



EXCELLENTIA  
ADVISORY GROUP

INDUSTRY FOCUS | SURGERY CENTER CONSULTING

<https://www.excellentiagroup.com>

---

---

---

---

---

---

---



D.O.T.  
REGULATED MEDICAL WASTE MANAGEMENT  
TRAINING

Presented by  
Cathy Montgomery, RN, CASC

---

---

---

---

---

---

---

Regulated Medical Waste  
Guidelines/Regulations



---

---

---

---

---

---

---



Department of Transportation  
Mission Statement

Serve the United States by ensuring a fast, safe, efficient, accessible and convenient transportation system that meets our vital national interests and enhances the quality of life of the American people, today and into the future.




---



---



---



---



---



---



---



---

## D.O.T. Overview



### TRANSPORTER

**An Agency** is contracted by the facility for the transport, final treatment, and disposal of RMW.

**An Employee** is someone who transports small quantities of primary red bags(s) or sharps containers in a private or facility vehicle.

---



---



---



---



---



---



---



---

## D.O.T. Overview



### GENERATOR

**An agency** that generates RMW, in this case your facility.

**An employee** who certifies that the final packaging of RMW meets federal and state regulations – the person who signs the manifest.

**All generators must successfully complete training!**

---



---



---



---



---



---



---



---

## Regulated Medical Waste



Pathological  
Waste



Microbiological  
Waste



Sharps

---



---



---



---



---



---




---



---



---



---



---



---

[www.hercenter.org/rmw/rmwlocator.cfm](http://www.hercenter.org/rmw/rmwlocator.cfm)

State-by-State  
Regulated Medical Waste  
Resource Locator

You will Exit HERC and go to ENVCAP when you select a state by clicking on the map.




---



---



---



---



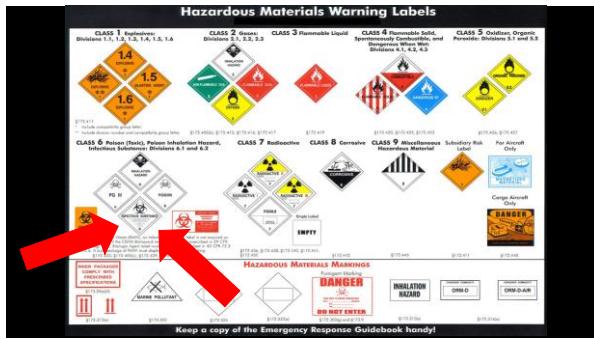
---



---

## D.O.T.'s Categories of Hazardous Materials (HAZMAT)

1. Explosives
2. Gases
3. Flammable & Combustible Liquids
4. Flammable Solids
5. Oxidizing Substances, Organic Peroxides
6. Poisonous Substances (6.1)
  - Infectious Substances (6.2)
7. Radioactive Materials
8. Corrosives
9. Miscellaneous Hazards



D.O.T.  
Hazardous  
Materials  
Class 6.2



## Packaging Groups

D.O.T. has identified 3 packaging groups:

- PG I = Great Danger
- PG II = Moderate Danger
- PG III = Minor Danger




---



---



---



---



---



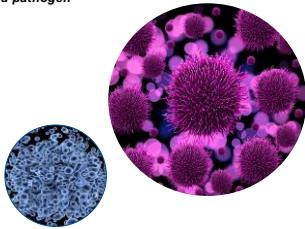
---

## Infectious Substance 6.2

*Reasonably expected to contain a pathogen  
(49 CFR 173.134)*

**Two types of pathogens:**

- A = capable of causing permanent harm
- B = not capable of causing permanent harm




---



---



---



---



---



---

### Key Requirements

Waste intended for transport must be segregated:

- Sharps
- Fluids
- Other RMW




---



---



---



---



---



---

## Regulated Waste - OSHA 1910.1030 (b)

*"Liquid or semi-liquid blood or other potentially infectious material; contaminated items that would release blood or other potentially infectious materials in a liquid or semi-liquid state if compressed; items that are caked with dried blood or other infectious materials and are capable of releasing these materials during handling; contaminated sharps; and microbiological wastes containing blood or other potentially infectious materials."*

---



---



---



---



---



---

## Regulated Medical Waste

- Dripping with body fluid\*
- Squishing with body fluid\*
- Caked with body fluid\*
- Sharps



\*Body Fluid = blood or OPIM

---



---



---



---



---



---

## OPIM - OSHA 1910.1030 (b)

*"Other Potentially Infectious Materials (OPIM) means (1) The following human body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids; (2) Any unfixed human tissue or organ from a human."*

---



---



---



---



---



---

### Red Bag Challenges



---

---

---

---

---

---

### Red Bag Challenges



---

---

---

---

---

---

### Red Bag Challenges



---

---

---

---

---

---

## Red Bag Challenges

Unless visibly soiled with blood, these items do not belong in red bag trash:

✓ <i>Bed Pans</i>	✓ <i>Vent tubing</i>
✓ <i>Empty specimen containers</i>	✓ <i>Emesis basins</i>
✓ <i>Dressings and gauze</i>	✓ <i>Urinals</i>
✓ <i>Diapers/Incontinence Pads</i>	✓ <i>Paper towels</i>
✓ <i>Splints</i>	✓ <i>IV bags</i>
✓ <i>Masks, gowns, gloves</i>	✓ <i>Casts and splints</i>
✓ <i>Tapes</i>	✓ <i>Packaging materials</i>
✓ <i>Cotton</i>	✓ <i>Foley bags and catheters</i>
✓ <i>Suction tubing</i>	✓ <i>Alcohol preps</i>

---



---



---



---



---



---



---



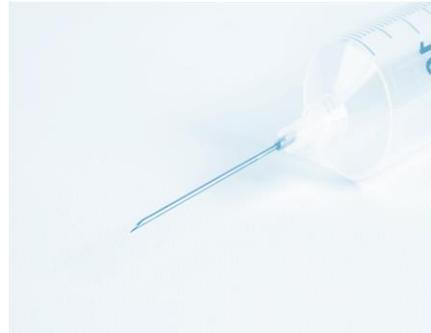
---



---

### Sharps per the D.O.T.

49CFR173.134(a)(6)  
 Sharps means any object contaminated with a pathogen or any that may become contaminated with a pathogen through handling or during transportation and also capable of cutting or penetrating skin or a packaging material.




