

# MOC Waste Management and Disposal

## 1. Waste Management

### 1.1 Introduction

#### Waste Management and Disposal

##### Markets Outside of California

Required Procedures for Protected Health Information Waste, Medical Waste, Hazardous Waste, and Universal Waste

This training module details the requirements and processes that all Kaiser Permanente employees, physicians, and contingent employees must follow to properly dispose of waste.



*It is important to understand the disposal requirements for each type of waste that you generate.*

1 of 17 | You've completed 0% of the lesson.

### 1.2 Responsibilities

#### Waste Disposal Responsibilities

Every Kaiser Permanente employee, physician and contingent worker is responsible for placing waste into the appropriate waste container.

**It is a VIOLATION of regulations for KP to send hazardous or medical waste to solid waste landfills.**

If you are not sure how to dispose of waste, or observe waste that has been improperly disposed, contact your supervisor/department manager, the Environmental Health and Safety (EH&S) Manager or Compliance Officer who supports your site.



2 of 17 | You've completed 0% of the lesson.

## 1.3 Compliance Reporting

### Compliance Reporting

- Employees must immediately report any improper disposal of hazardous, medical, or PHI waste to their Manager/Supervisor.
- The **Kaiser Permanente Compliance Hotline** is also available 24 hours a day, 7 days a week to report waste disposal compliance concerns or issues. You can include your name or can remain anonymous when reporting situations in your workplace that you think may be illegal or improper.
- The Compliance Hotline telephone number is 1-888-774-9100.
- Concerns can also be reported electronically via [Compliance Hotline](#).



3 of 17 | You've completed 0% of the lesson.

## 1.4 Regulated Waste

### Regulated Waste

This training module provides information on the proper disposal requirements for regulated waste streams.

Protected Health Information (PHI) Waste

Medical Waste

- Biohazardous Waste
- Pathology Waste
- Sharps Waste
- Trace Chemotherapy Waste
- Regulated Waste

Pharmaceutical Waste

Hazardous and Universal Waste



**Overall, a primary message of this training module is that “regulated” waste must not be placed in regular trash containers.**

4 of 17 | You've completed 0% of the lesson.

## 1.5 Protected Health Information (PHI)

# Protected Health Information (PHI)

## PHI Waste Management

KP policy is that all paper waste must be collected as confidential waste for shredding. This prevents PHI or other confidential information from going into the regular trash. You **must** place all paper, DVDs, or CDs into a container that has been designated for secure destruction through shredding.

Example containers:



*Desk collector before transferring to locked collection container for shredding*



*Locked collection container for paper to be shredded*



*Locked collection container for paper to be shredded*

5 of 17 | You've completed 0% of the lesson.

## PHI Identifiers (Slide Layer)

# Protected Health Information (PHI)

## PHI Identifiers

PHI identifiers include but are not limited to:

- Patient or member name, medical record number (MRN), demographic information, social security number, or any other information that identifies the individual.
- Just one of these identifiers on a KP document containing information relating to the individual's health condition, treatment or coverage requires the entire document to be considered PHI.



CLOSE

5 of 17 | You've completed 0% of the lesson.

## PHI Documents (Slide Layer)

# Protected Health Information (PHI)

## PHI Documents

You should always assume that these documents contain PHI:

- After visit summaries (AVS)
- Patient care documents, questionnaires, encounter lists, care-related faxes
- Medical records, test results, visit notes, medical referral forms
- Pharmaceutical prescription forms, labels, and patient medication lists
- Member coverage and benefits information, claims and billing records



CLOSE

5 of 17 | You've completed 0% of the lesson.

