



Medical Waste Breakout Session

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DISCUSSION TOPICS:

- 1. Management of Biohazard Waste – Rebecca Hernandez**
- 2. Top 10 Medical Waste Program Violation – Kevin Valdez**
- 3. Small Quantity Medical Waste Registration – Dana Barkil**
- 4. Q&A**



Management of Biohazard Waste (“red bag”)



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Specialist**

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What is Biohazardous waste?





Biohazardous waste Definition



- HSC 117690(b)(1): *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...***

Also includes:

- Highly communicable waste
- Laboratory waste
- Fluid or blood products

Key words: Infectious or contagious to humans



Biohazardous Waste Management: Biohazard bag color

- *HSC 117630(c)*: The color of the bag should be **RED**, unless yellow bags are used to segregate trace chemotherapy, or white bags for pathology waste.





Biohazardous Waste Management: ASTM Standards



- **ASTM** = American Society for Testing and Materials
- Biohazard bags must meet ASTM standards (horizontal & vertical testing):
 - D1709 (impact resistance (i.e., 165 g)).
 - D1922 (tear resistance (i.e., 480 g))
- Biohazard bags must be robust enough to contain infectious waste.





Biohazardous Waste Management: ASTM Standards

- What bags must be used “in house”?

- ❑ *HSC 117630(c): ...shall be marked with the international biohazard symbol...*
- ❑ *HSC 117630(b)...must be manufacturer certified to meet the ASTM D1709 standard (impact resistance). *Certification info is “typically” **not** printed on the bag.**





Biohazardous Waste Management: ASTM Standards

- How do you know if the “red bag” is “certified.”



Biohazard bag containers are made of rigid, high-density polyethylene for durability and leak-free performance. Snap-on, snap-off lid provides an extra measure of safety in the lab. White with universal biohazard waste symbol imprinted in black on an orange background. Containers are not autoclavable.

Certifications: Meets the 165 g dart drop standard (ASTM D1709-98).

[Less Product Information](#)



Biohazardous Waste Management: ASTM Standards

- What bags must be used for OFFSITE transport?

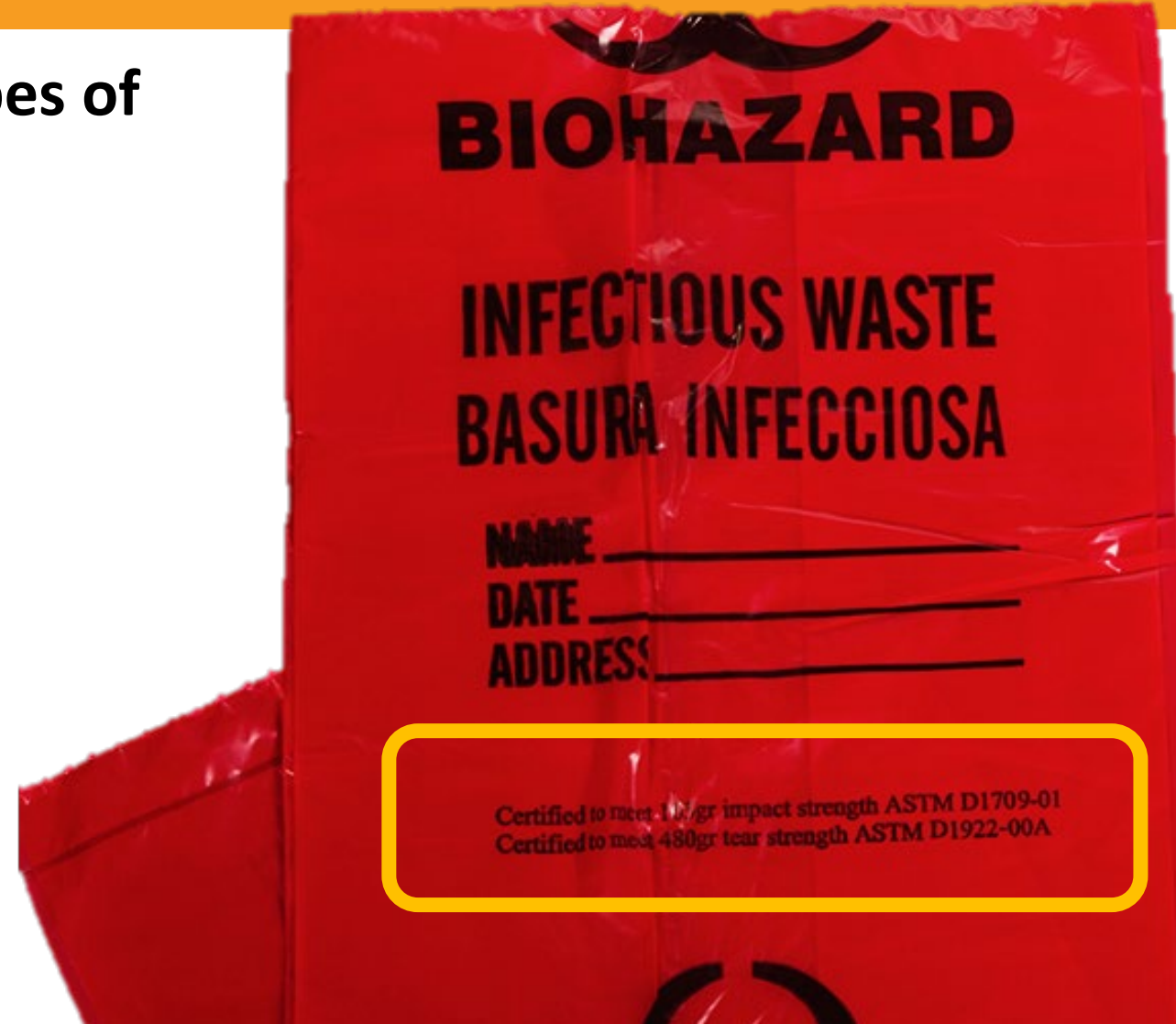
- ☐ HSC 117630(c): ...shall be marked with the international biohazard symbol...
- ☐ Facility uses only ASTM D1709 certified bags?
- ☐ HSC 117630(a): Ready for offsite transport?
 - ☐ Place bags in a ...container lined with a biohaz bag that is marked and certified... as meeting (or exceeding) ASTM D1922 and ASTM D1709 standards. (i.e., a stamp)





