

Title: NYU Regulated Medical Waste Safety Written Program

Effective Date: October 2002

Revision Date: April 14, 2017

Issuing Authority: VP, Facilities and Construction Management

Responsible Officer: Director Environmental Health and Safety

PURPOSE OF THE PROGRAM

To outline procedures for the safe handling and disposal of regulated medical waste (RMW) in order to minimize employee exposure and injuries.

WHO NEEDS TO KNOW THIS PROGRAM

All NYU employees that generate, handle or transport RMW should be familiar with this written program.

REGULATIONS

The US Occupational Safety and Health Administration (OSHA) Bloodborne Pathogen Standard regulates handling and storage of RMW in labs and patient care areas. The New York State Departments of Health (NYS-DOH), Environmental Conservation (NYS-DEC), US Environmental Protection Agency (EPA) and US Department of Transportation (DOT) regulate RMW decontamination, transport and disposal. RMW regulations apply to disposal of potentially infectious research-associated or clinical materials.

PROCEDURES FOR IMPLEMENTATION

Responsibilities:

New York University (NYU) strives for excellence in its Environmental Health and Safety (EHS) program. For this written document compliance is achieved through the following structure:

Department of Environmental Health and Safety

Environmental Health and Safety (EHS) is responsible to develop the program, manage the contractor that picks up and disposes of the RMW, schedule pickups for departments that generate RMW, budget for disposal of RMW, provide containers for departments to pack the RMW after being generated and maintain manifest for the waste.

Department Chair, Director, or Manager

The department chair, director or manager of a department that generates and transports RMW must comply with this written program, provide training for their employees that generate and/or

transport RMW, provide appropriate personal protective equipment for their employees and provide containers to store the RMW when generated.

All NYU Employees that generate and/or transport RMW

All NYU employees that generate and/or transport RMW are responsible to comply with this written program, wear personal protective equipment (PPE) to handle RMW and attend training given by their supervisors.

WRITTEN PROGRAM DEFINITIONS

Regulated Medical Waste

Regulated Medical Waste (RMW) refers to items regulated under federal, state and/or local regulations. This includes agents that are infectious to humans and associated biologicals (serums, vaccines, antigens, and antitoxins), and is not limited to, cultures and stocks, pathological waste (tissue, organs, body fluids and anatomical parts (animal or human), human blood and blood products (includes items that are saturated with blood), and gloves used in the handling of such waste. Any PPE saturated with blood or cultures/stocks, must be treated as RMW. Pasteur Pipettes, sharps (e.g., all needles, syringes, and scalpels (regardless of whether they are contaminated), broken glass, glass tubes used in experiments involving RMW) and animal waste (body parts, body fluids, blood or bedding originating from animals known to be contaminated with infectious agents or inoculated during research, production of biologicals or pharmaceutical testing with infectious agents) are considered RMW.

Infectious Agents

Infectious Agents are any organisms that cause disease or an adverse health impact to humans.

UNIVERSITY WRITTEN PROGRAM

TRAINING

All persons generating RMW shall be trained by their supervisor in the proper handling and disposal of RMW. For those who are responsible for bringing sealed boxes to a central storage area, basic PPE must be worn (gloves and safety glasses) should be worn.

PERSONAL PROTECTIVE EQUIPMENT

Specialized clothing, such as lab coats, gloves, and eye and face protection, shall be worn by personnel handling materials that are classified as RMW. PPE shall be readily available through the department in which the persons are employed.

PACKAGING OF RMW FOR DISPOSAL

RMW shall never be disposed of as conventional garbage. All RMW shall be placed in specialized cardboard or reusable plastic containers for transport and disposal. These containers shall have the words "Infectious Waste" and the generator's name and address printed on them or have stickers with such designation adhered to the containers. Each cardboard container shall have two red liners placed inside: an outer liner with the generator's name and address pre-printed on it and an inner liner with no pre-printed information. Assemble cardboard containers in appropriate manner indicating "this side up". The reusable plastic container shall have one red liner, with the preprinted generator's name and address, placed inside. It is imperative that these supplies be kept under strict control so they can only be used for what they were intended. The building management of each facility shall provide the necessary supplies. For more information review the [NYU Biosafety Manual](#) or the [Regulated Medical Waste](#) website.

