



**IMPORTANT INFORMATION TO AVOID POTENTIAL FINES AND LOSS OF RMW DISPOSAL SERVICE
AT YOUR FACILITY – PLEASE READ**

January 13, 2021

Dear Valued Client,

Curtis Bay Medical Waste Services wants to ensure that your facility follows all Federal, State, OSHA, DOT, and EPA regulations when it comes to your waste streams. This letter will help ensure that you can **avoid FINES from any surprise inspections**. We want to take this time to provide you with the following list of waste streams **that are prohibited at our Hospital/Medical/Infectious Waste Incinerator (HMIWI) facility**.

Per regulations, it is the responsibility of the generator to accurately classify, package, and label the waste in accordance with the Federal, State, DOT and Local Statutes as well as Regulatory requirements.

Special medical wastes shall be collected in three (3) mil thick or equivalent strength, leak proof, tear resistant, and non-chlorinated plastic bags, which shall be tied tightly, and then contained and sealed securely in corrugated cardboard boxes. All contaminated sharps such as needles, scalpels, blades, glass, and other pointed or sharp-edged objects shall be secured in the impervious and puncture proof containers.

PLEASE NOTE: Curtis Bay is **not** authorized under its operating permit, issued by the Maryland Department of Environment (MDE), to accept the following types of waste for regulated medical waste treatment. **This is not applicable for your pharmaceutical, controlled substance, APHIS, or hazardous waste disposal service.**

REGULATED MEDICAL WASTE NOT ACCEPTED BY CURTIS BAY

- a. **Complete human remains, including cadavers, heads, torsos, and fetuses**
- b. **Untreated Category A Infectious Substances**
- c. **RCRA Hazardous Pharmaceutical Waste**
- d. **Chemicals:** Formaldehyde or formalin (more than 10%), acids, alcohol, waste oil, solvents, reagents, fixer developer
- e. **Hazardous Waste:** Drums or other containers with a hazardous warning symbol, batteries and other heavy metals
- f. **Radioactive Waste:** Any container with a radioactivity level that exceeds regulatory or permitted limits; lead-containing materials
- g. **Bulk Chemotherapy Waste (Only Trace Chemo Waste Accepted)**
- h. **Compressed Gas Cylinders, Canisters, Inhalers and Aerosol Cans**, even if the container is empty
- i. **Any Mercury Containing Material or Devices:** Any mercury thermometers, Sphygmomanometers, lab or medical devices
- j. **Mercury Containing Dental Waste:** Non-contact and contact amalgam and products, chairside traps, amalgam sludge or vacuum pump filters, extracted teeth with mercury fillings and empty amalgam capsules
- k. **Flammable Waste**
- l. **Potassium Chloride and Sodium Chloride in large quantities:** In excess of one pallet. These items when heated then put in water can cause an explosion hazard and be very harmful to humans.



- I. CONTROLLED HAZARDOUS SUBSTANCES (CHS) and HAZARDOUS WASTES** as defined in the Code Regulations (COMAR 26.13.02)
- a. Wastes exhibiting one or more of the characteristics of:
 - i. **Ignitibility:** having a flash point under 140°F, or as further defined in COMAR 26.13.02.11
 - ii. **Corrosivity:** pH less than 2 or greater than 12.5, or as further defined in COMAR 26.13.02.12
 - iii. **Reactivity:** explosive or chemically reactive, or as further defined in COMAR 26.13.02.13
 - iv. **Toxicity:** acutely or chronically poisonous, or as further defined in COMAR 26.13.02.14
 - b. Wastes listed in COMAR 26.13.01.04A and C, which in general correspond to hazardous wastes identified by the Environmental Protection Agency (EPA) as “F”, “K”, “P”, and “U” wastes
 - c. Mixtures of solid and hazardous wastes that exhibit hazardous characteristics
 - d. This includes hazardous pharmaceutical wastes. Examples include (not a comprehensive list):
 - i. Coumadin
 - ii. Epi-pens (non-sodium based)
 - iii. Dental/Oral Antiseptics > 24% alcohol
 - iv. Humulin N
 - v. Lindane Shampoo
 - vi. Nicotine Patches/Gum
 - vii. Nitroglycerine
- II. RADIOACTIVE HAZARDOUS SUBSTANCES (RHS)** as defined in the Code Regulations (COMAR 26.15.02), or other solid waste emitting radiation at more than three (3) times the rate of Background Radiation at the BRMWI. Background Radiation at the BRMWI registers at approximately 10,000 counts per minute on a rate meter. The facility’s radiation detector alarms are set at 30,000 counts per minute.
- III. COMPRESSED GAS CYLINDERS:** When heated to high temperatures, empty gas cylinders (including aerosol cans) often explode causing damage to the refractory material lining the inside of the incinerator. If the cylinders contain oxygen or a combustible material, the damage is greater.
- IV. MERCURY:** A toxic substance that can pose a threat to human health and the environment when improperly managed. Healthcare facilities are known to contribute mercury to the environment through medical waste treatment technologies, wastewater and solid waste. There are a large variety of sources of mercury and mercury-related compounds in healthcare facilities. A few examples include:
- a. Dental amalgam fillings
 - b. Thermometers
 - c. Sphygmomanometers (blood pressure devices)
 - d. Esophageal bougies and dilators
 - e. Nasal sprays
 - f. Cantor or Miller-Abbott tubes
 - g. Batteries of all types
 - h. Switches and relays
 - i. Thermostats
 - j. Computer monitors and other facilities and operational equipment
 - k. Electron microscopes in labs and other diagnostic equipment
 - l. Stains, fixatives and pharmaceutical formulations
 - m. Certain drug and vaccination formulations that use the mercury-based preservative thimerosal
 - n. Cleaning products and degreasers



