Checklist for Healthcare Hazardous Waste Compliance

Have you done what you need to be compliant with hazardous waste rules? Follow this checklist to ensure that you have covered your bases and are ready for an inspection.

- Do you have the proper hazardous waste licenses (federal HWID and a state or county license) and do you know your generator size? If not, please visit MnTAP's Healthcare Hazardous Waste webpage for guidance.
- Do you have your hazardous waste storage area set up? If yes, do you...
 - O Have an emergency contact list posted in this area? This must include the name(s) and contact information of emergency responders and your hazardous waste disposal vendor, a written location of your spill kits, and other required information (a free template is available on our website)
 - O Have a weekly check-off log posted in this area? At least one person (and at least one back-up person) at your site must be designated to perform a weekly check of the storage area to ensure it is free of spills and other hazards or potential dangers (a free template is available on our website)
 - O Have secondary containment for your full hazardous waste bins? This could be a plastic tote or bin (or several, as needed), unless the room has no floor drains and no other way for a hazardous spill to escape the storage area
 - O Have all of your full containers properly labeled with the date of first collection, the date the containers entered the storage area, and a description of the contents? Are the containers tightly closed?
- Do you have satellite collection bins in all building locations that may generate hazardous waste? This may include black boxes in your soiled utility room(s), medication prep area(s), and at your nurse stations; containers in your laboratories, pharmacies, and imaging departments; and collection spots in your facilities area (for batteries, bulbs, electronics, and chemicals). These bins must be inaccessible to patients/visitors.

Do you dispose of controlled substances at your site? If so, are you ensuring that they are NOT ending up in your black boxes?

- Has your staff been trained on proper disposal of hazardous waste? If yes, have you...
 - Set up a procedure for training new hires? Anyone who generates, or has the potential to generate, hazardous waste must be trained within six months of hire. Furthermore, LQG (large quantity generator) sites must train all staff annually (free, customizable, downloadable PowerPoint trainings are available on our website)
 - O Have you documented training for all relevant employees? You must be able to produce this documentation for a hazardous waste inspector (a free template is available on our website)
 - Has all staff that signs hazardous waste manifests or prepares hazardous waste shipments completed the DOT (Department of Transportation) training? (a link and free template is available on our website)
- Are you keeping all hazardous waste shipping manifests for a period of no less than five years? Can you readily produce these documents during an inspection? Best practice is to create a binder for these files and all other paperwork related to your hazardous waste disposal activities. You will be asked to show this documentation during a hazardous waste inspection.

END