COVID-19 Medical Waste Management

The California Department of Public Health (CDPH), Medical Waste Management Program (MWMP) regulates the generation, handling, storage, and treatment of medical waste by providing oversight under the authority of the Medical Waste Management Act (MWMA). This document provides general guidance for the management of Novel Coronavirus Disease 2019 (COVID-19) contaminated medical waste based on federal guidelines and standards.

As of the date of this publication, there are no additional regulatory handling, marking, storage, transportation or treatment requirements for medical waste contaminated with COVID-19.

Follow the requirements of the MWMA (PDF) statutes for managing medical waste in California (see https://www.cdph.ca.gov/Programs/CEH/DRSEM/CDPH%20Document%20Library/EMB/MedicalWaste/MedicalWasteManagementAct.pdf). Waste contaminated with COVID-19 is considered a Category B infectious substance when it is derived from the healthcare of humans. Follow the US Department of Transportation (USDOT) regulations for packaging, labeling and offsite transportation of Regulated Medical Waste (RMW). The details of RMW and Category B infectious substances transportation is discussed in USDOT Hazardous Materials Regulations (HMR) 49 CFR 173.197 (see https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&ty=HTML&h=L&mc=true=&PART&n=pt49.1.173#se 49.2.173_1197).

General Guidance

CDPH - The CDPH webpage, Coronavirus Disease 2019, provides general information on how to limit the spread of COVID-19 (see https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Immunization/nCOV2019.aspx). Additionally, the CDPH Center for Healthcare Quality (CHCQ) released an All Facilities Letter, AFL 20-14 (PDF), (see https://www.cdph.ca.gov/Programs/CHCQ/LCP/CDPH%20Document%20Library/AFL-20-14.pdf) on February 19, 2020, providing interim guidance for Environmental Infection Control for COVID-19.

OSHA - Additional guidance can also be found on the Occupational Safety and Health Administration (OSHA) website, COVID-19 overview (See https://www.osha.gov/SLTC/novel_coronavirus/).

Who to Contact - Facilities may also contact their Local Enforcement Agency (LEA), County Health Director, and CDPH Medical Waste Management Program (MedicalWaste@cdph.ca.gov) regarding COVID-19 waste management queries.

Personal Protection Equipment (PPE)
Clear guidelines for healthcare professionals protection are available at OSHA control and prevention (see https://www.osha.gov/SLTC/covid-19/controlprevention.html#health). Additionally, the CDC advises that administrative rules and engineering controls, environmental hygiene, correct work practices, and appropriate use of PPE are all necessary to prevent infections.

Disinfecting Agents
Coronaviruses are enveloped viruses, meaning they are easily disinfected with the use of appropriate disinfectant products per the US Environmental Protection Agency (EPA). For cleaning and decontamination information, consult CDC guidance for cleaning and disinfecting environments (see https://www.cdc.gov/infectioncontrol/guidelines/index.html), including those contaminated with other coronavirus (see https://www.cdc.gov/sars/guidance/l-infection/healthcare.html).

Trauma Scene Waste Practitioners
Trauma scene waste practitioners who are registered with the MWMP should follow their disinfecting procedures as established. Wear appropriate PPE, follow the OSHA Bloodborne Pathogens standard, and use the technologies and chemicals appropriate to the task for cleanup and disinfection. Additionally, refer to Chapter 9.5 of the MWMA on the statutes for Trauma Scene Waste Management.

Packaging COVID-19 Contaminated Waste
Waste from COVID-19 patients is handled as standard RMW. Refer to the MWMA for the statutes in California. The CDC has provided general, not COVID-19 specific, recommendations in the Guidelines for Environmental Infection Control in Health-Care Facilities (2003) (see https://www.cdc.gov/infectioncontrol/guidelines/environmental/background/medical-waste.html). CDC guidance states that the management of RMW should be performed in accordance with routine procedures as it has not been implicated in the transmission of Severe Acute Respiratory Syndrome Coronaviruses (SARS-CoV) including COVID-19.
Transportation within a Facility and Offsite

Facility operation and logistics vary among health care facility types requiring each facility to develop a Medical Waste Management Plan (Plan) tailored to address the needs at each facility while maintaining compliance with the MWMA. Each Plan should include the procedures of transporting waste from the room it is generated in to the interim storage room and ultimately to the Designated Accumulation Area. From this area, the waste will then be treated onsite or prepped for transportation offsite for treatment.

All containers for offsite transport should be USDOT approved. Pharmaceutical waste shall also be transported in compliance with the United States Drug Enforcement Administration (DEA) requirements. RMW and Category B infectious substances are listed in the USDOT Hazardous Materials Regulations (HMR) 49 CFR 173.197 (see https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&ty=HTML&h=L&mc=true=&PART &n=pt49.1.173#se49.2.173_1197). As of the publication date of this document, there is no requirement for any additional specialized packaging or marking for this waste required per regulations.

A special permit issued by the USDOT is not required to transport RMW contaminated with COVID-19.

Treatment of COVID-19 Waste

RMW’s are treated or decontaminated to reduce the microbial load in the waste and to render the by-products safe for further handling and disposal. Treatment processes are permitted under each state’s medical waste statutes and regulations and treatment methods may include autoclaving, incineration, chemical disinfection, grinding/shredding/disinfection methods, and energy-based technologies (e.g., microwave or radiowave treatments). Waste treated in California shall follow the requirements outlined in the MWMA Sections 118215 – 118245.

If onsite treatment is not available or the health care facility chooses to not treat the waste onsite, the facility should package the waste appropriately for transport offsite (see Transportation section above) to a permitted medical waste transfer station and/or treatment facility.

Waste shall be taken to a permitted Transfer Station and Offsite Treatment facility (TSOST) for treatment. A list of permitted TSOST facilities in California can be found on the Medical Waste Management Program website (see https://www.cdph.ca.gov/Programs/CEH/DRSEM/Pages/EMB/MedicalWaste/Transfer-and-Treatment.aspx).

If the waste is being sent out of the State of California for treatment, check with the receiving State for their requirements on the treatment of medical waste and specifically medical waste contaminated with COVID-19.

Once the waste has been efficaciously treated by a permitted medical waste facility, the waste is no longer considered RMW and can be managed as solid waste. Treatment facilities shall coordinate with the solid waste landfill for final disposal of the waste. Direct efficacy questions for medical waste treatment to your Local Enforcement Agency and/or to the CDPH, Medical Waste Management Program at MedicalWaste@cdph.ca.gov.