Biohazardous Waste Management: ASTM Standards

- Do facilities need to purchase two types of biohazard bags?
 - ❑ Not necessarily.
 - ❑ **Option #1:** Facility only uses ASTM D1709 certified bags?
 - ❑ Must **also** purchase bags printed with both ASTM D1709 & 1922 standards.
 - ❑ **Option #2:** Facility uses bags printed with both ASTM D1709 & 1922 standards?
 - ❑ No need to line the container.





Biohazardous Waste Management: Labeling Requirements

- **How should biohazard bags be labeled?**

- ❑ Biohazard symbol
- ❑ *SDCC 68.1205*: Generator's label placed on all biohazard bags when accumulation **first** begins.*
- ❑ *Exemption*: Small benchtop red bags do not need a generator's label if they are later consolidated into larger, labeled red bags.

**Applies to all MW that is shipped offsite but focusing only on red bags.*

Benchtop container:
Generator's label **NOT** required



Container on Floor:
Generator's label required



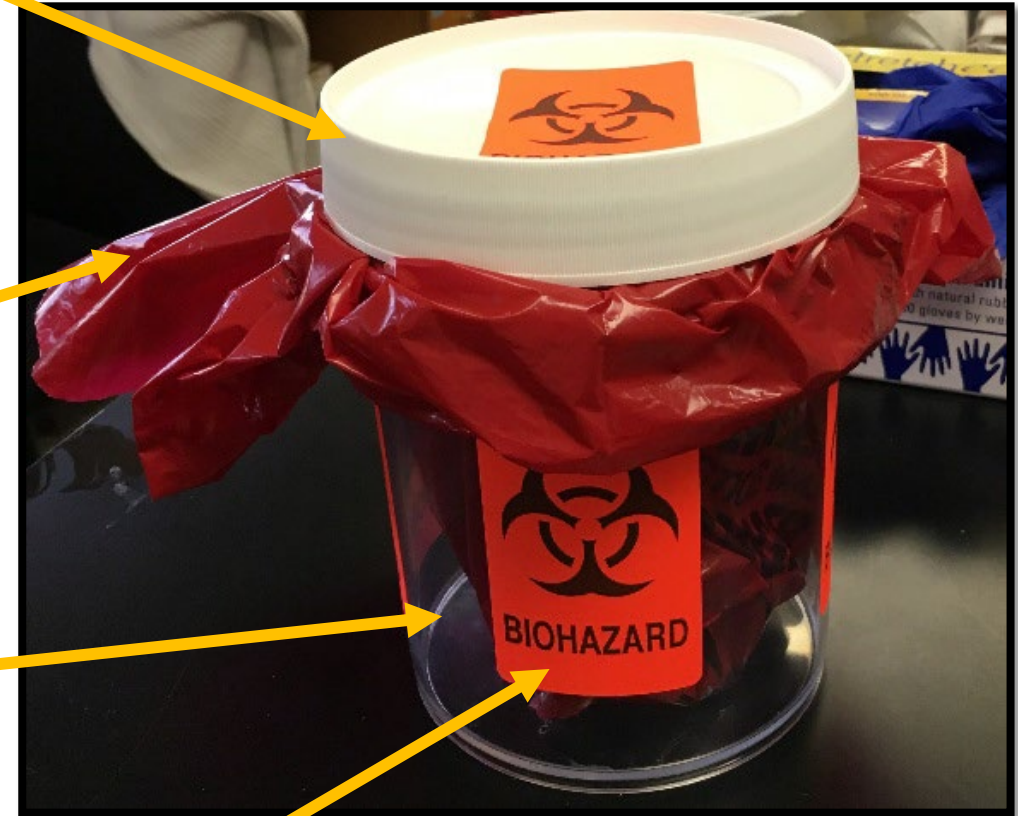


Biohazardous Waste Management: Containerization

- **How should biohazard bags be containerized?**

Biohazard waste must be placed in compliant red bags **within** **containers** that meet the following requirements:

- ☐ may be any color
- ☐ Rigid and leak resistant,
- ☐ have tight-fitting covers
- ☐ labeled with the words "Biohazardous Waste" OR the international biohazard symbol and the word "BIOHAZARD" on the lid and sides





Biohazardous Waste Management: Containerization

- **Benchtop biohazard bags on wire stands**
- *Assume the bag is preprinted with the biohazard symbol & that it is ASTM D1709 certified.



Biohazard waste must be placed in compliant red bags **within containers** that meet the following requirements:

- ☐ may be any color
- ☐ Rigid and leak resistant,
- ☐ have tight-fitting covers
- ☐ labeled with the words "Biohazardous Waste" OR the international biohazard symbol and the word "BIOHAZARD" on the lid and sides



Exemptions to containerization of Biohazardous Waste

- When are red bags NOT required to be containerized? *HSC 118280(b)*



Surgical Suite



Patient Rooms

Generator's label still required!!

****NOTE: Biohazard bags must be transferred to a proper container after completing the procedure.*



Test your knowledge!

- Which colors are allowed for biohazard bags?