## PHI Waste Management (Slide Layer)

# Protected Health Information (PHI)

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CLOSE

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## Disposal (Slide Layer)

### Disposal

- Do not place PHI waste in regular trash containers
- Check with your Supervisor, Department Manager, or Compliance Officer if you are unsure of how to dispose of PHI
- If you find or observe confidential/PHI waste improperly disposed outside of a secure container, immediately notify your supervisor or manager
- Steps should be taken to ensure such waste is safely collected and placed in a confidential waste container



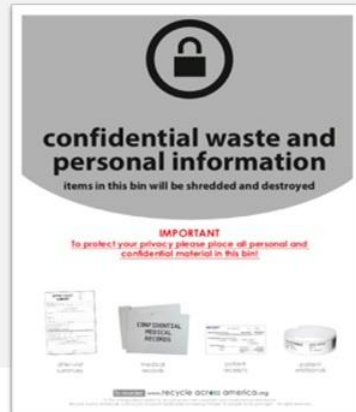
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## Label (Slide Layer)

### Protected Health Information (PHI)

**Look for this label on waste containers when disposing of paper or any item with confidential information:**



CLOSE

5 of 17 | You've completed 0% of the lesson.

## PHI Examples (Slide Layer)

### PHI Examples

**THIS IS NOT A COMPREHENSIVE LIST OF ALL ITEMS THAT ARE CONFIDENTIAL/PHI WASTE**

- All paper (handwritten or printed)
- After Visit Summary (AVS) sheets
- Care-related faxes
- Check-in/Payment receipts
- Claims and billing records
- Dietary tickets
- Encounter lists/ Appointment logs
- Medical records
- Medical referral forms
- Member coverage and benefits information
- Patient menus
- Patient print out sticker
- Patient safety engineering work orders
- Pharmaceutical prescription forms
- Patient care documents/Medication lists
- Patient questionnaires-
- Post-It sticky notes
- Test orders or result printouts
- Vendor contracts
- Visit notes
- Wrist bands

NEXT

5 of 17 | You've completed 0% of the lesson.

## 1.6 Protected Health Information (PHI)

### Protected Health Information (PHI) Disposal

- Do not place PHI waste in regular trash containers
- If you find or observe confidential/PHI waste improperly disposed outside of a secure container, immediately notify your supervisor or manager



6 of 17 | You've completed 0% of the lesson.

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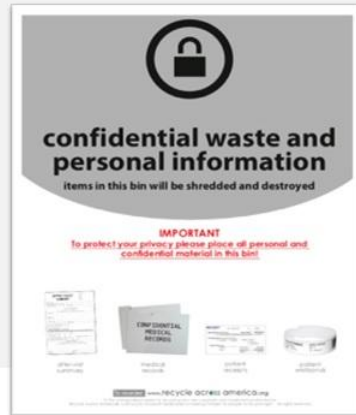
6 of 17 | You've completed 0% of the lesson.



## Label (Slide Layer)

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Look for this label on waste containers when disposing of paper or any item with confidential information:



CLOSE

6 of 17 | You've completed 0% of the lesson.

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NEXT

6 of 17 | You've completed 0% of the lesson.

## 1.7 Biohazardous Waste

### Biohazardous Waste

All materials with blood or other potentially infectious materials (OPIM).

Click on each button.

Examples

Highly  
Infectious

Waste  
Disposal



**DO NOT place medical waste in a regular trash container.**

7 of 17 | You've completed 0% of the lesson.

## Highly Infectious (Slide Layer)

### Biohazardous Waste

#### Highly Infectious

Some highly infectious agents require special collection and disposal procedures. This includes collecting waste in a designated medical waste container segregated from other red bag waste, and using specific decontamination procedures. Contact your EH&S Professional and Infection Prevention Department if you are treating patients involving highly infectious agents, including any of the three listed below:

- *Coxiella burnetii* (Q fever)
- Creutzfeldt-Jakob disease (CJD)
- Ebola

CLOSE

7 of 17 | You've completed 0% of the lesson.

