



County of San Diego

Department of Environmental Health
Hazardous Materials Division



MEDICAL WASTE INSPECTION GUIDELINES

February 2017

REGULATORY AUTHORITY

The Medical Waste Management Program was established by the California Department of Health Services (presently known as California Department of Public Health (CDPH)) to ensure statewide standards for uniformity in the safe handling, minimization and disposal of medical waste. The regulations governing this program are found within the Medical Waste Management Act (MWMA) of the California Health and Safety Code, Division 104, part 14, Chapters 1-11 and in the San Diego County Code of Regulatory Ordinances (SDCC), Title 6, Division 8, Chapter 12.

The San Diego County Department of Environmental Health, Hazardous Materials Division (HMD) is the local enforcement agency for the Medical Waste Management Act within San Diego County. It is the responsibility of all generators of regulated medical waste to comply with the Medical Waste Program.

The Hazardous Materials Division provides support to generators through various administrative activities, including but not limited to, the following:

- Guidance and assistance in complying with the Medical Waste Program.
- Educational seminars open to all medical waste generators.
- Reviewing and processing medical waste management plans from all generators.
- Issuing medical waste treatment permits and registrations.
- Conducting evaluations and inspections.
- Responding to complaints and emergency incidents.
- Taking enforcement action when necessary.

An annual fee (SDCC, Section 68.1204) is required of all generators of medical waste to support implementation of this program. See *General Inspection Guidelines Manual* for details on conducting a medical waste inspection.

REGULATED MEDICAL WASTE

Regulated medical waste is waste that meets both of the following requirements:

1. Any biohazardous, sharps, pathology, pharmaceutical, or trace chemotherapy waste not regulated by the federal Resource Conservation and Recovery Act of 1976 (Public Law 94-580). The definitions of these can be found in Section 117690 of the Medical Waste Management Act.
2. Medical Waste can be generated as a result of one or more of the following actions:
 - a. the diagnosis, treatment, immunization, or care of humans or animals in a health care setting;
 - b. autopsy or necropsy.
 - c. preparation of a body for final disposition such as cremation or interment;
 - d. research pertaining to the production or testing of microbiologicals;
 - e. research using human or animal pathogens;
 - f. sharps and laboratory waste that poses a potential risk of infection to humans generated in the inoculation of animals in commercial farming operations;
 - g. consolidation of home-generated sharps; and
 - h. cleanup of trauma scenes.

The following are examples of businesses considered to be generators of medical waste:

- Medical and dental offices
- Clinics
- Acupuncture practices
- Hospitals
- Surgery centers
- Veterinary offices
- Pet shops
- Testing and/or Research Laboratories
- Education and Research facilities
- Biotechnology Research & Development facilities
- Trauma scene waste management practitioners
- Convalescent homes
- Pharmacies
- Home-generated sharps consolidation points
- Some schools and colleges

MEDICAL WASTE GENERATOR REQUIREMENTS

1. Obtain a Unified Program Facility Permit from the CUPA, the Department of Environmental Health (DEH), Hazardous Materials Division (HMD). Medical Waste permits are obtained through the California Environmental Reporting System (CERS).
2. Submit applicable permit fees on an annual basis to the CUPA.
3. Comply with the Medical Waste Management Act and the San Diego County Ordinance.
4. Submit a Medical Waste Management Plan if required by law.
5. Small quantity generators participate in triennial inspections conducted by the HMD inspectors. Large quantity generators participate in annual inspections.
6. Maintain tracking documents and other required records if medical waste is generated or treated off-site.
7. Apply for an on-site medical waste treatment permit as needed.

MEDICAL WASTE STORAGE REQUIREMENTS

Medical waste shall be contained separately from other waste at the point of generation (origin).

Biohazardous waste must be placed in a red bag labeled with the words “BIOHAZARDOUS WASTE” or with the international biohazard symbol and the word “BIOHAZARD.” In addition, red bags must be labeled in a manner that will identify the generator by location. This red bag must be placed in a rigid and leak-resistant container with a tight-fitting lid for storage, handling or transport. This secondary container must be labeled with the words “BIOHAZARDOUS WASTE” or with the international biohazard symbol and the word “BIOHAZARD” on the lid and on the sides, in order to be visible from any lateral direction.

