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EDMUND G. BROWN JR.  
Governor

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To: Local Enforcement Agencies who implement the Medical Waste Management Program, Medical Waste Generators, Transfer and Treatment Facilities & Transporters

Subject: Senate Bill (SB) 225, an Urgency Act to Amend California Health and Safety Code (HSC), Relating to Medical Waste; Effective Immediately

On September 28, 2015, the Governor signed SB 225, an act that amends California Health and Safety Code, Sections 117630, 117904, 117943, 117945, 117975, 118032, 118040, 118275, and 118345 of the Medical Waste Management Act. As an urgency bill, the provisions of AB 225 take effect immediately. These changes are as follows:

- **Biohazard Bags.** A biohazard bag that is used to collect medical waste within a facility shall be manufacturer certified **only** to meet the American Society for Testing Materials (ASTM) D1709 standard test for impact resistance of 165 grams (drop dart test). However, if and when the biohazard bag containing the medical waste is being prepared for transport offsite for treatment, it must be placed into a biohazard bag that is **marked and certified** as having passed both the ASTM D1709 standard for impact resistance of 165 grams **and** the ASTM D1922 standard for tear resistance of 480 grams in both parallel and perpendicular planes and subsequently placed into a United States Department of Transportation (USDOT) approved container for transport.
- **Shipping Document.** SB 225 removed all references to the USDOT shipping document from the Medical Waste Management Act (MWMA). The MWMA only specifies that a tracking document shall be maintained for the purpose of tracking medical waste from the point when the waste leaves the generator facility until it receives final treatment. Although the MWMA still references the Code of Federal Regulations that imposes federal standards for the transportation of medical waste on public roads and highways, CDPH will focus on whether the required tracking document is properly maintained and that the minimum required elements are compliant with the MWMA.
- **Pharmaceutical Waste Container Labeling.** SB 225 removed the requirement to label medical waste regulated pharmaceutical containers or secondary containers with the entire phrase, "HIGH HEAT or INCINERATION ONLY" on the pharmaceutical waste containers. The SB 225 amendment now allows the container label to have either the words "HIGH HEAT" or "INCINERATION ONLY," or with another label approved by the department, on the lid and sides, so as to be visible from any lateral direction.
- **Pharmaceutical Waste Container Labeling (when sharps and pharmaceutical wastes are consolidated into a single container).** SB 225 also removed the requirement to label

containers used to consolidate sharps and pharmaceutical wastes into a single container with the entire phrase, "HIGH HEAT OR INCINERATION ONLY." The SB 225 amendment now allows the label to have either the words "HIGH HEAT" or "INCINERATION ONLY," or with another label approved by the department, on the lid and sides, so as to be visible from any lateral direction. In addition, these single containers are still required to be labeled with the biohazardous waste symbol.

- References to the USDOT Shipping Documents. SB 225 also made conforming changes to sections 117904, 117943, 117945, 117975, 118032, 118040, and 118345 of the MWMA by removing references to the USDOT shipping documents.

The chaptered bill can be found on the California Legislative Information website:

<http://leginfo.legislature.ca.gov/faces/home.xhtml>

If you should have any questions, please contact our Medical Waste Management Program at (916) 449-5671.

Sincerely,



Alison Dabney, Chief  
Medical Waste Management Program