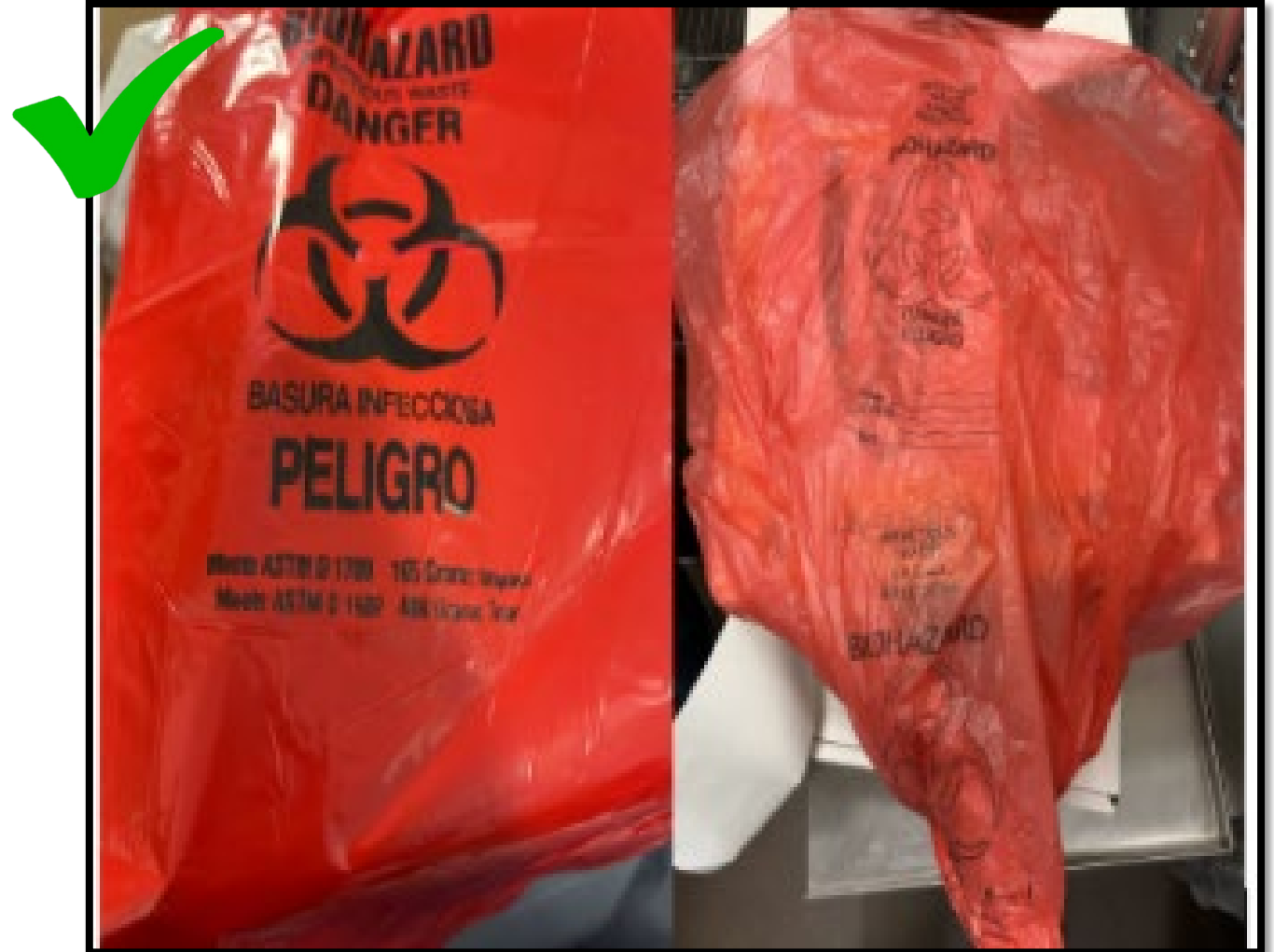


Only **RED is allowed for biohazard bags storing biohazard waste.*



Test your knowledge!

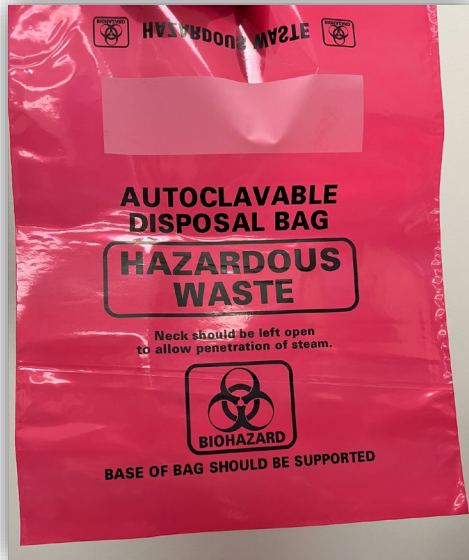
Which bag(s) would be most appropriate to ship your biohazardous waste OFFSITE?



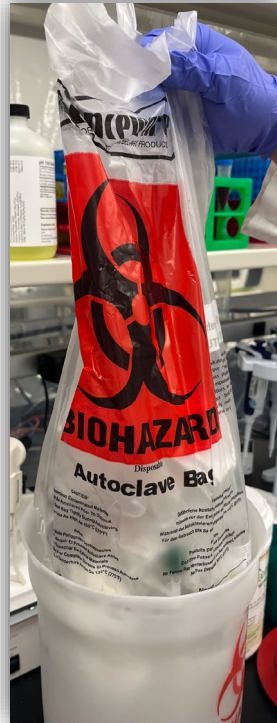


Test your knowledge!

