEN BAGS

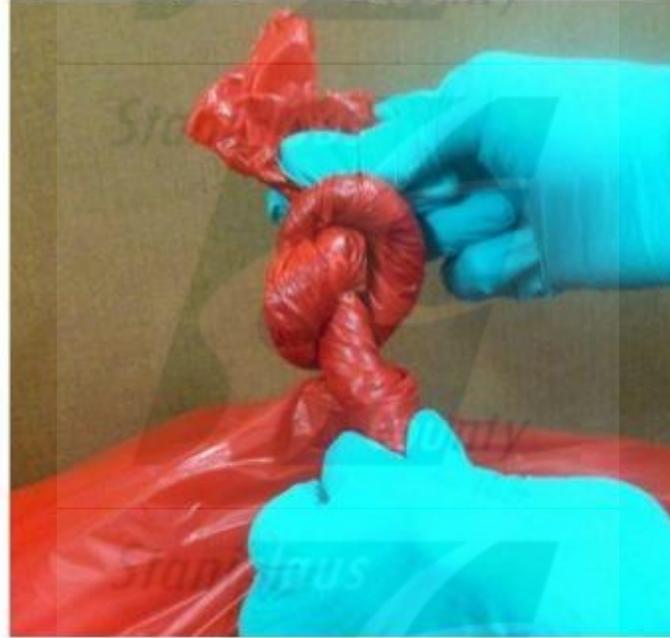
(Clear plastic bag with a biohazard symbol)

# Twist and Tie ALL Bags Tight

Gooseneck- Zip Tie or Tape.



Simple Single Knot



Twist and Tape. Tight



Twist and Zip Tie. Tight



# Important Definition

## HSC § 117640 – Common Storage Facility

“Common storage facility”

- ▶ Any **designated accumulation area that is onsite** and is **used by small quantity generators** otherwise **operating independently** for the **storage of medical waste for collection by a registered hazardous waste hauler.**

# Important Definition

## HSC § 117645 - Container

### “Container”

- ▶ **Rigid container** in which the medical waste is placed **prior to transporting** for purposes of storage or treatment.

# Important Definition

## HSC § 117647 - Empty

“Empty” - a condition achieved when tubing, a container, or inner liner removed from a container that previously contained liquid or solid material, including, but not limited to, a chemotherapeutic agent, is considered empty. The tubing, container, or inner liner removed from the container shall be considered empty if it has been emptied so that the following conditions are met:

- ▶ (a) If the material that the tubing, container, or inner liner held **is pourable**, **no material can be poured or drained** from the tubing, container, or inner liner when held in any orientation, including, but not limited to, **when tilted or inverted**.
- ▶ (b) If the material that the container or inner liner held **is not pourable**, **no material or waste remains in the container or inner liner that can feasibly be removed by scraping**.

# Important Definition

## HSC § 117780 - Treatment

### “Treatment”

- ▶ Any method, technique, or process designed to change or destroy the biological character or composition of any medical waste so as to **eliminate its potential for causing disease or creating public or environmental harm**



## Main Treatment Methods

- Steam Sterilization (Autoclave)
- Incineration

# Treatment Methods



# Important Definition

## HSC § 117695 - Treated Medical Waste

“Treated Medical Waste”

- ▶ **Medical waste that has been treated** in accordance with the provisions of the Medical Waste Management Act, Chapter 8 (commencing with Section 118215), and that is not otherwise hazardous, **shall thereafter be considered solid waste** as defined in Section 40191 of the Public Resources Code **and not medical waste.**

# What Happens To Treated Medical Waste?

**1. Treated medical waste is trucked to landfill and buried in an area dedicated exclusively to treated medical waste.**



**2. Heavy Equipment Operator at the landfill drives a bulldozer and a compactor repeatedly over the treated medical waste.**



**3. Treated medical waste is covered with other waste and soil.**

# Important Definition

## HSC § 117705 - Medical Waste Generator

“Medical waste generator”

- ▶ **Any person whose act or process produces medical waste and includes**, but is not limited to, a provider of health care, as defined in Section 56.05 of the Civil Code. All of the following are **examples of businesses that generate medical waste**:
- ▶ (a) **Medical and dental offices, clinics, hospitals, surgery centers, laboratories, research laboratories, unlicensed health facilities**, those facilities required to be licensed pursuant to Division 2 (commencing with Section 1200), **chronic dialysis clinics**, as regulated pursuant to Division 2 (commencing with Section 1200), and **education and research facilities**.
- ▶ (b) **Veterinary offices, veterinary clinics, and veterinary hospitals.**
- ▶ (c) **Pet shops.**
- ▶ (d) **Trauma scene waste management practitioners.**

# Important Definition

## HSC § 117710 - Medical Waste Management Plan

“Medical waste management plan”

- ▶ A document that is completed by generators of medical waste that **describes how the medical waste generated at their facility shall be segregated, handled, stored, packaged, treated, or shipped for treatment**, as applicable, pursuant to Section 117935 for small quantity generators and Section 117960 for large quantity generators, on forms prepared by the enforcement agency, if those forms are provided by the enforcement agency.

