MEDICAL WASTE PRODUCING FACILITY REQUIREMENTS

Andrew Shannon
DEQ, Office of Waste Management and Radiological Protection
shannona@michigan.gov
517-230-9800
AGENDA AND OBJECTIVES

I. General Program Overview
II. Types of Regulated Medical Waste
III. Medical Waste Producing Facility Requirements
IV. Program Initiatives
ANDREW L SHANNON, ENVIRONMENTAL QUALITY SPECIALIST
MEDICAL WASTE REGULATORY PROGRAM
SOLID WASTE SECTION
OFFICE OF WASTE MANAGEMENT AND RADIOLOGICAL PROTECTION
517-230-9800
shannnona1@michigan.gov

MICHELLE WHITE, SECTION REGISTRATION TECHNICIAN
SUSTAINABLE MATERIALS MANAGEMENT UNIT
SOLID WASTE SECTION
OFFICE OF WASTE MANAGEMENT AND RADIOLOGICAL PROTECTION
517-230-2980
whitem13@michigan.gov
PRIMARY OBJECTIVES

- To protect the public and healthcare workers from risks of infectious diseases contracted from improper disposal of potentially infectious wastes

- To protect Michigan’s environment from degradation and pollution from improper disposal of medical industry derived plastics, sharps, and contaminants
**REGULATORY AUTHORITY AND PROGRAM**

<table>
<thead>
<tr>
<th>PROGRAM</th>
<th>Medical Waste Regulatory Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>AGENCY</td>
<td>Michigan Department of Environmental Quality</td>
</tr>
<tr>
<td>PROGRAM ESTABLISHED</td>
<td>1990</td>
</tr>
<tr>
<td>TOTAL ACTIVE REGISTRANTS</td>
<td>~16,000</td>
</tr>
<tr>
<td>PROGRAM STAFF</td>
<td>One Full-Time Program Specialist, One Part-Time Registration Technician</td>
</tr>
</tbody>
</table>
"Producing facility" means a facility that generates, stores, decontaminates, or incinerates medical waste
MEDICAL WASTE PRODUCING FACILITIES

- Physician’s Offices, Dental Practices,
- Podiatry Offices, Veterinary Practices
- Mortuaries
- Nursing Homes
- Hospitals
- Tattoo/Body Art Facilities
- Pharmacies
- Any other facility that stores, generates, decontaminates, or incinerates medical waste
CATEGORIES OF MEDICAL WASTE

Cultures and stocks of infectious agents and associated biologicals, including,

- laboratory waste
- biological production wastes
- discarded live and
- attenuated vaccines
- culture dishes and related devices
Liquid human and animal waste, including blood and blood products and body fluids, but not including urine or materials stained with blood or body fluids
Pathological Waste includes human organs, tissues, body parts other than teeth, products of conception*, and fluids removed by trauma or during surgery or autopsy or other medical procedure, not fixed in formaldehyde.

*The MWRA was modified in 2013 by the Legislature limiting what is considered a ‘product of conception’ to exclude fetuses, fetal remains, etc. of a predetermined gestational age. They are not considered to be pathological waste.
Rules under the MWRA further define ‘stained with blood or body fluids’ to mean the contaminated item cannot release blood or body fluids in a liquid or semi-liquid state when compressed, or caked and dried blood or body fluids are not capable of being released when handled, making it an unregulated waste.
CATEGORIES OF MEDICAL WASTE

- **Sharps** includes needles, syringes, scalpels, and intravenous tubing with needles attached.
- The MIOSHA Blood Borne Infectious Diseases Standard Part 554) also requires the following to be treated as sharps in accordance with the MWRA:
  1. Broken Glass
  2. Broken Capillary Tubes
  3. Exposed Ends of Dental Wires
Contaminated wastes from animals that have been exposed to agents infectious to humans, these being primarily research animals.
Bacillus anthracis, Lassa virus, Ebola, and West Nile are examples of outbreaks requiring EPA, CDC, or DOT-issued directives on disposal.
Medical waste does *not* include pharmaceuticals unless they contain live or attenuated vaccines in which case they’re dual/mixed waste.
OTHER AGENCIES
REGULATING MEDICAL WASTE

- DEQ – regulates how generators must regulate their med waste from point of generation to disposal
- EPA – guidelines for land disposal and incineration
- DOT – packaging, labeling, shipping, and transportation
- MIOSHA – handling of bloodborne infection diseases
Includes medical waste producer requirements in Section 1, Chapter 2, Section 2.5 (page 2-82)
GUIDEBOOK