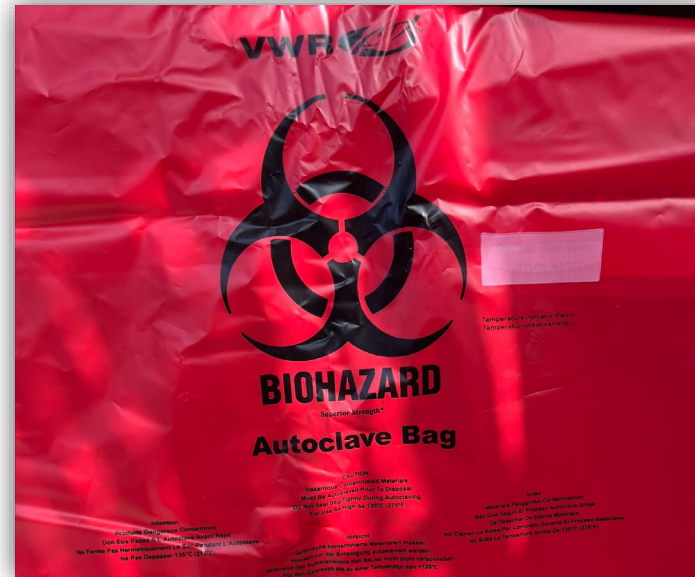
Based on color and markings alone, which of the following bag(s) could be used to store Biohazardous waste?
**Assume they are all ASTM D1709 manufacturer certified.*



A



B



C



D



Thank you!

- Questions?



