

CHARLES D. BAKER Governor

KARYN E. POLITO Lieutenant Governor The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
Bureau of Environmental Health
Community Sanitation Program
250 Washington Street, Boston, MA 02108-4619
Phone: 617-624-5757 Fax: 617-624-5777

TTY: 617-624-5286

MARYLOU SUDDERS Secretary

MONICA BHAREL, MD, MPH Commissioner

> Tel: 617-624-6000 www.mass.gov/dph

## Advisory

## Additional documentation for the disposal of medical or biological waste treated on-site

The Massachusetts Department of Public Health, Bureau of Environmental Health, Community Sanitation Program (CSP) is issuing this Advisory to recommend best management practices by medical or biological waste generators to help better identify medical or biological waste that is treated on-site prior to disposal at landfills or incinerators as solid waste.

The CSP regulations, 105 CMR 480.000: Minimum Requirements for the Management of Medical or Biological Waste, require medical or biological waste to be labeled with information about the generator in accordance with 105 CMR 480.300(C):

(C) Prior to transport for off-site disposal, waste that has been rendered noninfectious by a method other than incineration shall be labeled or otherwise marked so as to clearly identify it as noninfectious medical or biological waste and to identify the waste generator responsible for the treatment. Such waste may be disposed of in the same manner as waste that is not regulated by 105 CMR 480.000, except for sharps, which shall be disposed of in accordance with the requirements of 105 CMR 480.200(E). [emphasis added.]

In addition to the requirement that a label (i.e. sticker) be adhered to each bag or container of treated medical or biological waste, the CSP recommends that generators insert a placard (or other clearly marked conspicuous document) within each bag or container to assure solid waste handlers and others that may come in contact with the waste that the waste has been treated and is no longer considered medical or biological waste. This will also assist emergency responders in properly identifying the waste in the event of an incident or accidental release during transport or delivery (e.g. an alleged illegal disposal of waste found on the side of a highway), and will insure contact information for the generator is available should the sticker on the bag be missing or illegible.

Placards may be made of any plastic, metal, dense paper or other material capable of withstanding, without deterioration or a substantial reduction in effectiveness, a 30 day exposure to open weather conditions. In addition, the CSP recommends the development and inclusion of a formal written policy in the waste generators policy/procedures manual with provisions for ongoing training in placard processes, which is maintained in the required record keeping log. The policy should require that placards include at least the information and format recommendations noted below and are loosely enclosed within each bag or container of properly treated waste.

• Documented information identifying the source of the waste, including but not limited to the following:

Name and location of the Generator

Person to contact in case of an incident or accidental release (with phone number)

Type of waste and date the waste was rendered non-infectious

Volume of waste treated and documented in the record keeping log for that date

Treatment process utilized to render the waste non-infectious

- <u>Designed</u> with a background of contrasting color (e.g. blue, pink, neon green, etc.), and/or
  have a dotted or solid line outer border which contrasts with the background color.
- <u>Maintained</u> in a condition in which the format, legibility, color, and visibility will not be substantially reduced due to damage, deterioration, or obscurement by dirt or other matter.