# Important Definition

## HSC § 117715 - Medical Waste Permit

“Medical waste permit”

- ▶ A permit issued by the enforcement agency to a **medical waste treatment facility**

# Important Definition

## HSC § 117720 - Medical Waste Registration

“Medical waste registration”

- ▶ A registration issued by the enforcement agency to a **medical waste generator**

## Important Definition

# HSC § 117725 - Medical Waste Treatment Facility

- ▶ (a) “Medical waste treatment facility”
  - ▶ All land and structures, and other appurtenances or improvements on the land under the control of the treatment facility, **used for treating medical waste offsite from a medical waste generator**, including all associated handling and storage of medical waste as permitted by the department.
  
- ▶ (b) For purposes of this section, **land is under the control of the treatment facility if it is owned, rented, or controlled by contractual agreement.**

# Important Definition

## HSC § 117730 - Mixed Waste

“Mixed waste”

- ▶ **Mixtures of medical and non-medical waste.** Mixed waste is medical waste, except for all of the following:
- ▶ (a) Medical waste and hazardous waste is hazardous waste and is subject to regulation as specified in the statutes and regulations applicable to **hazardous waste**.
- ▶ (b) Medical waste and radioactive waste is radioactive waste and is subject to regulation as specified in the statutes and regulations applicable to **radioactive waste**.
- ▶ (c) Medical waste, hazardous waste, and radioactive waste is radioactive mixed waste and is subject to regulation as specified in the statutes and regulations applicable to **hazardous waste and radioactive waste**.

# HSC § 117820 - Medical Waste Management Program (What CUPA Inspectors do)

30

- ▶ A medical waste management program shall include, but not be limited to, all of the following:
  - ▶ (a) **Issuing medical waste registrations and permits** pursuant to the Medical Waste Management Act.
  - ▶ (b) Processing and reviewing the medical waste management plans and inspecting onsite treatment facilities in accordance with Chapter 4 (commencing with Section 117925) for all **small quantity medical waste** generators required to be registered.
  - ▶ (c) Conducting an evaluation, inspection, or records review for all facilities or persons issued a **large quantity medical waste** registration pursuant to Chapter 5 (commencing with Section 117950) or issued a permit for an onsite medical waste treatment facility pursuant to Chapter 7 (commencing with Section 118130).

# HSC § 117820 - Medical Waste Management Program (What CUPA Inspectors do)

31

- ▶ (d) Inspecting **medical waste generators** in response to **complaints or emergency incidents**, or as part of an investigation or evaluation of the implementation of the medical waste management plan.
- ▶ (e) Inspecting **medical waste treatment facilities** in response to a **complaint or as part of an investigation or emergency incident**.
- ▶ (f) Taking enforcement action for the suspension or revocation of medical waste permits issued by the local agency pursuant to this part.
- ▶ (g) Referring or initiating proceedings for civil or criminal prosecution of violations specified in Chapter 10 (commencing with Section 118335).
- ▶ (h) Reporting in a manner determined by the department so that the **statewide effectiveness of the program can be determined**.

# Medical Waste Generator Status

## ▶ 117760 - Small Quantity Generator

“Small quantity generator” means a medical waste generator, *other than a trauma scene waste management practitioner*, that generates **less than 200 pounds per month** of medical waste.

- ▶ SQG requirements are found in chapter 4 of the Medical Waste Management Act (MWMA).

## ▶ 117680 - Large Quantity Generator

“Large quantity generator” means a medical waste generator, *other than a trauma scene waste management practitioner*, that generates **200 or more pounds** of medical waste **in any month of a 12-month period**.

- ▶ LQG requirements are found in chapter 5 of MWMA

# Registration

## SQG

- ▶ (a) Each small quantity generator using onsite steam sterilization, incineration, or microwave technology **to treat medical waste** shall register with the enforcement agency. Small quantity generators **owning or operating a medical waste treatment facility** shall also apply for a permit for that treatment facility pursuant to MWMA Chapter 7 (commencing with Section 118130).
- ▶ (b) Small quantity generators using onsite treatment, as specified in subdivision (a), that **operate as a business in the same building**, or that are **associated with a group practice in the same building**, may register as **one generator**.

# Registration

## SQG

- ▶ (c) Small quantity generators using onsite treatment, as specified in subdivision (a), as specified in subdivision (b), **operating in different buildings on the same or adjacent property**, or as approved by the enforcement agency, may register as **one generator**.
- ▶ (d) “Adjacent,” for purposes of subdivision (c), means real property within 400 yards from the property boundary of the primary registration site.
- ▶ Valid for **2 years**.

# Registration

## LQG

- ▶ (a) Each large quantity generator, except as specified in subdivisions (b) and (c), shall register with the enforcement agency prior to commencement of the generation of medical waste.
- ▶ (b) Large quantity generators **operating as a business in the same building**, or that are associated with a **group practice in the same building**, may register as **one generator**.

