Basic Infectious Waste Requirements For Generators of Small Amounts

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If you generate small amounts of infectious waste, this fact sheet will help you manage that waste safely and may also reduce your disposal costs. It summarizes basic requirements for businesses and institutions -- such as schools, livestock owners and many health care providers such as dentists, veterinarians and visiting nurses -- that generate less than 50 pounds per month (lb/mo).

If your infectious waste is only from household (personal) use, please read <u>Protect Yourself, Protect Your Community – Safe Options for Household Sharps Disposal</u> (DNR Publication WA1637) or visit the DNR website (<u>dnr.wi.gov</u>) and search for "household healthcare waste" or "sharps disposal" or "publications".

Safety requirements apply to all

The basic safety requirements apply to all businesses and institutions that generate or manage infectious waste in Wisconsin. They address:

- source separation,
- containment,
- storage,
- · transportation,
- treatment,
- disposal and
- recordkeeping.

The medical waste rule is <u>chapter NR 526, Wis.</u>
<u>Adm. Code</u>. The URL for the rule is: http://docs.legis.wisconsin.gov/code/admin_code/nr/500/526.pdf. The exact citations for the safety requirement are listed in a note under s. <u>NR 526.04</u>.

What is "source separation"?

Source separation means putting wastes into separate containers at the location where you generate the wastes. Separating wastes at the source enables recycling and cuts disposal costs.

State law requires you to keep non-infectious waste out of infectious waste containers and to recycle. For more information, see Waste Reduction and Recycling: A Guide for Wisconsin Healthcare (Pub WA1150).

You must also determine if any of your wastes are hazardous wastes. For more information, see Is Your Waste Hazardous? (Pub WA1152).



Separate waste containers and signs encourage source separation at Gundersen Health System in LaCrosse. (Photo Credit: Wisconsin DNR)

What items are infectious wastes?

Infectious wastes include:

- contaminated sharps, i.e., needles, syringes with needles attached, lancets, scalpel blades, broken glass vials, broken rigid plastic vials and laboratory slides;
- unused or disinfected hypodermic needles, scalpel blades, lancets and syringes with needles attached;
- bulk (drippable, pourable) amounts of human blood and body fluids;
- human tissue:
- · microbiological laboratory waste; and
- tissue, blood or body fluids from animals known to be infected with anthrax, brucellosis, psittacosis, Q fever, rabies or tuberculosis.

What items are not infectious waste?

Items commonly thought to be infectious waste but which usually are not, include:

- items which are not saturated with blood, such as blood-spotted bandages, clothing;
- sanitary napkins;
- diapers;
- gloves and drapes;
- syringes and IV tubing without needles attached;
- tissue and blood for most animals (see previous question for the exceptions);
- animal manure and bedding; and
- · waste glass.

Section NR 526.05 lists items that are and are not presumed to be infectious waste. If you are still not sure, contact DNR.

What items should not be mixed with infectious waste?

The following items do not belong in infectious waste containers:

 Mercury thermometers, mercury devices and vaccines preserved with Thimerosal. These

- are hazardous waste. Recycle these before they break or spill. To learn how to dispose of mercury and other hazardous wastes, see Managing Excess Vaccines (Pub WA841).
- Pharmaceuticals that do not have a sharp involved. Some are controlled substances, some are hazardous wastes and some are solid wastes. See <u>Evaluating & Managing</u> <u>Pharmaceutical Waste</u> (Pub WA1257).
- Empty glass vials. Recycle these if you can, otherwise put them in the regular trash.
 However, if your vials contained hazardous waste, see <u>Managing Empty Containers</u> (Pub WA1256).

How should you contain sharps?



Place sharps in rigid puncture-resistant containers with secure lids or caps.

Acceptable containers include commercially-available sharps containers or thick-walled plastic detergent or bleach bottles with screw-on caps. Unacceptable containers include coffee cans (their lids are too easily punctured), plastic milk jugs, plastic bags, pop cans and soda bottles.

