

Waste Basics

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California veterinary practices generate several types of regulated waste. To avoid citation and fines, practices must understand what constitutes waste and how each type of waste should be disposed of in accordance with the law.

Medical Waste

Medical waste is a term used to encompass several types of waste generated in medical and veterinary practices. Subcategories are biohazardous, pathology, pharmaceutical (non-controlled drugs), trace chemotherapeutic, and sharps waste. Biohazardous waste is that which is suspected, by the attending veterinarian, of being infected with a pathogen that is also infectious to humans, and includes all specimen cultures as well as contagious ecthyma and brucellosis vaccines that require disposal. Pathology waste is animal parts, tissues, fluids, or carcasses suspected by the attending veterinarian of being contaminated with an infectious agent known to be contagious to humans. Pharmaceutical waste is discarded (adulterated, expired, unwanted) drugs in any form, not including controlled substances. Trace chemotherapeutic waste is a type of pharmaceutical waste that includes items contaminated through contact with, or having previously contained, chemotherapeutic agents. Chemotherapeutic agents do not include antibiotics or non-steroidal anti-inflammatory drugs used to treat neoplasia in animals. Sharps waste means any device that has acute rigid corners, edges, or protuberances capable of cutting or piercing.

Medical waste is overseen by the California Department of Public Health Medical Waste Management Program (CDPH MWMP) through the California Medical Waste Management Act. California veterinary practices must register with the CDPH MWMP as small quantity medical waste generators and dispose of medical wastes in accordance with the act. Methods of disposal for all categories, excluding pharmaceutical (and trace chemotherapeutic waste), include state-approved medical waste transporters, use of approved mail-away systems, or registration and operation of approved in-house disposal systems. Pharmaceutical and trace chemotherapeutic waste may only be disposed of through an approved medical waste transporter.

Controlled Substance Waste

Any discarded controlled substance listed on the Federal Drug Enforcement Administration (DEA) controlled substance schedules is subject to regulated disposal. The ultimate authority over controlled substance disposal is the DEA, which enforces the federal Controlled Substances Act. The DEA requires a closed regulatory system for all controlled substances, meaning that a controlled substance must be accounted for from cradle to grave by being passed from one DEA registrant to another until it either reaches the ultimate user (the public), or is destroyed. The DEA directs practitioners to utilize approved reverse distribution companies when disposing of discarded controlled substances. Reverse distributors are DEA registrants that are authorized to pick up, inventory, transport, and properly dispose of scheduled drugs.

Hazardous Waste

Substances that are toxic, ignitable, corrosive, or reactive are classified as hazardous waste. The California Environmental Protection Agency (CalEPA) maintains multiple extensive lists of known hazardous chemicals. However, California environmental regulations state that ultimately it is the responsibility of the user to determine if a chemical meets any of the four aforementioned categories. A chemical is considered toxic if it displays characteristics of toxicity in the environment or can be harmful to health at or above referenced levels. It is considered ignitable if in liquid form it has a flash point of less than 60 degrees Celsius; in solid form can ignite at room temperature through friction or absorption of moisture; or is an ignitable compressed gas. It is considered corrosive if in liquid form it has a pH of less than two or greater than 12.5. It is considered reactive if it can explode, become unstable, release a toxic gas, or undergo violent reaction when mixed with water or when exposed to heat. CalEPA requires small quantity generators of hazardous waste, which in most cases include veterinary practices, to obtain a CalEPA identification number. All hazardous waste must be disposed of via a hazardous waste transporter approved by CalEPA.

The table to the right outlines each type of waste, examples in veterinary practice, the corresponding jurisdictional agency, and options for compliant disposal.

| Waste Type | Examples in Veterinary Practice | Jurisdictional Authority | Disposal Methods |
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| Medical | <p>Biohazardous – Materials in contact with a known or suspected zoonotic agent, specimen cultures, and discarded contagious ecthyma and brucellosis vaccines.</p> <p>Pathology – Tissues, fluids, bedding, or materials known or suspected to be contaminated with a zoonotic agent.</p> <p>Pharmaceutical – Any unwanted non-controlled drug.</p> <p>Trace Chemotherapeutic – Used syringes, IV fluid bags, or tubing that contain a chemotherapeutic agent or gloves that were worn when handling chemotherapeutic agents.</p> <p>Sharps – hypodermic needles, blades, needles, acupuncture needles, root canal files, and broken glass.</p> | California Department of Public Health Medical Waste Management Program (CDPH MWMP) | <p>Scheduled pick-up by a registered medical waste transporter.</p> <p>Use of an approved mail-back system (not available for pharmaceutical waste, or trace chemotherapeutic waste).</p> <p>Registration and utilization of an approved in-house disposal system (not available for pharmaceutical waste, or trace chemotherapeutic waste).</p> |
| Controlled Substance | DEA Schedule II-V – controlled substances such as narcotics, barbiturates, dissociatives, and select benzodiazepines. | Federal Drug Enforcement Administration (DEA) | Scheduled pick up by a DEA-approved reverse distribution company. |
| Hazardous | Substances which are ignitable, toxic, corrosive, or reactive: Anesthetic gases, copper, selenium, or zinc boluses for livestock, ether, ethylene oxide, formalin, lead, mercury, radiographs, or radiographic fix containing rare earth metals (e.g.: silver), reserpine, and strong acids or bases used in lab procedures. | California Environmental Protection Agency (CalEPA) | Scheduled pick-up by a CalEPA-approved hazardous waste transporter. |

It is important to properly dispose of waste generated in veterinary practices by approved methods for purposes of regulatory compliance, health and safety, and environmental protection. Contracting with registered transporters is in most cases the only compliant option and in many cases is the most convenient. For more information about waste management in veterinary practices, log in to cvma-inline.net, click on Regulatory Compliance, then visit the Waste section in the Resources box. ■

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