All mercury-containing waste and equipment must be handled under the EPA's Resource Conservation and Recovery Act (RCRA) regulations. Due to the potential health hazards associated with mercury, proper handling and disposal of mercury is critical to avoiding worker exposure, environmental contamination and hazardous/dangerous situations at our disposal facility.

- V. **FLUORESCENT and HIGH-INTENSITY DISCHARGE LAMPS, CATHODE RAY TUBES:** Fluorescent and high-intensity discharge lamps often contain mercury. Cathode Ray tubes do contain mercury. Incineration of these items can increase airborne emissions of mercury from the facility. The US EPA is currently considering regulating all spent lamps of this type as hazardous waste because of the mercury content.
- VI. **LARGE NON-COMBUSTIBLE ITEMS:** Non-combustible materials, such as metal furniture, office equipment, and concrete or other construction materials, are not reduced in size in the incinerator, causing equipment downtime and exposing workers to hazardous conditions while the jam is being cleared.
- VII. **MEDICAL WASTE THAT IS NOT PACKAGED, NOT LABELED, NOT ACCOMPANIED BY PROPER SHIPPING PAPERS, OR NOT TRANSPORTED IN CERTIFIED VEHICLES IN ACCORDANCE WITH APPLICABLE REGULATIONS.**

We are constantly striving to improve the overall service level to all our valued customers. In providing excellent customer service, **we must adhere to all State and Federal guidelines for emissions.** Curtis Bay is implementing a system that monitors mercury concentration in the flue gas leaving the incinerator which will help us track the sources of waste and be able to correlate high mercury with individual waste generators. With this said, we want to ensure that your facility is not fined for any of the material listed above that you may or may not be putting in your waste stream for treatment at Curtis Bay. Any generator that is found in violation of these regulations will not only be subject to the fines outlined, but also potentially to **refusal of disposal service at our facility.**

As a "one-stop-shop", Curtis Bay can provide you with the proper information and assist your facility in appropriately disposing of the prohibited wastes stream listed above to avoid any fines. We ask that you **please share this information with your entire staff** and make it visible in your workplace for reference. **Should you have any questions specific to your service or waste streams, please contact our Customer Care team at (855) 228-1715 or customerservice@curtisbaymws.com**



BOX PREPERATION GUIDE

Regulated Medical Waste must be placed in a red biohazard bag, tied or sealed, and then placed in a United States Department of Transportation approved UN rated corrugated box, supplied to you by us. Any boxes that are not properly packaged will be refused by the driver. Due to insurance regulations, our drivers are not permitted to prepare or package your waste for transport.

PLEASE NOTE: All other containers will be handled on a case-by-case basis and require pre-approval from Curtis Bay Medical Waste Services prior to being scheduled for pickup. Please call our customer service team for more information.

Please ensure that you adhere to the following guidelines to complete an environmentally safe waste disposal:

- **SEPARATION:**
 - Ensure that your Regulated Medical Waste is packaged separately from your Chemotherapeutic and Pathological Wastes.
 - It is very important that you indicate the waste type on the outside of the box. Should you require assistance in determining waste types, please contact our office.
 - Segregate your Hazardous Wastes from your Medical Wastes; Hazardous waste cannot be combined or transported with Infectious or Chemotherapeutic Wastes.

- **BOX WEIGHT:**
 - Total box weight must be less than 40 pounds.
 - Boxes weighing greater than 40 pounds presents a safety hazard for our drivers & will be subject to additional charges or may need to be repackaged to reach the appropriate weight.