Sharps containers must be labeled with a biohazard emblem or with the words "bio-hazard", "sharps" or "infectious waste".

DO NOT add bleach to the container; bleach may not completely disinfect needles, and it could spill and injure you or waste handlers.

How should you contain non-sharp infectious wastes?

Place non-sharp infectious wastes in a plastic bag that is both puncture- and tear-resistant. If necessary, use two bags. Rigid reusable containers are also acceptable as long as they are disinfected after being emptied.

Place the sealed bag in a rigid shipping container, such as a corrugated cardboard box, a covered reusable container or a cart. Your infectious waste hauler may provide shipping containers as part of your contract.

The rigid container must be labeled with a biohazard emblem and the word "bio-hazard".

Don't re-open bags or containers except to prevent spills or leakage. Once you put something in an infectious waste container, you must manage it as infectious waste.

May you use products that solidify infectious waste?

It depends. Read <u>Solidifying Infectious Waste</u> (Pub WA1329) to find out if what you intend to do meets Wisconsin's treatment standards and is the best choice for you. Please note that sharps must be rendered both non-infectious and unusable by grinding or breaking before they can be landfilled

How long may you store infectious wastes?

Infectious waste containers may be stored up to 90 days after they are full or after you decide to discard them.

How and where may you store wastes?

Your central storage area should:

- Be accessible only to authorized persons.
- Contain only infectious waste (a designated area within a room is acceptable).
- Be clean and dry, with a floor impermeable to liquids.
- Inside a building, secure container or vehicle, to keep the waste from being exposed to the weather.

You must prevent nuisance conditions. Refrigeration is not necessarily required.



This infectious waste storage area is a designated area within a room at UW Hospital and Clinics. (Photo Credit: Wisconsin DNR)

Where may you send your infectious waste for treatment?

The waste must go to a licensed storage or treatment facility or to a place, such as a hospital or sharps collection station, where it will be treated properly. (See ss. NR 526.09(4) and NR 526.10(3).)

To find a licensed infectious waste transporter, go to the DNR website at dnr.wi.gov and search for "infectious waste transporter".

May you use a sharps collection station?

"Sharps collection stations" voluntarily collect discarded sharps as a public service. While some sharps collection stations serve only home generators, many accept sharps from business and institutional generators like you. They may charge you up to the amount it costs them to dispose of the waste. Call ahead to ensure the station will accept your waste.

To locate a sharps collection station near you, go to the DNR website at dnr.wi.gov and search for "sharps disposal".

May you burn infectious wastes?

No, burn barrels and crematoria are not licensed for medical waste treatment.

May you transport infectious wastes?

Sure. If you (the generator) are transporting less than 50 lb. of infectious waste <u>every</u> month, you don't need a special license. (You may also transport sharps for others, such as home-bound or rural generators.) You must follow the minimum requirements in s. NR 526.10(3).

If you will be transporting 50 lb. or more in any one month of a year, see the next section.

What records must you keep?

Even though you may be exempt from other paperwork (see next section), you must keep records of the waste you send off-site for treatment and that you treat on-site.

- If you use a licensed infectious waste hauler, keep a copy of the infectious waste manifest (shipping paper) and the written evidence that your waste has been destroyed, which, by law, the treatment facility must provide to you (see ss. NR 526.14 and .15.)
 Some vendors provide electronic records.
- If you transport your waste yourself, keep a simple log documenting the dates, amounts of waste, and where you took each shipment.
- If you treat your own waste by autoclaving or other means, follow the requirements in ss. NR 526.11 and NR 526.12(4) for operating and testing your equipment and for keeping records.

Save the records for at least 3 years (5 years for hospitals, clinics and nursing homes).

We recommend keeping your records in a secure yet accessible location with other important records, in a shared file cabinet or network drive. Avoid storing them in personal files or on individual computers, which are more vulnerable to loss.

Do you need to notify the state?

No, generators do not need to notify the state. However, you may need to file annual reports.

Licensing & reporting requirements apply to some

Do you need a transporter's license?