Top 10 Medical Waste Program Violations

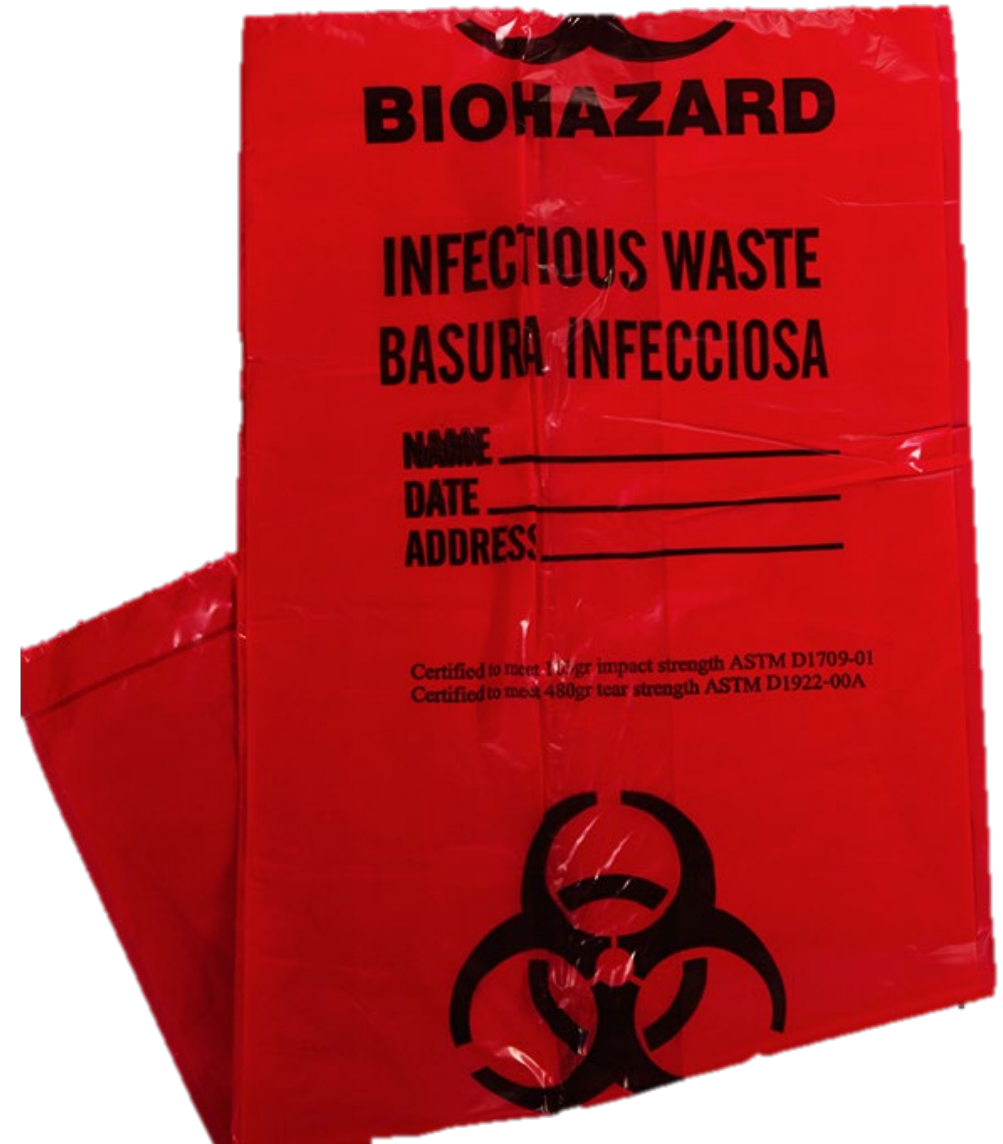
Kevin Valdez, EHS III



- HMD4216 Biohazard bags not placed in a USDOT-approved container lined with a biohazard bag that is ASTM D1709 and ASTM D1922 certified. HSC 117630(b)

CUPA Guidance:

1. *Tied off bags must be placed into DOT approved container.*
2. *Bags must be ASTM 1709 and ASTM 1922 certified.*
3. *Certification must be marked on bags.*



- HMD4217 Waste container or bin not labeled with the words "Biohazardous Waste" or with the international biohazard symbol and the word "BIOHAZARD" on the lid and sides. HSC 118280(c)

CUPA Guidance:

1. *Ensure container markings are not faded, worn, or illegible.*
2. *Secondary container should have markings visible to staff and inspector.*
3. *Red containers are not required but are most common.*



- HMD4201 Failed to submit or report in CERS chemical inventory information for medical waste and keep up to date. SDCC 68.904(a)(2)

CUPA Guidance:

1. *All routinely generated medical waste streams must be reported in CERS.*
2. *Annual waste amounts must be accurate in CERS and on MWMP.*
3. *Medical wastes treated on site, regardless of type, and subsequently disposed of as solid waste, must be reported.*

Infectious Waste, General 📄		See Site Map	800 pounds
Infectious Waste, Pathology Waste 📄		Infectious waste holding area	150 pounds
Infectious Waste, Sharps 📄		See Site Map	100 pounds
INFECTIOUS WASTE, TRACE CHEMO 📄		SEE SITE MAP	20 pounds



- HMD4200 Failed to obtain or maintain a Small Quantity Medical Waste Registration or a Unified Program Facility Permit. HSC 117705; SDCC 68.904, 68.905, 68.906, 68.907.1, 68.1201

CUPA Guidance:

1. *Submittal of medical waste items in CERS must be completed once facility becomes a routine generator of medical waste.*

6HWASTE	HW/MW Fees per medical and/or hazardous waste item as reported in CERS	65.107(k)(2)(b)
6HLQGMW	LQG MW Fee per business generating 200 lbs. or more of medical waste in a month	65.107(k)(8)

2. *Large Quantity Generators must also create a MWMP.*
3. *Registration only allowed for Small Quantity Generators, not subject to any other CUPA program.*



- HMD4303 Did not maintain on file disposal receipts, tracking or shipping documents for medical waste shipped offsite for at least 3 years. HSC 117945

CUPA Guidance:

1. Disposal receipts must be available for review for SQG's
2. LQG's should be available within two business days but at inspection time is best to prove compliance with requirement
3. Tracking documents for all medical waste shipped off must provide types, amounts, hauler, dates, final destination, etc.