- **BOXING WASTE:**
 - SHARPS CONTAINERS
Needles and sharps must be placed in a compliant sharps container. Sharps containers must be securely sealed and placed inside the red bag, then in the box.
 - LIQUIDS
Please avoid packaging free liquids, but if necessary, containers with free liquids must be less than 200mls, secured properly to prevent any leakage, then placed in the red bag, and then in the box.
 - PACKAGING
The top and bottom of the box must be sealed with packaging tape only (masking tape and duct tape are not allowed). Do not Flap Box lids closed. Finish by adding your dated customer label to your box. Please contact our office to purchase packaging tape and any other additional supplies you will need to complete a safe approved regulated waste pick-up.



RED BAG GUIDE

UNITED STATES DEPARTMENT OF LABOR REGULATED WASTE DEFINITIONS

Regulated Waste Categories: Liquid, semi-liquid blood, or other potentially infectious materials; 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 potentially infectious materials that are capable of releasing these materials during handling. Contaminated sharps. Pathological and microbiological wastes containing blood or other potentially infectious materials.

Bloodborne Pathogens: Pathogenic microorganisms that are present in human blood can cause disease in humans. These pathogens include, but are not limited to: Hepatitis B Virus (HBV), and Human Immunodeficiency Virus (HIV).

Contaminated: The presence or the reasonably anticipated presence of blood or other potentially infectious materials on an item or surface.

Other Potentially Infectious Materials:

(1) All 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. This includes the following human body fluids:

- Cerebrospinal Fluid
- Amniotic Fluid
- Pericardial Fluid
- Vaginal Secretions
- Synovial Fluid
- Peritoneal Fluid
- Semen
- Pleural Fluid
- Saliva in Dental Procedures

(2) Any unfixed tissues or organ (other than intact skin) from a human (living or dead).

***Human remains, such as cadavers, complete torsos, heads and/or fetal remains/ fetuses DO NOT GO IN THE RED BIOHAZARD BAG**

(3) HIV containing cell or tissue cultures, organ cultures, and HIV or HBV containing culture medium or other solutions; and blood, organs, or other tissues from experimental animals infected with HIV or HBV.

U.S. Department of Labor WWW.OSHA.GOV Occupational Safety & Health Administration

Regulations (Standards–29 CFR–Code of Federal Regulations) Bloodborne Pathogens 1910.1030



PHARMACEUTICAL WASTE GUIDE

Curtis Bay Medical Waste Services, a leader in providing best in class, cost-effective and compliant waste management solutions, provides the safe handling and complete destruction of pharmaceutical waste. We routinely work with pharmacies, hospitals, institutions, reverse distributors, and major pharmaceutical companies who need various products disposed of in accordance with government and industry guidelines. We will arrange the collection of your pharmaceuticals to meet your schedule. Proper documentation is provided throughout the entire process; our familiarity with government guidelines ensures that the chain of custody is preserved throughout the operation.

Why should you be concerned about pharmaceutical waste?

- To protect humans from harm (you, your employees, and your family)
- To protect & promote a cleaner environment (ground, water, air)
- To be a good citizen/steward
- To comply with our Code of Conduct and all applicable laws & regulations
- To avoid fines and imprisonment (Non-Compliance fines range from \$500 to \$100,000)

Major Program Steps:

- Characterization of hospital formulary
- Identify hazardous pharmaceuticals
- Waste collection & segregation
- Place waste in appropriate container
- Transportation & Disposal
- Comply with DOT regulations for transportation
- Comply with EPA regulations for disposal

Contact your Curtis Bay Medical Waste Services Account Representative for more information on pharmaceutical waste destruction and our other service offerings to ensure you are OSHA compliant.



MERCURY GUIDE

Mercury, a toxic substance, can pose a threat to human health and the environment when improperly managed.

The USDEP (United States Department of Environmental Protection Agency) and the AHA (American Hospital Association) signed a Memorandum of Understanding to virtually eliminate mercury-containing waste from the health care industry.

There are three (3) ways you can keep mercury out of the medical waste stream:

- (1) Use alternative products that DO NOT contain mercury whenever possible.
- (2) Separate mercury-containing products before they get into the incineration waste stream.
- (3) Recycle mercury-containing products as much as possible to keep mercury out of the environment.

Curtis Bay Medical Waste Services is a full service environmental company committed to utilizing the recycling technologies of the future. In following the edict of the USDEP and AHA, we have joined forces with several hospitals and established guidelines for an economical, safe and environmentally sound way to manage the reduction of mercury and mercury containing devices within the healthcare industry.

The superior recycling technologies used by our vendor assure that you would receive the following benefits:

- Complete compliance with all Federal, State and Local regulations.
- Fully Permitted Facility – PADEP Hazardous Waste Recycling Permit Facility with six million dollars of liability insurance, and a five-million dollar umbrella.
- Facility with five years of fluorescent lamp recycling, and over 20 years of hazardous waste experience.
- 100% recycling and reuse of elemental mercury, devices, and lamps (no components or residuals are land filled).
- Facility's standards meet or exceed industry standards for safety and industrial hygiene.
- Peace of mind through limited liability.