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State Health Officer & Director

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



EDMUND G. BROWN JR.
Governor

March 26, 2014

To: Multiple Addressees

MEDICAL WASTE HAULER REGISTRATION

Dear Hauler or Generator:

The California Department of Public Health, Medical Waste Management Program (Department) is writing to you with regard to the transport of medical waste.

The Department has received information that indicates that businesses are entering into contracts with waste generators, then subcontracting the transport of the waste to a registered transporter. Some of the businesses that have been entering into these agreements are registered with the Department and others are not. However, regardless of their registration status, this activity is not permissible. Section 118000, subdivision (a) of the California Health and Safety Code (HSC) provides: "Except as otherwise exempted pursuant to Section 118030 or 118032, all medical waste transported to an offsite medical waste treatment facility shall be transported in accordance with this chapter by a registered hazardous waste transporter issued a registration certificate pursuant to Chapter 6..." This section requires that all medical waste be transported by a registered transporter, with certain exceptions that are not relevant here. Thus, the law does not allow a transporter to subcontract the transport of medical waste to a different transporter from the one that the generator identified in its medical waste management plan.

As a medical waste *generator*, your facility must have a registered transporter and that transporter may not subcontract the transport of your waste. The tracking documents provided to you by your transporter must contain your transporter's information, such as the registration number and business location.

As a medical waste *transporter*, your company may not transport waste for a generator, when you do not have a contract with them for the transport.

If you have questions, please call me at (916) 449-5692 or e-mail me at alison.dabney@cdph.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alison Dabney".

Alison Dabney, Chief
Medical Waste Management Program

cc: Ronald Pilorin, Chief
Emergency, Restoration and Waste Management Section