

## **QUESTIONS AND ANSWERS FOR LARGE GENERATORS OF INFECTIOUS WASTE**

### **QUESTION:**

Who is a generator of infectious waste?

### **ANSWER:**

A generator is any person who produces infectious waste. A "person" can be a business that is operated by a sole proprietor, a partnership, or a corporation. "Person" also includes governmental bodies.

### **QUESTION:**

What is an infectious waste?

### **ANSWER:**

As defined in Ohio law, the following nine categories are considered infectious wastes.

1. Cultures and stocks of infectious agents, wastes from the production of biologicals, and discarded live and attenuated vaccines.
2. Laboratory wastes that are, or likely to have been, in contact with infectious agents.
3. Pathological wastes, including human and animal tissues, organs, and body parts, and body fluids and excreta that are contaminated with or likely to be contaminated with infectious agents, removed or obtained during surgery or autopsy or for diagnostic evaluation, provided that, with regard to pathological waste from animals, the animals have or are likely to have been exposed to a zoonotic or an infectious agent.
4. Waste materials from the rooms of humans, or the enclosures of animals, that have been isolated because of diagnosed communicable disease that are likely to transmit infectious agents. Such waste materials from the rooms of humans do not include any system established by the Centers for Disease Control, unless specific wastes generated under the universal precautions system have been identified as infectious wastes by the Public Health Council in rules adopted in accordance with Chapter 119 of the Ohio Revised Code.
5. Human and animal blood specimens and blood products that are being disposed of, provided that, with regard to blood specimens and blood products from animals, the animals were or are likely to have been exposed to a zoonotic or infectious agent. "Blood products" does not

include patient care waste such as bandages or disposable gowns that are lightly soiled with blood or other body fluids, unless the generator determines that they are soiled to the extent that they should be managed as infectious wastes.

6. Contaminated carcasses, body parts, and bedding of animals that were intentionally exposed to infectious agents from zoonotic or human diseases during research, production of biologicals, or testing or pharmaceuticals, and carcasses and bedding of animals otherwise infected by zoonotic or infectious agents that may present a substantial threat to public health if improperly managed.
7. Sharps used in the treatment, diagnosis, or inoculation of human beings or animals or sharps that have, or may have, come into contact with infectious agents in medical, research, or industrial labs. This would also include any broken glass articles that contained infectious agents.
8. Any other waste materials the public health council identifies as infectious wastes. Currently no other waste items have been designated as an infectious waste by the public health council.
9. Any other waste materials the generator designates as infectious waste.

It should be noted that nearly all of the categories of infectious waste depend upon the presence of infectious agents or the possibility of the presence of infectious agents. The exceptions to this are **blood and blood products, cultures, and sharps**, which are independent of the presence of infectious agents.

**QUESTION:**

What is an infectious agent?

**ANSWER:**

An infectious agent is a type of microorganism, helminth, or virus, that causes, or significantly contributes to the cause of, increased morbidity or mortality of human beings. A statutory change has deleted the words "or animals" from the definition.

**QUESTION:**

Do I have to quantify the amount of infectious waste that I produce?

**ANSWER:**

No. Once registered with the Ohio EPA as a generator of infectious waste a large generator is not required to quantify the amount of infectious waste he/she produces.

**QUESTION:**

If our facility treats the infectious waste that we produce, is it then considered to be an infectious waste treatment facility?

**ANSWER:**

Yes. Large generators (50 pounds or more of infectious waste during any one month) of infectious waste who treat the infectious waste that they produce are considered to be infectious waste treatment facilities and must abide by all the regulations contained in rule 3745-27-32 of the Ohio Administrative Code, except paragraph (M).

**QUESTION:**

Are infectious waste treatment facilities that treat the infectious waste that they produce required to obtain permits and licenses from the Ohio EPA?

**ANSWER:**

Infectious waste treatment facilities that exclusively treat infectious waste which was generated by the person or company that owns or operates the facility is NOT required to obtain a permit-to-install from the Division of Solid and Infectious Waste or an annual operating license from the local Board of Health. Furthermore, by statute infectious waste treatment facilities that are hospitals may accept sharps infectious waste, from small generators who have staff privileges, infectious wastes generated by individuals from their own care or treatment, and from emergency medical squads without losing the permitting and licensing exemption. Of course, incinerators are required to obtain a permit-to-install and a permit-to-operate from the Ohio EPA's Division of Air Pollution Control.

**QUESTION:**

If I treat my infectious waste on-site or on my premises, how must my infectious waste be packaged prior to treatment?

**ANSWER:**

Infectious wastes must be separated from other types of wastes at the point where they were generated. Used "sharps" and unused discarded hypodermic needles, syringes, and scalpel blades must be placed into a sharps container that have the "sharps" designation on them. Liquid or semi-liquid infectious wastes consisting of blood, blood products, body fluids, or excreta may be disposed of into a sanitary sewer system. All other types of infectious wastes must be placed into red plastic bags, or another color bag that is labeled with an international biohazard symbol that is at least 5 inches in diameter. Infectious waste treated on-site does not require a second biohazard bag or an optional container.