Sharps

All sharps shall first be placed into specialized sharps containers prior to being placed in the lined cardboard or reusable containers used for transport. Sharps containers are made of a rigid, puncture resistant material (i.e. plastic). At no time shall sharps be placed inside the lined cardboard containers without first being placed in the sharps container. Sharps shall not be disposed of as conventional garbage. The containers should be closed when $\frac{3}{4}$ full to avoid using pressure to close. Each department is responsible for obtaining Sharps containers. The outside of the boxes/reusable containers should be marked "SHARPS".

Non-Sharps

Non-sharps are all materials other than sharps material classified as RMW (e.g., tissue, organs, blood, carcasses, etc.) shall be placed in lined cardboard or reusable containers. Should small intermediate receptacles be used (i.e., within dental clinics, health service examining rooms, etc.),

they shall be lined with red bag liners. The full small liners shall then be placed within the double lined cardboard containers or single lined plastic reusable container for disposal.

Pathological Waste

Pathological waste (body parts, organs, tissues and body fluids) shall be placed into specialized lined cardboard containers. This waste shall not be mixed with other RMW or vice versa. The building management shall supply the containers. In addition to the words "Infectious Waste", pathological waste containers must be affixed with a label stating "Pathological Waste." These specialty labels will be provided by building management.

Liquid Waste

The sanitary sewer was designed for the disposal of certain liquid wastes. Use of the sanitary sewer reduces the chance for leaks or spills during transport and reduces disposal costs. Biological liquid waste can be poured down the drain (sanitary sewer), under running water after it has been decontaminated by autoclave or chemical means.

Hypodermic Needles from Student Housing and Real Estate Properties

In an effort to provide proper disposal of used hypodermic needles (for insulin-dependent individuals) from Student Housing and other NYU residential properties, and to prevent injuries by housing staff and NYC Sanitation workers, an arrangement has been made with Student Health Center to accept spent needles.

Each user of hypodermic needles should recap the spent needle with the original cover and place it in a coverable puncture resistant container (coffee can, plastic container or commercially available sharps container). The container should not be over packed so it cannot be covered and sealed properly. Full containers should be brought to the Student Health Center, located on the 3rd Floor of 726 Broadway. Designated times and dates shall be coordinated with the EHS. The containers will be accepted during normal business hours.

Other Precautions

At no time shall eating or drinking be allowed in areas where RMW is generated or stored. Proper personal hygiene practices shall be used after handling RMW. Hands should be washed following the handling of RMW. Non-disposable PPE shall not leave the work area. Home laundering of lab coats is prohibited. Any disposable PPE shall be disposed of as RMW. Should there be a lapse of time between the generation and pick-up of RMW, refrigeration or freezing is recommended for animal carcasses, tissues, organs, and pathological waste. Any questions regarding RMW should be directed to the EHS at x81450.

Reduction

Any waste that is not considered RMW (e.g., food waste, paper towels, other paper waste, non-infectious rodent bedding and non-contaminated personal protective equipment) should not be put in receptacles designated for RMW. A separate conventional waste receptacle should be available for such waste.

WARNING SIGNS AND LABELS

A biohazard warning sign shall be placed on doors to laboratories and rooms where RMW is being generated or temporarily stored. Warning labels or signs must be placed on receptacles used to hold RMW. These signs can be found on the [Biosafety website](#). Biosafety labels can be ordered from any laboratory safety catalog. Boxes that have been properly sealed for pick-up, must also display a label identifying the waste stream. See Appendix A for examples and descriptions of each sign and label.

