

MyRCRAid & Miscellaneous Topics

Other topics your inspector will discuss with you when doing a healthcare facility inspection

- Non-Pharma Hazardous Waste
 - Lab waste (xylene)
 - Morgue/tissue waste (formalin)
 - Hand sanitizer?
- Universal Waste
 - Lamps
 - Batteries
 - Electronics
- Regulated Medical Waste (RMW)
- Tips & Takeaways

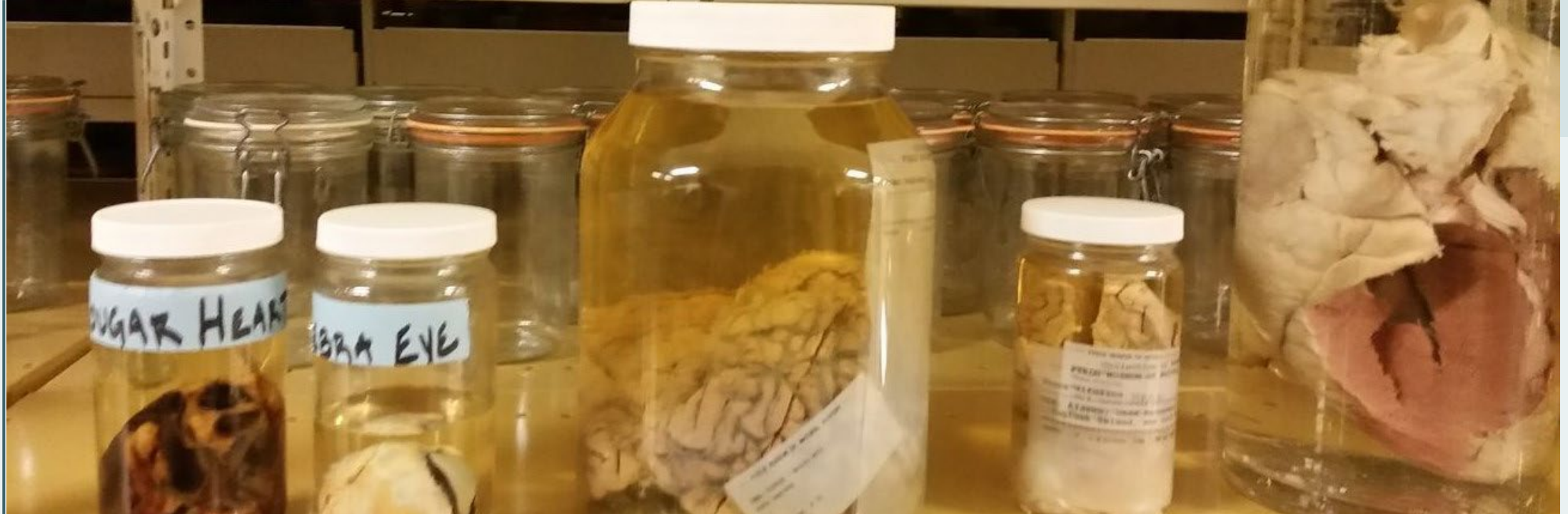
Hospital Labs – Histology & Pathology





Xylene

- Xylene used as a fixative for staining tissue samples.
- Once "spent" would be a D001, F003 hazardous waste.
- Needs to be managed in a Satellite Accumulation Container (SAC) within the lab (see Revised Position on Satellite Accumulation 9/1/08).
- SACs must be marked with indication of hazard & words "Hazardous Waste"



Formalin

- Formalin is a mixture of formaldehyde, methanol & water used to preserve tissue samples.
- Is a U122 hazardous waste when unused.
- Once "spent" could be a D001 hazardous waste depending on concentration.
- Remove tissue samples from formalin prior to shipping liquid to a TSDF (Tissue samples should be disposed of as RMW).
- SACs must be marked with indication of hazard & words "Hazardous Waste"



Hand Sanitizer

- Alcohol Based Hand Sanitizer (ABHS) was often bought in bulk during the height of the Covid-19 pandemic.
- US FDA gave some manufacturers temporary guidance to manufacture and distribute ABHS which expired 12/31/21
- Many purchased hand sanitizers are approaching, or past, their expiration dates.
- Most ABHS is a flammable D001 hazardous waste when disposed of.
- NJDEP has seen an uptick of illegal disposal or abandonment of ABHS.



