



# Medical Waste - Updates and Best Practices

**By: Dana Barkil**

**EPIC+ Seminar 10/31/2023**



# Background: Dana Barkil

- SEHS in San Diego County, Hazardous Material Division (HMD).
- Medical Waste Program Technical Lead in San Diego County.
- Bachelor's Degree in Bio-Medical Engineering & Master's in Medical Waste Treatment.
- 20 years of work experience in the medical waste sector, with my focus on San Diego County for the past 6 years.

Email: [Dana.Barkil@SDCOUNTY.CA.GOV](mailto:Dana.Barkil@SDCOUNTY.CA.GOV)

Cell Phone: 619-249-8704



# Topics

- Medical Solid Waste Security
- Nicotine Replacement Therapies (NRTs)
- Bio-Hazardous Waste Container
- Medical Waste On-Site Treatment
- **Small Quantity Medical Waste Registration (SQMWR)**



# Medical Solid Waste Security

- According to MWMA 117700(d): Medical waste **does not** include Waste that is not biohazardous, such as paper towels, paper products, articles containing nonfluid blood, and other medical **solid** waste products commonly found in the facilities of medical waste generators.
- Other examples of medical **solid** waste are empty specimen containers, bandages, dressings, surgical gloves, decontaminated medical waste, non-medical waste sharps, and biohazardous wastes that are not generated in human or animal health care.



# Medical Solid Waste Security

- The County of San Diego used to have a provision in our ordinance that required regulated facilities to secure medical solid waste to deny access to unauthorized persons (San Diego County Code 68.1211)

## **SEC. 68.1211. MEDICAL SOLID WASTE SECURITY.**

Any person who is a generator, or an employee of a generator of medical solid wastes, shall assure that their medical solid waste, prior to disposal, is stored in an area secured as to deny access to unauthorized persons. If such wastes are placed in a trash receptacle or compactor which is accessible, at any time, to unauthorized persons, such receptacle or compactor shall be locked to prevent access to the contents to anyone other than authorized persons or refuse collection personnel.

(Amended by Ord. No. 8477 (N.S.), adopted 11-8-94, operative 1-1-95; amended by Ord. No. 9293 (N.S.), effective 1-12-01; amended by Ord. No. 9667 (N.S.), effective 8-14-04)

However, this section was repealed effective **07/01/2021**

Therefore, as of 07/01/2021 restricting access to medical solid waste is no longer a requirement per the San Diego County Ordinance.



# Nicotine Replacement Therapies (NRTs)

- Amendment to the P075 Hazardous Waste(HW) Listing for Nicotine Rulemaking was approved and became effective on March 9, 2021. **The rulemaking removed nicotine patches, gums, and lozenges that are FDA-approved over-the-counter (OTC) nicotine replacement therapies (NRTs) from the P075 acute hazardous waste listing in California.**

For more information:  
<https://dtsc.ca.gov/pharmaceutical-waste-rulemaking/>



## What does this mean?

- Before 03/09/2021, NRTs ready for disposal were previously managed and disposed of as P-listed RCRA HW. However, they are no longer considered P-listed RCRA HW.



## How should NRTs be managed now in California?

- If the NRTs meet the pharmaceutical waste definition, manage and dispose of as **pharmaceutical Medical Waste (MW)**.

# Biohazardous Waste Container (Red Bag Waste)

## According to MMWA Section 118280 (c):

- Biohazardous waste should be bagged and placed for storage, handling, or transport in a rigid container that may be disposable, reusable, or recyclable. Containers shall be leak resistant, **have tight-fitting covers**, and be kept clean and in good repair.