## Example BioHaz (Slide Layer)

### Biohazardous Waste Examples

- Materials and devices with visible fluid or dry blood.
- Blood transfusion bags and/or tubing.
- Breathing circuits with visible blood
- Gauze or bandages with any recognizable fluid blood or dry caked blood.
- Gowns and Gloves with any amount of visible fluid or dry blood and/or otherwise potentially infectious body fluids.
- Pads, drapes, and sponges with any amount of visible fluid or dry blood and/or otherwise potentially infectious body fluids.
- Suction canisters.
- Blood and body fluids, excretions, exudates, secretions, suctioning, and other body fluids that cannot be directly discarded into the municipal sewer system.
- Any item that is labeled with a biohazard symbol (see image at right) must be placed in a biohazard waste container for disposal.
- Specimen bag/Trays covers/Laboratory containers



CLOSE

7 of 17 | You've completed 0% of the lesson.

## Waste Disposal (Slide Layer)

### Biohazardous Waste Waste Disposal

- Biohazardous waste must be promptly placed in a RED biohazardous waste container/bag.
- If you have any doubt about whether a waste item is biohazardous, place the item into a red bag container.
- If you observe medical waste in the regular trash, immediately notify your supervisor. Do not retrieve the medical waste from the container. Isolate the container so the contents may be properly managed and disposed.



NEXT

7 of 17 | You've completed 0% of the lesson.

## Bio Label (Slide Layer)

# Biohazardous Waste

## Disposal of Items with a “Biohazard Symbol”

- Any item that is labeled with a biohazard symbol must be placed in a biohazard waste container for disposal even if the items are empty.
- Examples of items that may have biohazard symbol label include:
  - specimen bags
  - tray covers
  - laboratory containers
- Never place soiled linen in a red biohazard bag before placing it in the blue soiled linen bag. Do not discard soiled linen in Red Biohazardous Waste Containers



**DO NOT place an item with a biohazard symbol in regular trash.**

CLOSE

7 of 17 | You've completed 0% of the lesson.

## 1.8 Pathology Waste

# Pathology Waste

What is Pathology Waste?

Human specimens or tissues removed from a minor procedure, surgery, or autopsy disposed by KP.

- Bone fragments
- Tissue, skin tags
- Biopsies, surgical specimens, limbs
- Organs and placentas
- Anatomical parts from surgery, obstetrical procedures, autopsy, and laboratory procedures

Example departments that generate Pathology Waste:

- Operating rooms
- Procedure rooms
- Dermatology/Mohs lab
- Labor and Deliver
- Pathology



NEXT

8 of 17 | You've completed 0% of the lesson.



## Waste Container (Slide Layer)

### Pathology Waste

#### Waste container for pathology waste:

Place in a container lined with a red bag that has a biohazard symbol and is labeled with the words “Path” or “Pathology Waste”, “Incinerate Only” AND a biohazard symbol.



Look for a pathology waste container lined with a red bag and biohazard symbols

**DO NOT** place pathology waste in a regular trash container.

8 of 17 | You've completed 0% of the lesson.

## 1.9 Sharps

### Sharps

What Is Medical Waste Sharps?

Devices that are designed to puncture or capable of puncturing or cutting the skin and that are contaminated with blood or potentially infectious body fluids.

Click on each button.

Examples

Waste  
Disposal

Injury  
Prevention



9 of 17 | You've completed 0% of the lesson.

## Waste Disposal (Slide Layer)

### Sharps

#### Waste Container for medical waste sharps:

- All sharps waste must be placed in a red sharps container, labeled with the word "Sharps" AND the international biohazard symbol.
- When no fill line is present, the sharps container must be closed and replaced when it is 3/4 full.



**DO NOT place sharps waste in regular trash container.**

CLOSE

9 of 17 | You've completed 0% of the lesson.

## Examples (Slide Layer)

### Sharps

#### Examples included:

- Needles
- Syringes with or without needles attached
- Lancets
- Pipettes
- Disposable scalpel blades
- Blood vials
- Broken or unbroken glassware that has been in contact with infectious agents
- Glass serum bottles



CLOSE

9 of 17 | You've completed 0% of the lesson.

