



State of California—Health and Human Services Agency
Department of Health Services



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Director

GRAY DAVIS
Governor

December 9, 2002

To: Permitted Offsite Medical Waste Treatment Facilities and Transfer Stations

From: Jack McGurk, Chief Environmental Management Branch

SUBJECT: ALTERNATIVE MEDICAL WASTE GUIDANCE FOR THE INCINERABLE WASTE STREAM

A meeting was held on December 5, 2002 to discuss interim measures that should be taken regarding the incinerable medical waste stream. Representatives from the Department of Health Services, California hospitals, and treatment facility operators participated in discussions on how to avert a crisis in medical waste treatment that could arise in light of the closure of commercial medical waste incinerators in the western United States. In December 2001 California's only commercial medical waste incinerator was permanently closed and in November 2002 the medical waste incinerator in Chandler, Arizona closed. These closures greatly limit access to incineration to California generators.

The following provisions are being offered to permitted transfer stations and off-site treatment facilities to assist in meeting the needs of medical waste generators while protecting public health. Alternative medical waste treatment technologies are on the horizon, but at present are not available to California generators. Therefore these measures are considered temporary and open to review. Monitoring of these efforts will be increased and the situation will be reviewed periodically and at a timeframe no greater than one year. In order for a facility to implement any of these options, changes to their operations plan must be submitted and approved by the Department. Upon approval the site's permit will be amended to allow the changes.

1. Allow an increase in the storage time to a maximum of 120 days at transfer stations and off-site treatment facilities for pharmaceutical wastes so that the amount of waste being shipped for incineration can be better managed and the number of truck trips lessened.
 - a. Pharmaceuticals must be stored in a secure indoor storage area
 - b. Current storage rules will apply at generator sites



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2. Allow the treatment at off-site treatment facilities of “soft tissues” such as placentas in microwaves and autoclaves (steam sterilizers).
 - a. Operations plan amendments must describe how this will be handled and must include validation of treatment.
 - b. Inclusions of gross anatomical parts will be reviewed and discussed at a later date.
3. Allow off-site treatment facilities to process trace chemotherapeutic waste in microwaves or autoclaves.
 - a. Operations plan amendments must describe how this will be handled
 - b. In service training plan for generators as to “only trace chemo” must be covered by this change
 - c. Department will randomly monitor this waste stream at off-site treatment facilities, but will follow up violations of bulk chemo within these containers with generators
4. Allow off-site treatment and transfer stations storing medical wastes in a frozen state to increase the time they store these wastes prior to being sent for incineration.
 - a. Operations plan amendments must describe the length of time needed for storage and actions to be taken to maintain the waste in a frozen state.
 - b. Permit conditions will be amended to allow for this change.

Should you have any questions regarding this issue, please contact Darice Bailey, Chief of the Waste Management Section, at (916) 324-2209.

Sincerely,

Jack McGurk, Chief

Environmental Management Branch