Includes US DOT standards in Section 1, Chapter 4, page 4-16

Packaging Requirements

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>173.24</td>
<td>General Packaging</td>
</tr>
<tr>
<td>173.24a</td>
<td>Requirements for all HAZMAT</td>
</tr>
<tr>
<td>173.24a(c)</td>
<td>Changes regarding Infectious Substances and mixed contents</td>
</tr>
<tr>
<td>173.134(b)</td>
<td>Exceptions for:</td>
</tr>
<tr>
<td>173.134(c)</td>
<td>Division 6.2 Packaging</td>
</tr>
<tr>
<td>173.196</td>
<td>Regulated Medical Waste</td>
</tr>
<tr>
<td>173.197</td>
<td>Category A Infectious Substance</td>
</tr>
<tr>
<td>173.199</td>
<td>Regulated Medical Waste</td>
</tr>
<tr>
<td>178.609</td>
<td>Category B Infectious Substance</td>
</tr>
<tr>
<td></td>
<td>6.2 Packaging Tests</td>
</tr>
</tbody>
</table>
GUIDEBOOK

Includes MIOSHA bloodborne infection diseases standards in Section 2, Chapter 22, page 22-1
FIELD INSPECTIONS: STAFF ENGAGEMENT

- Health & Safety Coordinator
- Environmental Health Coordinator
- Infection Control Supervisor
- Regulatory Compliance Manager
- OSHA Coordinator
Medical Waste Regulatory Act requires:

- Certificate of Registration
- Medical Waste Management Plan
- Employee training records
- Proper packaging
- Storage no longer than 90 days
- Shipment records
- Facilities that produce any volume of medical waste must register as a medical waste producer under the public health code
- Registrations require renewal every three years
- Renewal applications are sent to facilities automatically
- Registration fees vary between $50 to $150 depending upon the facility type
MEDICAL WASTE PRODUCER REGISTRATION

- Initial application and renewal can be completed and paid on-line
- Go to www.michigan.gov/deqmedwaste
- Select “Registration and Fee Payment Portal”

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

Initial Application for Registration as a Producing Facility of Medical Waste

This information is required under authority of Part 138 of 1978 PA 309 as amended. Failure to register is subject to an administrative fine of $500.00. If you are registering for more than one (1) facility, please complete and submit a separate application and a sum of total fees for each.

- PLEASE PRINT ALL REQUIRED INFORMATION -

| PRODUCING FACILITY NAME AND ADDRESS: Enter the facility name and address as it is to appear on the Certificate of Registration. |
| STREET ADDRESS |
| CITY, STATE, ZIP CODE |
| CONTACT NAME |
| TELEPHONE NUMBER |
| APPLICATION DATE |
| BILL TO NAME AND ADDRESS: Enter the BILLING name and address if different from the producing facility name and address. |
| BILL TO NAME |
| PO BOX OR STREET ADDRESS |
| CITY, STATE, ZIP CODE |
| CONTACT NAME |
| CITY, STATE, ZIP CODE |
Go to www.michigan.gov/lara
Select “Verify a License”
Select “Hospitals, Hospices, Surgery Centers, Nursing Homes, Substance Abuse"
Select “Person” or “Business”
Enter search criteria
Select “Search”
VERIFY A LICENSE/REGISTRATION

Example of search for “Oakland County”
MEDICAL WASTE MANAGEMENT PLAN

- Required of all medical waste producing facilities
- Must list and describe the type(s) of medical waste produced by the facility and method(s) of packaging, storage, treatment, and disposal used for each medical waste type.
- Sample plan is available at www.michigan.gov/deqmedwaste

MECC 2016
EMPLOYEE TRAINING & RECORDS

- PPE and universal precautions must be practiced to prevent risk of infection and exposure
- Record of training for all employees handling medical waste at the facility required
- Must be documented in accordance with the Medical Waste Management Plan and made available for at least 3 years
PROPER PACKAGING

- Medical waste must be collected separate from other wastes
- Containers must be rigid, puncture-proof, leak-proof, and labeled with a biohazard symbol
- Medical waste may be stored at a producing facility no longer than 90 days (sharps included)
- Period begins on the date when the container use is initiated
Shipping records documenting medical waste is removed from the facility at least every 90 days

