

QUESTIONS AND ANSWERS FOR SMALL 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 wastes from animals, the animals have or likely to have been exposed to a zoonotic or infectious agent.
4. All waste materials from the rooms of humans, or the enclosures of animals, that have been isolated because of diagnosed communicable diseases that are contaminated with any body substance that may transmit infectious agents. Also included are waste materials from the rooms of patients who have been placed on blood and body fluid precautions that the public health council identifies as an infectious waste.
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 an zoonotic or infectious agent. This does not include bandages or gowns that are lightly soiled with blood or body fluids, unless the generator determines that it should be handled as an infectious waste.

6. Contaminated carcasses, body parts, and bedding of animals intentionally exposed to infectious agents from zoonotic or human diseases during research, production of biologicals, or testing of pharmaceuticals. Also included is the carcasses and bedding of animals otherwise infected by zoonotic or infectious agents.
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 humans beings. A statutory change has deleted the words “or animals” from the definition of an infectious agent.

QUESTION:

What is a zoonotic agent?

ANSWER:

“Zoonotic agent” means a type of microorganism, helminth, or virus that causes disease in vertebrate animals and that is transmissible to human beings and causes or significantly contributes to the cause of

increased morbidity or mortality of human beings.

QUESTION:

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

ANSWER:

Yes. Small generators of infectious waste are required to maintain records which show the amount of infectious waste produced during each calendar month. All that is required is a monthly total which is the summation of all infectious waste produced during that particular month. Should a small generator have more than one office, or location, where infectious waste is generated, then she/he must keep a record of the amount of infectious waste produced at each location. A small generator is not required to register with the Ohio EPA until he/she produces 50 pounds of infectious waste at one location. However, once she/he produces this quantity of infectious waste at any one location, he/she would then be obligated to register all of the locations which generate infectious waste and to follow the regulations that pertain to large generators at each location.

QUESTION:

If I go over 50 pound limit for just a few months and have to register, may I obtain a refund for the months that I was under the 50 pound limit?

ANSWER:

No refunds are given for months in which generator may fall back under the 50 pound limit. Once registered as a generator of infectious waste one must dispose of his/her infectious waste as a large generator during the time for which the registration certificate is valid.

QUESTION:

Must “sharps” be placed into special containers?

ANSWER:

Yes. “Sharps” must be placed into containers that are rigid, puncture resistant, leak resistant, and tightly closed (containers specifically designed and manufactured for the management and/or disposal of “sharps”) before disposal. Such containers must have the “sharps” designation on them. Also, if the sharps have not been autoclaved or applied heat encapsulated before they leave the generator’s premise, the container must be labeled with the international biohazard symbol. Most “sharps” containers that are commercially available meet the criteria of an acceptable container and can be used for “sharps” disposal. Also, unused discarded hypodermic needles, syringes, and scalpel blades must be placed into a special “sharps” container meeting the

minimum operational requirements of rigid, puncture-resistant, leak resistant, and closed tightly to prevent loss of contents before disposal.

QUESTION:

What should I do with the infectious waste that I produce?

ANSWER:

If you meet the criteria of a small generator, you can place the infectious waste that you produce (except for specimen cultures and cultures of viable infectious agents) in the solid waste stream (goes out with the other regular trash). The only infectious wastes that must be specially packaged are “sharps”. It should be noted that under Ohio statute, small generators are permitted to take their “sharps” to a hospital for proper treatment, provided that they have staff privileges there and this arrangement is acceptable to the hospital. Small generators of infectious waste may opt to have their “sharps” taken to a licensed infectious waste treatment facility for treatment.

QUESTION:

Will my solid waste hauler pickup my solid waste if it contains some untreated infectious wastes?

ANSWER:

In accordance with Ohio law small generators of infectious waste may dispose of this waste (except for specimen cultures and cultures of viable infectious agents) with the rest of their solid waste. However, the solid waste hauler can make a business decision not to accept solid waste that also contains some untreated infectious waste.

QUESTION:

Can I take my sharps to a hospital for treatment?

ANSWER:

Under Ohio statute, hospitals may treat the “sharps” generated by a small generator without being required to obtain an annual operating license from the local board of health, provided the small generator has staff privileges at the hospital. It is up to the hospital to decide whether or not it will accept the “sharps” from small generators.

QUESTION:

If I choose to have all of my infectious wastes taken to a licensed treatment facility what other regulations will I have to follow?

ANSWER:

Other than “sharps”, there are no specified packaging requirements, however, most waste handling companies that will be picking-up the waste usually have specific packaging requirements for this type of waste. Likewise, no requirement exists for small generators of infectious waste to utilize shipping papers, but they are usually provided by most infectious waste transporters and licensed treatment facilities. Certain handling requirements do exist for infectious waste and must be followed by small generators who wish to have all of their waste taken to a licensed treatment facility. The general handling requirements are:

1. Infectious waste containers are handled in a manner that maintains the integrity of the packaging.
2. Infectious wastes are kept in a nonputrescent state, using refrigeration or freezing when necessary.
3. Any outside storage areas are locked.
4. Lock the infectious waste storage area or label visibly with a sign stating, “warning: infectious waste” and/or displaying the international biohazard symbol at all points of access.
5. Protect infectious wastes from animals and ensure that the wastes does not become a food source or a breeding place for insects or rodents.

