

June 14, 2016

To: ALL MEDICAL WASTE GENERATORS IN SAN MATEO COUNTY

SUBJECT: IMPACTS OF ASSEMBLY BILL NUMBER 333 ON THE MEDICAL WASTE MANAGEMENT PROGRAM

San Mateo County Environmental Health Department (**SMCEH**) acts as the enforcement agency for the Medical Waste Management Act in San Mateo County, on behalf of the California Department of Public Health. On September 25, 2014, Assembly Bill 333 (AB 333) was signed by the Governor and filed with the Secretary of State. AB 333 amends multiple sections of the Medical Waste Management Act (MWMA).

Upon review and analysis of AB 333, SMCEH has determined that medical waste generators will be impacted as follows:

- 1) **MWMA Section 117890: Facilities are now required to notify (SMCEH) of participation in temporary offsite events.** Temporary events include, but are not limited to, health fairs, vaccination clinics, and veterans stand downs. Facilities must notify the local enforcement agency of their intended participation at least 72 hours before the event, unless the sponsor of the temporary event previously notified the local enforcement agency.
- 3) The generator or sponsor shall notify by e-mail Darrell Cullen, REHS at dacullen@smcgov.org.

4)

The notification, must include the following information:

1. Medical waste generator's business name, address, and phone number.
2. Location of temporary Event.
3. Date & times of temporary Event.
4. A brief description of handling, storage and disposal of medical waste.
5. Name, address, and phone number of company disposing of medical.

Keep a copy of your completed notification and disposal receipts and have them available for review during your facility's routine inspections.



2) MWMA Sections 117946 & 117976: (SMCEH) will no longer issue Limited Quantity Hauling Exemptions (LQHE) permits. Medical waste generating facilities may transport up to 37.5 pounds of medical waste, pursuant to the Materials of Trade Exemption contained in Section 173.6 of Title 49 of the Code of Federal Regulations. There is no requirement to register with SMCEH for the Materials of Trade Exemption, but you still are required to register in SMCEH as Medical Waste Generator.

The following information will be reviewed by this Agency during our on-site inspection at your facility:

- (A) The name of the person transporting the medical waste.
- (B) The number of containers of medical waste transported.
- (C) The date of the medical waste transported.

Additionally, disposal records and/or shipping and tracking documents for all untreated medical waste shipped off-site for disposal will be reviewed during our routine inspection.

All disposal records/documents are to be maintained and available for two years.

3) MWMA Section 117935 and 117960: Additional information must be included in the Medical Waste Management Plan MWMP. The MWMP must include the steps taken to **categorize pharmaceutical wastes**. If there is onsite treatment, the MWMP must include a closure plan for the termination of treatment. Updated MWMPs may be submitted annually.

4) MWMA Section 117967: Facilities with onsite treatment must provide training. Annual training compliant with Occupational Safety and Health Administration (OSHA) standards is required on the use of the equipment, the proper protective equipment to wear, and how to clean up spills.

5) MWMA Section 117630: Biohazard bags must meet updated requirements. The bags must meet the standards of the American Society for Testing Materials and bio hazardous waste bags must be red, except when yellow bags are used to further segregate trace chemotherapy waste and white bags are used to further segregate pathology waste.

Your Medical Waste Management Plan needs to include procedures for handling bio hazardous waste bags during segregation and final disposal.

Additional information and updates will be posted to SMC's website at: www.smchealth.org/medwaste.

Sincerely,

Darrell Cullen, REHS
Medical Waste Program Specialist IV.