Central Accumulation Areas (CAAs)



- All containers must be closed, marked with indication of hazard & Hazardous Waste, labeled with an accumulation start date.
- CAAs must be managed with adequate aisle space to respond in an emergency.
- CAAs should be inspected on a weekly basis. – Don't just rely on your consultant. They don't get the NOV, you do!
- CAAs need to have communication or alarm system, spill equipment & fire extinguisher, adequate water supply.
- Wastes need to be shipped off within 90 or 180 days dependent on generator category.

Universal Waste

Bulbs
Batteries
Aerosol Cans
and
Consumer Electronics

Universal Waste (UW)

the basics

SQHs

Have less than 11,000 lbs of all UW combined on site at any time.

- Must ship off UW at least once per year
- Need to track how long UW is accumulated (dating, log or other)
- Must label waste with UW and type of waste (e.g. Universal Waste -Batteries)
- Must manage UW in a way that prevents releases to the environment
- Can ship to destination facility or another handler
- No treatment, dilution or disposal

LQHs

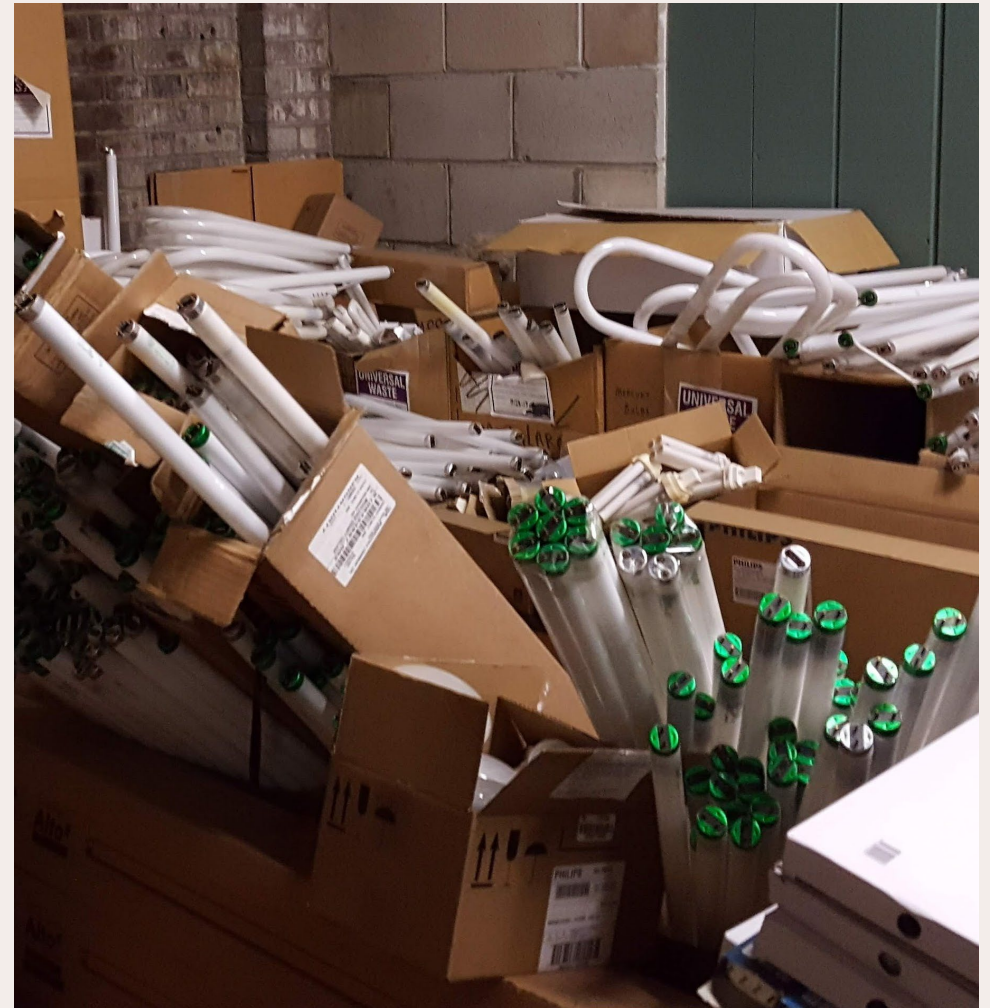
Have more than 11,000 lbs of all UW combined on site at any time.