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. 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:

What are the requirements for specimen cultures and cultures of viable infectious agents?

ANSWER:

Cultures must either be treated at the location where they were generated by incineration, autoclaving, or chemical treatment or else taken to a licensed infectious waste treatment facility for proper treatment.

If they are taken to a licensed infectious waste treatment facility, they must be transported by a registered transporter and be accompanied by shipping papers. Likewise, cultures must be contained in a plastic bag that is either red in color, or conspicuously labeled with the international biohazard symbol. Before leaving the premise for treatment the untreated cultures must either be placed into a second sealed or tied bag like the first one, or else the initial bag must be placed into a rigid, sturdy, fully enclosed container. The disposable corrugated cardboard containers and the reusable containers used in the waste industry are acceptable.

QUESTION:

Do unused discarded “sharps” count towards my waste generation rate?

ANSWER:

No. Although they require special packaging before disposal into the solid waste stream, they are not categorized as an infectious waste and therefore do not count towards the waste generation rate. They are to be packaged in accordance with the minimum operational requirements of rigid, puncture-resistant, leak resistant, and closed tightly to prevent loss of contents.

QUESTIONS:

Can liquid infectious wastes go down the drain, and if so must this waste still be quantified?

ANSWER:

Liquid or semiliquid infectious wastes consisting of blood, blood products, body fluids, and excreta may be placed into a sanitary sewer system. Even though these types of infectious wastes may be disposed of in this manner, they still must be quantified by the generator. It should be noted that under Ohio statute a facility that holds a license under section 4717.17 of the Revised Codes does not have to quantify any blood, blood products, other body fluids, or embalming fluids that are discharged on the site where generated into a disposal system, as defined in section 6111.01 of the Revised Code, as infectious waste.

QUESTION:

Must small generators of infectious waste use shipping papers for their untreated infectious waste?

ANSWER:

Small generators of infectious waste are not required to use shipping papers for their untreated infectious waste except when sending specimen cultures and cultures of viable infectious agents to a licensed infectious waste treatment facility. Small generators who opt to have all of their infectious waste taken to a licensed treatment facility may be asked to use shipping papers by their waste handling company.

QUESTION:

How must small generators treat the specimen cultures that they produce?

ANSWER:

They can treat specimen cultures and cultures of viable infectious agents either by incineration, chemical treatment, or autoclaving. The approved chemical solution is a 15% vol/vol hypochlorite (household bleach). Stronger solutions (for example, 25%) of household bleach may also be used. All cultures must be submerged for a minimum of 20 minutes. The cultures must be completely submerged for a minimum of twenty minutes. The treatment solutions must be mixed immediately before use and discarded after use, with any excess treatment solution being decanted before disposal. Autoclaving must be done at 121 degrees Centigrade at a minimum of 15 pounds per square inch for at least 60 minutes.

QUESTION:

Once treated, do specimen cultures need a disposal shipping paper?

ANSWER:

No. Once treated by the small generator specimen cultures and cultures of viable infectious agents may be disposed of with the rest of the regular trash without a shipping paper.

QUESTION:

Are small generators who treat their own specimen cultures and cultures of viable infectious agents considered to be treatment facilities?

ANSWER:

No. Even though large generators of infectious waste who treat the infectious waste that they generate are considered to be treatment facilities, small generators who treat cultures are not considered to be infectious waste treatment facilities.

QUESTION:

What should I do with infectious waste that is also radioactive or has hazardous waste characteristics?

ANSWER:

Any infectious waste that is also radioactive or has a hazardous waste characteristic should not be managed as an infectious waste. Radioactive wastes must be managed in accordance with applicable Ohio Department of Health and U.S. Nuclear Regulatory Commission regulations. Any waste that meets the definition of a hazardous waste shall be managed as such in accordance with Chapters 3745-

50 to 3745-69 of the Ohio Administrative Code.

QUESTION:

What should I do if I produce 50 pounds of infectious waste in one month?

ANSWER:

Submit an application for registration as a generator of infectious waste to the Ohio EPA within 30 days. Application forms can be obtained by contacting the Ohio EPA's Division of Solid and Infectious Waste Management at (614) 644-2621.

QUESTION:

Am I subject to inspection by the local Board of Health or by the Ohio EPA?

ANSWER:

Yes. The local Board of Health or the Ohio EPA is required to make inspections within 15 days after receiving a written request from any person. Additionally small generators can be inspected at other times when deemed appropriate by the local Board of Health or the Ohio EPA.

For further information regarding the Ohio EPA Division of Solid and Infectious Waste Management's regulations on small 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.