Standards for Handling, Transporting, and Destroying Waste Associated with Ebola Contamination

Background:
In response to the recent confirmed cases of Ebola in the United States, this policy outlines regulatory requirements and procedures for handling, transportation and destruction of waste contaminated, or potentially contaminated with the Ebola virus (Ebola Contaminated Waste (“ECW”)). Special waste handling procedures are required given the Ebola virus’s ability to survive dried on various surfaces for several hours; and the Ebola virus’s ability to survive in body fluids (such as blood, saliva, mucus, vomit, urine, sweat, or feces) up to several days at room temperature.

Regulatory Classification:
ECW is considered by the United States Department of Transportation (“USDOT”) to be a Category A infectious substance regulated as a Hazardous Material under HMR 49 CFR Parts 171-180. Treatment of patients and decontamination of health care facilities, equipment and other places for Ebola is governed by standards set forth by the Rhode Island Department of Health (“RIDOH”), the Center for Disease Control (“CDC”) and the Occupational Safety and Hazardous Administration (“OSHA”).

The Department’s Rules and Regulations Governing the Generation, Transportation, Storage, Treatment, Management and Disposal of Regulated Medical Waste in Rhode Island, (the “Regulations”) give the Director the authority to regulate the generation, transportation, storage and treatment of Regulated Medical Waste. Rule 2.2 (e) gives the Director the following authority:

In certain situations involving outbreaks, or suspected outbreaks, of certain highly communicable diseases (either human or animal) the Director, in consultation with the Rhode Island Department of Health as appropriate, may issue a written order requiring a different standard of treatment for regulated medical waste associated with the outbreak.

The Department is invoking this authority for ECW. Therefore ECW is classified as a special category of Isolation Waste and shall be managed under these guidelines.

Rule 2.3 (h) of the Regulations further states that any waste which is a mixture of regulated medical waste and any other type of waste that is neither radioactive nor a
hazardous waste of a type other than regulated medical waste shall be considered as a Regulated Medical Waste.

Therefore, any ECW shall be classified as a special category of Isolation Waste, until appropriately determined otherwise or destroyed in accordance with the Regulations. Said wastes may include, but is not limited to, any human wastes, bedding, mattress, towels, curtains, rugs, clothing, food, furniture, utensils, trashes and personal protection equipment of workers involved in decontamination.

Isolation and Handling Requirements:
All ECW shall be immediately isolated, managed and transported for destruction per USDOT requirements as described below.

Transportation Requirements:
Transporting ECW is regulated by USDOT and RIDEM. USDOT requires special packaging and training for those involved with loading and unloading ECW. Packaging the waste must strictly follow the standards in USDOT-SP 16266 requirements. RIDEM requires transporters of ECW to have a Medical Waste Transporter Permit from RIDEM and also to notify the RIDEM of their intention to transport ECW.

Medical Waste Transfer Stations
Permitted Medical Waste Transfer Stations shall obtain an authorization from RIDEM before accepting any ECW.

Ebola Contaminated Waste Destruction:
The acceptable treatment technology for EWC is incineration per Rule 15.7(c) of the Regulations. Any other technology, including autoclaving, must be specifically authorized by RIDEM in writing.

Materials that have been decontaminated in accordance with RIDOH requirements as well as ECW that has been treated and destroyed in accordance with RIDEM standards is no longer considered Regulated Medical Waste and may be treated as solid waste.

Discharge into Sewer System
Sewage discharge of waste or bodily fluids from Ebola patients should be done in accordance with the pretreatment permit issued by the local sewer authority. CDC information on this issue can be found at:

Rinse waters containing appropriate disinfectant associated with decontamination of personnel and equipment are not considered regulated medical waste.

Ebola Contaminated Waste in Private Homes
ECW removal and disinfection of private homes, or other locations that are not health care facilities, should be done by professionals who have been trained in accordance with protocols established by the CDC and OSHA including training regarding blood borne
pathogens in addition to specific training relative to Ebola. Any firm involved with generating ECW must also register as a Regulated Medical Waste Generator with RIDEM (https://www.ri.gov/DEM/medical_waste_generator). Handling and Disposal requirements are identical to those for ECW in Health Care Facilities. Cleanup and disinfection must follow OSHA Regulations (1910.1030 blood borne pathogens) and CDC protocols. Furthermore packaging must follow the specific USDOT requirements for authorized packaging of a Category A infectious substance which are listed in 49 CFR 173.196. In addition, each packaging must meet specific test standards in accordance with 49 CFR 178.609 for ECW.

This guidance in no way indicates when a person may or may not enter or re-enter the premises. Decisions about the safety of occupancy or re-occupancy should be done in consultation with State and Federal Health Officials.

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Date