# Biohazardous Waste Container (Red Bag Waste)

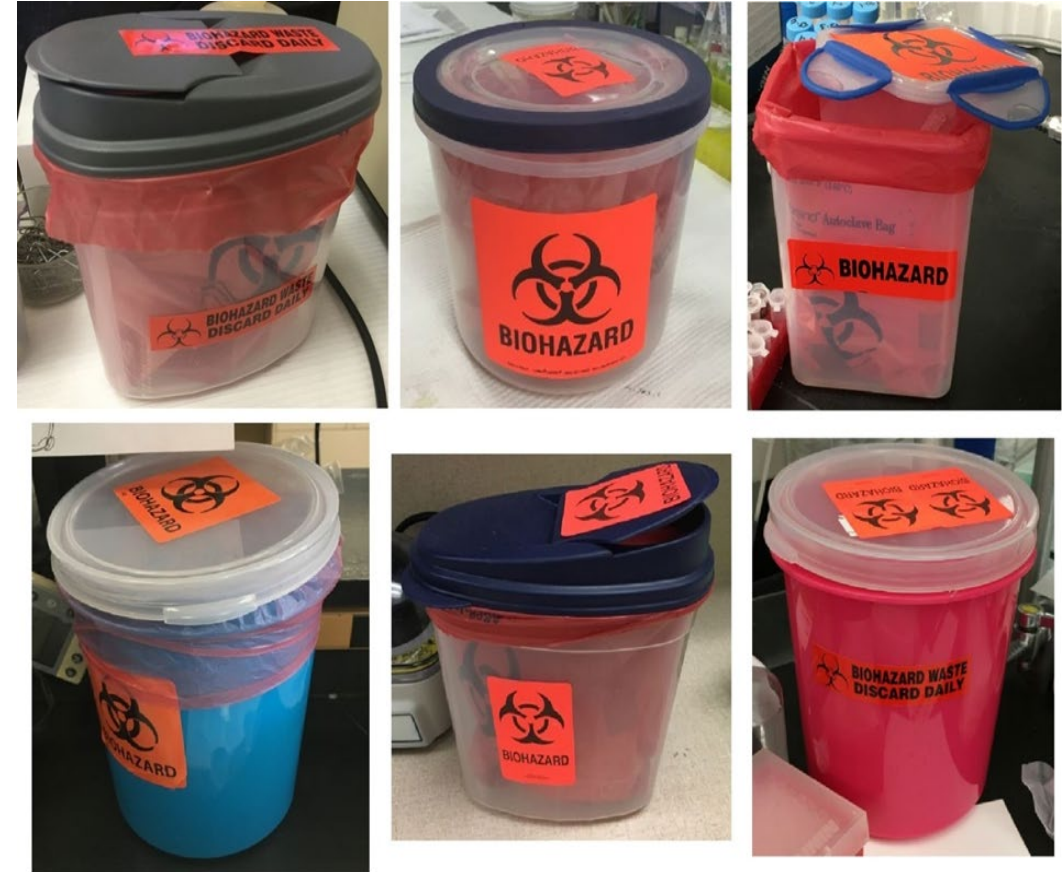
- ❖ MWMA 117915 & 117980 - **Containment and storage** of medical waste shall be in accordance with Chapter 9 (commencing with Section **118275**)
- ❖ MWMA 118275 - Medical Waste Segregation and Storage (a) To **containerize or store** medical waste, at the **point of generation** and while collected in that room.
- ❖ SDCC 68.1205 - Medical waste must be **accumulated**, stored, and transferred in containers that meet the requirements specified in the California Medical Waste Management Act.





# Be Advised

- Biohazardous waste container (floor or bench top) will not need a tight-fitting cover when the staff is actively working at a particular station and adding waste to the container, **but the cover must be replaced** when work ceases and/or staff leaves that work area for any length of time, e.g., end of work, end of shift, work required in another work area, or leaving for a break.



# Examples of Violations

- ☒ EHS observed an **open** biohazardous waste container (floor or bench top), not in active use.
- ☒ EHS observed a biohazardous waste container, not in active use, **missing a cover/unlidded**.

**Violation Classification:** Potentially a “Minor” for 1st time; could be Class II or Class I depending on various factors.

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



# Medical Waste On-site Treatment Permit

“Treatment” means any method, technique, or process designed to **change or destroy the biological character** or composition of any medical waste so as to eliminate its potential for causing disease or creating public or environmental harm.

\*The end goal of medical waste treatment is to render it solid waste (trash).\*



# Medical Waste On-site Treatment Application

Large Quantity Generator vs Small Quantity Generator of medical waste:

*117680 - Large Quantity Generator (LQG):*

Large quantity generator” means a medical waste generator, other than a trauma scene waste management practitioner, that generates 200 or more pounds of medical waste in any month of a **12-month period**.

*117760 - Small Quantity Generator (SQG):*

“Small quantity generator” means a medical waste generator, other than a trauma scene waste management practitioner, that generates less than 200 pounds per month of medical waste.

# Medical Waste On-site Treatment Application

Required for ***BOTH* LQGs and SQGs** who treat medical waste on-site

- ▷ Must notify HMD no less than **90 days** before starting treatment
- ▷ Send [application](#) to Dana Barkil at [Dana.Barkil@sdcounty.ca.gov](mailto:Dana.Barkil@sdcounty.ca.gov)
- ▷ Permit valid for **5 years**

# Small Quantity Medical Waste Registration (SQMWR) Program

Effective September 4, 2020 , **Facilities that qualify for registration:**

- Facilities that generate less than 200 lbs total of medical waste\* per month
  - Sharps waste
  - Biohazardous waste
  - Non-RCRA Pharmaceutical Waste
  - Trace Chemotherapy Waste
  - Pathology Waste
- Facilities should **not** treat medical waste on-site
- Facilities should **not** be subject to any CUPA programs

[Small Quantity Medical Waste Registration Application](#)

For more information, visit: [County of SD SQMWR Website](#)

\*Registration valid for **2 years**\*



# Questions?

[Dana.Barkil@sdcounty.ca.gov](mailto:Dana.Barkil@sdcounty.ca.gov)

619-249-8704

