



# Infectious Waste

## Management guidance for transporters

**I**nfectious waste poses an environmental danger due to its *biological* risk. It is different from **hazardous** waste, which poses an environmental danger due to its *chemical* risk. **Pathological** waste also poses a *biological* risk and is regulated the same as infectious waste.

### Infectious and pathological waste

**Infectious waste** includes the following wastes generated in Minnesota by a business or government entity:

- liquid blood or body fluids from humans or research animals
- wastes which will release blood or body fluids when compressed
- contaminated sharps from human or any animal use
- live or attenuated human vaccines
- infectious cultures and contaminated laboratory items used to manipulate those cultures.

**Pathological waste** includes human body parts or tissue removed and intended for disposal, except teeth.

**Hazardous waste** includes waste with chemical qualities that make it harmful to human health and the environment.

Some wastes can be both infectious and hazardous. The Minnesota Pollution Control Agency (MPCA) refers to such wastes by the term-of-convenience **dual waste**. When storing and treating dual waste, you must comply with both infectious and hazardous waste requirements.

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This document is intended to provide guidance only on requirements under the Minnesota Infectious Waste Statutes and Rules, found at Minn. Stat. § Ch. 116 and Minn. R. Ch. 7035, administered by the MPCA. Infectious waste may also be regulated concurrently as:

- regulated waste under the Federal Bloodborne Pathogens standard (BBP) found at 29 CFR 1910.1030 and administered by the Minnesota Department of Labor and Industry, Occupational Safety and Health Division (MNOSHA)
- regulated medical waste under the Federal Hazardous Materials Regulations (HMR) found at 49 CFR 173.134, administered by the U.S. Department of Transportation (DOT)

Be aware that the BBP and HMR may regulate wastes that are not included in the definition of infectious waste as used in this document. For example, the HMR regulates all animal-generated veterinary waste, while 'infectious waste' includes only veterinary sharps. Although this document does not discuss other regulations, transporters of infectious waste must ensure they meet all applicable requirements.

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## Who is a transporter?

A *commercial transporter* is a business or a state or local government entity that transports, for any form of compensation, waste that it did not generate. This definition includes courier and shipping services. It does not include federal government agencies, which are *not* commercial transporters and are exempt from all MPCA transporter requirements.

Infectious waste generators who transport their own, and who transport other generators' waste only at-cost or less, are *not* commercial transporters but must meet transporter operational requirements discussed on page 3.

Businesses that commonly generate infectious waste at off-site locations, such as ambulances, home health agencies and trauma clean-up services, are *not* commercial transporters when they transport that waste back to their central facility for consolidation. However, these businesses *are* commercial transporters if they transport infectious waste previously generated by another generator.

Businesses that transport infectious wastes into Minnesota from another state for regulated storage, decontamination, or disposal are regulated the same as those transporting waste generated within the state.

Note: All transportation of regulated medical waste in commerce by any party is regulated by the DOT under the HMR, regardless of its status under the MPCA's infectious waste requirements.

## Transporter registration

All commercial transporters must be registered with the MPCA. To register, commercial transporters must submit an Infectious Waste Management Plan to the MPCA. Management plans must include:

- The corporate identity of the transporter. Ensure that the corporate identity submitted to the MPCA is registered with the Minnesota Secretary of State to do business in Minnesota.
- The location of all sites in Minnesota from which the transporter will operate, including transfer facilities.
- The types of infectious or pathological wastes to be transported.
- The method of receiving waste to ensure that infectious and pathological wastes are segregated from other wastes, such as hazardous waste and

dual wastes, and handled separately. Describe the specific actions, such as:

- developing waste acceptance criteria of which customers will be informed
  - contract terms specifying compliance with the waste acceptance criteria, with monitoring and penalty elements
  - other reasonable methods implemented by the transporter to ensure it does not collect and transport hazardous waste inadvertently or deliberately comingled with acceptable infectious waste at customer sites.
- How the waste will be packaged and labeled
  - How the waste will be handled during loading, unloading and at any transfer facilities to minimize the number of employees exposed to the waste and the amount of exposure they receive. (An exposure control plan prepared to meet the BBP may meet this item, but it then must be integrated into the management plan.)
  - The methods used to disinfect emptied reusable containers and transport vehicle surfaces that have been in contact with infectious waste.
  - The methods used to prevent putrefaction of collected infectious waste and a description of any equipment or policies necessary to implement those methods.
  - A detailed staff training and continuing education plan describing (at a minimum) how employees will be trained in relevant elements of the infectious waste management plan as well as any mandatory training required by the DOT under the HMR.
  - How the transporter will ensure it does not store infectious waste for more than 48 hours (except in the course of transportation), or concurrent application for certification of the management plan for an off-site storage facility. For more information on storage facility certification, see MPCA solid waste fact sheet #4.32, Infectious Waste – Management guidance for storage and decontamination facilities, available at [www.pca.state.mn.us/waste/pubs/business.html](http://www.pca.state.mn.us/waste/pubs/business.html).
  - A spill response plan itemizing the spill kit to be maintained in transport vehicles and describing actions employees will take after a spill including personal protection methods, cleanup and repackaging of the waste.

