



Commercial facilities used for the consolidation and short-term storage of untreated medical wastes prior to transport to an approved medical waste treatment or disposal facility are designated as “Medical Waste Storage Facilities.” Wastes from multiple medical waste generators may be collected at the medical waste storage facility to provide more cost-effective transport to an approved medical waste treatment or disposal facility. Medical waste storage facilities may have one or more types of storage units ranging from enclosed structures to refrigerated cargo vehicles. Medical waste storage facilities are not the same as solid waste transfer stations and the regulations for transfer stations (Section 7 of Colorado’s solid waste regulations) do not apply to medical waste storage facilities.

### **Certificate of Designation**

Commercial facilities used to consolidate, store, treat, process and/or dispose of medical waste must obtain a Certificate of Designation as a solid waste site or facility under Colorado’s solid waste regulations (6 CCR 1007-2). Such facilities are required to submit an Engineering Design and Operations Plan as part of their application for a Certificate of Designation to both the local governing authority and the Colorado Department of Public Health and Environment (the Department) Hazardous Materials and Waste Management Division for review and approval prior to the facility beginning operation.

You should have, among other things, the following items in your Engineering Design and Operations Plan:

- The names, mailing addresses, telephone numbers and email addresses of the owners and operators of your facility.
- The names, mailing addresses, telephone numbers and email addresses of emergency contacts for your facility that have authority to take actions at the facility in the event of an emergency.
- The mailing address and physical address of your facility, including the county and legal description as well as the quarter-section, section, township and range.
- A vicinity map showing access and service roads to the site, residences, wells, location of surface water and all man-made or natural features relating to the facility within a half-mile radius.
- A site map and drawings showing facility boundaries, proposed structures or other storage units and areas to be used for unloading, storage and loading of wastes, including the dimensions, elevations and layout of all storage units, as well as the general process flow for your facility.
- A general description of your facility, provisions to minimize nuisance conditions on-site and actions to be taken if nuisance conditions are confirmed at the site boundary.
- A detailed description of unloading, monitoring, handling and storage practices, waste tracking system and provisions for alternative waste handling in the event of equipment breakdown.
- Waste characterization and acceptance criteria, including descriptions of waste screening methodologies and waste exclusion procedures for detecting and preventing the acceptance of radioactive and/or hazardous wastes. Medical waste storage facilities cannot receive or store hazardous wastes as defined in Section 25-15-101(9) of the Colorado Hazardous Waste Act or radioactive material as defined in the Rules and Regulations Pertaining to Radiation Control (6

CCR 1007-1). However, medical waste storage facilities may be co-located on properties where hazardous and/or radioactive waste storage sites are also permitted as long as each waste management area is permitted and managed separately.

- Medical waste management, personnel training, safety, inspection, fire prevention, contingency and facility closure plans.

Your Engineering Design and Operations Plan must specify who is allowed to access the facility for the drop-off and pickup of medical wastes. If your facility is open to the public, hours of operation must also be specified in the operations plan and posted in a conspicuous location outside of the facility.

If your facility already has a Certificate of Designation as a solid waste site or facility, you must submit an amended Engineering Design and Operations Plan for approval before accepting medical waste for consolidation and short-term storage. If your facility accepts wastes other than medical wastes, the medical wastes must be managed separately from all other wastes received.

### ***Exception***

A Certificate of Designation and Engineering Design and Operations Plan are not required for qualified entities that offer medical waste collection and storage as a community service limited to only household medical wastes, such as a household medical waste collection program, a sharps collection roundup, or a pharmaceutical take-back program. These entities must establish and follow a medical waste management plan to ensure the wastes are packaged and handled appropriately.

### **Medical Waste Management Plan**

The medical waste management plan must be specific to the types of medical waste managed at your facility and contain the following:

- Provisions for the packaging, handling, storage, transportation, treatment and disposal of the waste, and a mechanism to communicate incoming packaging requirements to all participants.
- A contingency plan for spills, equipment shutdowns, or loss of containment.
- Staff training plan, which should also include the Occupational Health and Safety Administration's (OSHA) Bloodborne Pathogens Standard (29 CFR 1910.1030) and other applicable Federal, State and local regulations.
- Designation of a person responsible for plan implementation, including their contact information. Alternate employees should also be selected in case the designated individual is unavailable (e.g., due to vacation, illness, etc.). The designated individual and alternate(s) should have a strong knowledge of the plan and be able to communicate to other employees the importance of this plan, which employees are affected by the plan, and what is expected from staff to implement the plan.

If your facility is also accepting medical wastes from businesses, or is a business whose specific purpose is to collect and store medical wastes from any source (either household or business), you must obtain a Certificate of Designation.

### **Handling and Storage Requirements**

Commercial medical waste storage facilities must provide for proper storage of medical wastes to prevent nuisance conditions, exposures to site employees, and unauthorized access to the waste, including secured access and barriers to prevent animals, birds, insects and unauthorized people from entering the site and storage units. The exterior door, gate or lid must be marked with the international

biohazard symbol (if the medical waste is subject to OSHA's Bloodborne Pathogens Standard) and the words "Caution – Medical Waste Storage Area – Unauthorized Persons Keep Out." Signs should be legible with lettering at least two (2) inches tall.

