

Compliance Training

Medical Waste Training Department of Transportation Requirements

Identifying the DOT Training Requirement

The Department of Transportation (DOT) requires special training for staff members who will be responsible for preparing medical waste for transportation. The DOT lists "regulated medical waste" as hazardous material subject to its transportation Standards. Specifically, these Standards are found in the Code of Federal Regulations (CFR), Title 49, Parts 100-704.

Entities such as healthcare facilities are considered shippers or generators of regulated medical waste, and must ensure that any employee who loads, unloads, or handles hazardous materials and/or prepares hazardous materials for transportation receives hazardous materials training. This means that employees who perform tasks such as placing medical waste into a shipping box, closing the box for shipping, or completing the manifest (shipping papers) must be properly trained.

Bloodborne Pathogens and Medical Waste Training

The training that you conduct for Bloodborne Pathogens and Medical Waste must be supplemented with information specific to DOT requirements. According to the DOT, hazardous material training is a systematic program that ensures an employee is familiar with the general requirements for hazardous materials handling, and is able to recognize and identify hazardous materials, has knowledge of the DOT requirements applicable to their job function, and has knowledge of emergency response information, self-protection measures and accident prevention methods and procedures.

Hazardous Materials Training

DOT training for hazardous materials should be comprised of three major sections:

1. **General Awareness/Familiarization** - this section addresses an employee's familiarity with requirements of the Standard, the identification of hazardous materials, DOT's placard system, and DOT labeling. This is a section of DOT requirements that should be added to your current Bloodborne Pathogens and Medical Waste training.
2. **Function Specific Training** - this section will address the process of preparing the medical waste for shipment, including completion of shipping papers.

THIS TRAINING SESSION IS RECOMMENDED FOR:

Staff members that:

- place medical waste into a shipping box;
- close the box for shipping; or
- complete the manifest (shipping papers).

Training Objectives

The training objectives of this training session are to:

- explain the DOT requirements, and
- provide a lesson plan to meet the training requirements.

Interactive Training Reminder

Compliance Training is an interactive training program in which you can address questions with other staff members or supervisors to obtain clarification for situations in your work setting.

Write down any questions that you have about the training topic and address them with your Safety Training Coordinator or supervisor.

3. **Safety Training** - addresses measures to protect employees from exposure to hazardous materials (in this case, medical waste), emergency response information (who to contact in the event of an exposure incident), and the procedures for limiting accidents when handling and storing medical waste. This information is covered in the “Compliance Training” segments for Bloodborne Pathogens and Medical Waste.

Which Facilities Need to Provide Training?

Employers must provide training to employees that handle and prepare hazardous materials for transportation. We will use the DOT’s term “regulated medical waste” to describe the type of hazardous materials shipped by your facility.

Lesson Plan

The following outline can be used to understand the DOT compliance requirements as they pertain to your facility, along with the training requirements for employee(s) that prepare medical waste for transport.

1. General Awareness

Requirements of the Standard- The DOT’s Standard for Hazardous Materials requires training to ensure employee familiarity with its requirements for the safe handling, packaging and transportation of regulated medical waste. The training is required for all employees that place medical waste into a shipping box, close or seal the box for shipping, or complete the manifest (shipping papers).

Identification of Hazardous Materials - covered employees must be familiar with the DOT’s classification of hazardous materials they prepare for transportation. Specifically, healthcare facilities will generate and prepare the following hazardous material for transportation:

Name - “Regulated Medical Waste”

Hazard Class - “Class 6.2”

Identification Number - “UN3291”

This description is found in the DOT’s table of hazardous materials, 49 CFR 173.134. The description will be needed for proper completion of shipping papers for the medical waste hauler.

Placarding - the DOT has special placards that are used to identify the type of cargo that will be transported in vehicles. According to 49 CFR 172, placarding does not apply to regulated medical waste. Affected employees should know that there is no requirement for the use of placards for regulated medical waste transported from their facility.

Labeling - Additional labeling of regulated medical waste is not required, as long as it is labeled with the international biohazard symbol.



