

## Regulated Medical Waste Management Regulations, Amendment 3

### Compliance Assistance Document for Regulated Medical Waste Transporters

This document provides a *high-level* overview of the [Regulated Medical Waste \(RMW\) Management Regulations \(9VAC20-121\)](#) for RMW Transporters. The new regulations are effective March 15, 2023, and background information on Amendment 3 to the regulations is available on the [Virginia Regulatory Town Hall webpage](#).

#### General Handling

Transporters of RMW are required to:

- Wear appropriate personal protective equipment when handling, packaging, or loading RMW
- Handle RMW in a manner that maintains the integrity of the packaging at all times, prevents damage, leakage, and spills, and provides protection from the elements, vectors, and trespassers
- Transport RMW to a facility permitted to receive it for transfer, treatment, or disposal (Untreated RMW must not be transported to a solid waste landfill or other solid waste management facility)

RMW should not be manually or mechanically compacted or compressed prior to treatment.

#### Packaging and Labeling

RMW should be transported in accordance with the applicable requirements for shipping papers, packaging, labeling, marking, and vehicle placarding of the [U.S. Department of Transportation \(DOT\) Hazardous Materials Regulations, 49 CFR Parts 171 through 180](#).

#### Transportation

During transport, and in areas used to transfer a load of RMW from one vehicle to another, transporters should:

- Maintain packaging in an upright stable configuration to minimize the potential for spills
- Ensure the integrity of containers is not compromised by the stacking arrangement
- Limit access to vehicles and equipment to only persons specifically designated to manage RMW
- Secure the cargo carrying body, except when loading and unloading
- Ensure surfaces of vehicles and equipment used to transport RMW are clean and impermeable to liquids (no carpets, cracks, or gaps)
- Maintain vehicles in a clean and orderly condition, free of standing liquid and debris
- Handle waste under cover or in a container to protect it from the elements, and over a floor or bermed pavement to contain spills (quick pickups do not require a cover, floor, pavement)

#### Reusable Carts and Containers

Reusable carts or containers used to transport RMW should meet the requirements of the [U.S. DOT Hazardous Materials Regulations](#), and be sealed, puncture resistant, and leak proof.

These items should not be reused when damaged, including when a lid or locking mechanism is damaged. When ready to be discarded, they must be properly cleaned and disinfected, and all RMW labeling must be removed or covered, prior to disposal as solid waste.

##### Cleaning of Reusable Carts and Containers

- Clean and disinfect immediately after each use
- Clean with detergent and water
- Disinfect using one of the following options:
  1. An EPA-registered general or broad-spectrum disinfectant following instructions on label
  2. Heated rinse water between 180°F and 195°F for at least 15 seconds, or until the surface temperature reaches 160°F, or
  3. Immersion in or rinsing with an [approved chemical sanitizer](#) for at least 3 minutes
- Contain and discharge all wash water directly to an approved sanitary sewer system

Wheeled carts for RMW, and other items used to move RMW, should be:

- labeled with the universal biohazard symbol or color-coded red, and
- secured, locked, or sealed so no waste materials can leak when not being filled and prior to moving.

Wheeled carts and roll-off containers should not be used to hold liquids, sharps, anatomical waste, or animal carcasses unless the RMW is:

- contained in rigid containers capable of retaining liquids with enough absorbent material to absorb all liquid present, and
- separated from other types of RMW by a leak-proof rigid barrier, divider, or separate compartment.

## Spill Kits and Cleanup

RMW transporters must carry a [spill containment and cleanup kit](#) in the vehicle containing the following items:

- Material designed to absorb spilled liquids
- EPA-registered hospital grade disinfectant effective against mycobacteria in a sprayer
- Enough red plastic bags to double enclose at least 150% of the max load managed
- Appropriate personal protective equipment, such as puncture and leak resistant gloves, safety glasses or face shield, protective coveralls or bib, protective footwear, and mask or respiratory protection as needed
- First aid kit
- Fire extinguisher
- Boundary marking tape
- Lights
- Other appropriate safety equipment

Spills should be addressed immediately by repackaging RMW (placing in secondary packaging), cleaning and disinfecting the area, and replenishing the spill kit.

## Cleaning of Vehicles and Equipment

All vehicles and equipment used to transport RMW must be thoroughly cleaned and disinfected before being used for any other purpose and prior to any transfer of ownership.

Disinfection should include using an EPA-registered hospital grade disinfectant effective against mycobacteria in accordance with manufacturer's label instructions.

Any areas visibly contaminated, or that become contaminated as a result of a spill, must be immediately decontaminated.

## Transport by U.S. Postal Service

Transport of RMW by the U.S. Postal Services that fully complies with [39 CFR 111](#) will be considered in compliance if:

1. The generator maintains a complete and legible copy of the manifest or mail disposal service shipping record for a period of three years. Disposer's certification and other tracking items must be completed and shown on the copy
2. The addressee is a facility permitted by all the appropriate agencies of the Commonwealth or the host state, and
3. No package shall be more than 35 pounds by weight.

## Permits

RMW transporters are not required to register with or obtain a [permit](#) from the Virginia Department of Environmental Quality as long as the transporter is not operating as an RMW Transfer Station or RMW Treatment Facility. Transporting of Category A Waste may require a [special permit](#) through the Pipeline and Hazardous Materials Safety Administration of the U.S. Department of Transportation.

Any vehicle parked 24 hours or more during transport of RMW will be considered a RMW Transfer Station that requires a [permit](#) and is subject to [additional requirements](#) in accordance with the regulations.

Temporary storage of RMW generated from an emergency cleanup is allowed without a permit for up to 72 hours provided [additional regulatory requirements](#) are met.