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STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT
LANSING



REBECCA A. HUMPHRIES
DIRECTOR

TO: Medical Waste Producing Facilities

FROM: Liane J. Shekter Smith, P.E., Chief
Environmental Resource Management Division

DATE: October 26, 2010

SUBJECT: Disposal of Hazardous Waste Commingled with Medical Waste

This memorandum serves to provide interpretation and guidance to facilities that generate mixed hazardous waste and medical waste streams, for example in the administration of chemotherapy treatment in hospitals and preparation of pharmaceutical agents in pharmacies.

The Department of Natural Resources and Environment (DNRE), Environmental Resource Management Division (ERMD), recognizes the disposal procedures for these dual waste streams may create confusion due to an overlap in current regulations and, as such, has prepared this memorandum to clarify acceptable disposal practices.

The ERMD has interpreted Sections 13811(b)(v), 13811(c)(v), and 13811(d)(iii) of the Medical Waste Regulatory Act, Part 138 of the Public Health Code, 1978 PA 368, as amended (MWRA), to allow for the following provision as “a process approved by the department” for the disposal of blood, blood products, body fluids, sharps, and pathological waste as defined that may be contaminated with hazardous waste:

Any medical wastes as defined in the MWRA that also meet the definition of hazardous waste or are mixed with hazardous waste shall be managed as hazardous waste in accordance with the most current Michigan rules and regulations for the management of hazardous waste. Hazardous waste, however, if commingled with medical waste, shall not be managed as a medical waste.

This interpretation does not preclude or exempt any rules or regulations under the jurisdiction of the United States Department of Transportation, such as labeling, transport, and packaging requirements, nor does it negate any rules and regulations pertaining to these waste streams in other states in the event that these wastes are transported for treatment and disposal outside of Michigan. It is recommended that you contact your hazardous waste and/or medical waste disposal vendor to verify the types of waste they are qualified to accept for treatment and disposal.

Should you have questions or comments regarding this memorandum, please contact Andrew Shannon, Solid Waste Management Unit, Solid Waste and Land Application Section, ERMD, at 517-335-1146; shannona1@michigan.gov; or DNRE, P.O. Box 30241, Lansing, Michigan 48909-7741.

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