

Center Point

A publication of the Center for Safe Schools
Designed to assist schools in creating and maintaining a safe and healthy school through best practices in prevention and preparedness.

Biohazard Disposal in Schools

Compliance with Law: Is your school in compliance with current regulations regarding disposal of biohazard (regulated medical) waste?

Educational institutions such as colleges, universities, and schools are considered generators of regulated medical waste if care is provided by health care professionals (i.e., a school nurse) to students on the premises and involve diagnosis or treatment. Wastes generated by these facilities must be managed as regulated medical waste. There is no volume standard below which a school is exempt from proper disposal of regulated medical waste.



Schools that provide care or treatment to students or staff which is performed by a health care professional (school nurse) must use red bags to dispose of its regulated medical waste. This is required under Pennsylvania's Municipal Waste Management Regulations, Chapter 271, 25 Pa Code §271.1.

Red bags may not be disposed of in the regular school trash disposal process.

What is regulated medical waste? 25 Pa Code § 271.1 (Definitions) lists three type of medical waste schools should be concerned with.

Body fluids—Liquids emanating or derived from humans and limited to the following: blood; cerebrospinal, synovial, pleural, peritoneal and pericardial fluids; semen and vaginal secretions; and amniotic fluid. The term also includes the following fluids if they contain visible blood: feces, sputum, urine and vomitus. [Editor's Note: Diapers not contaminated above are not subject to regulated medical waste disposal regulations.]

Infectious waste—

- (i) **General.** Municipal and residual waste which is generated in the diagnosis, treatment, immunization or autopsy of human beings or animals, in research pertaining thereto, in the preparation of human or animal remains for interment or cremation, or in the production or testing of biologicals, and which falls under one or more of the following categories:

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(C) *Human blood and body fluid waste.*

(I) Liquid waste human blood.

(II) Blood products.

(III) Items saturated or dripping with human blood.

(IV) Items that were saturated or dripping with human blood that are now caked with dried human blood, including serum, plasma and other blood components, which were used or intended for use in patient care, specimen testing or the development of pharmaceuticals. [Editor's Note: This section includes those dried blood dressings and other bleeding control materials.]

(VII) Items saturated or dripping with body fluids or caked with dried body fluids from persons during surgery, autopsy, other medical procedures or laboratory procedures.

Sharps—Broken glass that has been in contact with pathogenic organisms, hypodermic needles and syringes to which a needle can be attached, with or without the attached needle, suture needles, disposable razors, pasteur pipettes, scalpel blades, blood vials, needles with attached tubing, culture dishes, suture needles, slides, cover slips and other broken or unbroken glass or plastic ware.



Storage of Materials:

The school may not store regulated medical waste for longer than 30 days after the bag is full or sealed, whichever occurs earlier. Unless the waste becomes putrescent or attracts vectors, in which case, the waste must be moved off-site for processing or disposal within 3 business days.



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Once the school is ready to ship the waste off-site for processing/disposal, the school can choose from the following options:

1. Use a waste transporter that is licensed by the Pennsylvania Department of Environmental Protection (DEP) to transport medical waste to pick up the waste and transport it to an appropriate facility,
2. Ship the waste using the USPS program for mailing medical waste (see 25 Pa Code §284.701(a)(4)(ii) - The USPS program provides a useful alternative for generators of small quantities of medical waste, such as schools.), or
3. If the school generates less than 220 pounds of regulated medical waste per month, the school can transport its own waste, provided that all other applicable requirements are met and the waste is transported to a facility permitted to accept the waste.

Specifically, the requirements for segregation and storage, including bag requirements are found at 25 Pa Code §§284.401-284.415.

Sharps Containers

Many schools regularly collect sharps in the form of needles and other invasive testing items. Sharps are defined as regulated medical waste and must be managed accordingly.

Therefore, sharps may not be placed in the dumpster. Used sharps containers may be used until full as long as the storage is in accordance with § 284.411 (relating to basic storage requirements).

Container requirements for sharps can be found at 25 Pa Code §284.413(b). The containers must be labeled in accordance with 25 Pa Code §284.414.



Handling of Medical Waste:

Use of personal protective equipment (PPE) should be a matter of standard operating procedure for persons handling medical waste.

Your school should have a universal precautions section within your all-hazards plan's prevention chapter.



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For more Information on
All-Hazards Planning or School Emergency Preparedness

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