## Injury Prevention (Slide Layer)

### Sharps

#### Injury Prevention

- It is critical that all sharps devices be placed in sharps disposal container for safe disposal.
- When sharps are incorrectly placed in regular trash or red bag containers, EVS workers or other staff that handle, transport, or dispose waste are at risk for serious injury (i.e., disease transmission, mental health impacts).



CLOSE

9 of 17 | You've completed 0% of the lesson.

## 1.10 Trace Chemotherapy Waste

### Trace Chemotherapy Waste

Trace Chemotherapy waste consists of materials which previously contained or had contact with chemotherapeutic agents including:

- tubing
- empty bags
- bottles
- vials
- syringes
- gloves, masks, gowns
- wipes
- close loop transfer devices
- any item otherwise contaminated with chemotherapeutic agents via incidental contact



**Note:** Bulk chemotherapeutic waste consists of chemotherapeutic waste items that are not "empty" (e.g., vials with free flowing liquid).

Bulk chemotherapeutic wastes (including materials used to clean up a chemo spill) must be placed in a black hazardous waste container, and not in a trace chemotherapeutic waste containers.

Trace chemotherapy waste must be placed in a yellow chemotherapy waste sharps container, soft trace chemotherapy waste may be collected in a red or yellow biohazard bag labeled "Chemotherapy Waste" or "Trace Chemo Waste" with "Incinerate Only" or "High-heat Only"

10 of 17 | You've completed 0% of the lesson.

## 1.11 Non-Hazardous Pharmaceutical Waste

### Non-Hazardous Pharmaceutical Waste

**What is non-hazardous Pharmaceutical Waste?** Are unused, partially used or expired prescription or over-the-counter medications that are not hazardous waste.

**Examples:**

- liquid medications, injectable and oral
- pills, capsules, and tablets
- medicated Creams/lotions,
- eye drops, suppositories
- unemptied IV medication bags
- patches, lozenges, and medicinal lollipops



Pharmaceutical waste that requires collection as trace chemotherapeutic or hazardous waste is addressed in the Trace Chemotherapeutic and Hazardous Waste slides.

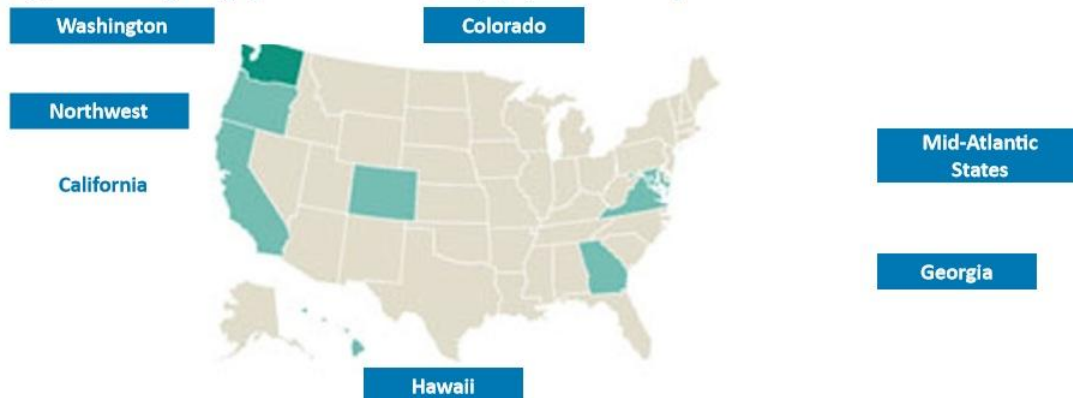
Where Do You Work?

11 of 17 | You've completed 0% of the lesson.

### Where Do You Work (Slide Layer)

### Where Do You Work?

Click on the Market you work in to get Market specific non-hazardous pharmaceutical waste disposal information.  
If you work in Program Office, Shared Services or KPIT employee, select the Market you work in.