---



---



---



---



---



---



---



---



---

### D.O.T.'s Hazmat Training Standard

*“D.O.T. has identified inadequate training for employees handling hazardous materials as one of the primary causes for hazmat incidents.”*  
 49 CFR 172.704




---



---



---



---



---



---



---



---

## Hazmat Employee



- Loads, unloads, or handles hazmat
- Tests, repairs, or otherwise represents packaging's
- Prepares hazmat for transportation
- Is responsible for transporting hazmat

49 CFR 171.8

---



---



---



---



---



---

## Hazmat Employee



- Employees who determine the hazard class of a material affect the safety of the shipment, even if they just classify the material based on information provided them
- Employees who prepare packages and shipping papers
- Employees who sign shipping papers

---



---



---



---



---



---

### Hazmat Training

- General awareness
- Security awareness
- Function Specific
- Safety




---



---



---



---



---



---

## Security Awareness

- Keep RMW storage areas restricted from the general public and unauthorized, untrained personnel
- Train personnel handling RMW
- Follow Medical Waste policies and procedures
- Know your driver: Don't be afraid to ask for ID, watch for unmarked vehicles
- Make sure all containers are properly packaged, marked and safe for transport before the driver loads them on to the truck

---



---



---



---

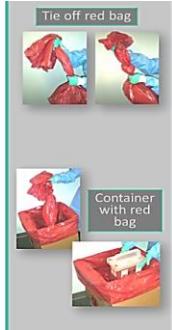


---



---

### Preparing Disposable Containers




---



---



---



---



---



---




---



---



---



---



---



---

## Function Specific

When moving containers of contaminated sharps from the area of use, the containers

**MUST:**

- Be closed immediately prior to removal or replacement to prevent spillage or protrusion of contents during handling, storage, transport, or shipping
- Placed in a secondary container if leakage is possible




---



---



---



---



---



---

## Sharps Container Challenges




---



---



---



---



---



---

## Function Specific

Shipping Manifest all RMW REQUIRES the following prior to shipment:

- Hazard Class: 6.2 identifies the shipment as infectious substance
- Identification No.: UN3291 is the ID number for RMW
- Packing Group: PGII is the code for "Medium Danger"




---



---



---



---



---



---

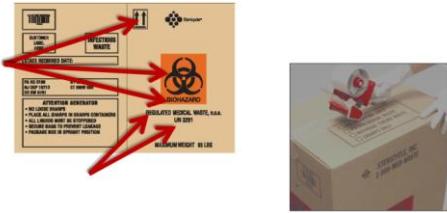
**Final Transport Container** must be marked **externally** with the words:

Regulated Medical Waste  
UN3291  
 Biohazard



### DOT Requirements for RMW

#### Typical Regulated Medical Waste Container Markings



## FUNCTION SPECIFIC



## FUNCTION SPECIFIC




---



---



---



---



---



---

## Manifest Reconciliation

- It is our responsibility to ensure that the RMW is actually destroyed by the vendor
- This is done through reconciliation – the matching of the copy of the manifest with the "Proof of Destruction" copy provided by the vendor
- Reconciled manifests are kept for 3 years and kept at the POINT OF ORIGIN




---



---



---



---



---



---

## Safety

- General OSHA training
- Ensure employees wear PPE
- Practice safe handling
- Ensure containers are safe for transport

---



---



---



---



---



---

**D.O.T. Hazmat  
Training  
Requirements**

- Training must be completed within 90 days of employment
- Employee can perform Hazmat functions (until trained) if directly supervised
- Retraining is required every three years




---



---



---



---



---



---



---

## Recordkeeping



**Training record must include:**

- Employee's name
- Most recent training completion date
- Description, copy or the location of the training materials
- Name and address of the person who provided the training
- Certification by the employer that the employee has

---



---



---



---



---



---



---



## Testing

**➢Required**

- Can be oral, written, or return demonstration
- Keep records as long as employed plus 90 days afterwards

---



---



---



---



---



---



---

## In Conclusion

The US DOT regulates the transportation of regulated medical waste to ensure that:

- Waste is properly identified and classified
- Waste is packaged so as to keep it safe during transport
- Employees packaging the waste are trained in associated risks
- Employees who sign the shipping papers are properly trained
- The materials are stored in a secured area minimizing security threats
- The US EPA continues to work on proper waste segregation for non-RCRA hazardous pharmaceuticals. Regulations concerning pharmaceutical waste are changing



D.O.T.  
REGULATED MEDICAL WASTE MANAGEMENT  
TRAINING



Cathy Montgomery, RN, CASC  
cathy@excellentia-group.com | 1-636-875-5088 ext. 102

INDUSTRY FOCUS | Surgery Center Consulting  
[cathy@excellentiagroup.com](mailto:cathy@excellentiagroup.com)  
<https://www.excellentiagroup.com>