

Georgia Department of Natural Resources

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DISPOSAL OF CHEMOTHERAPY WASTE

The Hazardous Waste Compliance Program of the Georgia Environmental Protection Division has been conducting compliance assistance visits at Georgia hospitals. One issue that warrants special attention is the disposal of hazardous chemotherapy waste. In some cases, hazardous chemotherapy waste is being added to biomedical waste and handled as such. Biomedical waste contractors are permitted to accept biomedical waste only and are not permitted to accept hazardous waste in any amount, which is usually specified in your contract. We found that some chemotherapy wastes were neither stored nor transported in containers labeled as hazardous waste and the biomedical waste contractor did not have an EPA Identification Number as a transporter of hazardous waste.

Biomedical waste is defined by the Rules for Solid Waste Management, Chapter 391-3-4-.15(2) as human tissue, body parts, blood, body fluids, cultures and stocks of infectious agents, needles, IV tubing, syringes with needles attached, and scalpel blades. Syringes and IV bags that contain unused hazardous chemotherapy wastes should not be disposed of as biomedical waste.

WHAT QUESTIONS SHOULD YOU ASK?

1. Do you dispose of the following chemotherapy drugs, contaminated personal protective equipment, wipes and pads from the pharmacy, patient room, or oncology clinic?

Arsenic Trioxide	P012	Daunomycin	U059	Melphalan	U150
Carmustine (BiCNU®)	D001	Diethylstilbestrol	U089	Mitomycin C	U010
Chlorambucil	U035	Docetaxel (Taxotere®)	D001	Paclitaxel (Taxol®)	D001
Chlornaphazin	U026	Etoposide (Vespid)	D001	Streptozotocin	U206
Cyclophosphamide	U058	Fulvestrant (Faslodex®)	D001	Uracil Mustard	U237

Note: The letter and three numbers beside the chemical name is the EPA hazardous waste number. This is not a complete list of U-listed and P-listed chemicals. For a complete list, refer to Title 40 of the Code of Federal Regulations, Sections 261.33 (e) and (f).

2. Do you have Material Safety Data Sheets (MSDS's) for all chemotherapy drugs used and have you examined the MSDS waste disposal information to determine if it is a hazardous waste?
3. Do you generate a total of 220 pounds or more per month of non-acute hazardous waste (or 2.2 pounds of P-listed acute hazardous waste)? If so, your hospital is required to have an EPA Identification Number and comply with storage and shipping requirements. For assistance, you may refer to the "Hazardous Waste Management Guide for Georgia Hospitals," which is located at http://www.gaepd.org/Files_PDF/techguide/hwb/gahospguide.pdf under Technical Guidance.
4. Does your hospital ship hazardous waste off-site? If so, your waste hauler is required to have an EPA Identification Number.

If you need assistance or would like to request a compliance assistance visit, please call the Hazardous Waste Compliance Program in Atlanta at (404) 657-8831.