MEDICAL WASTE TRACKING FORM			INSTRUCTIONS FOR COMPLETING MEDICAL WASTE TRACKING FORM	
1. Generator's Name and Mailing Address		2. Tracking Form Number		<p>Copy 1 — GENERATOR COPY: Mailed by Destination Facility to Generator Copy 2 — DESTINATION FACILITY COPY: Retained by Destination Facility Copy 3 — TRANSPORTER COPY: Retained by Transporter Copy 4 — GENERATOR COPY: Retained by Generator</p> <p>As required under 40 CFR Part 259:</p> <p>1. This multi-copy (4-page) shipping document must accompany each shipment of regulated medical waste generated in a Covered State. 2. Items numbered 1-14 must be completed before the generator can sign the certification. Items 4, 7, 10, 11, 12, & 19 are optional unless required by the State. Item 22 must be completed by the destination facility.</p> <p>For assistance in completing this form, contact your nearest State office or Regional EPA office, or call (800) 424-9348.</p>
3. Telephone Number ()		4. State Permit or ID No.		
5. Transporter's Name and Mailing Address		6. Telephone Number ()		
EPA Med. Waste ID No.		7. State Transporter Permit or ID No.		
8. Destination Facility Name and Address		9. Telephone Number ()		
		10. State Permit or ID No.		
11. US EPA Waste Description		12. Total No. Containers	13. Total Weight or Volume	
a. Regulated Medical Waste (Unleached)				
b. Regulated Medical Waste (Treated)				
c. State Regulated Medical Waste				
14. Special Handling Instructions and Additional Information				
15. Generator's Certification: Under penalty of criminal and civil prosecution for the making or submission of false statements, representations or omissions, I declare, on behalf of the generator, that the contents of this shipment are fully and accurately described above and are classified, packaged, marked, and labeled in accordance with all applicable State and Federal laws and regulations, and that I have been authorized, according to applicable regulations, to make such declarations on the person in charge of the generator's operation. Printed/Typed Name _____ Signature _____ Date _____				
16. Transporter 1 (Certification of Receipt of Medical Waste as described in items 11, 12, & 13) Printed/Typed Name _____ Signature _____ Date _____ 17. Transporter 2 or Intermediate Handler (name and address) 18. Telephone Number () 19. State Transporter Permit or ID No. EPA Med. Waste ID No. _____				
20. Transporter 2 or Intermediate Handler (Certification of Receipt of Medical Waste as described in items 11, 12, & 13) Printed/Typed Name _____ Signature _____ Date _____ 21. New Tracking Form Number (for consolidated or remanifested waste)				
22. Destination Facility (Certification of Receipt of Medical Waste as described in items 11, 12, & 13) <input type="checkbox"/> Received in accordance with items 11, 12, & 13 Printed/Typed Name _____ Signature _____ Date _____ (If other than destination facility, indicate address, phone, and permit or ID No. at item 14.)				
23. Discrepancy Box (Any discrepancies should be noted by item number and initials)				



- HMD4213 Biohazardous bags not containerized in rigid, leak resistant, and covered containers or bins when placed for storage, handling, or transport. HSC 118280(c)

CUPA Guidance:

1. *Ensure all biohazardous waste is placed in secondary contained lined with red bag.*
2. *Containers must be rigid, leak resistant and covered with tight fitting lid.*
3. *Red bag on hamper stand ok ONLY in surgery suites*
