

# COVID-19 Waste

## Frequently Asked Questions



### COVID-19 Waste

As of April 27, 2020, the United States has surpassed one million positive COVID-19 diagnoses. Healthcare facilities are working tirelessly to lessen the fatality rate of infected patients and prevent the virus from spreading. Proper waste management is vital in a global pandemic. However, new issues lead to questions and possible alterations to the status quo.

### Frequently Asked Questions

**Q: Which agencies are concerned with COVID-19 waste?**

A: Many agencies are concerned with the handling of infectious waste. Links below provide access to these agencies' COVID-19-related resources.

- [Centers for Disease Control \(CDC\)](#)
- [National Institute for Occupational Safety and Health \(NIOSH\)](#)
- [Occupational Safety and Health Administration \(OSHA\)](#)
- [Department of Transportation \(DOT\)](#)
- State and local health agencies

**Q: What waste streams are affected by the COVID-19 crisis?**

A: The most prevalent waste stream affected by COVID-19 is biohazardous waste, but the crisis can affect medical waste, pharmaceutical waste, and hazardous waste generation. Facilities may see different quantities of waste, such as increased COVID-19-contaminated personal protective equipment (PPE) and increased medical waste from treating more patients than usual.

**Q: What constitutes biohazardous waste?**

A: States define medical, biohazardous and medical waste. Therefore, you need to check with your state and local agencies when addressing biohazardous waste. Generally, biohazardous waste is a subset of medical waste. It is any waste that is contaminated with or suspected to be contaminated with biological material. State's may have their own separate requirements. Some categories of biohazardous waste include:

- Solid biohazardous waste
  - Contaminated solid waste
  - Not completely saturated with fluid
- Liquid biohazardous waste
  - - Blood or bodily fluid
  - - Saturated with blood
- Biohazardous sharps
  - Sharps
  - Any contaminated item that is sharp enough to pierce flesh

- Includes needles, broken glass
- Pathological waste
  - Does not include teeth
  - Unfixed human organs, tissues, and body parts

State and local agencies may define biohazardous waste differently. It is best management practice to assume all biological materials are infectious.

**Q: What constitutes medical waste?**

A: Medical waste is a broader term that encompasses biohazardous waste, infectious waste, sharps, and pathological waste. Medical waste does not include urine, feces, saliva, or other bodily fluids unless it contains recognizable fluid blood. State and local agencies may define medical waste differently.

**Q: What constitutes pharmaceutical waste?**

A: Pharmaceutical waste includes prescription and over-the-counter pharmaceuticals that must be disposed of for different reasons (e.g., contaminated, unused, expired, or spilled). Management and disposal of pharmaceutical waste is covered under the Environmental Protection Agency (EPA) Pharmaceutical Drug Rule (40 CFR 266 Subpart P). As of the creation of this document, only certain states have adopted this new rule.

**Q: Has my state adopted the EPA Pharmaceutical Drug Rule?**

A: All states are required to adopt 40 CFR 266 Subpart P by July of 2021. The EPA released an infographic with state-specific statuses as of March 9<sup>th</sup>, 2020 (<https://www.epa.gov/hwgenerators/where-are-management-standards-hazardous-waste-pharmaceuticals-and-amendment-p075>).

**Q: My state has not adopted the EPA Pharmaceutical Drug Rule yet. What do I do with my pharmaceutical waste?**

A: Continue to treat pharmaceutical waste deemed hazardous waste under Resource Conservation and Recovery Act (RCRA) and your state's hazardous waste management standards and prepare for your state's progression towards the rule's adoption.

**Q: What constitutes hazardous waste?**

- A: Hazardous waste is a solid waste that has certain hazardous characteristics or has been identified by a regulatory agency.
- Step 1: Is the material solid waste? (40 CFR Part 261 Subpart A): Solid waste is any discarded solid, liquid, semi-solid, sludge, or contained gaseous material that is not excluded from the definition of "solid waste" or excluded under a variance.
  - Step 2: Is the waste exempt or excluded? (40 CFR Part 261 Subpart E): Waste streams excluded or exempt from hazardous waste regulations under a variance include:
    - Materials that are recycled, like solvents.
    - Universal wastes that are recycled.
    - Neutralization of a liquid waste whose only hazard is pH.
  - Step 3: Is the material listed? (40 CFR Subpart D): This includes any waste that is under a F, K, P, or U code.
  - Step 4: Is the waste characteristic? (40 CFR Part 261 Subpart C): This includes any waste that has at least one characteristic.
    - Ignitability (40 CFR Part 261.21)
    - Corrosivity (40 CFR Part 261.22)

- Reactivity (40 CFR Part 261.23)
- Toxicity (40 CFR Part 261.24)
- Step 5: State and Local Hazardous Wastes: State and local agencies may define hazardous waste differently.

**Q: Does hazardous waste include infectious (or COVID-19-contaminated) waste?**

A: RCRA regulations do not regulate infectious waste, including those contaminated by the novel coronavirus which causes COVID-19.

**Q: Which wastes can be contaminated with COVID-19?**

A: Many wastes can be contaminated.

- Biohazardous wastes
- PPE, such as face masks/goggles, gloves, and gowns
- Solid wastes (e.g., tissues used by patient, disinfectant wipes)
- Sharps that have been used on infected or suspected to be infected persons
- Pathological waste (human fluids, tissue, blood, body parts, bodily fluids)

**Q: How do I dispose of my facemask?**

A: Used masks become biohazardous waste after use by a person who is suspected to be infected, or when after use by personnel treating a patient who is suspected to be infected. Masks that do not encounter possibly infected persons can be disposed of as medical waste.

**Q: My facility is performing COVID-19 tests. Can this waste be put into the trash?**

A: Waste produced from these tests can be anything from waste PPE to used tissues. This waste is generally considered biohazardous waste (e.g., regulated medical waste or clinical waste suspected of containing a highly communicable disease). Test results will not be immediately available. It is best practice to treat it as potentially biohazardous/infectious medical waste. Check state requirements.

**Q: When are my disinfectant wipes considered biohazardous?**

A: If wiping an area that is not considered to be impacted by the virus, the waste can be disposed as general solid waste. If the area wiped is suspected to be contaminated, the spent wipes are managed as biohazardous waste.

**Q: What are the additional regulatory requirements for COVID-19 biohazards?**

A: Currently, there are no additional regulatory handling, marking, storage, transportation, or treatment requirements for waste contaminated with COVID-19. It must be managed as all other infectious wastes are managed.