# Registration

## LQG

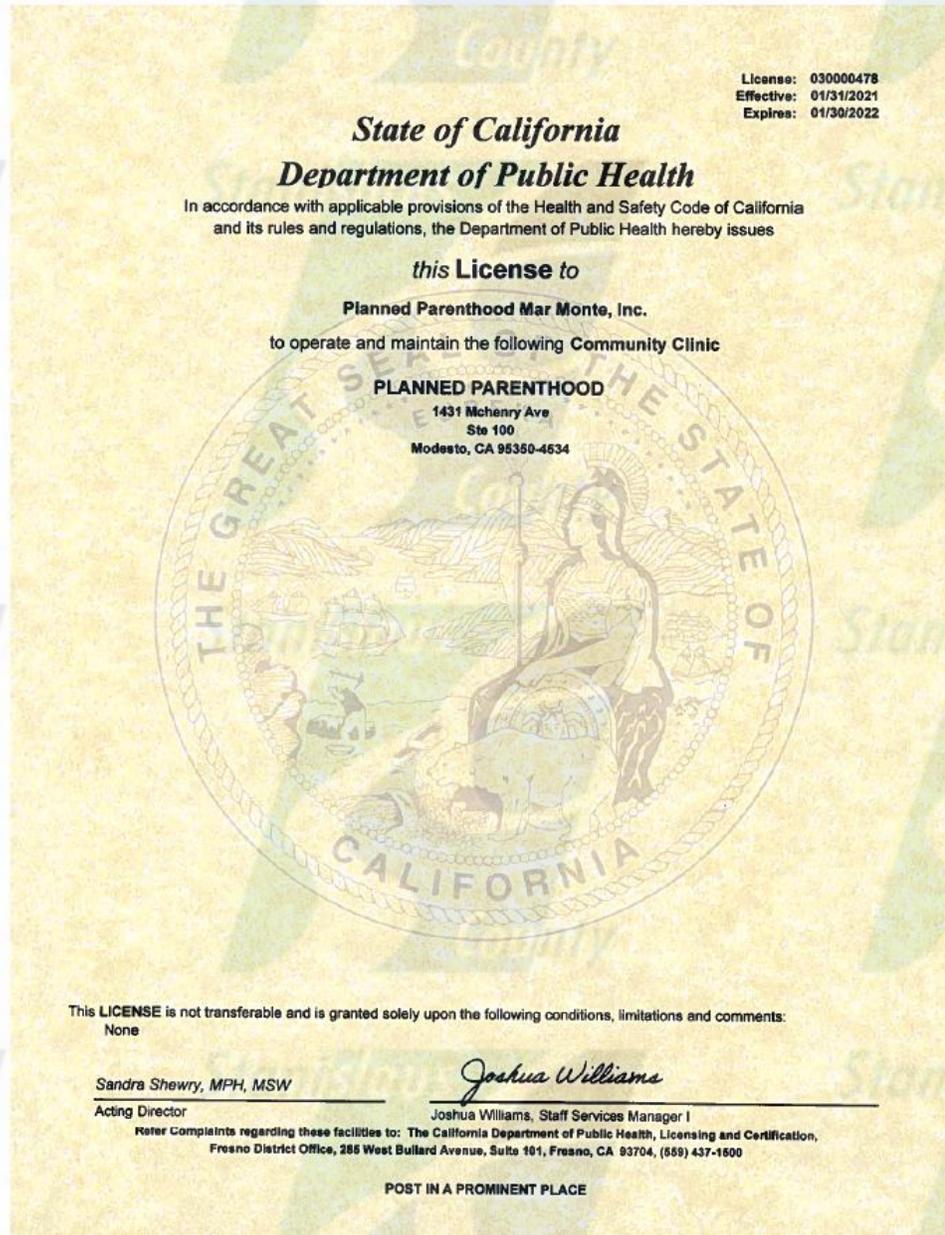
- ▶ (c) Large quantity generators as specified in subdivision (a), **operating in different buildings on the same or adjacent property**, or as approved by the enforcement agency, may register as **one generator**.
- ▶ (d) “Adjacent,” for purposes of subdivision (c), means real property within 400 yards from the property boundary of the primary registration site. All federal transportation requirements specified in Section 173.6 of Part 49 of the Code of Federal Regulations shall apply for purposes of transporting medical waste from adjacent properties.
- ▶ Valid for **1 year**.

# Registration Continued

Very important note:

The previous slide indicated that only SQG's that treat are required to register with the CDPH.

The practice here in Stanislaus County is that all medical waste generators are required to register with us.



## SQG Requirements (Chapter 4)

- ▶ Must register with Stanislaus County.
  - ▶ All fees must be paid prior to issuing a registration.
- ▶ Maintain a Medical Waste Management Plan (MWMP)
- ▶ Properly containerize all medical waste
- ▶ Must properly dispose of medical waste using a registered medical waste hauler
  - ▶ Tracking documents for medical waste disposal must be retained for **3 years**
- ▶ Subject to **biennial inspection if they are treating medical waste.**

# LQG Requirements (Chapter 5)

- ▶ Must register with Stanislaus County
  - ▶ All fees must be paid prior to issuing a registration.
- ▶ Maintain a MWMP
- ▶ Properly containerize all medical waste
- ▶ Must properly dispose of medical waste using a registered medical waste hauler
  - ▶ Tracking documents for medical waste disposal must be retained for **2 years**
- ▶ Subject to **annual inspection**

# Types of Medical Waste Streams

40

- Biohazardous Waste
- Sharps Waste
- Trace Chemotherapy Waste
- Pathology Waste
- Pharmaceutical Waste



# Biohazardous



“Biohazardous waste”

Includes all of the following:

- ▶ (A)
- ▶ (i) **Regulated medical waste, clinical waste, or biomedical waste** that is a waste or reusable material **derived from the medical treatment of a human or from an animal** that is suspected by the attending veterinarian of being **infected with a pathogen that is also infectious to humans, which includes diagnosis and immunization; or from biomedical research, which includes the production and testing of biological products.**
- ▶ (ii) **Regulated medical waste or clinical waste or biomedical waste** suspected of **containing a highly communicable disease.**

