



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
(858) 505-6880 FAX (858) 505-6848
<http://www.sdcdeh.org>



MEDICAL SOLID WASTE SECURITY

What is medical solid waste?

San Diego County Code defines *medical solid waste* as solid waste of obvious medical origin. It is not medical waste, but could be perceived to be so by the general public. Some examples of *medical solid waste* are empty specimen containers, bandages, dressings containing non-liquid blood, surgical gloves, decontaminated medical waste, non-medical waste sharps, and biohazardous wastes that are not generated in human or animal health care.

Is special handling required for medical solid waste?

Yes. In San Diego County *medical solid waste* must be stored in an area secured as to deny access to unauthorized persons, animals, wind, rain, insects and rodents prior to disposal. If such wastes are placed in a trash receptacle or compactor which is accessible to unauthorized persons, it must be locked to prevent access to the contents by anyone other than authorized persons or refuse collection personnel.

More stringent security requirements were established because waste of obvious medical origin is perceived as high risk and therefore a cause for concern by some segments of the general public. *Medical solid waste* should be no more or no less hazardous than any other category of solid waste.

How do small businesses/practices meet this requirement?

The most commonly used method of securing *medical solid waste* so that unauthorized persons do not have access is by storing the waste in a locked dumpster or locked enclosure.

What do I do when the other tenants in my complex won't lock the dumpster?

You cannot control the other businesses in a complex that share trash receptacles, but in many cases it is possible to arrange for a lockable trash receptacle that is for the exclusive use of your office. This may involve working with your landlord to ensure that you are provided with adequate facilities to comply with regulatory requirements. Another option is to have the landlord re-notify all tenants to lock the waste dumpster after use to assist in compliance with the law. Regular reminders to tenants might help resolve or improve the situation. Also, a sign posted at the dumpster area advising everyone to lock the dumpster would probably improve security. You can request that the Department of Environmental Health, Hazardous Materials Division (HMD) write a letter to the property owner or property management firm. HMD does not have the authority to require security for solid waste by businesses that do not generate *medical solid waste*. A letter from the HMD describing the requirement in County Code is often enough to convince the property management firm to assist you in your efforts to keep *medical solid waste* storage secure.

What if there is not enough room for a dumpster or other tenants will not keep the dumpster locked?

At some office locations there is not enough room or access for a dumpster. In a case like this the practice should move the *medical solid waste* outside just before pick-up to limit the amount of time that an unauthorized person has access to this waste. This is not an option if sharps are treated by steam sterilization (autoclave) because the California Medical Waste Management Act requires the destruction of sharps that have been rendered non-infectious by treatment if public access to this waste cannot be prevented.

What if unauthorized persons continue to gain access to medical solid waste?

Businesses that generate *medical solid waste* are expected to make every reasonable effort to prevent this occurrence. The Department of Environmental Health will work to assist businesses in meeting this requirement, but the Department will take action if a public nuisance is created or if a business is not willing to cooperate or make a reasonable effort to protect the public from *medical solid waste*.

It is recommended that *medical solid waste* be disposed of in black or opaque trash bags. This practice prevents casual observation of the waste, so that unauthorized persons have to make a deliberate effort to view this waste. This practice reduces the number of people who would be "exposed" to this risk.

We appreciate and encourage your continuing efforts to store *medical solid waste* in a manner that denies access to unauthorized persons. For additional information about medical and hazardous waste, contact the Hazardous Materials Duty Desk at (858) 505-6880 or visit HMD's website at http://www.sdcounty.ca.gov/deh/hazmat/med_waste.html. For ways to reduce waste through pollution prevention contact HMD's Pollution Prevention Specialist at (858) 505-6881.

"Environmental and public health through leadership, partnership and science"

Best Management Practices for Medical Solid Waste

PREVENT UNAUTHORIZED ACCESS TO MEDICAL SOLID WASTE BY DISPOSING OF IT INTO A DUMPSTER THAT IS KEPT LOCKED OR STORED IN A SECURED AREA

If your facility is located where you share the dumpster with other tenants, it may be difficult to keep the dumpsters locked or otherwise secured. Try the following alternatives to prevent access to your medical solid waste by unauthorized personnel:

- 1. Maintain medical solid waste inside your facility until it is time for the scheduled pick-up by your solid waste company.**
- 2. Look into the possibility of associating with other health practitioners to share a locking dumpster that is not used by other types of businesses. Coordinate with them to keep an eye on the trash enclosure or dumpster to ensure it is kept closed/secured.**
- 3. Find out if your landlord has an empty storage room where your medical solid waste can be stored during the week out of the reach of unauthorized persons while awaiting disposal.**
- 4. Proper management of treated sharps waste is of particular concern due to the high risk of injury. The California Medical Waste Management Act requires the destruction of sharps that have been rendered non-infectious by treatment if public access to this waste cannot be prevented. If you cannot prevent the public from gaining access to treated sharps waste then you must use other available management practices for treatment and disposal of regulated sharps waste, such as mail-back systems, approved encapsulation technology or a medical waste hauler.**