

Connecticut Biomedical Waste (BMW) Requirements (22a-209-15) and Common Industry Practices



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Common Synonyms for BMW

- Regulated Medical Waste (OSHA)
- Red Bag Waste
- Biohazard Waste
- Infectious Substance (USDOT)
- Medical Waste
- Sharps



Is BMW Regulated as Hazardous Waste?

- BMW is regulated as solid/special waste
- Not regulated as hazardous waste unless it exhibits a hazardous characteristic OR
- Is mixed with a listed hazardous waste
(See listing per CT Hazardous Waste Management Regulations)

Who Generates BMW?

- Hospitals
- Skilled nursing facilities
- Laboratories
- Physicians' offices
- Veterinarians
- Dental offices
- Funeral homes



What *is* BMW?

This IS NOT BMW!



BMW *is*:

Any solid waste:

- Infectious waste (including sharps)
- Pathological waste
- Chemotherapy waste
- Mixed with a BMW
- Disposable and non-decontaminated reusable containers



AND

- ◆ Generated during administration of medical care or research involving humans or animals

Specific Exclusions

- Hazardous waste
- Radioactive waste (unless decayed)
- Waste generated by homeowners
- Personal hygiene materials from non-isolation waste
- Syringes/equipment used by farmers to treat livestock
- Samples collected by DEP



Commonly Generated BMW In Hospitals

Infectious Waste Defined

Any waste:

- ◆ Capable of causing an infectious disease
- ◆ Identified by a licensed health care provider
- ◆ One specifically listed in the SW regulations (22a-209-15)

AND

is suspected or known to be contaminated with a human pathogen in sufficient quantity and virulence to transmit a disease

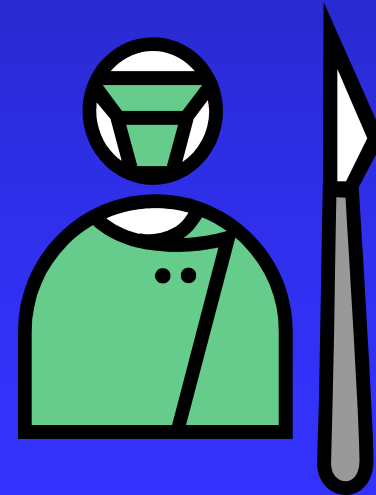
Common Examples

- Disposable dressings saturated with body fluids
- Blood-containing IV bags, tubing, pleuravacs, evacuation bottles, suction liners
- Used sanitary diapers & linens from isolation
- Human cell cultures, slides & cover slips
- Animal carcasses
- Surgical sponges, tapes & drapes
- Spill clean-up materials
- Disposable personal protective equipment



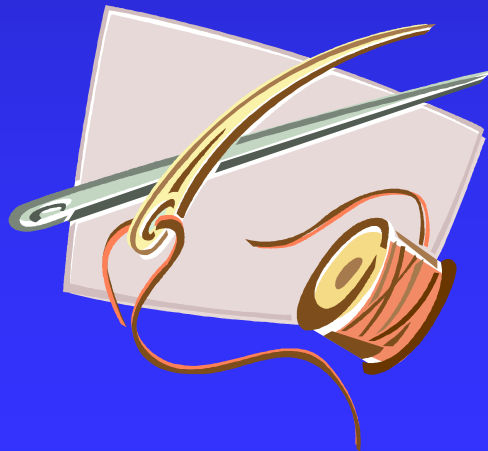
Sharps Defined

Any item capable of causing a puncture or cut including needles, scalpel blades, broken glassware, and syringes



Common Examples

- Discarded hypodermic & suture needles
- Syringes (with/without attached needles)
- Anesthetic carpules
- Broken glassware, if contaminated
- Scalpel blades, razors, trocar blades



Common Examples (cont'd)

- Glass blood vials
- Capillary tubes
- Glass culture dishes
- Staples



Pathological Waste Defined

Any human tissue, organ or body part removed during surgery, autopsy, or other medical procedure



EXCLUDING

Teeth, gums, formaldehyde or other preservative agents, human corpses, etc.

Chemotherapy Waste Defined

Any waste in contact with an antineoplastic agent during preparation, handling or administration of such an agent

Common Examples

- Empty containers
- Personal protective equipment
- Tubing, IV bags, bottles, vials
- Linens



Note: 7 chemotherapy drugs are hazardous wastes- chlorambucil, cyclophosphamide, daunomycin, melphalan mitomycin C, streptozotocin, and uracil mustard

Generator Requirements

Questions?

Proper BMW Management

- Segregate: Sharps, Body fluids, & Others
- Implement a written BMW Management Plan
- Package in appropriate containers
- Label containers with water-resistant labels
- Mark primary and secondary containers with water-resistant identification tags

BMW Storage Requirements

- Construct areas using impervious materials
- Protect from water, precipitation, wind, animals
- Lock outdoor storage areas
- Post universal biohazard symbol and/or the word “BIOHAZARD”



BMW Storage Requirements (cont'd)

- Segregate BMW from all other wastes
- Maintain in a non-putrescent state (BMW may be refrigerated during storage)
- Not subjected to violent mechanical stress during storage



Mixing BMW with Other Wastes

Rules:

- BMW + hazardous waste = hazardous waste
- BMW + radioactive waste = radioactive waste
- BMW + other solid waste = BMW

Note:

- Decontaminated BMW + rendered unrecognizable = municipal solid waste

BMW Disposal Methods

- Chemotherapy waste – incineration
- Pathological waste – incineration or interment
- Infectious waste – incineration, permitted discharge to a sanitary sewer, or DEP approved alternative disposal technology

BMW Small Quantity Generator (SQG) Defined

Generates or transports less than 50 lbs in a month or in any single shipment

SQG's may:

- ◆ Self-transport without a permit
- ◆ Ship certain BMW using US Postal Service
- ◆ Exempt from certain tracking and record keeping requirements



Self Transportation Requirements

- SQG's may ship to a SWF or another facility owned by generator
- Generators may ship from the original generation point to a central collection point

IF

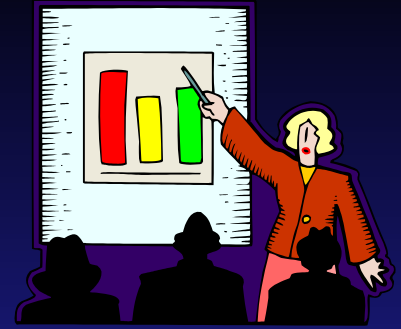
- Segregated, packaged, labeled and marked
- Written authorization provided for employees
- Transported by employer/employees
- Shipping logs maintained at each site

Record keeping & Reporting Requirements

If applicable, maintain on-site for 3 years:

- ◆ Signed Medical Waste Tracking forms
- ◆ Original US Postal Service receipts and return mail receipts
- ◆ Operating logs and annual reports
- ◆ Shipping logs
- ◆ Exception reports

Best Management Practices



- Perform an assessment of all your waste streams
- Train employees regularly, including nurses, in proper waste segregation procedures
- Limit number of BMW containers by locating them in utility rooms instead of each patient's room
- Join H2E and use their resources

Result

- Decreased disposal costs & level of treatment needed

Recent Enforcement Cases



- Notice of Violation issued to 3 CT hospitals
 - ◆ BMW identified in loads delivered to RRFs

- Violations Identified
 - ◆ Lack of BMW management planning as required by DEP (& JCAHO)
 - ◆ Lack of on-going BMW-specific training
 - ◆ Poor record keeping

For More Information

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