



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

May 1, 2019

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.

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 (10%), formalin, 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**
- 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

- 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**