# Biohazardous



- ▶ (B) **Laboratory waste** such as **human specimen cultures or animal specimen cultures** that are **infected with pathogens that are also infectious to humans**
- ▶ cultures and stocks of infectious agents from **research**
- ▶ wastes from the **production of bacteria, viruses, spores, discarded live and attenuated vaccines used in human health care or research, discarded animal vaccines**, including Brucellosis and Contagious Ecthyma, as defined by the department
- ▶ **culture dishes, devices used to transfer, inoculate, and mix cultures**
- ▶ wastes identified by Section 173.134 of Title 49 of the Code of Federal Regulations as Category B “once wasted” for laboratory wastes.

# Biohazardous



- ▶ (C) Waste that, **at the point of transport** from the generator's site or at the point of disposal **contains recognizable fluid human blood, fluid human blood products, containers, or equipment containing human blood that is fluid, or blood from animals suspected by the attending veterinarian of being contaminated with infectious agents known to be contagious to humans.**
- ▶ (D) Waste containing **discarded materials contaminated with excretion, exudate, or secretions from humans or animals** that are required to be isolated by the infection control staff, the attending physician and surgeon, the attending veterinarian, or the local health officer, to **protect others from highly communicable diseases or diseases of animals that are communicable to humans.**

# Sharps

## “Sharps waste”

- ▶ A device that has acute rigid corners, edges, or protuberances **capable of cutting or piercing**, including, but not limited to, **hypodermic needles, hypodermic needles with syringes, blades, needles with attached tubing, acupuncture needles, root canal files, broken glass items used in health care** such as Pasteur pipettes and blood vials contaminated with biohazardous waste, and **any item capable of cutting or piercing from trauma scene waste.**



# Trace Chemotherapy

## “Trace chemotherapeutic waste”

- ▶ Waste that is **contaminated through contact with, or having previously contained, chemotherapeutic agents**, including, but not limited to, **gloves, disposable gowns, towels, and intravenous solution bags and attached tubing that are empty**. A biohazardous waste that meets the conditions of this paragraph is **not subject to the hazardous waste requirements of Chapter 6.5** (commencing with Section 25100) of Division 20.



# Pathology



Pathology waste includes both of the following:

- ▶ (A) **Human body parts, with the exception of teeth, removed at surgery and surgery specimens or tissues removed at surgery or autopsy** that are suspected by the health care professional of **being contaminated with infectious agents known to be contagious to humans or having been fixed in formaldehyde or another fixative.**
- ▶ (B) **Animal parts, tissues, fluids, or carcasses suspected** by the attending veterinarian of **being contaminated with infectious agents known to be contagious to humans.**

# Pharmaceutical



“Pharmaceutical waste”: **A pharmaceutical**, as defined in Section 117747, **including trace chemotherapy waste, that is a waste**, as defined in Section 25124.

For purposes of this part, “pharmaceutical waste” **does not include a pharmaceutical that meets either of the following criteria:**

- ▶ (A) The pharmaceutical is being **sent out of the state to a reverse distributor**, as defined in Section 4040.5 of the Business and Professions Code, **that is licensed as a wholesaler of dangerous drugs** by the California State Board of Pharmacy pursuant to Section 4161 of the Business and Professions Code.
- ▶ (B) The pharmaceutical is being **sent by a reverse distributor**, as defined in Section 4040.5 of the Business and Professions Code, **offsite for treatment and disposal** in accordance with applicable laws, or **to a reverse distributor that is licensed as a wholesaler of dangerous drugs by the California State Board of Pharmacy** pursuant to Section 4160 of the Business and Professions Code **and as a permitted transfer station if the reverse distributor is located within the state.**

