Considerations for Waste Determination

Waste generators are responsible for conducting a <u>waste determination</u> for all waste they produce. A generator is the person or site whose act or process produces the waste. This includes healthcare facilities such as hospitals, clinics, or labs. A waste determination is a conclusion about the makeup of the waste that is used to decide how it should be managed under applicable regulations. This helps ensure that organizational waste is handled and disposed of properly. For example, the <u>U.S. Environmental Protection Agency (EPA) requires</u> that a person who generates a solid waste must make an accurate determination as to whether that waste is a hazardous waste to ensure wastes are properly managed according to applicable RCRA regulations.

Organizations should have policies, training, and resources in place that can guide employees on how to make accurate waste determinations. A waste determination should be based upon an understanding of the processes that produce the waste.

When making a waste determination, some of the key considerations to ask include:

- What is the waste?
- Who generated it?
- How was it generated?
- Where was it generated?

The answers to these four questions can impact the requirements and considerations (found in the table below) that need to be applied when managing waste.

Considerations	Descriptions
Regulations	Regulations are the legal requirements your organization must follow, and they may be local, state, or federal laws. Where the waste is generated matters, as some regulations, such as those governing regulated medical waste (RMW), may vary from state to state.
	Examples of federal regulators of RMW include the <u>Occupational Safety and Health Administration (OSHA)</u> and the <u>Department of Transportation (DOT)</u> . Regulatory definitions will help you classify your waste as part of a waste determination.
Standards and Industry Best Practices	When considering industry best practices, look to organizations such as the <u>Centers for Disease Control and Prevention</u> (<u>CDC</u>). Regulatory agencies may also publish industry-specific guidelines and resources, such as A <u>10-Step Blueprint for</u> <u>Managing Pharmaceutical Waste in U.S. Healthcare Facilities</u> , which was published in 2022 with support from the U.S. EPA. These types of guidelines will help you in performing accurate waste determinations.
Waste Acceptance Policies	Waste acceptance policies are the requirements of waste vendors about what they will or will not accept, and under what conditions. Waste acceptance policies are designed based on regulatory requirements but are also informed by operational constraints, safety, business needs, and other policy considerations.
Organizational Policies	Your organization may have its own policies and procedures governing how certain waste is to be classified or managed. Your organizational policies should consider regulatory requirements, industry best practices, and standards you determine as necessary. Organizational policies should also consider vendors' waste acceptance policies and alignment with your internal policies related to managing waste.

If waste is not properly identified, there can be many negative effects relating to compliance, safety, and sustainability. Possible impacts can include environmental, community health, and financial implications.

To ensure effective and compliant waste determination measures, all organizations must ask the four key questions to ensure they are abiding by guidelines, keeping people safe, and being sustainable.

<u>Learn more</u> about how Stericycle can support your organization's medical waste and compliance needs and sustainability goals.