Containers of untreated medical waste must meet applicable containment and labeling requirements of OSHA's Bloodborne Pathogens Standard and/or United States Department of Transportation (US DOT) Division 6.2 (49 CFR Parts 171-180). Medical waste must be stored in a manner and location that maintains the integrity of the packaging and provides protection from water, precipitation and wind. Storage units must be constructed of easily cleanable materials that are impervious to liquids and resistant to corrosion by disinfection agents. They must have adequate drainage and be free of standing water.

Medical waste may be stored for a maximum of 14 calendar days once it has been received at the storage facility before it must be transported to an approved treatment or disposal facility. If odors or nuisance conditions develop, the waste must be stored inside an enclosed structure at 45 degrees F or less, or be transported to an approved treatment or disposal facility. Site-specific conditions may warrant more stringent storage requirements.

Tracking systems must be used to maintain control over wastes received and managed at your facility. Tracking systems should identify the source of the waste, the volume and types of waste received, the date the waste was received at the site, as well as the date the waste was shipped from the facility. Records (e.g., medical waste accumulation logs, shipping papers and/or manifests, etc.) must be kept for at least three years.

### **Contingency Planning**

Medical waste storage facilities must have a plan to respond to a medical waste spill or loss of containment in order to minimize hazards to human health and the environment. Your plan should be reviewed and approved by the local emergency response authorities. The plan should address:

- Cleanup and disinfection procedures to be followed to contain and clean up spills or releases of medical waste.
- Use instructions and location of your spill kit and a list of supplies (e.g., absorbent materials, medical waste bags and containers, disinfectant) and personal protective equipment (e.g., disposable gloves, face mask, goggles, apron) available in the spill kit.
- Proper packaging and disposal of used absorbent materials and personal protective equipment.
- Other response information for the site, including site plans, electrical and water sources, potential hazards, and agreements between local authorities and the facility owners/operators in the event response by local authorities is necessary.
- Spill reporting requirements:
  - Spills or releases that may impact the environment or present a clear and imminent public health hazard should be reported to the Colorado Department of Public Health and Environment's 24-hour spill reporting hotline at 1-877-518-5608 and to the local emergency response authorities where the spill or release occurred.
  - Spills or releases to the sanitary sewer must also be reported to your local wastewater treatment facility within 24 hours of the spill.

Medical waste storage facilities must also have contingency plans for alternate storage and management of wastes in the event of equipment failure or if site capacity is reached.

Employees with job responsibilities involving any aspect of medical waste management must be familiar with the contingency plan and be trained in spill or release response appropriate to their jobs.

### **On-site Inspections**

Medical waste storage facilities must be inspected daily by the operator to detect problems with pests, leaks or breakage of containers, odors or equipment malfunctions, and to prevent unauthorized access or disposal at the facility. Corrective actions must be implemented immediately when problems are detected. Documentation, such as inspection logs, should be kept to show that the site is properly maintained. Actions taken to correct problems should be noted in the inspection log or attached to the log as a separate report. Documentation of on-site inspections must be maintained for at least three years.

### **Staff Training**

Training is necessary to educate employees about the proper management of the types of medical waste managed at your facility. The type and amount of training will depend on the employee's job roles and responsibilities. Training should also include or reference federal requirements, such as OSHA and US DOT requirements. Examples of topics that should be included in your medical waste training program include:

- Medical waste identification, containment and labeling.
- Hazardous waste screening techniques.
- Proper storage of medical waste.
- Preparation and packaging of medical waste for off-site transport, including US DOT's Division 6.2 Infectious Substances requirements and the Materials of Trade exception (49 CFR Parts 171-180) if applicable.
- Medical waste spill or release containment and cleanup procedures.
- OSHA Bloodborne Pathogens Standard (29 CFR 1910.1030).
- OSHA Hazard Communications Standard (29 CFR 1910.1200).
- OSHA Personal Protective Equipment Standard (29 CFR 1910 Subpart I).

Training should be given to employees by a qualified individual at a frequency that ensures staff members are consistently demonstrating proper management and handling of medical waste. Training must be given whenever an employee starts a new position with job responsibilities involving any medical waste management and when a new medical waste procedure is put in place. All facility personnel with job duties related to medical waste management must receive annual refresher training.

### **Recordkeeping**

A copy of your facility's Certificate of Designation and approved Engineering Design and Operations Plan must be maintained at your facility. The plan should be reviewed annually and must be updated whenever significant changes related to medical waste handling occur, with those changes submitted to the Department and the local governing authority for approval. The plan must be made available upon written request to the medical waste transporter and medical waste treatment facility.

Your facility must also keep records to show how certain aspects of the plan are being implemented. Any records related to medical waste management at the facility (e.g., medical waste tracking records, inspection logs, shipping papers or manifests, training rosters) must be kept for at least three years. The location of these records should be specified in your Engineering Design and Operations Plan.

## **Closure Plan**

Your medical waste storage facility must have a closure plan that states what procedures will be used to close the facility to ensure that all medical waste stored there has been sent to an approved medical waste treatment or disposal facility and to ensure no nuisance conditions exist after the facility is closed. The closure plan must be included in your Engineering Design and Operations Plan. You must give written notice to both the Department and the local governing authority at least sixty (60) calendar days in advance of your planned closure date. Within thirty (30) calendar days of completing closure activities, you must provide written notification to document that all facility closure standards have been achieved.

## **Other Requirements**

Medical waste storage facilities are subject to applicable solid waste fees and financial assurance requirements, and are subject to inspection by authorized Department staff in order to evaluate compliance with these requirements.

### **For more information please contact:**

Colorado Department of Public Health and Environment  
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