# Medical Waste Storage Labeling, Holding Times and Treatment Methods

| Medical Waste Stream  | Inner Packaging and Primary Container (Onsite)   | Onsite Containment Prior to Offsite Transport  | Onsite Holding Times  | Treatment Method   |
|---|--|--|---|--|
| <b>Biohazardous Waste</b><br><ul style="list-style-type: none"> <li>Bloody items</li> <li>Gauze</li> <li>Soiled gowns and gloves</li> <li>Bloody Suction Canisters</li> </ul>                          | Labeled biohazardous waste container lined with a red bag.<br><b>BAG:</b> Certified ASTM D1709: <i>minimum requirement</i><br><br><b>LABELLED:</b> "Biohazardous Waste" or "BIOHAZARD" with international biohazard symbol.    | Tied red bag(s) in a USDOT-approved, rigid container lined with a red bag. Must have a tight-fitting lid<br><b>BAG:</b> Certified ASTM D1709 <b>AND</b> D1922<br><b>LABELLED:</b> on lid and sides visible from any lateral direction with "Biohazardous Waste" or "BIOHAZARD" with the international biohazard symbol.                             | <ul style="list-style-type: none"> <li>At &gt;0°C, ≥ 20 pounds per month, shall contain or stored ≤ 7 days*</li> <li>At &gt;0°C, &lt; 20 pounds per month shall store ≤ 30 days*</li> <li>At ≤ 0°C, any amount may be stored up to 90 days</li> </ul> | <ul style="list-style-type: none"> <li>Steam Sterilization</li> <li>Incineration</li> <li>Approved Alt Tech</li> </ul> |
| <b>Sharps</b><br><ul style="list-style-type: none"> <li>Needles</li> <li>Broken glass vials</li> <li>Blades</li> <li>Clips</li> <li>Pins</li> <li>Trocars</li> <li>Carpujects</li> </ul>               | FDA-certified sharps waste container.<br><br>Sharps container, <u>not individual sharps</u> , may be placed in a red biohazard bag.<br><br><b>LABELLED:</b> "Sharps Waste" or "BIOHAZARD" with international biohazard symbol. | Sharps waste container in a USDOT-approved, rigid container with a tight-fitting lid, or USDOT approved transport carriage.<br><br>sharps waste container(s) without bag or secondary container.<br><br><b>LABELLED:</b> "sharps waste" or with the international biohazard symbol and the word "BIOHAZARD".                                        | <u>Closed sharps containers ready for disposal:</u><br><ul style="list-style-type: none"> <li>At &gt;0°C, any amount may be stored ≤ 30 days*</li> <li>At ≤ 0°C, any amount may be stored up to 90 days</li> </ul>                                    | <ul style="list-style-type: none"> <li>Steam Sterilization</li> <li>Incineration</li> <li>Approved Alt Tech</li> </ul> |
| <b>Chemotherapy</b><br>(Contaminated with trace chemotherapy agents)<br><ul style="list-style-type: none"> <li>Gloves</li> <li>Gowns</li> <li>Towels</li> <li>Sharps</li> </ul>                        | Labeled chemotherapy waste container lined with a red or yellow biohazard bag.<br><b>BAG:</b> Certified ASTM D1709: <i>minimum requirement</i><br><br><b>LABELLED:</b> "Chemotherapy Waste" or "CHEMO"                         | Tied red or yellow bag(s) in a USDOT-approved, rigid container lined with a red or yellow bag. Must have a tight-fitting lid<br><b>BAG:</b> Certified ASTM D1709 <b>AND</b> D1922<br><br><b>Labeled:</b> on lid and sides visible from any lateral direction with "Chemotherapy Waste" or "CHEMO".<br><br><i>(For chemo sharps containers, see sharps labeling listed above and include "Chemotherapy Waste" or "CHEMO" labeling.)</i> | <ul style="list-style-type: none"> <li>At &gt;0°C, ≥ 20 pounds per month, shall be stored ≤ 7 days*</li> <li>At &gt;0°C, &lt; 20 pounds per month shall be stored ≤ 30 days*</li> <li>At ≤ 0°C, any amount may be stored up to 90 days</li> </ul>     | <ul style="list-style-type: none"> <li>Incineration</li> <li>Approved Alt Tech</li> </ul>                              |
| <b>Pathology</b><br><ul style="list-style-type: none"> <li>Human and animal body parts</li> <li>Waste specimens</li> <li>Solidified Canisters</li> <li>Tissues</li> <li>Animal Carcasses</li> </ul>  | Pathology Waste container shall be lined with a red or white biohazard bag.<br><b>BAG:</b> Certified ASTM D1709 <i>minimum requirement</i><br><br><b>LABELLED:</b> "Pathology Waste" or "PATH"                                 | Tied red or white bag(s) in a USDOT-approved, rigid container lined with a red or white bag. Must have a tight-fitting lid<br><b>BAG:</b> Certified ASTM D1709 <b>AND</b> D1922<br><br><b>Labeled:</b> on lid and sides visible from any lateral direction with "Pathology Waste" or "PATH".   | <ul style="list-style-type: none"> <li>At &gt;0°C, ≥ 20 pounds per month stored ≤ 7 days*</li> <li>At &gt;0°C, &lt; 20 pounds per month shall be stored ≤ 30 days*</li> <li>At ≤ 0°C, any amount may be stored up to 90 days</li> </ul>               | <ul style="list-style-type: none"> <li>Incineration</li> <li>Approved Alt Tech</li> </ul>                              |
| <b>Pharmaceutical</b><br>(Items containing residual medication)<br><ul style="list-style-type: none"> <li>Syringes</li> <li>Vials</li> <li>Pills</li> </ul>    | Pharmaceutical waste container.<br><br><b>LABELLED:</b> "HIGH HEAT" OR "INCINERATION ONLY".<br>(Unopened/Unused or expired – Return to Pharmacy.)<br>(Controlled substances must be rendered non-retrievable.)                 | Pharmaceutical waste transport container by itself must be a rigid, USDOT-approved container with a tight-fitting lid.<br><br><b>Labeled:</b> on lid and sides visible from any lateral direction with "HIGH HEAT" or "INCINERATION ONLY".<br><br><i>(No biohazard symbol required unless comingling sharps and pharmaceuticals.)</i>  | <ul style="list-style-type: none"> <li>Not temperature specific</li> <li>If full, ≤ 90 days</li> <li>If not full, once per year</li> </ul> (Stored no longer than 30 days at a permitted transfer station or offsite treatment facility.)             | <ul style="list-style-type: none"> <li>Incineration</li> <li>Approved Alt Tech</li> </ul>                              |

Medical waste packaged for shipment offsite must be in a rigid non-bulk packaging conforming to the packaging requirements of §§173.24 and 173.24a and packaging requirements specified in 29 CFR 1910.1030.

