

*Let's talk trash...*

# *How Georgia dental offices should dispose of biomedical waste*

*Laney Kay, JD*

Sorry, we don't get to talk about fun trash like Tom Cruise and Katie Holmes. We're going to talk about dental office trash, specifically, the containment and disposal of regulated, biomedical waste in Georgia.

Several dentists called me after seeing a news report where a dialysis center was throwing away tubing and other biomedical waste in a regular dumpster. They all questioned which trash should go into the dumpster and which trash should be picked up by biomedical waste handlers. Here are some issues to consider.

Let's get a few things straight about trash disposal. There are several issues that must be considered when discussing biomedical waste. First, Georgia has a "cradle to grave" standard for trash, which means that the generator of waste is responsible for its proper handling and disposal from the time it's produced to the time it's properly disposed of in a landfill, incinerator, etc. What that means to you is this: If you throw sharps in a dumpster and some kid is dumpster-diving and gets injured, you are potentially liable for the injury. If you let some fly-by-night operation pick up your sharps and they dispose of them by tossing them in a McDonald's

dumpster at midnight, you are still liable, so it's very important to make sure that you use a reputable, licensed medical waste hauler to pick up your regulated waste. None of us wants to end up as a featured story on the evening news because of our improper waste disposal.

Basically, biomedical waste in dental offices is governed by two separate entities. For all practical purposes, while inside the office, trash containment and storage is controlled by OSHA, the Occupational Safety and Health Administration. Once you open the door to take it outside for disposal, it's governed by the Georgia Department of Natural Resources Environmental Protection Division (EPD). The difficult

part of our job is making sure that we comply with both governing bodies and that we maintain safe handling and disposal procedures, while not going overboard and making ourselves crazy.

Here's the deal: OSHA is concerned with the safety of employees within the work environment. Specifically, OSHA wants to make sure that all trash cans that could contain potentially infectious materials are properly marked with "biohazard" labels and that all employees are trained to handle and dispose of any biomedical waste properly and safely. That means that all trash cans used to contain materials used in operatories, the lab, sterilization area, or other potentially

contaminated areas should be clearly labeled with "biohazard" labels. All employees must be trained to handle that waste as potentially infectious material, and should always wear personal protective equipment when handling that waste. OSHA wants to make sure that if someone drops a pen in a trash can filled with gauze and dirty gloves, he or she won't go rifling through the can with bare hands.

That doesn't mean that all this trash should be put in red bags and handled as regulated, biomedical waste. In fact,

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## WASTE DISPOSAL

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studies have shown that only 1 %-2% of all waste generated by dental offices is considered to be regulated waste. Items such as masks, gowns, soiled equipment barriers, gloves, and blood and/or saliva stained (*not saturated*) gauze or cotton rolls are not considered to be biomedical waste and studies have shown this material is no more dangerous than regular household waste.

According to OSHA and the infection control guidelines for dentistry, regulated biomedical waste includes sharps (including IV tubing with needles attached), extracted teeth, and items that are saturated with blood and/or saliva, and items caked with dried blood. These items must be either decontaminated on site and then disposed of properly, or they must be placed in red bags (or sharps containers) and picked up for disposal by a licensed biomedical waste handler.

The Georgia Department of Natural Resources Environmental Protection Division has different concerns than OSHA. They are concerned with ensuring that garbage is properly disposed of in order to protect the public and their landfill workers from potentially infectious materials. Most dental practices are considered to be "small generators," which means that they generate less than 100 pounds of regulated biomedical waste per month. Technically, small generators are exempt from having to treat their medical waste before disposal and they are allowed to dispose of their small amount of biomedical waste in a permitted sanitary landfill.

Unfortunately, it's not as straightforward as it sounds. First, if you choose not to treat your waste, you have to put it in a red biohazard bag. Even though small generators are supposedly allowed to dispose of their biomedical waste with the regular trash, most county landfills refuse to take it, and a few counties have even fined doctors for putting red bags in the regular trash. Before you dispose of red bags with your regular trash, contact your waste hauler or your local county landfill to make sure they will accept it.

So, bottom line, how should dentists handle contaminated waste in dental offices?

In the office, label all trash cans that contain any potentially contaminated materials with "Biohazard" labels (labels should be placed on the top and all visible sides of the container). Use regular trash bags in these cans; do *not* put any regulated, biomedical waste in these trashcans. That trash can go out with the rest of the garbage.

Some counties, especially in rural areas, will allow dentists to make an appointment to drop off biomedical waste, including sharps containers, at the county landfill. The waste is then immediately buried to prevent anyone from being exposed accidentally to the potentially infectious waste.

The best way for sharps to be disposed of is to either have them picked up by a licensed medical waste hauler or mail them to the hauler in a special container. Another option is an approved system like the "Isolyzer" system, which decontaminates the sharps and encases them in a solid. Those encased, decontaminated sharps can then be placed in the regular trash, if your trash hauler will allow it.

For all other regulated waste, other than sharps, there are a couple of different options. If the office does a lot of surgery and generates a lot of blood-saturated materials, it may be most efficient to place the materials in red bags and have a service pick it up once a month.

For the majority of dental offices that generate very little regulated waste, the most efficient method of waste disposal would be on-site treatment with an autoclave. When you're cleaning up the operatory after a procedure, place all blood and/or saliva saturated materials in an autoclaveable envelope and autoclave it. The EPD requires a temperature of 121 degrees Celsius for at least 30 minutes to ensure proper decontamination; 121 degrees Celsius is the standard temperature for dental autoclaves. The packet can then be thrown in the regular trash and a red bag is not required because the waste is no longer infectious.

If you choose to use this option, the EPD requires the use of biological monitors to ensure that the autoclave is working properly; since weekly autoclave

monitoring is already required by OSHA and the CDC, no additional monitoring is required. The EPD also requires that offices notify them if they choose to autoclave regulated waste (*please see form on page 27*). There is no fee; it's just a form to complete and file.

Hopefully this makes the biomedical waste disposal issue a little easier. As usual, setting up procedures and training all employees will generally take the hassle out of the situation, so good luck.

*PLEASE NOTE: This information is provided for informational purposes only and is not legal advice. Questions about state regulations and requirements should be directed to the Georgia Department of Natural Resources Environmental Protection Division at (404) 657-5947; (888) 373-5947; or [www.ganet.org/dnr/environ](http://www.ganet.org/dnr/environ), and specific questions should be directed to your personal attorney.*

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