Regulated Medical Waste Management and Proper Waste Segregation
State-Specific Information – California
Objective: Understand how to properly segregate waste streams and properly handle the most common regulated waste.

I. Waste Stream Overview
II. Identifying & Segregating Waste
III. Managing RMW Collection and Storage
IV. Proper Packaging of RMW
V. Labeling & Documentation
VI. DOT Requirements
VII. Summary
General waste commingled with RMW

General waste commingled with RMW and loose sharps
• OSHA mandates special waste handling for Regulated Medical Waste to protect staff members and waste haulers

• Signed shipping document indicate your responsibility for the contained wastes and proper segregation
Cal-OSHA’s Definition of Regulated Medical Waste

- Liquid or semi liquid blood or other potentially infectious material (OPIM)
- Contaminated items that contain liquid or semi-liquid blood or are caked with dried blood or OPIM
- Are capable of releasing these materials when handled or compressed
- Contaminated sharps
- Pathological and microbiological wastes containing blood or OPIM
- Medical waste regulated by California Health and Safety Code
Medical Waste Management Act

- California Health and Safety Code
- Sections 117600 - 118360

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 95825-7377

Medical Waste Management Act
California Health and Safety Code
Sections 117600 – 118360
Biohazardous Waste

California Health and Safety Code:

• Laboratory waste cultures and stocks
• Sharps waste
• Contaminated waste
  – Pathological
  – Chemotherapeutic
  – Pharmaceutical
• Human surgery specimens/tissues suspected of being contaminated with infectious agents known to be contagious to humans
• Animal parts/tissues/carcasses suspected by veterinarian of being contaminated with infectious agents known to be contagious to humans
• Excretions, exudates, secretions from humans/animals that are required to be isolated by the infection control staff, attending physician, veterinarian, or local health officer, to protect others from highly communicable diseases or diseases of animals that are highly communicable to humans
Registration of Medical Waste Generators (Shippers)

Generators (shippers) of medical waste, both SQ and LQ, are required to register with either:

• Local Enforcement Agency (LEA)
  
  Counties with LEAs are listed on next slide

• California Department of Public Health (CDPH)
  (if there is no LEA and State acts as LEA)
| Local Enforcement Agencies |
|---------------------------|-------------------------------------------------|
| Alameda County of Solid/Medical Waste Mgmt. | San Bernardino County Environmental Health |
| Colusa County Environmental Health | San Diego County Dept. of Environmental Health |
| Contra Costa County Environmental Health | San Francisco City & County DPH/ Hazardous Materials Program |
| Del Norte County DPH Env. Mgmt. Dept. | San Joaquin County Environmental Health Services |
| Kings County Division of Environmental Health | San Mateo County Environmental Health Division |
| Lassen County Health and Human Services Dept. | Santa Clara County Department of Environmental Health |
| City of Long Beach Health Department | Santa Cruz County Environmental Health Services |
| City of Vernon Health & Environmental Control | Shasta County Environmental Health Division |
| Madera County Environmental Health | Siskiyou County Public Health |
| Marin County Environmental Health Services | Sonoma County Public Health Department |
| Merced County Dept. Public Health, Div. Env. Hlth | Stanislaus County Department of Environmental Resources |
| Modoc County Environmental Health | Tehama County Environmental Health |
| Monterey County Health Department | Tuolumne County Environmental Health |
| Orange County Environmental Health | Ventura County Environmental Health Division |
| Riverside County Environmental Health Services | Yuba County Environmental Health |
| Sacramento County Environmental Health | |
• MWMP is a document completed by generators (shippers) of medical waste

• Plan is filed with the enforcement agency, either the State or, where applicable, the Local Enforcement Agency

• State filers can obtain a checklist CDPH Form 8661 for assistance in creating their plans

• LEA filers can check for specific forms from the LEA
Identifying & Segregating Waste
What Goes in the RMW Box?