Sharps waste must be placed into a sharps container that is rigid, puncture-resistant, leak proof when sealed and difficult to reopen once sealed. The sharps container must be labeled with the words “SHARPS WASTE” or with the international biohazard symbol and the word “BIOHAZARD”. In addition, sharps containers must be labeled in a manner that will identify the generator by location. Certain chemically contaminated sharps that are not considered medical waste, must be stored in a rigid container, closed, and labeled as hazardous waste.

Wastes which are empty and contaminated with trace amounts of chemotherapy drugs, such as gloves, disposable gowns, towels, intravenous solution bags and attached tubing must be placed in a secondary

container labeled with the words “Chemotherapy Waste,” “CHEMO,” or other label approved by the department on the lid and sides, so as to be visible from any lateral direction and generator identified.

Biohazardous waste which is recognizable human anatomical parts or comprised of human surgery specimens or tissues which have been fixed in formaldehyde or other fixatives, must be decanted in a secondary container labeled with the words “Pathology Waste,” “PATH,” or other label approved by the department on the lid and sides, so as to be visible from any lateral direction and generator identified.

Pharmaceutical waste that is either prescription, over-the-counter, or a veterinary drug may be considered medical waste by definition and must be placed in a container labeled with the words “HIGH HEAT” or “INCINERATION ONLY,” or with another label approved by the department, on the lid and sides, so as to be visible from any lateral direction. This does not include pharmaceuticals that are listed or defined as hazardous under RCRA or Radiation Control Law. Radioactive pharmaceuticals are regulated under the federal Resource Conservation and Recovery Act of 1976 or the Radiation Control Law (Chapter 8, part 9). In addition, pharmaceuticals that were not previously hazardous under the California Hazardous Waste Control Law will continue to be regulated as solid waste and may therefore be disposed of in the trash. In summary, pharmaceutical wastes fall into one of three categories based upon their hazard characteristics, RCRA listing, and quantity: hazardous waste, medical waste, or solid waste.

A designated accumulation area used for the storage of medical waste containers prior to transportation or treatment shall be secured so as to deny access to unauthorized persons and shall be marked with warning signs on, or adjacent to, the exterior of entry doors, gates, or lids. The storage area may be secured by use of locks on entry doors, gates, or receptacle lids.

The wording of warning signs shall be in English, “CAUTION—BIOHAZARDOUS WASTE STORAGE AREA—UNAUTHORIZED PERSONS KEEP OUT,” and in Spanish, “CUIDADO—ZONA DE RESIDUOS—BIOLOGICOS PELIGROSOS—PROHIBIDA LA ENTRADA A PERSONAS NO AUTORIZADAS,” or in another language, in addition to English, determined to be appropriate by the infection control staff or enforcement agency.

MEDICAL WASTE ACCUMULATION TIME LIMITS

Businesses that generate 20 or more pounds of biohazardous waste per month shall not store that waste onsite for more than seven (7) days above 0 degrees Centigrade (32 degrees Fahrenheit) without obtaining prior written approval of the DEH-HMD. If the business generates less than 20 pounds per month, the waste may be stored up to thirty (30) days. However, if the biohazardous waste is stored at or below 0 degrees centigrade (32 degrees Fahrenheit), it may be stored up to ninety (90) days.

Full sharps containers ready for disposal may not be stored more than thirty (30) days. However, if it is stored at or below 0 degrees Centigrade (32 degrees Fahrenheit), it may be stored up to ninety (90) days.

Pharmaceutical waste may be stored at an onsite location for not longer than ninety (90) days when the container is ready for disposal. The container shall be emptied at least once a year, unless prior written approval is granted by DEH-HMD.

FORMS AND GUIDANCE DOCUMENTS USED DURING A MEDICAL WASTE INSPECTION

Medical Waste Management Plan	<u>HM-9213</u>
Application for Onsite Medical Waste Treatment Permit	<u>HM-9188</u>
Medical Waste Storage Times Guidance Document	<u>HM-9214</u>
Medical Waste Disposal for Veterinary Practices	<u>HM-9216</u>
Medical Solid Waste Security	<u>HM-9217</u>
Medical Waste Disposal for Dental Practices	<u>HM-9218</u>
Medical Waste Disposal for Medical Practices	<u>HM-9219</u>
Waste Pharmaceuticals-Waste Determination Guidance	<u>HM-9267</u>
Pollution Prevention for Medical Waste Generators	<u>HM-9634</u>