Minimum of 3 years of records must be maintained
CURRENT PILOT PROJECT

- 2013 initiated pilot program with Local Health Department inspection support
- Near conclusion of the third year of the pilot
- Includes local health departments from 23 Michigan counties
- Will evaluate expansion of program and funding following pilot
<table>
<thead>
<tr>
<th>NAME OF HEALTH DEPARTMENT</th>
<th>COUNTIES SERVED</th>
<th>WEB SITE</th>
<th>MAIN CONTACT NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td>DISTRICT HEALTH DEPARTMENT #10</td>
<td>CRAWFORD, KALKASKA, LAKE, MANISTEE, MASON, MECOSTA,</td>
<td><a href="http://www.dhd10.org/">www.dhd10.org/</a></td>
<td>231-873-2193</td>
</tr>
<tr>
<td></td>
<td>MISSAUKEE, OCEANA, NEWAYGO, WEXFORD</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ALLEGAN COUNTY HEALTH DEPARTMENT</td>
<td>ALLEGAN</td>
<td><a href="http://www.allegancounty.org/">www.allegancounty.org/</a></td>
<td>269-673-5411</td>
</tr>
<tr>
<td>BARRY-EATON DISTRICT HEALTH DEPARTMENT</td>
<td>BARRY, EATON</td>
<td><a href="http://www.barryeatonhealth.org/">www.barryeatonhealth.org/</a></td>
<td>517-543-2430</td>
</tr>
<tr>
<td>BRANCH-HILLSDALE-ST JOSEPH COMMUNITY HEALTH AGENCY</td>
<td>BRANCH, HILLSDALE, ST JOSEPH</td>
<td><a href="http://www.bhsj.org">www.bhsj.org</a></td>
<td>517-279-9561</td>
</tr>
<tr>
<td>IONIA COUNTY HEALTH DEPARTMENT</td>
<td>IONIA</td>
<td><a href="http://www.ioniacounty.org/health-department/">www.ioniacounty.org/health-department/</a></td>
<td>616-527-5341</td>
</tr>
<tr>
<td>LIVINGSTON COUNTY DEPARTMENT OF PUBLIC HEALTH</td>
<td>LIVINGSTON</td>
<td><a href="http://www.lchd.org">www.lchd.org</a></td>
<td>517-546-9850</td>
</tr>
<tr>
<td>MID-MICHIGAN DISTRICT HEALTH DEPARTMENT</td>
<td>CLINTON, GRATIOT, MONTCALM</td>
<td><a href="http://www.mmdhd.org">www.mmdhd.org</a></td>
<td>989-831-5237</td>
</tr>
<tr>
<td>MUSKEGON COUNTY PUBLIC HEALTH</td>
<td>MUSKEGON</td>
<td><a href="http://www.muskegonhealth.net">www.muskegonhealth.net</a></td>
<td>231-724-6246</td>
</tr>
<tr>
<td>OAKLAND COUNTY HEALTH DIVISION</td>
<td>OAKLAND</td>
<td><a href="http://www.oakgov.com/health">www.oakgov.com/health</a></td>
<td>248-858-1280</td>
</tr>
</tbody>
</table>
NEW PROGRAM INITIATIVES

- Convening a stakeholder workgroup to amend the existing statute (enacted in 1990)
- Continuing to recruit and offer assistance in the development of community-based sharps collections programs for residents
- Goal of improving customer service and enhancing overall program efficiency
www.michigan.gov/deqmedwaste

Medical Waste Regulatory Program Information
- Medical Waste Frequently Asked Questions
- Medical Waste Directory
- Registration and Fee Payment Portal
- 2016 DEQ & LHD Pilot Project Resource Information
- Dental Amalgam Waste Removal Systems
- Medical Waste Disposal Services
- Medical Waste Pocket Reference
- Initial Registration Application
- The Point is... Needles Hurt!
- A Remedy for Prescription Drug Disposal
- Sharps Collection Programs for Michigan Residents
- Medical Waste Management Sample Plan
- Approved Alternative Treatment Technologies for Medical Waste
- Contact Information for Medical Waste
- Medical Waste Annual Report 2014
- Medical Waste Contact Info and Program Description

Laws and Rules
- Medical Waste Producing Facilities Administrative Rules
- Medical Waste Regulatory Act

MECC 2016
MEDICAL WASTE WEB PAGE

- Medical Waste Directory (Identifies Medical vs. Non-Medical Waste)
- Online Registration and Fee Payment Portal (Initial and Renewal)
- Dental Amalgam Waste Removal Systems (DEQ Interpretation)
- Medical Waste Disposal Services for Businesses
- Sharps Collection Programs by County for Michigan Residents
Medical Waste Pocket Reference for Regulated Facilities

Sample Medical Waste Management Plan (to complete and file on-site at facility within 90 days of registration)

Prescription/Unused Medication Disposal Recommendations

Approved Alternative Treatment Technologies for Medical Waste

Home-Generated Sharps Disposal Options Brochure