4. *“Open” secondary container ONLY allowed in BSC’s.*



- HMD4351 Medical Waste Management Plan (MWMP) not submitted to HMD within 30 days of generating medical waste or making updates to the MWMP. HSC 117960, 117970

CUPA Guidance:

1. Violation for LQG's only.
2. MWMP must be submitted to the CUPA via CERS Hazardous Materials Inventory.
3. Updates to hauler, types of waste, amounts, must be reflected accurately in MWMP.



Medical Waste Management Plan	
Facility Information	
Business Name	Permit or Registration #
Type of Business	Date
Street Address	City/ZIP
Person Responsible for implementing the Medical Waste Management Plan (MWMP)	
Name	
Title	Phone
Types of Medical Wastes (MW) Generated	
Please check the box for all types of medical waste that will be generated by your facility. Also estimate the number of pounds (lbs.) that will be generated each month. Definitions are in Chapter 2 of the Medical Waste Management Act in the California Health and Safety Code (HSC) §117625-117780.	
<input type="checkbox"/> Sharps waste - a device used in a healthcare setting that has acute rigid corners, edges, or protuberances capable of cutting or piercing. (e.g., needles, syringes, blades, scalpels, root canal files, Pasteur pipettes, or broken glass) Estimated monthly amount <input type="text"/> lbs	<input type="checkbox"/> Biohazardous waste - regulated medical waste, clinical waste, or biomedical waste from the medical treatment of a human or from an animal that is suspected to be infected with a pathogen that is infectious to humans. Biohazardous waste also includes: Highly Communicable waste - waste contaminated with excretion, exudates or secretions from humans or animals who are isolated due to highly communicable diseases. Laboratory waste - infectious specimens or microbiological cultures, stocks of infectious agents, live and attenuated vaccines, biologicals, and culture media. Fluid Blood or Blood Products - recognizable fluid human blood or blood products, containers, equipment containing human blood or blood from animals Estimated monthly amount <input type="text"/> lbs
<input type="checkbox"/> Non RCRA Pharmaceutical waste - a prescription or over-the-counter human or veterinary drug that is not RCRA hazardous waste nor radiological waste. Estimated monthly amount <input type="text"/> lbs	<input type="checkbox"/> Liquid/Semi-liquid biohazardous waste - treated onsite by chemical disinfection and discharged to sewer.* Estimated monthly amount <input type="text"/> lbs
<input type="checkbox"/> Trace Chemotherapeutic waste - waste that is contaminated through contact or contained, chemotherapeutic agents. (e.g. gloves, disposable gowns, towels, and empty IV bags with attached tubing) Estimated monthly amount <input type="text"/> lbs	<input type="checkbox"/> Other (specify): <input type="text"/> Estimated monthly amount <input type="text"/> lbs
<input type="checkbox"/> Pathology waste - human body parts or animal tissues suspected to be infectious to humans or have been fixed in formaldehyde or other fixative Estimated monthly amount <input type="text"/> lbs	
<input type="checkbox"/> Trauma Scene waste - waste that has been removed, is to be removed, or is in the process of being removed, from a trauma scene by a trauma scene waste management practitioner. Estimated monthly amount <input type="text"/> lbs	
Estimate of <u>TOTAL</u> monthly medical waste generated: <input type="text"/> lbs	

