

Regulated Medical Waste Packaging Reminders for Labs in Vanderbilt University Buildings

As Vanderbilt labs begin to reopen and ramp back up to regular work levels, it is important to assure that biological waste is being collected properly, packaged according to Department of Transportation (DOT) regulations for Regulated Medical Waste (RMW), and following VU and vendor guidelines. Spot checks by VEHS have revealed some common issues that can be resolved with some "refresher" information. If you are currently trained and certified to handle and sign for Regulated Medical Waste shipments (or you supervise personnel who package biowaste for shipment), please review the 5 reminders below to ensure that you're following these required safety practices.

Reminder #1: Know Your DOT Training Status

Any lab personnel that will be preparing the regulated medical waste container for shipment or signing for the RMW waste pick-up should have completed <u>Regulated Medical Waste Shipping Training for Lab</u> <u>Researchers</u> and received a certificate like the one shown to the right. Certified lab members and their supervisor should ensure that they have a copy of their certificate available in the event of a DOT inspection.

CERTIFICATE OF TRAINING

A. Researcher			
Has successfully completed Regulated Medical Waste awareness training for regulated medical waste shipped by a contract carrier [40 CFR 173.134 (d)]. Understanding of the training was demonstrated through successful completion of a written examination including general awareness, safety & security, and function'specific elements in accordance with 49 CFR 172.			
D	ate of Training:	March 17, 2020	
	xpiration Date	March 17, 2023	
	Iailing Address of 'raining Site:	Vanderbilt Environmental Health & Safety (U-0211 MCN) 1161 21st Avenue South, Nashville, TN 37232	
-	rainer/Title	Online Training (Vanderbilt Learning Exchange)	

The DOT certification is valid for three years from the date of training.

Check your Certificate of Training for your expiration date and mark your calendar to renew your <u>training</u> through Oracle Learn (VU) or the Learning Exchange (VUMC) at least 30 days before that date.

Reminder #2: Close container liners using approved methods to prevent leaks!

The DOT performance standard for sealing the RMW waste bag lining the shipping container is a closure that will not leak if the bag is inverted and held in place for several minutes. Methods like tying off the corners in two knots or using lab or autoclave tape to seal the bag are not recommended because they won't achieve this level of leak protection. Please use a single, overhand knot to securely close liners (as shown on the far right) as this is the method specifically prescribed by the DOT. Sealing with two zip-ties is also an acceptable substitute.





Reminder #3: Bundle your serological pipettes to eliminate bag breakage

Any waste with the potential to break through the bag needs to be collected separately in a way that will prevent this condition. If the bag is punctured, it increases the potential for leaks and spills and can be a mechanical injury hazard.

Bag puncture is most commonly the result of serological pipettes that are discarded individually into a waste bag. We recommend collecting the pipettes separately in a bag or box (as shown to the <u>far</u> right) that encloses the tips of the pipettes and creates a bundle.

Bundling your pipettes <u>before</u> they are removed from the biosafety cabinet (BSC) is ideal in all cases but should be done whenever possible at BSL-2. In doing so, the spread of contamination can be minimized while making these items less problematic for disposal. VEHS Biosafety 5.2020 Page





Reminder #4: Do Not Stack Packed RMW Containers More Than Two High

Both lab personnel and vendor employees have been observed stacking their packed RMW containers three high. When stacked to this height, the containers become difficult to move safely and create ergonomic hazards. Also, if the top container falls to the ground, the chances of that container popping open from the impact are great. This creates a spill and exposure hazard that is easily preventable by limiting stacking of full containers to no more than 2 high.

Vendor Specific Reminders

BioWaste LLC Only Write the Room Number on the Container Tags

While inspecting containers prior to shipment, some were found with the name of the Principal Investigator written on the tag. Please only write the room number and building on the tag. This allows Vanderbilt to track which waste came from which room without revealing IDs.



Stericycle Inspect Incoming Containers for Damage

Stericycle containers have many "nooks & crannies" that can be easily damaged over time. Inspect Stericycle containers provided prior to using them to collect waste. Common damage points are the locking clamps on the side of the container, the hinges on the top flaps and the interlocking teeth on the top. If you see any damage that would prevent the container from closing securely or leak contents, put that container to the side and do not use it. Inform your RMW contact to have close containers removed by Stericycle at their next visit.



Reminder #5: Know how to respond in the case of a biological materials spill or exposure

Biological Waste Spill Reminders

- If you generate liquid-based biohazardous waste, you need to have supplies on hand and follow procedures outlined in <u>Responding to Personnel Exposures and Spills Involving Biological Materials</u>.
- If a spill of untreated waste occurs in a public area, close off or keep others out of the area. You must report these spills to VEHS Biosafety (2-2057) immediately.

Biological Material Exposure Response

If biological materials enter your body by way of a cut or puncture sustained from a contaminated sharp object, contact with damaged skin or a splash to the eyes, nose or mouth, do the following:

- 1. Proceed to the closest sink and flush the exposure site for 15 minutes.
- 2. Report the exposure to your lab supervisor if they are available.
- 3. Report to the Occupational Health Clinic (or Student Health if applicable) for medical follow-up as soon as possible.

If an exposure involves human-derived materials, timely assessment is critical. Report to the Vanderbilt Adult Emergency Department if Occupational Health is closed. **Exposures involving recombinant or synthetic nucleic acids** requiring BSL-2 containment must also be reported to VEHS Biosafety (2-2057) as soon as possible once medical follow-up is initiated.

> Need further assistance regarding RMW? Please visit <u>https://www.vumc.org/safety/waste/biological-waste</u>