- A list containing the identity, location, and contact staff of all infectious waste storage, decontamination, and disposal facilities used by the transporter creating the plan.
- The name and title of the individual responsible for implementing the management plan.
- The signature of the transporter's chief executive officer or its designated representative.

### Submitting management plans for registration

The MPCA no longer requires or provides a registration application form. Transporters may submit management plans to the MPCA in hard copy form or via fax or e-mail. If submitted electronically, include an image of the original required signature. Contact the MPCA to determine the current staff person to whom to direct submitted plans. The MPCA is currently waiving commercial transporter registration-application fees.

Keep a printed or electronic copy of the plan and the registration issued by the MPCA at the transporter's principal place of business.

Although the Minnesota infectious waste standards mandate biennial re-registration, the MPCA now issues commercial transporter registrations, which are valid until revoked by the MPCA. However, registered commercial transporters must submit a revised management plan when there is a substantive change to the previously submitted plan, or upon request of the MPCA or county authority.

### Transporter operational requirements

Transporters must comply with their infectious waste management plan.

#### Allowed transport

Transporters must accept properly packaged and labeled infectious waste; they are prohibited from accepting any waste not properly packaged and labeled.

After acceptance, transporters must transfer infectious waste only to:

- infectious waste storage, decontamination, or disposal facilities in Minnesota certified by the MPCA
- infectious waste storage, decontamination, or disposal facilities in another state approved by the appropriate receiving state regulatory agency
- other sites owned or operated by the original waste generator

- other transporters registered with the MPCA, if the transfer will result in subsequent transportation of the waste within Minnesota.

Note: The Minnesota Department of Health no longer issues management plan-acknowledgment cards to infectious waste generators. Although the Minnesota Rules still prohibit accepting waste from generators without such cards, transporters must now accept properly packaged and labeled infectious waste from any party.

### Transport requirements

All transportation of regulated medical waste in commerce by any party must comply with the packaging, labeling, shipping paper, and all other requirements of the HMR. Transporting regulated medical waste in containers or bulk outer packages that do not meet the requirements of the HMR, as referenced in 49 CFR 173.197, including closure, is prohibited.

Equip each vehicle with a spill kit including, at a minimum:

- absorbent materials sufficient for the amount of liquid infectious waste transported
- one gallon of hospital-grade disinfectant
- collection shovel, broom, collection pan, and buckets of a size and type appropriate for the amount and type of infectious waste transported
- appropriate personal protective equipment (PPE) for the amount and type of infectious waste transported
- additional packaging and labeling materials

Immediately report any inadvertent release of regulated medical waste from its packaging during transport to the Minnesota Duty Officer at 651-649-5451. In addition, submit a written report the DOT within 30 days of the discovery of the incident.

Although the stated requirements mandate vehicle marking, the MPCA no longer requires external marking of infectious waste transport vehicles nor assigns individual vehicle numbers. Transporters must continue to comply with applicable DOT vehicle markings required under the HMR.

## More information

For more information on hazardous waste, see the Minnesota Pollution Control Agency (MPCA) [hazardous waste publications](#) Web site at [www.pca.state.mn.us/waste/pubs/business.html](http://www.pca.state.mn.us/waste/pubs/business.html).

Address questions regarding the Bloodborne Pathogens standard (BBP) to MNOSHA.

Address questions regarding the Federal Hazardous Materials Regulations (HMR) to the U.S. DOT or Minnesota DOT.

### Minnesota Pollution Control Agency

Toll free (outstate only)..... 1-800-657-3864  
Metro..... 651-296-6300  
Web site ..... [www.pca.state.mn.us](http://www.pca.state.mn.us)

### Minnesota Department of Labor and Industry, Occupational Safety and Health Division (MNOSHA)

Toll free..... 1-800-DIAL-DLI  
Web site .... [www.doli.state.mn.us/MnOSHA.asp](http://www.doli.state.mn.us/MnOSHA.asp)

### Minnesota Department of Transportation

Hazardous Materials ..... 651- 215-6330  
Web site . [www.dot.state.mn.us/cvo/hazmat.html](http://www.dot.state.mn.us/cvo/hazmat.html)

### Minnesota Technical Assistance Program

Toll free (outstate only)..... 1-800-247-0015  
Metro..... 612-624-1300  
Web site  
..... [www.mntap.umn.edu/healthcarehw/index.html](http://www.mntap.umn.edu/healthcarehw/index.html)

### U.S. Department of Transportation

Hazardous Materials ..... 1-800-467-4922  
Web site ..... [www.phmsa.dot.gov/hazmat](http://www.phmsa.dot.gov/hazmat)