

MEDICAL WASTE

Although medical waste does not fall under the primary jurisdiction of Cal/OSHA, it still poses a number of potential hazards to employees and should be reviewed periodically as a subject of employee safety training.

Considerable confusion exists not only among veterinary practices, but also among medical waste hauling and disposal companies regarding medical waste. Common areas of confusion include: what constitutes medical waste, how medical waste should be stored in-house, and how long medical waste can remain on a premises prior to removal by a registered medical waste hauler. As a consequence, items that should be handled as medical waste end up being discarded into conventional garbage, which results in risk to sanitation workers and stress on the environment. In contrast, when items not specified as medical waste by law are treated as such, it results in undue costs to veterinary practices. Veterinary practices often rely on medical waste hauling and disposal companies to direct them on medical waste management, but information given can be inaccurate at times. Ultimately, it is the responsibility of each practice to comply with the law, so a careful review of the practice medical waste management plan using applicable laws and regulations is recommended.

In California, medical waste is defined by the Medical Waste Management Act in the California Health and Safety Code. The act is enforced and regulated by the California Department of Public Health Environmental Management Branch and can be found at www.cdph.ca.gov under the "Certificates and Licenses" tab, then under "Medical Waste." Practices are encouraged to review the act.

The Medical Waste Management Act seeks to protect human beings from highly communicable diseases which pose a risk of contraction through contact with the various types of medical waste outlined below. By legal definition, a "Highly Communicable Disease" refers only to diseases that have the potential to harm human beings. Diseases such as parvovirus and distemper do not fall into medical waste categories, while zoonotic threats such as salmonella, rabies, and ringworm do. The bottom line—the Medical Waste Management Act serves to protect human health. Since the vast majority of animal issues do not pose a human health risk, the medical waste component of case management is minimal.

What is NOT Medical Waste?

Fluid animal blood, dried blood, feces, urine, excretion, sputum, secretion, surgery drapes, soiled sanitary supplies, gauze pads, and surgery supplies that are NOT contaminated with pathogens known or suspected by the veterinarian of being highly communicable to human beings do NOT constitute medical waste. Non-contagious animal parts, fluids or excretions are not considered biohazardous and do not need to be included in medical waste receptacles. [California Health and Safety Code Section 117700](#).

Types of Medical Waste

Medical Waste is classified in the following categories:

- **Biohazardous:** 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. Biohazardous waste includes animal specimen cultures, animal parts, tissues, fluids, or carcasses suspected by the attending veterinarian of being contaminated with infectious agents known to be contagious to humans, and specimens fixed in formalin. Examples include an E-Coli pyometra uterus being removed in surgery or anything from or touching an animal suspected of having a zoonotic disease. Provided that the attending veterinarian does not suspect a risk to humans, biohazard waste does not include gauze pads with dried blood, fluid blood, animal excrement, soiled bedding, or body tissues removed during surgery.
 - **Laboratory:** a subcategory of biohazardous waste that includes 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, and discarded Brucellosis and Contagious Ecthyma vaccines; 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.

- ***Pathology:*** surgery specimens or tissues removed at surgery or necropsy 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. Animal parts, tissues, fluids, or carcasses suspected by the attending veterinarian of being contaminated with infectious agents known to be contagious to humans.
- ***Pharmaceutical:*** unwanted, expired, surplus or adulterated prescription or over-the-counter human or veterinary drugs not including controlled substances, radioactive drugs, or any drugs classified as hazardous substances.
- ***Sharps:*** means 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 a human trauma scene.
- ***Trace chemotherapeutic:*** means waste that is contaminated through contact with, or having previously contained, chemotherapeutic agents, including, but not limited to, gloves, disposable gowns, towels, empty syringes (without needles attached), intravenous solution bags and attached tubing that are empty.

Medical Waste Storage and Disposal

- Biohazardous waste must be deposited and stored in a red bag that meets specifications set forth in [Section 117630 of the California Health and Safety Code](#).

The biohazard bag conspicuously labeled with the words “Biohazardous Waste” or with the international biohazard symbol and the word “BIOHAZARD.” ([California Health and Safety Code Section 118275\(a\)\(2\)](#)). Bags must not exceed 3 pounds of solid content or 1 gallon of liquid content. Once content is deposited, the bag must be tied in a manner that prevents leaking or expulsion of contents. Bags intended for storage, handling, or transport must be placed in a rigid container which may be disposable, reusable, or recyclable. Containers shall be leak resistant, have tight-fitting covers, and be kept clean and in good repair. Containers may be recycled with the approval of the enforcement agency. Containers may be of any color and shall be labeled with the words “Biohazardous Waste” or with the international biohazard symbol and the word “BIOHAZARD” on the lid and on the sides so as to be visible from any lateral direction.

If a practice generates 20 or more pounds of biohazardous waste per month, the practice shall not contain or store that waste above 0° Centigrade (32° Fahrenheit) at an onsite location for more than seven days without obtaining prior written approval of the enforcement agency.