11 of 17 | You've completed 0% of the lesson.



## GA, MA, NW and WA (Slide Layer)

# Waste Disposal

**Georgia, Mid-Atlantic, Northwest, Washington ONLY**



- All Non-hazardous pharmaceutical waste must be placed in a blue or blue lidded container that is labeled with the international biohazard symbol and the words "Incinerate Only".
- Wall Mounted or Tabletop Containers should be used for vials, pills, patches, medicinal lollipops.
- Washington State market only: Syringes with or without needles containing 3% or more volume of medication (visible medication) with and without blood or OPIM contamination.
- Disposal of pharmaceuticals down the drain is prohibited by federal and state law.

**DO NOT place pharmaceutical waste in regular trash.**

CLOSE

11 of 17 | You've completed 0% of the lesson.

## HI (Slide Layer)

# Waste Disposal

**Hawaii**

- All pharmaceutical waste must be placed in a red sharps container, or other designated sharps container..
- Disposal of pharmaceuticals down the drain is prohibited by federal and state law.



CLOSE

11 of 17 | You've completed 0% of the lesson.

## Waste Disposal

**Colorado ONLY**

- Pharmaceutical Waste must be placed in a RCRA waste container (black with white lid) labeled "Hazardous Waste Pharmaceuticals"
- Do NOT dispose of pharmaceuticals down the drain.
- Do NOT dispose of pharmaceuticals in regular trash.
- Syringes used to administer medications must be placed in sharps containers for disposal



HAZARDOUS WASTE	
WASTE NAME	Hazardous Waste Pharmaceuticals
Building	Not Labeled
Department	Not Labeled
Date Generated	
<div></div>	



CLOSE

11 of 17 | You've completed 0% of the lesson.

### 1.12 Hazardous Waste

## Hazardous Waste

What Is Hazardous Waste?

Hazardous waste includes items that are toxic, flammable, corrosive, or reactive as defined by federal or state regulations.

Click on each button.

Identification

Waste  
Collection

RCRA  
Pharmaceuticals  
(Subpart P Waste)

P-Listed Waste

Silver Nitrate  
Sticks

Aerosols

Waste Disposal

Container  
Management

12 of 17 | You've completed 0% of the lesson.

## Identification (Slide Layer)

### Hazardous Waste Identification

Waste items regulated as “***hazardous waste***” have specific criteria that have specific disposal criteria:

Click on each  button.



CLOSE

12 of 17 | You've completed 0% of the lesson.

## Waste Collection (Slide Layer)

### Hazardous Waste Collection

- Hazardous waste must be segregated in a properly labeled hazardous waste container so that incompatible materials are not mixed in the same container.

*For example: flammables such as alcohols can't be put in the same container as reactive waste such as silver nitrate sticks, if mixed can cause a fire.*

- For this reason, several hazardous waste containers may be in your department to enable collection of different types of waste.



***DO NOT place hazardous waste in a sharps container, biohazardous red bag, or regular trash.***

CLOSE

12 of 17 | You've completed 0% of the lesson.

## RCRA Pharmaceuticals (Slide Layer)

### Hazardous Waste RCRA Pharmaceuticals

What are RCRA Hazardous Waste Pharmaceuticals? Are pharmaceuticals regulated under federal hazardous waste regulations for its "chemical characteristic" or is "listed" by regulation.

This is not a comprehensive list of examples:

- Phenol liquid and expired swabs
- Insulin vials or pens
- Vaccines: Flu Multi-dose vials, MPSV4-Menomune
- Bulk Chemotherapy Agents
- Expired or unused Chloro-prep products or other alcohol-based disinfectants
- Anesthetic Agents (e.g., Sevoflurane or Desflurane)
- Silver creams
- Lens cleaner
- Cactus Sink or Rx Destroyer

*See your EH&S/Safety Department for specific requirements for your department.*

*SHARPS are NOT permitted in the hazardous waste container.*



CLOSE

12 of 17 | You've completed 0% of the lesson.