If you are transporting 50 lb. or more in any one or more calendar months of a calendar year, you must have an infectious waste transportation license and follow the requirements in s. NR
526.10.

For more information or to apply for a license, go to the DNR website at dnr.wi.gov and search for "transporting infectious waste" or contact the
DNR environmental program associate for the area of the state where you are located.

Do you need a medical waste reduction plan?

Only hospitals, nursing homes and clinics (e.g., dialysis, dental and veterinary clinics) have to write and implement medical waste reduction plans and submit annual progress reports.

Medical facilities generating small amounts of infectious waste may be exempt from writing a plan. The exemption limits are not quite the same as in the previous question, so be sure to read Medical Waste Reduction and the Annual Report (Pub WA802). The ideas on the next page may help you generate less than 50 lb/mo.

Do you need to file annual reports?

If you send 50 lb. or more away for treatment in any <u>one</u> month of a calendar year, you need to file an infectious waste annual report with DNR. Facilities that must implement medical waste reduction plans also must file the annual report.

To find out for sure whether you are exempt or not, go through the questions under "Exemption Status" in the <u>Infectious Waste Annual Report Instructions</u> (Form 4400-177 Instructions).

Reducing disposal costs

There <u>are</u> ways to cut the costs of infectious waste disposal. Consider these ideas:

Reduce waste Avoiding waste saves money and hassle in the long run. See if you can:

- reduce packaging,
- · use fewer disposables,
- substitute other products or materials,
- change or modify equipment,
- change purchasing policies or ask your corporate office to do so,
- work with suppliers, or
- change housekeeping practices, e.g., by moving or labeling waste containers.

For more ways to reduce waste, go to the DNR website at dnr.wi.gov and search for "reducing health care waste."

Reuse waste wherever possible by:

- appropriate reprocessing, such as sterilizing, disinfecting, decontaminating, laundering, or recharging;
- exchanging waste or equipment with others;
- selling or donating unused items, reprocessed items or equipment (go to dnr.wi.gov and search for "donating medical items").

Recycle everything you can: paper, metals, glass, plastics, cardboard, batteries, light bulbs and anything containing mercury.

Use a sharps collection station, as described on page 3.

Manage infectious wastes together with other generators. Generators in the same building or property who manage waste together are called "groups of generators" and may submit only one annual report (about transportation) on behalf of the group

Set up a sharps collection station You may manage sharps together with others by setting up a sharps collection station. As a generator yourself, you may accept sharps from other small generators without registering as long as you take in no more than the amount you generate.

If you wish to accept more than you generate or if transporting others' sharps would put you over the 50 lb/mo transportation limit, you must register as a sharps collection station. Registration is free and simple.

For more information, see our website at dnr.wi.gov and search for "sharps collection" or read Sharps Collection (Pub WA807).

Treat your own non-sharp infectious waste according to the treatment methods allowed in s. NR 526.11. For example, you may autoclave non-sharp infectious waste. Do not burn it. Be sure to keep records [see s. NR 526.12(4)]. If considering the use of solidifiers, see Solidifying Infectious Waste (Pub WA1329).

Change your waste pickup schedule within the limits of your waste hauler's contract. Full containers can be stored up to 90 days. However, if the pickup is 50 lb. or more, you will have to file an infectious waste annual report for the year. Balancing the two costs is a business decision.

Reserve waste If you have slightly over the 50 lb. limit one month (e.g., in the fall when you give influenza vaccinations) and have not stored a waste container for 90 days yet, you may reserve it for the next pickup.



For more information

Go to Wisconsin's healthcare waste pages, at http://dnr.wi.gov search for "healthcare waste."

Search the <u>DNR Waste & Materials</u>
<u>Management Guidance and Publications</u> for the category "medical/infectious waste" or for a particular publication title or number (e.g., 1257).

Send an email to DNRWasteMaterials@Wisconsin.gov.

Call the Waste and Materials Management Program general number at (608) 266-2111 and ask to have your call redirected.

Access Wisconsin's infectious waste rules www.legis.state.wi.us/rsb/code/nr/nr526.html

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