DISPOSAL OF RMW BY LICENSED VENDOR

Once the containers are at a 90% capacity, the liner(s) shall be taped closed, one at a time, and the transport container shall be sealed. Cardboard containers are required to be sealed with packaging tape. Scheduling of pick-ups of RMW from individual laboratories, clinics, rooms, etc. shall be coordinated through the building management. Any missed pickups should immediately be reported to the FCM Helpdesk (x 81001).

Should a central collection/storage area be utilized, transport of RMW must be in a sealed red bag and placed in a rigid secondary containment (i.e., a plastic tub). If the material is of a weight that may result in the tub being dropped, a rolling cart with shall be used. Appropriate packaging containers, liner bags and tape should be available in the room. All containers must be labeled with the responsible person's name and room number for tracking purposes.

Full cardboard containers shall be stored in a secure location until the licensed waste hauler is scheduled to pick up a shipment for transport to a licensed treatment facility. At no time is RMW to be left unattended in an unsecured area. At the end of each work day, all containers should be temporarily closed if not ready for disposal.

RMW shall be transported from NYU property by a licensed vendor to a licensed treatment facility. Coordination shall be through the NYU EHS Department.

RECORDKEEPING

Each shipment that is removed from NYU property shall be recorded on a multi-paged manifest. Prior to removal from NYU property, the licensed transport driver and a representative of NYU sign a copy of the manifest with the number of containers and total weight of the shipment. A copy of the pickup manifest is provided to the NYU representative. Once the waste has been properly disposed of (incinerated or autoclaved), a fully signed copy of the manifest is returned to the EHS for the Washington Square Campus and the Dental Center Facilities Management for the Dental Center, indicating such. EHS is responsible for maintaining records for the Washington Square Campus. Facilities Management at the Dental Center is responsible for maintaining records specific to that facility.

APPENDIX A: Signs and Labels

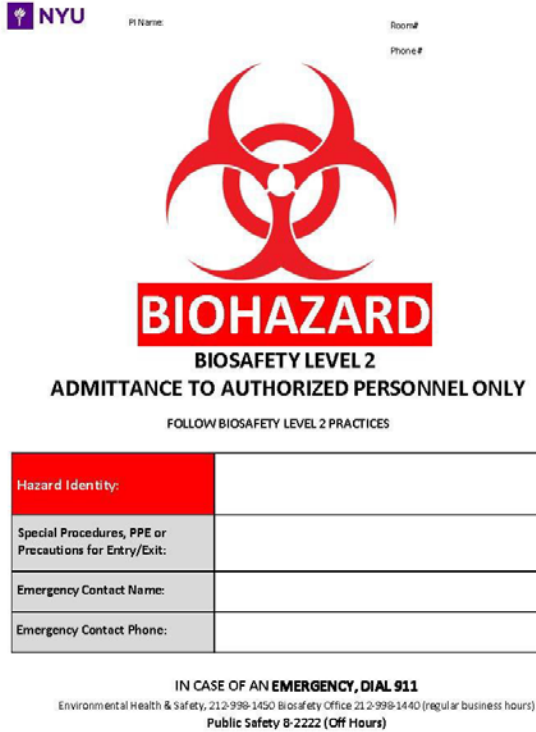


Image 1: Example of a NYU BSL-2 biosafety sign



Image 2: Example of a biosafety label



Image 3: Example of a RMW label not classified as pathological waste.

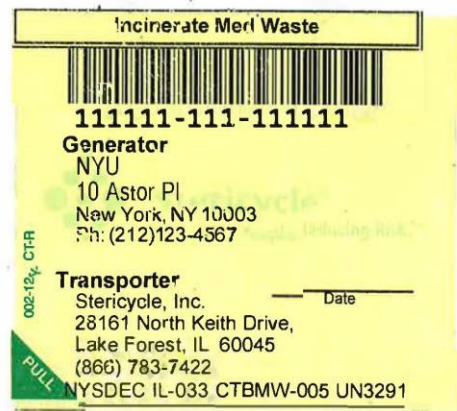


Image 4: Example of a pathological waste label.