## P-Listed (Slide Layer)

### P-Listed Waste

Some specific pharmaceuticals, their empty containers, and production/delivery paraphernalia are classified as "acutely" hazardous waste and are referred to as P-Listed Wastes under hazardous waste regulations. If your site is operating under the new Subpart P hazardous waste rule, P-Listed waste can be collected in the RCRA Pharmaceutical Hazardous Waste Container. P-listed hazardous waste pharmaceuticals have specific requirements for collection, disposal and storage. Here is a list of P-listed pharmaceutical wastes typically generated by KP:

P-Listed Pharmaceuticals
Warfarin & Salts (Concentration > 0.3%)
Arsenic Trioxide
Aminopyridine
Epinephrine POWDER FORM ONLY
Physostigmine Salicylate
Physostigmine

*Note: Under revised regulations, nicotine is no longer classified as P Listed waste and should be disposed as Pharmaceutical Waste.*



*See your EH&S/Safety Department for specific requirements for your department.*

CLOSE

12 of 17 | You've completed 0% of the lesson.



## Silver Nitrate Sticks (Slide Layer)

### Hazardous Waste Silver Nitrate Sticks

Silver nitrate stick waste, whether used or expired, must be collected in a **Silver Nitrate Stick Hazardous Waste Container**.

**DO NOT** place silver nitrate sticks in a sharps container, biohazardous red bag, or regular trash.



CLOSE

12 of 17 | You've completed 0% of the lesson.

## Waste Disposal (Slide Layer)

### Hazardous Waste Waste Disposal

The disposal of these containers is managed by your EH&S department.

Primary examples of the types of hazardous waste containers include: Hazardous Waste Pharmaceutical Waste Container; Aerosol Waste Container; P-Listed Waste Container; and the Silver Nitrate Waste Container.

It is important that you use the correct hazardous waste container and understand the differences between each container type in your department.

Look for a hazardous waste label on the waste container



**Hazardous waste must be placed in designated hazardous waste containers.**  
**Do not place hazardous waste in regular trash containers or medical waste containers.**

CLOSE

12 of 17 | You've completed 0% of the lesson.

## Container Management (Slide Layer)

### Hazardous Waste Container Management

- Hazardous waste containers must be located at or close to where the waste is generated.
- Hazardous waste containers must have properly completed labels that identifies the contents, GHS hazard warnings, and the accumulation start date.
- Containers kept closed at all times, except for when adding or removing waste.
- If a hazardous waste container is nearing full or is full notify your Supervisor.

The following information is required to be filled out on each label:

1. Facility name and address
2. Composition of the waste
3. Hazardous properties of the waste
4. Physical state of the waste
5. Accumulation start date
6. Container Full Date (entered when full)
7. Waste codes

Optional information to add:

- ☐ Solids
- ☐ Liquids
- ☐ Gases

HAZARDOUS WASTE

Generator Information

Facility Address and EPA ID #

CAL XXX-XXX-XXX-XXX  
XXXX Hospital or Medical Center  
4321 Cal Drive  
Oakland, CA 94612

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CLOSE

12 of 17 | You've completed 0% of the lesson.

## Aerosols (Slide Layer)

### Hazardous Waste Aerosols

Non-Empty Aerosol Can still contains the contents and propellant at the time that it is discarded. Non-empty aerosol cans are commonly discarded for a number of reasons such as:

- spray mechanism is damaged or clogged and no longer works
- propellant has been exhausted, or
- product is no longer wanted or needed

Empty aerosol cans are not hazardous or universal waste - they can be disposed of as solid waste (or recycled for the metal content). An empty can is determined to be empty if you push the nozzle and nothing comes out, the nozzle is not clogged, and when you shake the can you do not feel contents moving around inside.