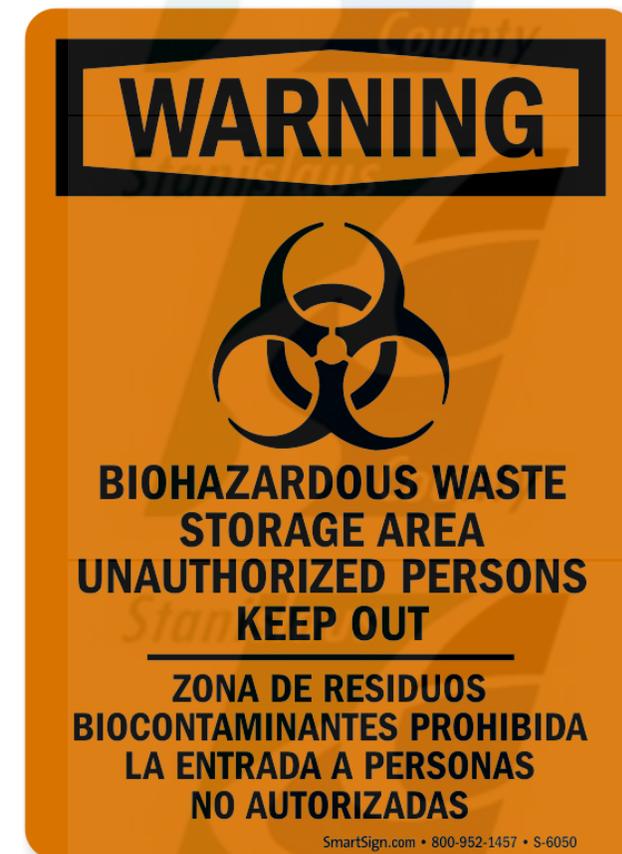
Reference: HSC Sections 117630, 117636, 117690118275, 118280, 118285.

NOTE: Offsite storage at a permitted transfer station or treatment facility begins the day of pick up and is not to exceed 7 days at > 0°C or 30 days at ≤ 0°C without being granted an extension by the Department.

\* If odor presents a nuisance, more frequent removal is required

# Containment and Storage (Chapter 9)

- ▶ Refer to chart on previous slide to know how each medical waste stream must be stored
- ▶ During the inspection, **check each room that contains medical waste to verify proper containment and storage**
- ▶ **Designated Accumulation Area**
  - ▶ **Must have a sign on the door** that reads “CAUTION—BIOHAZARDOUS WASTE STORAGE AREA—UNAUTHORIZED PERSONS KEEP OUT,” **and in Spanish**, “CUIDADO—ZONA DE RESIDUOS—BIOLOGICOS PELIGROSOS—PROHIBIDA LA ENTRADA PERSONAS NO AUTORIZADAS”
  - ▶ The **accumulation area must also be secured**



# Containment and Storage Continued

## ▶ Interim Storage Area

- ▶ Medical waste that is stored in an area **prior to transfer to the designated accumulation area**, as defined in Section 118310, shall be stored in an area that is **either locked or under direct supervision or surveillance**.
- ▶ Intermediate storage areas **shall be marked with the international biohazard symbol or the signage** described in Section 118310.
- ▶ These warning signs **shall be readily legible from a distance of five feet**. This section does not apply to the rooms in which medical waste is generated.



Violation?

51



Violation?

52



Violation?

53



# Medical Waste Management Plan SQG

- ▶ (a) Name of the person.
- ▶ (b) Business address of the person.
- ▶ (c) Type of business.
- ▶ (d) Types, and estimated average monthly quantity, of medical waste generated.
- ▶ (e) Type of treatment used onsite.
- ▶ **(f) Name and business address of the registered hazardous waste hauler used by the generator for backup treatment and disposal, for waste when the onsite treatment method is not appropriate due to the hazardous or radioactive characteristics of the waste.**
- ▶ **(g) Name of the registered hazardous waste hauler used by the generator to have untreated medical waste removed for treatment and disposal, if applicable.**
- ▶ **(h) Name of the common carrier used by the generator to transport pharmaceutical waste offsite for treatment and disposal pursuant to Section 118032, if applicable.**

# Medical Waste Management Plan

## SQG

- ▶ (i) If applicable, the steps taken to categorize the pharmaceutical wastes generated at the facility to ensure that the wastes are properly disposed of as follows:
  - ▶ (1) Pharmaceutical wastes classified by the federal Drug Enforcement Agency (DEA) as “controlled substances” are disposed of in compliance with DEA requirements.
  - ▶ (2) Name and business address of the registered hazardous waste hauler used by the generator to have wastes that are not regulated pursuant to the federal Resource Conservation and Recovery Act of 1976 and nonradioactive pharmaceutical wastes regulated as medical waste safely removed for treatment in compliance with subdivision (b) of Section 118222 as waste requiring specific methods.
- ▶ **(j) A closure plan for the termination of treatment at the facility using, at a minimum, one of the methods of decontamination** specified in subdivision (a) or (b) of Section 118295.
- ▶ (k) A statement certifying that the information provided is complete and accurate.