**QUESTION:**

How long can I store infectious waste?

**ANSWER:**

Once waste has been placed into the container, the generator is required to handle the infectious wastes in a manner and location that maintains the integrity of the packaging and maintain the infectious waste in a nonputrescent state, using refrigeration or freezing when necessary. There is no longer a storage time limit requirement. Rule of Thumb: If you can smell it or see evidence of its presence (bugs, rodents), the handling and management requirements have been violated.

**QUESTION:**

If I have my infectious wastes taken to an infectious waste treatment facility how must it be packaged?

**ANSWER:**

All used sharps must be into a sharps container. The containers must have the word "sharps" on them and be labeled with the international biohazard symbol. Other infectious wastes must be double bagged in either red plastic bags, or other colored bags which are labeled with an international biohazard symbol that is at least five inches in diameter. Optionally, one bag may be placed into a sturdy, rigid, tightly closed container. The bags used must be able to hold 25 pounds of water, without leakage, while being carried suspended from their tops for 60 seconds. The bags must also pass the 165 gram Dropped Dart Impact Resistance test. Containers if used can be either reusable or disposable. Reusable containers require cleaning after each use with a detergent and chemical disinfection with a U.S. EPA hospital disinfectant that is also tuberculocidal or a ten percent volume/volume of household bleach. In either case the containers must be labeled on two opposite sides with the international biohazard symbol.

**QUESTION:**

Do I need a registered transporter to take my untreated infectious waste to a treatment facility?

**ANSWER:**

Yes. Persons who transport untreated infectious waste off the premise where they were generated must be registered with the Ohio EPA and follow all the regulations which pertain to transporters. Large generators of infectious waste who want to transport untreated infectious waste from any satellite locations to a main facility for treatment or centralized collection must use a registered transporter. However, there is a provision stating that if the generator is already registered with the Ohio EPA as a generator of infectious waste, he/she is exempt from the registration fee as a transporter, but is still required to meet the transporter standards.

**QUESTION:**

If I want to transport infectious waste from a satellite facility to the main facility must the infectious waste be the only material in the shipment?

**ANSWER:**

The untreated infectious waste must be the only type of waste in the shipment. Radioactive, hazardous, or solid waste can not be transported in the same shipment as untreated infectious waste. Other materials such as supplies may be transported in the vehicle as long as the infectious waste is contained in its own separate compartment. A compartment is any enclosed container that can be secured in a stationary position within a vehicle.

**QUESTION:**

Are shipping papers required for the transport of untreated infectious waste?

**ANSWER:**

Yes, a treatment shipping paper is required unless the untreated wastes are being transported to an infectious waste treatment facility that is owned or operated by the person or company that generated the wastes. If the untreated infectious wastes are transported to a main facility for centralized pick-up treatment shipping papers are required.

**QUESTION:**

Are shipping papers required for the transport of infectious wastes that have been treated to render them noninfectious?

**ANSWER:**

Yes. After infectious wastes have been treated to render them noninfectious the wastes must have a disposal shipping paper with them when being transported for final disposal.

**QUESTION:**

Once infectious wastes have been treated must they be transported by a registered transporter?

**ANSWER:**

No. Once treated to render them noninfectious, the wastes do not have to be transported by a registered transporter.

**QUESTION:**

Are generators and infectious waste treatment facilities subject to inspection by Board of Health and Ohio EPA personnel?

**ANSWER:**

Yes. Infectious waste treatment facilities must be inspected at least four times per year, and generators who send their infectious wastes off-site for treatment are also subject to inspection to ensure that they are complying with the infectious waste regulations.

For further information regarding the Ohio EPA Division of Solid and Infectious Waste Management's regulations on large generators, please contact any of the following:

- 1) A registered sanitarian in your local health department. Currently 95 of the 150 local health districts have an approved program with the Ohio EPA and perform compliance monitoring and enforcement of the Ohio EPA's regulations. The phone number for your local health department can be obtained from your local phone directory.
- 2) An inspector in the Ohio EPA District Office - Division of Solid and Infectious Waste Management. Phone numbers and addresses for the District Offices are listed on the attachment to this guidance document.
- 3) An infectious waste specialist in the Ohio EPA central office who can be reached by telephone at (614) 644-2621 or write to: Ohio EPA - DSIWM; Infectious Waste Specialist; P.O. Box 1049; Columbus, OH 43216-1049.

For more information or to obtain a copy of the current infectious waste regulations, please call the Ohio EPA, Division of Solid and Infectious Waste Management, Infectious Waste Unit at (614) 644-2621.