Laboratory Waste Reagents Disposal Guidance

Background:

Regulated Medical Waste (RMW) are defined as Waste generated in the diagnosis, treatment, research, or immunization of human beings or animals which is capable of causing disease or which, if not handled properly, poses a risk to individuals or a community. RMW are classified into 9 groups for clarity (refer to groups in MEDCOM regulation 40-35).

Used reagents that did not come into contact with blood or human body fluids do not meet the definition for RMW and there <u>should not</u> be disposed of as such. It is understood that waste reagents contain chemicals. MEDCOM regulation 40-35 (Management of RMW) Paragraph 7 (b) states "generators of waste laboratory reagents must make a waste determination to ensure proper disposal."

Local guidance:

Army Public Health Center conducted a Laboratory Waste Effluent Characterization Study No. S.0057103.3-18 on 6-8 March 2018 for 11 analyzers/equipment in the lab and determined what effluents from the analyzers met the criteria to be handled as Hazardous Waste (HW). In line with this argument - that the same reagents are used in these analyzers/equipment - then their disposal should mimic the waste from the analyzers. That is, they are not HW and can be disposed of either down the drain or as solid waste, whichever is appropriate. For concerns about any other new equipment/analyzer on which a waste characterization was not conducted, further request to APHC can be initiated.

For more information concerning this issue please contact the undersigned at 270-412-3990 or <u>ayub.m.odera.mil@mail.mil</u>.

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