

Biohazardous (Ebola) Waste Storage at Generating Medical Facilities

Purpose

Any medical facility in Kansas that may generate Ebola waste or suspect Ebola waste should be prepared to properly package that waste and place it into secure storage while awaiting on-site treatment or off-site disposal. This document provides guidance regarding the packaging and storage based upon the classification of Ebola waste in Kansas (both Category A infectious waste and RCRA hazardous waste), applicable special DOT permits and regulations, KDHE's hazardous waste regulations, and likely off-site disposal options.

Note: All KDHE written and verbal guidance advises waste generating facilities to immediately contact KDHE as soon as Ebola waste or suspect Ebola waste begins to be generated to ensure that final waste management decisions are aligned with current disposal facility requirements.

Packaging Requirements

Ebola waste and suspect Ebola waste may be generated in large quantities, as much as five to ten 55-gallon containers per day per patient. The selected packaging should comply with applicable DOT shipping requirements to avoid a need for repackaging prior to shipment. The general DOT regulations for packaging Category A waste can be found at 49 CFR Part 173.196; however, a national Special Permit was issued by DOT providing alternative packaging specifically to address Ebola waste disposal at a certain facility in Texas. This Special Permit 16279 dated October 24, 2014 can be found at

http://phmsa.dot.gov/pv_obj_cache/pv_obj_id_16F699678412C96AF68A6801FF8545F63A9E0100/filename/DOT_SP_16279.pdf

KDHE recommends following the packaging guidelines found in SP-16279 because this will satisfy all on-site storage requirements as well as facilitate subsequent transportation and disposal. This would include inner packaging (a minimum of two plastic film bags) and outer packaging (a triple-walled corrugated fiberboard or poly/plastic 55-gallon container). On-site storage in properly labeled fiberboard or plastic drums would facilitate disposal as Ebola waste if testing confirms the suspicion or as other regulated medical waste if confirmation is not received. The exterior surface of the fiberboard drums should be disinfected prior to movement from the patient care area to the storage area.

Depending upon the selected off-site disposal facility, the fiberboard or plastic drums may need to be placed into large 95-gallon plastic overpack drums (also described in SP-16279).

Selection of a Storage Area

Medical facilities should select a secure area to store Ebola waste that has been packaged in the 55-gallon fiberboard or plastic drums or 95-gallon overpack drums. Secure means locked when waste is not being put into or removed from the storage area. This area should differ from any other hazardous waste storage area used by the facility.

Storage Requirements

Because Ebola waste is "hazardous" in Kansas, certain RCRA rules apply. Storage must be for 90 days or less. Every container moved into the storage area should contain labels that have at a minimum the following (1) the words "Hazardous Waste," (2) the date the container was placed into storage, and (3) an "Infectious Substance" diamond label. The final outer shipping container must also include this information plus the proper DOT shipping name: "Infectious substances, affecting humans (Ebola Hazardous Waste)," hazardous class/division 6.2 (DOT), DOT ID # UN2814 along with the Kansas hazardous waste code: "EBOLA."