Everything SQHs need to plus:

- Must keep track of all incoming and outgoing loads of Universal Waste including type, and name & address of generator or destination
- Are required to submit an annual report to the Department by March 1 of each year of all UW received, stored and shipped off site
- Must have an EPA ID# or make some other notification to the Department

UW Lamps

- * UW bulbs include fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps
- * Light Emitting Diode (LED) lights are not generally HW or UW, don't need to manage them with your UW
- * Need to store lamps in closed containers and protect them from breakage
- * If you have a bulb crusher you need an Air permit and need to manage the crushed bulbs as a hazardous waste



UW Batteries



- * UW batteries include rechargeable nickel-cadmium batteries, silver button batteries, mercury batteries, small sealed lead acid batteries (burglar alarm and emergency light batteries)
- * Regular dry cell zinc-carbon and alkaline batteries are not generally HW or UW, don't need to manage them with your UW
- * Need to tape over or otherwise protect contacts on lithium batteries (see PHMSA 5/16/22 Advisory)
- * Keep track of all your buckets

UW Consumer Electronics



- * UW Consumer Electronics (UW-CE) means any appliance used in the home or business that includes circuitry, including but are not limited to, computers, printers, copiers, telefacsimiles, VCRs, stereos, televisions, and telecommunication devices.

- * CE destined for re-use are not a waste and therefore not a HW or UW, and you don't need to manage them with your UW

- * Facility should be able to demonstrate the CE still has re-use potential

- * Need to store UW-CE in a manner that protects them from breakage



Regulated Medical Waste (RMW)

Just the basics

Classes and Categories

- Cultures and Stocks
- Pathological Wastes
- Human Blood and Blood Products
- Sharps
- Animal Wastes
- Isolation Wastes
- Unused Sharps

Generator Category	Pounds of Regulated Medical Waste Generated Annually	Fee
1	<50 Pounds	\$85
2	50 – 200 Pounds	\$255
3	201 – 300 Pounds	\$500
4	301 – 1,000 Pounds	\$1,000
5	>1,000 Pounds	\$3,500

Segregation & Storage

- RMW must be segregated into Sharps, Fluids and Other
- Mixtures of RMW and solid waste become all RMW
- Stored RMW must be protected from the elements and vermin
- Facility must limit access to RMW containers to authorized personnel (lock outside storage areas)
- Must ship off within 1 year
- Must ship off immediately if putrescible

Packaging & Labeling

- Rigid;
- Leak-resistant; Impervious to moisture;
- Sufficiently strong to prevent tearing or bursting under normal conditions of use and handling;
- Sealed to prevent leakage during transport;
- Puncture resistant for packaging sharps and sharps with residual fluids; and
- Break-resistant and tightly lidded or stoppered for packaging fluids (quantities greater than 20 cubic centimeters).
- Package must be labeled as Medical Waste, Infectious waste or use the biohazard symbol
- Must also be marked with Generators Name & Address, Transporters Name & ID#, date of shipment and RMW



RMW Tracking forms & Annual Reports

- Generator is responsible for ensuring Tracking form is accurate
- Destination facility should mail back signed copy of tracking form within 35 days. If not it is the generators responsibility to follow up.
- Generator must maintain copies of all RMW tracking forms for 3 years.
- RMW generators who generate >200 lbs of RMW per year must submit an Annual Generators Report (AGR) to the Department
- AGR must now be done on-line through the DEP Online Business Portal
- AGR must be done by July 21 of each year.

Final tips & takeaways

You are the generator of your Pharma Waste, Haz Waste, Universal Waste and RMW, that means you are responsible!

- Visit your <90/<180 day storage area the day before your next pickup - Check for aisle space, access to com. or alarm system, spill equip, Make sure all containers are labeled & dated (<90 or 180 days?) Make sure all containers are closed.
- Make sure your Satellite Accumulation Containers are, Closed, Labeled, At or Near the “point of generation”, How many do you have & where?
- Make sure Universal Waste is being properly managed - Bulbs - labeled? Safe from breaking? bulb crusher = HW & Air permit, Batteries - buckets, buckets, everywhere – labeled? closed?, Computers/Electronics/TVs - labeled? protected from breakage?
- RMW closed? Labeled & Marked? Check around RMW dumpster for waste that “missed”
- Have someone other than the workers in that area inspect your accumulation and storage areas

Thank you,

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