# Medical Waste Management Plan LQG

- ▶ (a) Name of the person.
- ▶ (b) Business address of the person.
- ▶ (c) Type of business.
- ▶ (d) Types, and estimated average monthly quantity, of medical waste generated.
- ▶ **(e) Type of treatment used onsite, if applicable. For generators with onsite medical waste treatment facilities, the treatment capacity of the onsite treatment facility.**
- ▶ **(f) Name and business address of the registered hazardous waste hauler used by the generator to have untreated medical waste removed for treatment, if applicable, and, if applicable, the name and business address of the common carrier transporting pharmaceutical waste pursuant to Section 118032.**
- ▶ **(g) Name and business address of the offsite medical waste treatment facility to which the medical waste is being hauled, if applicable.**
- ▶ **(h) An emergency action plan complying with regulations adopted by the department.**

# Medical Waste Management Plan

## LQG

- ▶ (i) If applicable, the steps taken to categorize the pharmaceutical wastes generated at the facility to ensure that the wastes are properly disposed of as follows:
  - ▶ (1) Pharmaceutical wastes classified by the federal Drug Enforcement Agency (DEA) as “controlled substances” are disposed of in compliance with DEA requirements.
  - ▶ (2) Name and business address of the hazardous waste hauler used by the generator to have wastes that are not regulated pursuant to the federal Resource Conservation and Recovery Act of 1976 and nonradioactive pharmaceutical wastes regulated as medical wastes safely removed for treatment in compliance with subdivision (b) of Section 118222, as waste requiring specific methods.
- ▶ **(j) A closure plan for the termination of treatment at the facility using, at a minimum, one of the methods of decontamination specified in subdivision (a) or (b) of Section 118295, **thereby rendering the property to an acceptable sanitary condition following the completion of treatment services at the site.****
- ▶ (k) A statement certifying that the information provided is complete and accurate.

# Medical Waste Management Plan



Stanislaus County  
Department Of Environmental Resources  
3800 Cornucopia Way, Suite C, Modesto, California 95358

58

## MEDICAL WASTE MANAGEMENT PLAN

According to the Medical Management Act (Health and Safety Code, Section 117930 and 117960), any Small Quantity Generators (less than 200 pounds per month) that provide Onsite Treatment and all Large Quantity Generators (greater than 200 pounds per month) shall have a Medical Waste Management Plan on file with the Stanislaus County Department of Environmental Resources. The Medical Waste Management Plan shall contain the following information as appropriate for your facility:

Business Name: \_\_\_\_\_

Business Address: \_\_\_\_\_  
\_\_\_\_\_  
(City/Zip)

Phone Number: Phone Number: (\_\_\_\_) \_\_\_\_\_

Type of Facility or Business: \_\_\_\_\_

E-Mail Address: \_\_\_\_\_

### Registration for:

- Small Quantity Generator with Onsite Treatment (generates less than 200 pounds per month).
- State Licensed Small Quantity Generator (generates less than 200 lbs/month).
- Large Quantity Generator Only (generates 200 pounds or more per month).
- Large Quantity Generator with Onsite Treatment (generates 200 pounds or more per month).

Person responsible for implementation of the Medical Waste Management Plan:

Name: \_\_\_\_\_

Title: \_\_\_\_\_ Date: \_\_\_\_\_

1. List the types of medical waste generated at your facility, i.e., laboratory wastes, blood or body fluids, sharps, contaminated animals, surgical specimens, isolation wastes, or pharmaceuticals: (see "Regulated Medical Wastes" listed on Page 2).

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Estimate the monthly amount of medical waste generated (including sharps waste) at your facility:

\_\_\_\_\_ Pounds/month  
\_\_\_\_\_ Pounds/month

- ▶ Facilities are required to have a MWMP filed with Stanislaus County Dept. of Environmental Resources; they may use our forms or their own as long as it meets all of the criteria listed in the previous slides
- ▶ At the time of inspection make sure that the MWMP is current and accurate, the generator is required to submit updated MWMP to us within 30 days of a change.

# Tracking Documents

- ▶ **Tracks medical waste from the point when the waste leaves the generator facility until it receives final treatment.** At the time that the medical waste is received by a hazardous waste transporter, the **transporter shall provide the medical waste generator with a copy of the tracking document.**
- ▶ The tracking document shall include, but not be limited to, all of the following information:
  - ▶ (1) The name, address, telephone number, and registration number of the **transporter**, unless transported pursuant to Section 117946 or 117976.
  - ▶ (2) The **type of medical waste transported** and the **quantity or aggregate weight of medical waste transported.**

# Tracking Documents

- ▶ (3) The name, address, and telephone number of the **generator**.
- ▶ (4) The name, address, telephone number, permit number, and the signature of an authorized representative of the **permitted facility receiving the medical waste**.
- ▶ (5) The date that the medical waste is **collected or removed from the generator's facility**, the date that the medical waste is **received by the transfer station**, the **registered large quantity generator**, or **point of consolidation**, if applicable, and the date that the **medical waste is received by the treatment facility**.