If a practice generates less than 20 pounds of biohazardous waste per month, the practice shall not contain or store that waste above 0° Centigrade (32° Fahrenheit) at an onsite location for more than 30 days.

A practice may store biohazardous waste at or below 0° Centigrade (32° Fahrenheit) at an onsite location for not more than 90 days without obtaining prior written approval of the enforcement agency.

A practice may not store biohazardous waste above 0° Centigrade (32° Fahrenheit) at a location or facility which is offsite from the generator for more than seven days before treatment. [California Health and Safety Code Section 118280\(a-e\)](#)

Most commonly, veterinary practices use a [state-approved medical waste hauler](#) to dispose of biohazardous waste.

- Pharmaceutical waste must be segregated from other types of medical waste. It should not be placed into red biohazardous waste bags. Pharmaceutical waste may be placed into plastic or cardboard boxes and should be labeled “HIGH HEAT ONLY- INCINERATION.”

According to [Section 118280\(d\)\(2\) of the California Health and Safety Code](#), pharmaceutical (biohazardous) waste may be stored at an onsite location for not longer than 90 days when the container is ready for disposal. In certain circumstances, it may be stored on-site longer, but only through written approval by the local public health department. Pharmaceutical waste may not be stored at an off-site location for more than 7 days.

Transportation and disposal of pharmaceutical waste may only be completed by [registered medical waste haulers](#) approved by the California Department of Public Health or through a [mail-back service](#).

Controlled substances (Scheduled Drugs) fall under the jurisdiction of the [Federal Drug Enforcement Agency Office of Diversion Control](#) (DEA) and must be handled according to DEA requirements set forth in the Federal Controlled Substances Act. Management of unwanted, adulterated or expired controlled substances is handled by DEA Field Offices on a case by case basis. However, by-and-large, DEA field offices will direct registrants to dispose of controlled substances through an approved reverse distributor.

- Sharps Waste: To containerize sharps waste, a person shall do all of the following:
 - a. Place all sharps waste into a sharps container.
 - b. Tape closed or tightly lid full sharps containers ready for disposal to preclude loss of contents.
 - c. Store sharps containers ready for disposal for not more than thirty days without the written approval of the enforcement agency.
 - d. Label sharps containers with the words “sharps waste” or with the international biohazard symbol and the word “BIOHAZARD”.

[California Health and Safety Code Section 118285](#)

Sharps waste may be disposed of through one of three ways:

- a. a [state-approved medical waste transporter](#),
- b. an approved on-site alternative treatment technology. If you reside in a county that is under the jurisdictional oversight of the state Department of Public Health (visit [this map](#) or access [this list](#)), a list of approved on-site alternative treatment technologies may be accessed [here](#). If your county is under the jurisdiction of your local health department, a list of local medical waste management program enforcement contacts can be accessed [here](#).
- c. Mail-back systems are another option for the disposal of sharps waste. While economical, they do require an [approved container](#). Compliant containers are often provided by the mail-back service company. A list of companies can be accessed [here](#).

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- Trace chemotherapeutic waste must be segregated for storage, and, when placed in a secondary container, that container shall be labeled with the words “Chemotherapy Waste,” “CHEMO,” or other label approved by the health department on the lid and sides, so as to be visible from any lateral direction, to ensure treatment of the biohazardous waste pursuant to Section 118222. Sharps waste that is contaminated through contact with, or having previously contained, chemotherapeutic agents, shall be placed in sharps containers labeled in accordance with the industry standard with the words “Chemotherapy Waste,” “CHEMO,” or other label approved by the department, and shall be segregated from other sharps waste for separate disposal. Trace chemotherapeutic waste must be treated by incineration or alternative treatment technologies approved by the health department. To accomplish this, either use one of the state-approved [registered medical waste haulers](#) or an approved on-site alternative treatment technology. If you reside in a county that is under the jurisdictional oversight of the state Department of Public Health (visit [this map](#) or access [this list](#)), a list of approved on-site alternative treatment technologies may be accessed [here](#). If your county is under the jurisdiction of your local health department, a list of local medical waste management program enforcement contacts can be accessed [here](#).

MEDICAL WASTE SAFETY QUESTIONS

What are the different classifications of medical waste?

How is each type of medical waste managed in this practice?

Which receptacles are designated for each of the specific types of medical waste and where are they located in the practice?

Who is responsible for overseeing that medical waste is deposited, stored and disposed of properly in the practice?

What is not considered medical waste?

ADDITIONAL TRAINING RESOURCES

www.cvma-inline.net → Regulatory Compliance Section in the Resources box in the lower right hand corner of the page under "Waste."

For more information on the Medical Waste Management Program (MWMP), contact either the MWMP Headquarters at (916) 449.5671, or the Southern California Regional Office at (818) 551.2042. Or visit the California Department of Public Health Medical Waste Management Branch website: <http://www.cdph.ca.gov/certlic/medicalwaste/Pages/default.aspx>

CDPH Medical Waste Self-Assessment Manual:

<https://www.cdph.ca.gov/certlic/medicalwaste/Documents/MedicalWaste/SELFASSESS%203rd%20edition%20Nov2010.pdf>