

Medical Waste Management: Veterinary Practice Obligations

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Many veterinary practices find regulated waste statutes and regulations to be confusing, with misconceptions resulting in risk to sanitation workers, stress on the environment, and unnecessary costs to the veterinary practice when items not classified as medical waste are treated as such.

The Medical Waste Management Act ("Act") defines medical waste in the California Health and Safety Code. The Act is enforced by the California Department of Public Health Environmental Management Branch and can be found online by searching for "California Medical Waste Management Act."

The following are important clarifying points about the Act that pertain to veterinary practices.

Registering with Health Authorities

Because veterinary practices generate less than 200 pounds of medical waste per month, they are considered Small Quantity Generators and are thus required to register with local health authorities, provided the jurisdiction has a medical waste management program. Registration should be completed through local (city or county) public health departments and is commonly renewed every two years. Registration fees and inspection intervals will vary by jurisdiction. For practices operating in a jurisdiction that does not have a local medical waste management program, registration defaults to the State Medical Waste Management Program at the California State Department of Public Health.

Classification 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 infectious to humans. **Laboratory** is a subcategory of biohazardous waste that includes animal specimen cultures containing pathogens that are 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; and 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.

Biohazardous waste can be stored in sealed biohazard bags at room temperature for up to 30 days or in a freezer for up to 90 days. Biohazard bags must be red, but the containers in which they are kept 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.

Pathology: surgery specimens or tissues removed during 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.

Pathology waste should be stored in white bags in an approved container marked "Pathology waste" or "PATH." Its storage and disposal rules follow that of biohazardous waste.

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.

Pharmaceutical waste should be placed in a plastic or cardboard box and should be labeled "Pharmaceutical Waste – Incineration 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 and must be disposed of via a licensed reverse distributor.

Sharps: refers to devices that have acute rigid corners, edges, or protuberances capable of cutting or piercing skin.

Sharps waste can be stored on-site in a sealed sharps container for up to 30 days. 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.

Trace chemotherapeutic: waste that is contaminated through contact with, or previous containment of, chemotherapeutic agents.

Trace chemotherapeutic waste must be segregated for storage. Such waste should be placed in a yellow bag inside an approved secondary container labeled with the words "Chemotherapy Waste" or "CHEMO." 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 health 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 assist members with medical waste compliance, the CVMA is proud to announce a new member benefit with Clean Harbors Environmental Services, Inc. providing medical and hazardous waste transportation and disposal services at a discounted price to CVMA member veterinarians (see panel below for more information). Members may access this benefit through the CVMA member guide found under the Membership tab at cvma.net. ■

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