



TRILOGY MEDWASTE (TMW) REGULATED MEDICAL WASTE (RMW) ACCEPTANCE POLICIES

TMW policy requires compliance with all applicable regulations regarding the collection, transportation and treatment of RMW. Federal Department of Transportation (DOT) regulations require the generator of RMW to certify that the packaging and documentation of transported RMW complies with DOT regulations regarding waste classification, packaging, labeling and shipping documentation. To ensure that neither TMW nor the generator of RMW violates applicable regulations, it is imperative that all parties understand the rules regarding proper identification, classification, segregation and packaging of RMW. The purpose of this policy is to summarize the minimum requirements for preparing your RMW for collection, transportation and treatment. Additional facility or state-specific waste acceptance policies may apply based on permit specifications.

Please contact your local TMW representative for further information or email customerservice@trilogymedwaste.com.



REGULATED MEDICAL WASTE

TMW accepts medical waste generated in a broad range of medical, diagnostic, therapeutic and research activities. The term "medical waste" includes biohazardous, biomedical, infectious or RMW as defined under federal, state or local laws, rules, regulations and guidelines. Except as defined by specific state regulations, this excludes RCRA hazardous waste pharmaceuticals, all DEA scheduled drugs including *controlled substances, bulk chemotherapy, waste containing mercury or other heavy metals, batteries of any type, cauterizers, non-infectious dental waste, chemicals such as solvents, reagents, corrosives or ignitable materials classified as hazardous waste under Federal and/or state-specific EPA Regulations. In addition, TMW cannot accept bulk liquids, radioactive materials, or complete human remains (including heads, full torsos and fetuses). TMW cannot accept these excluded materials packaged as RMW. All lab wastes or materials which contain or have the potential to contain infectious substances arising from those agents listed under 42 CFR Part 73 (HHS), 7 CFR Part 331 (USDA-Plant Protection and Quarantine), and 9 CFR Part 121 (USDA-Veterinary Services) are strictly prohibited from medical waste by federal law and must be pretreated prior to disposal. Separate protocol and packaging requirements may apply for the disposal of non-hazardous pharmaceuticals. Hazardous waste transportation services may be offered in certain geographical locations, under separate contract. Please contact your local TMW representative for details and packaging specifications.



WASTE SEGREGATION AND PACKAGING

The generator is solely responsible for properly segregating, packaging and labeling of RMW. Proper segregation and packaging reduces the potential for accidental release of the contents and exposure to employees and the general public. DOT regulations (49 CFR 173.197) require that all packages of RMW be prepared for transport in containers that meet all of the following requirements: rigid, leak resistant, impervious to moisture, of sufficient strength to prevent tearing or bursting under normal conditions of use and handling, sealed to prevent leakage during transport and puncture resistant for sharps. All RMW must be accompanied by a properly completed shipping document (See 49 CFR 172.202).

MANAGEMENT OF NON-CONFORMING WASTE

As required by regulation and company policy, TMW employees may refuse containers that are non-conforming because of their contents or are improperly packaged, leaking, damaged or likely to create a risk of exposure to employees or the general public. Any waste found to be non-conforming to this Waste Acceptance Policy identified in route to, or at a TMW facility, may be returned to the generator for proper packaging and disposal, or may be rerouted for appropriate destruction; this may include improperly marked RMW which should have been identified for incineration (i.e. pathological, chemotherapy or non-hazardous pharmaceuticals). Proper segregation and packaging is essential to ensure compliant and safe handling, collection, transportation and treatment of RMW.



ACCEPTED RMW

- **Sharps** - Means any object contaminated with a pathogen or that may become contaminated with a pathogen through handling or during transportation and also capable of cutting or penetrating skin or a packaging material. Sharps includes needles, syringes, scalpels, broken glass, culture slides, culture dishes, broken capillary tubes, broken rigid plastic and exposed ends of dental wires.
- **RMW or Clinical Waste or Biomedical Waste** - Means a waste or reusable material derived from the medical treatment of an animal or human, which includes diagnosis and immunization, or from biomedical research, which includes the production and testing of biological products.

ACCEPTED RMW - MUST BE IDENTIFIED, SEGREGATED FOR INCINERATION

- **Trace Chemotherapy Contaminated Waste:** RCRA Empty drug vials, syringes and needles, spill kits, IV tubing and bags, contaminated gloves and gowns and related materials as defined in applicable laws, rules, regulations or guidelines.
- **Pathological Waste:** Human or animal body parts, organs, tissues and surgical specimens (decanted of formaldehyde, formalin or other preservatives as required per hazardous waste rules).
- **Non-RCRA Pharmaceuticals:** Must be characterized and certified as non-RCRA hazardous material by the generator. Excludes all DEA scheduled drugs, including controlled substances.*

- **California Only** - Solidified Suction Canisters: Suction canisters that have been injected with solidifier materials to control liquids or suction canisters made of high heat resistant plastics such as polysulfone.

NOT ACCEPTED - RMW NOT ACCEPTED BY TMW

- Untreated Category A Infectious Substances
- Complete Human Remains (including heads, full torsos and fetuses)
- Bulk Chemotherapy Waste
- 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
- Mercury Containing Material or Devices: Any mercury thermometers, sphygmomanometers, lab or medical devices
- RCRA Hazardous Pharmaceutical Waste and all DEA Federal and state controlled substances*
- Chemicals: Formaldehyde, formalin, acids, alcohol, waste oil, solvents, reagents, fixer developer, fluorescein
- Compressed Gas Cylinders, Canisters, Inhalers and Aerosol Cans
- Hazardous or Universal Waste: Any other waste determined by Federal or State EPA regulations including but not limited to batteries, bulbs, heavy metals, etc.
- Radioactive Waste: Any container with a radioactivity level that exceeds regulatory or permitted limits; lead-containing materials