- HMD4222 Biohazard bag waste stored more than 7 days at $>0^{\circ}\text{C}$ (for generators of 20 or more pounds a month). HSC 118280(e)(1)(A)

CUPA Guidance:

1. *Amounts don't align with Large or Small Generator statuses.*
2. *Protocols not in place to verify waste is hauled off site.*
3. *Weekly pick-ups required; the 7 days does not refer to the time allowed in central accumulation.*



- HMD4204 MW designated accumulation area not posted with an approved, legible biohazardous waste "warning sign" in English & Spanish or in another language, in addition to English which can be read from a distance of at least 25 feet. HSC 118310

CUPA Guidance:

1. *Multiples designated areas?
Multiple signs needed.*
2. *Outdoor designated areas:
Ensure signs are standing up
to weather.*
3. *We don't have a tape
measure, but....*



**CAUTION - BIOHAZARDOUS WASTE STORAGE
AREA UNAUTHORIZED PERSONS KEEP OUT**

**CUIDADO - ZONA DE RESIDUOS - BIOLÓGICOS
PELIGROSOS PROHIBIDA LA ENTRADA A
PERSONAS NO AUTORIZADAS**



- HMD4210 Primary containers accumulating MW not labeled with an electronic label or label with generator's name, address and phone number

CUPA Guidance:

1. *Pre-printed bags are useful.*
2. *Processes should be in place to label bag once it begins accumulating waste...not once ready for shipment.*
3. *Ensure all medical waste containers are labeled. Label should be easily identified by staff/inspector.*

Generator's Label (example)

Name: Medical Waste Generator
Address: 123 Generator Dr.
San Diego, CA
92123
Phone #: (858) 123-4567





Small Quantity Medical Waste Registration





Small Quantity Medical Waste Registration

SQMWR Qualification

FACILITIES THAT QUALIFY FOR REGISTRATION	FACILITIES THAT DO <u>NOT</u> QUALIFY FOR REGISTRATION
<p>Facilities that generate less than 200 lbs total of medical waste* per month</p> <ul style="list-style-type: none">· Sharps waste· Biohazardous waste· Non-RCRA Pharmaceutical Waste· Trace Chemotherapy Waste· Pathology Waste· Trauma Scene Waste <p>*Pourable/Scrapable chemotherapy waste on this table is considered hazardous waste and requires a UPFP.</p>	<ul style="list-style-type: none">· Facilities generating 200 pounds or more of medical waste per month.· Facilities that treat medical waste in any amount. (<i>autoclaving or other State-approved method</i>)· Facilities that generate hazardous wastes (<i>bulk chemo, flammable or toxic staining waste, RCRA pharmaceuticals, etc.</i>)· Facilities that handle hazardous materials in amounts exceeding local, state, or federal reporting thresholds. (<i>compressed medical gasses >1,000 cu ft.</i>)· Common medical waste storage facilities that provide a central collection point for 2 or more small quantity medical waste generators to store waste prior to collection by a waste hauler.



Small Quantity Medical Waste Registration

Ways to apply for SQMWR

- 1- Submit Registration application online through **Accela Citizen Access (ACA)**
- OR
- 2- Completing the **SQMWR application** and emailing the completed form to **medicalwaste@sdcounty.ca.gov**



Small Quantity Medical Waste Registration

Questions???



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