- Closed disposable sharps containers
- Blood and OPIM
- Soaked, dripping bloody dressings
- Intact glass or plastic bottles with bloody fluid or OPIM (Some states require them to be placed in a sharps container)
- All disposable items soaked or dripping with blood or OPIM
Identifying & Segregating Waste
Items NOT in the RMW Category

NOT RMW:

- Chemicals
- RCRA Hazardous waste
- Radioactive waste
- Complete human remains
- Bulk Chemotherapy waste
- Compressed gas cylinders, canisters, inhalers, and aerosol cans
- Any devices or solutions containing mercury or other heavy metals
- Regular office garbage or solid waste

- RMW – But REQUIRES SEGREGATION/INCINERATION
- Pathological waste
- Trace chemotherapeutic waste
Managing RMW Collection and Storage
OSHA Packaging Requirements

Cal-OSHA 5193 d E 3

Regulated waste shall be disposed of in containers which are closable, labeled, and color-coded

Proper packaging requires 3 things:

1. Lid, or other means of closure
2. Red Bag
3. Biohazard labeling on 4 sides and top

Applies to containers used for office storage and final transport containers
Generators (shippers) must properly select sharps containers in order to protect employees during transport

**Definition of Sharps**

- Needles and syringes
- Scalpel blades and lancets
- Glass pipettes, slides, and tubes
- Broken, contaminated glass
- Staples and wires (cardio-catheter wires)
- Orthodontic wires
- Disposable suture sets and biopsy forceps
- Electrocautery tips (no cauterizers or batteries)
Healthcare workers should be able to comfortably view the entire inlet opening of the disposal container.

Containers should be located within arm’s reach.

Place containers slightly below eye level or on a counter top.

An ideal standing installation height for a fixed sharps disposal container is 52 to 56 inches. This height will comfortably accommodate 95% of all adult female workers.
Direct visibility of the inlet opening is necessary

Containers should be promptly replaced when contents reach manufacturer’s fill line

Overfilled containers increase the risk of needlestick injuries and violate proper product usage requirements
Sharps containers must be placed in a secondary container for transport.
Proper Packaging of RMW
Preparing Reusable Containers

Tie off red bag

Container with red bag
Proper Packaging of RMW
Preparing Reusable Containers

Tie off red bag
**CHEMOTHERAPEUTIC WASTE**

- Biohazardous waste that is contaminated through contact with, or having previously contained chemotherapeutic agents

- Must be segregated for storage and placed in a secondary container that is labeled “Chemotherapy Waste,” “CHEMO,” etc.

- Stericycle can only accept “trace chemo,” i.e., less than 3% of original contents

**PATHOLOGICAL WASTE**

- Human surgery specimens, or tissues which have been fixed with formaldehyde or other fixatives

- Must be segregated for storage and placed in a secondary container that is labeled “Pathology Waste,” or “Path,” etc.

**LABELING**

- Labeling shall be provided on the lid and on the sides and be visible from any lateral direction
Proper Packaging of RMW
Weight Limitation

- The packaged waste must be within the required weight limits
A non-acceptable container may include any of the following:

- Red Bag not tied
- Leaking container
- Objects protruding
- Improperly closed (includes sharps containers)
- Overfilled
- Not properly labeled/marked

An improperly packaged container should **NEVER** be offered for transportation.
Managing RMW Collection and Storage
Proper Storage of RMW Containers

- Storage must be in containers that are leak resistant, have tight fitting covers and are kept clean and in good repair
- Secondary containers must be clearly labeled with appropriate symbols on the sides so as to be visible from any lateral direction

Warning signs – English
- CAUTION – BIOHAZARDOUS WASTE STORAGE AREA – UNAUTHORIZED PERSONS KEEP OUT

Spanish
- CUIDADO – ZONA DE RESIDUOS BIOLOGICOS – PELIGROSOS PROHIBIDA LA ENTRADA A PERSONAS NO AUTORIZADAS
# WASTE STORAGE TIMES

