Medical Waste Compliance Checklist

For Healthcare Facilities in the Midwest · OSHA · DOT · EPA · DEA · HIPAA

Section 1: Waste Identification & Segregation

■ **All regulated medical waste is identified and labeled at the point of generation**
Includes sharps, pathological waste, blood-soaked materials, cultures & stocks

■ **Separate containers used for sharps, red bag waste, and non-regulated waste**
Never mix regulated medical waste with regular trash

■ **Biohazard symbol displayed on all containers and storage areas**
Required under OSHA 29 CFR 1910.1030

■ **Pharmaceutical waste (non-DEA) separated from other medical waste**

■ **DEA-controlled substances have a documented destruction plan**
Must use DEA-authorized method per 21 CFR Part 1317

Section 2: Container Requirements

■ **Sharps containers are puncture-resistant, leak-proof, and closeable**
FDA-cleared containers required; fill no more than 3/4 full

■ **Red bags are tear-resistant and at minimum 1.5 mil thickness**

■ **All containers properly closed/sealed before transport or pickup**

■ **Containers are not overfilled or left open for extended periods**
OSHA violation risk if left open

■ **Reusable containers are cleaned and decontaminated between uses**
MedWaste Solution provides free reusable bin service

Section 3: Storage & Facility Requirements

■ **Designated, secured storage area for medical waste prior to pickup**
Must be inaccessible to unauthorized personnel

■ **Storage area is labeled with biohazard signage**

■ **Storage area is free from pests and environmental hazards**

■ **Waste not stored longer than permitted timeframes**
Large generators: 30 days max; small: 90 days max

■ **Refrigeration used for pathological waste if stored >7 days**

Section 4: Transportation & DOT Compliance

■ **Waste transported by a licensed, permitted medical waste hauler**
Verify current state and DOT permits

■ **Shipping papers / waste manifests completed for each pickup**

■ **Packaging meets DOT 49 CFR Part 173 requirements**

■ **Driver has current DOT hazmat training (every 3 years)**
Required under 49 CFR 172.704

■ **Vehicle placard/marking requirements met for quantity transported**

Section 5: Employee Training & OSHA

■ **Annual Bloodborne Pathogens training completed for all at-risk staff**
OSHA 29 CFR 1910.1030 requires annual refresher

■ **Exposure Control Plan updated annually and accessible to staff**

■ **PPE available and used when handling regulated waste**
Gloves, gowns, face protection as applicable

■ **Hepatitis B vaccination offered to all at-risk employees**

■ **Exposure incident procedures documented and communicated**

Section 6: Documentation & Recordkeeping

■ **Waste manifests/tracking documents retained for required period**
Typically 3 years minimum; check state requirements

■ **Training records maintained for each employee**

■ **Certificates of destruction on file for shredded documents**
HIPAA-required for PHI destruction

■ **EPA ID number current and on file if applicable**

■ **Annual/biennial RCRA reports filed if required**

Section 7: HIPAA & Document Destruction

■ **PHI-containing documents shredded by NAID-certified vendor**
OnTime Shredding — NAID Member

■ **Chain-of-custody maintained for document destruction**

■ **Certificates of destruction retained for each service**
HIPAA requires documented proof of destruction

■ **Electronic media (hard drives, devices) properly wiped or destroyed**

■ **Business Associate Agreement (BAA) in place with shredding vendor**