# Materials of Trade Exemption

- ▶ **SQG:** HSC §117946: (a) A small quantity medical waste generator or parent organization that employs health care professionals who generate medical waste **may transport medical waste generated in limited quantities up to 35.2 pounds to the central location of accumulation, provided that all of the following are met:**
  - ▶ (1) **Principal business** of the generator is **not to transport or treat** regulated medical waste.
  - ▶ (2) Generator shall adhere to the conditions and requirements set forth in the materials of trade exception, as specified in Section 173.6 of Title 49 of the Code of Federal Regulations.
  - ▶ (3) A person transporting medical waste pursuant to this section **shall provide a form or log to the receiving facility**, and the receiving facility shall maintain the form or log for a period of two years, containing all of the following information:
    - ▶ (A) **Name of the person** transporting the medical waste.
    - ▶ (B) **Number of containers** of medical waste transported.
    - ▶ (C) **Date** the medical waste was transported.
- ▶ (b) A generator transporting medical waste pursuant to this section **shall not be regulated as a hazardous waste hauler** pursuant to Section 117660.
- ▶ **LQG:** HSC §117976: (a) A large quantity medical waste generator or parent organization that employs health care professionals who generate medical waste **may transport medical waste generated in limited quantities up to 35.2 pounds to the central location of accumulation, provided that all of the following are met: (same as (1) – (3) above).**

# Inspection Process

- ▶ Verify payment so that a new registration can be issued, backdate the new registration to make sure there is no gap in the dates
- ▶ Verify containment and storage of all medical waste, try and see every room that medical waste is generated and stored in if possible
- ▶ Verify that generator has all tracking documents and is disposing of waste within the holding times
  - ▶ Verify if the generator is SQG or LQG
- ▶ Verify the MWMP to make sure that it is still accurate
- ▶ Issue new registration to the facility
  - ▶ Take a picture of the facility's state license if it isn't in the file

# Common Medical Waste Violations



**FINDING:** Waste deemed biohazardous are placed into a clear or blue plastic bag and disposed of into the biohazardous waste container.

**SOLUTION:** Place biohazardous waste into a red biohazard bag, securely tie, and dispose of into the biohazardous waste container.



**FINDING:** Isolation Patients - Facilities line an unlabeled flip-top cover container with a red biohazard bag for isolation waste.



Above image is the solution to the finding.

**SOLUTION:** Biohazardous waste shall be disposed of into a biohazard bag and placed for storage, handling, or transport in a rigid container with a tight-fitting cover labeled "Biohazardous Waste" or "Biohazard" with the biohazard international symbol on the cover and all visible lateral sides.

*NOTE: Flip-top/rotating covers are not allowed for biohazardous waste containers; it is not tight-fitting.*



## **FINDING:**

Overfilling the biohazardous waste container.

## **SOLUTION:**

Provide additional biohazardous waste containers to fully enclose biohazardous waste in the container or increase the pick up.



**FINDING:** Sharps containers placed into clear plastic bags and disposed of into the biohazardous waste containers. Suction canisters placed into clear plastic bags and disposed of into the biohazardous waste containers.

**SOLUTION:** The Department recommends sharps containers be sealed and individually transported, without first being placed into a biohazard bag, or placed on a flatbed cart to be wheeled to the biohazardous waste container located in the medical waste storage room. It is not required to place sharps container into a biohazard bag; however, should it be placed into a bag it shall be a biohazard bag. Biohazardous waste (such as suction canisters) shall be disposed of into a biohazard bag, securely tied, and disposed of into the biohazardous waste container.



# Virtual Inspections

- ▶ Due to the Covid-19 pandemic, CDPH is still not out in the field conducting medical waste inspections. Since CDPH has not been inspecting, neither have Stanislaus County Hazardous Material Specialists (HMS). In the meantime we can conduct **virtual inspection of “high risk” facilities.**
- ▶ We can inspect lower risk facilities such as vets or dialysis (when they don't have patients) facilities on site
- ▶ HMS utilize the **virtual inspection template** to conduct inspections.

# Virtual Inspection Template

Good Afternoon,

I hope all is going well and that everyone is staying safe. It is time for the routine Medical Waste Generator inspection for **[Insert facility name Here]** located at **[Insert facility address here]**. Due to the current pandemic this Department has refrained from conducting routine medical waste inspections. The health and safety of all employees and the public is our main priority during this time, for this reason we will be conducting a **virtual inspection** of this facility. We would like to ensure that your facilities medical waste is still being routinely disposed of and that all aspects of the Medical Waste Management Plan are being complied with.

In order to conduct the virtual inspection we ask that the following documents be available for review via email, fax or mail:

1. Provide a photo(s) showing that a copy of the Medical Waste Management Plan (MWMP) is accessible on site and your state license from CDPH.
2. Copies of the previous two months disposal documents
3. Photo(s) showing biohazardous waste accumulation storage area door and an overview photo of the storage area
4. Photo(s) of each type/ each waste container showing proper labeling and overall container condition
5. Photo(s) showing that proper sharps containers are being utilized and are labeled

**Please provide the requested information within the next 14 days.** If you have any questions regarding the documents that I am requesting feel free to reach out to me and I will do my best to assist you.

## Sources Cited

- ▶ Medical Waste Management Act, California Health and Safety Code Sections 117600 –118360, January 2017, California Department of Public Health
- ▶ “Environmental Protection Through Proper Medical Waste Management”, March 2018, California Department of Public Health, Medical Waste Management Program, Jennifer Cheng and Dale Parks



**Thanks for joining us. Happy Thanksgiving to all.**

**Any Questions?**

**Please email Ali Arshad, Dominick Salazar and Stephanie Freier at [Aarshad@envres.org](mailto:Aarshad@envres.org), [Dsalazar@envres.org](mailto:Dsalazar@envres.org), [Sfreier@envres.org](mailto:Sfreier@envres.org)**