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 following are some important points to clarify the Act as it pertains to veterinary practices.

1. Veterinary practices are considered Small Quantity Generators, meaning that they generate less than 200 pounds of medical waste per month. Small Quantity Generators are required to register with local health authorities, provided that the jurisdiction has a medical waste management program in place. Registration should be completed through local (city or county) public health departments and should be renewed every two years. Registration fees and inspection intervals will vary by jurisdiction. For those practices that operate in a jurisdiction that does not have a local medical waste management program, registration defers to the State Medical Waste Management Program at the California State Department of Public Health. To determine if your practice is overseen by a local health department or the state, go to http://www.cdph.ca.gov/certlic/medicalwaste/Documents/MedicalWaste/CAmap.gif. For a list of local Medical Waste Management Administrators, visit http://www.cdph.ca.gov/certlic/medicalwaste/Documents/MedicalWaste/2013/L%20E%20A.pdf.

2. “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.

3. Medical Waste is classified in three subcategories:
a. 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.

Biohazardous waste can be stored in sealed biohazard bags at room temperature for up to 30 days. However, practices may also opt to store sealed biohazard bags in a freezer for up to 90 days. Biohazard bags must be red, but the containers that they sit in can be of any color. Bags must be impervious to liquid and must be of sufficient strength to preclude ripping, tearing, or bursting under normal conditions of usage and handling when full. Bags and containers must be clearly labeled with the words “Biohazardous Waste” or with the international biohazard symbol and the word “BIOHAZARD” on the lid and all sides.

b. Pharmaceutical waste is considered to be a type of biohazardous waste and refers to any expired, adulterated, or unwanted over-the-counter or prescription human or veterinary drug in the practice.

Pharmaceutical waste should be placed in a plastic or cardboard box and should be labeled “INCINERATION ONLY” or “HIGH HEAT ONLY.” It can be stored in a sealed container for up to 90 days prior to being removed by a registered medical waste hauler. Controlled substances do not fall into this category because they are regulated by the Federal Drug Enforcement Agency (DEA) and must be disposed of via a licensed reverse distributor.

c. Sharps waste is any device that has acute rigid corners, edges or protuberances capable of cutting or piercing. Examples include any kind of needle, blade, root canal files, broken glass, or syringes contaminated with biohazardous waste. Sharps waste does not include animal vaccine vials, unless they contain or contained an agent that could potentially harm a human (such as brucellosis or sore-mouth vaccines in livestock).

Sharps waste can be stored in a sealed sharps container for up to 30 days on-site. Containers must be made of a rigid, puncture-resistant material that, when sealed, is leak resistant and cannot be reopened without great difficulty. Sharps containers should be labeled with the words “sharps waste” or with the
international biohazard symbol and the word “BIOHAZARD” on the lid and all sides.

The Medical Waste Management Act allows veterinary practices to accept home-generated sharps or pharmaceutical waste from clients, but does not require them to do so. Practices that do not accept home-generated sharps waste from clients should direct them to utilize designated public sharps and medication take-back facilities. A list can be found at www.calrecycle.ca.gov under the “Consumers” tab in the “Detailed Facility Search” section. In addition, the CDPH maintains a current list of take-back facilities at http://www.cdph.ca.gov/certlic/medicalwaste/Documents/MedicalWaste/2013/HomeGenShCons olPtjune09.pdf

Medical waste hauling and disposal companies must be licensed through the California Department of Public Health. To access a list of licensed companies, visit http://www.cdph.ca.gov/certlic/medicalwaste/Documents/MedicalWaste/Haulist.pdf.

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. Also visit their website at http://www.cdph.ca.gov/certlic/medicalwaste/Pages/default.aspx