<table>
<thead>
<tr>
<th>Type of Waste</th>
<th>If kept above 32 ° Fahrenheit</th>
<th>If kept at or below 32 ° Fahrenheit</th>
<th>Labeling Requirement**</th>
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| Sharps* (i.e. Generator/Customer)   | 30 days max                  | 90 days max                         | Sharps Waste Label = “Sharps Waste” or with the international biohazard symbol and the word “BIOHAZARD”  
Sharps Waste Contaminated with Chemo = Sharps waste shall be placed in sharps containers labeled with the words “Chemotherapy Waste”, “Chemo”, or other label approved by the EA, Enforcement Agency. |
| Biohazardous* (20 pounds or more/month) (i.e. Generator/Customer) | 7 days max | 90 days max | Red Bag Label = “Biohazardous Waste” or with the international biohazard symbol and the word “BIOHAZARD”  
Path Label = When placed in a secondary container, that container shall be labeled with the words “Pathology Waste”, “PATH”, or other label approved by the EA.  
Chemo Label = When placed in secondary container, that container shall be labeled with the words, “Chemotherapy Waste”, “Chemo”, or other label approved by the EA. |
| Biohazardous* (less than 20 pounds per month) (i.e. Generator/Customer) | 30 days max                  | 90 days max                         | Red Bag Label = “Biohazardous Waste” or with the international biohazard symbol and the word “BIOHAZARD”  
Path Label = When placed in a secondary container, that container shall be labeled with the words “Pathology Waste”, “PATH”, or other label approved by the EA.  
Chemo Label = When placed in secondary container, that container shall be labeled with the words, “Chemotherapy Waste”, “Chemo”, or other label approved by the EA. |

*Generators should weigh Biohazardous waste (but not sharps waste) to determine storage time allowed.  
**For Biohazardous waste, place label on the lid and the sides so as to be visible from any lateral direction. Generator is responsible for labeling and containerizing waste.  
For storage times longer than those listed above, please obtain written approval from the EA, Enforcement Agency.
Labeling & Documentation
Understanding the Shipping Document

Shipper’s Certification:
- Properly described
- Properly packaged
- Properly marked and labeled per US DOT
- Agreement as to volumes transported

RMW cannot be transported without a properly completed and signed shipping document by the generator (shipper).

The waste hauler is not authorized to sign the shipping document for the generator (shipper).
All boxes, reusable containers, and/or secondary containers prepared for shipment shall be marked with a water-resistant tag containing:

- Generator’s (shipper) name and address
- Transporter’s name, address, and permit number
- Date the transporter accepted the RMW
Labeling & Documentation
Requirements for Transport

DOT Shipping Papers (49 CFR 172.200) Legible, in English

✓ Proper shipping description:
✓ Waste identification number – UN 3291
✓ Name - Regulated Medical Waste, n.o.s.
✓ Hazard class and division – 6.2
✓ Packaging Group – PGII
✓ Total Quantity – cubic feet or weight

DOT

✓ Requires that all hazardous materials be accompanied by shipping documents
✓ Provide clear communication in event of emergency when hazardous material is in transit
✓ Critical for documents to be complete, correct, and to have emergency response number (manned 24/7)
✓ Shipper’s certification (Generator’s Signature)

CDPH

✓ SQ Generators (shippers) – maintain documents for 2 years
✓ LQ Generators (shippers) – maintain documents for 3 years
Emergencies

Emergency spill procedures (may include spill kits):

• Make sure procedures are consistent with Medical Waste Management Plan
• Post a current list of emergency numbers
• Be sure to review and update the list annually
DOT Requirements
RMW Container Markings

Manage all your Stericycle services – pickups, payments and compliance training in one convenient place.

MAY CONTAIN SHARPS
REGULATED MEDICAL WASTE, n.o.s.
UN 3291

Precaución: Contiene desechos medicos que pueden ser biopeligroso
Training Requirements

Since Regulated Medical Waste contains sharps and potentially infectious substances, all affected employees are required to have initial and annual OSHA Bloodborne Pathogens training.

The transport of Regulated Medical Waste is regulated by the United States Department of Transportation as a hazardous material while it is in transport. All affected employees (those who perform the functions of either packaging or signing the shipping papers) must complete DOT hazardous materials training initially and every three years thereafter.

Stericycle can provide the necessary DOT training for your employees. Please contact your sales or customer service representative for details.
Thank you for your interest in the specific laws governing Regulated Medical Waste in California.

Be sure to also check actual State website for further details and any possible changes to State regulations.

If you have additional specific questions relating to waste segregation please feel free to email Stericycle at DrugDisposalQuestion@Stericycle.com.