Place non-empty aerosols in a Universal or Hazardous waste container marked "Aerosols." Do not place in regular trash.



CLOSE

12 of 17 | You've completed 0% of the lesson.

## 1.13 Universal Waste

# Universal Waste

Click on each button.

**Battery Disposal**



**Electronic Device Disposal**



13 of 17 | You've completed 0% of the lesson.

### Battery Disposal (Slide Layer)

# Universal Waste

Click on each button.

**Battery Disposal**

**Electronic Device Disposal**

**Waste Container for batteries:** Containers must be labeled “batteries, Universal Waste” with the accumulation start date.

This specific to non-alkaline batteries, examples include: Lithium, button cell/hearing aid, rechargeable, and lead acid. Leaking or damaged batteries must be managed as hazardous waste, contact your EH&S professional for assistance.

Place batteries in a designated universal waste battery collection container:

- Put battery in a plastic bag (one per bag) or tape terminal ends before placing into the designated container.
- If plastic bags or tape are not available, contact your supervisor.

Devices that contain batteries:

- Do not place device in battery collection containers.
- Remove battery or place battery containing device in an electronic devices waste container.

***DO NOT place batteries in regular trash containers.***

13 of 17 | You've completed 0% of the lesson.

## Electronic Devices (Slide Layer)

### Universal Waste

Click on each button.

Battery Disposal

Electronic Device Disposal

Electronic items that are not managed by IT or Clinical Technology disposition processes must be collected as Universal Waste.

Examples include:

- power strip extension cords
- electric staplers
- tabletop lamps and clocks
- Televisions, microwaves
- light ballasts
- devices that contain unremovable batteries such as:  
pumps, cautery pens, calculators, glucose monitors, and  
flash/pen lights
- any electronic device with an on/off switch
- circuit boards
- light switches with dimmer controls
- GFI outlets
- electronic hand towel dispensers or soap/gel dispensers
- LED lamps and bulbs

Electronic devices that potentially store confidential information must be given to the IT department for proper disposal.

**DO NOT place any electronic devices in regular trash containers.**

13 of 17 | You've completed 0% of the lesson.

## 1.14 Waste Minimization

### Waste Minimization

Click on each button.

Minimization

Recycling  
and  
Composting



14 of 17 | You've completed 0% of the lesson.

## Minimization (Slide Layer)

### Minimization

- Minimizing the volume of regulated waste that is generated benefits the environment and makes it simpler to comply with regulations.
- Below are some methods to minimize the amount of waste that you or your department can consider:
  - Use non-hazardous alternatives that meet performance requirements when available.
  - Practice inventory control. Use first-in, first-out inventory flow
  - Do not buy more than needed to avoid exceeding expiration dates
  - Eliminate unnecessary components of pre-packaged clinical procedure kits
  - Printing double-sided
  - Collect eligible single use medical devices for reprocessing/remanufacturing

CLOSE

14 of 17 | You've completed 0% of the lesson.

## Recycling and Composting (Slide Layer)

### Recycling and Composting

Check with your EVS or EH&S Department to find out what can and can't be collected for recycling or composting at your location.

- Waste that can typically be recycled includes cardboard, cartons, and plastic.
- Compostable wastes might include organic materials such as food waste, paper towels, and yard waste.
- Placing non-recyclable items, such as styrofoam or plastic bags in a recycling container can cause the entire contents of the container to be rejected for recycling and the waste can end up in the landfill.
- Paper collected as confidential waste will be recycled after it is shredded.

**DO NOT place food waste in recycling container, place food in a composting container when available (or in regular trash if composting not available).**

**DO NOT place paper waste in a recycling container, place it in a confidential waste container.**



CLOSE

14 of 17 | You've completed 0% of the lesson.



## 1.15 Additional Information and Resources

### Additional Information and Resources

If you would like to download a copy of this presentation for future reference or additional waste disposal information, including fact sheets, click on the Resources menu.