2. Function-Specific Training

Preparing Hazardous Materials for Transportation

- Sharps should be in approved sharps containers (puncture resistant, leak-proof on sides and bottom, and red in color or labeled with the biohazard symbol).
- Sharps containers should be placed in transportation containers provided by the medical waste hauler.
- Red bag liners in the transportation container should be tied or closed to prevent spillage.
- The top and bottom of the transportation container should be sealed with tape to prevent spillage.
- Transportation boxes should be labeled as specified by the medical waste hauler.

It is the responsibility of the generator or shipper, not the hauler of the hazardous material, to ensure that the transportation container is properly prepared for transport.

Shipping Papers/Manifest

The manifest or shipping papers for the hazardous material must be completed by the generator or shipper, and are not the responsibility of the waste hauler. The shipping papers must be completed with information specific to the hazardous material contained in the shipment.

- a. According to the DOT Standard, no person may offer, transport, transfer, or deliver a hazardous waste unless an EPA Form 8700-22 hazardous waste manifest is prepared and signed as required by that person. The original copy of the manifest must be dated by, and bear the handwritten signature of the person representing the shipper at the time it is offered for transport. The forms used by waste haulers must be comparable to the EPA form, containing the same information, at a minimum. Additionally, the Standard requires that the shipper maintain manifests for a minimum of three years.

A representative of your facility must complete and sign the form used by the waste hauler, and keep a copy on file for three years.

- b. The description of the hazardous material on the shipping manifest must contain:

The name prescribed for the material as specified in the DOT's Hazardous Materials Table. The DOT name for your medical waste is "regulated medical waste."

The hazardous class or division prescribed for the material as specified in the DOT's Hazardous Materials Table. The hazardous class for "regulated medical waste" is "6.2."

The identification number prescribed for the material as shown in the DOT's Hazardous Materials Table. The identification number for "regulated medical waste" is "UN3291."

The total quantity (by net or gross mass, capacity, or as otherwise appropriate), including the unit of measurement, of the hazardous materials covered by the description. This will be an approximate weight in pounds, and must be written on the shipping papers before or after the description.

The basic description for the hazardous materials must appear in sequence on the shipping papers. For example, 10 pounds of medical waste should be listed on the manifest as: 10 lbs regulated medical waste, 6.2, UN3291.

The shipping papers or manifest will be dated and signed by the employee responsible for preparing the shipment for transport. Additionally, the representative of the waste hauler must date and sign the shipping papers, and leave the original with your facility.

3. Safety Training

If your facility uses the "Compliance Training" feature of the *Advisor*, the training that you have completed for Bloodborne Pathogens combined with this training module will fulfill the DOT training requirements. Ensure that the employee(s) preparing your medical waste for transport have completed the "Compliance Training" module from the *Advisor*, or have otherwise completed training for Bloodborne Pathogens.

When to Train

1. When an employee is first assigned the responsibility of preparing your medical waste for transport, he/she must complete the training within 90 days of assignment. (Custom Safety Program users will find initial DOT training information within the Employee Safety Orientation handbook for new hire training.)
2. DOT training must be repeated at least every three years. OSHA requires that Bloodborne Pathogens training be repeated annually. ●

Compliance Training Test

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NAME: _____ DATE: _____

SIGNATURE: _____ STAFF POSITION: _____

There are 10 questions to the test for Medical Waste Training - DOT Requirements. There is no pass or fail grade to the test. Review the training information to find the correct answers to any questions that may have been missed.

1 The training you already provide for Bloodborne Pathogens meets all of the requirements for DOT Medical Waste training.

Select One T F

2 As a generator of regulated medical waste, you must placard your waste under the standard 49 CFR 172.

Select One T F

3 Shipping papers must be maintained for a minimum of three years.

Select One T F

4 The manifest or shipping papers for the hazardous material must be completed by the generator or shipper, and are not the responsibility of the waste hauler.

Select One T F

5 The shipping papers or manifest will be dated and signed by the employee responsible for preparing the shipment for transport.

Select One T F

6 Because sharps containers are already leak-resistant, you do not need to use a transportation container.

Select One T F

7 When an employee is first assigned the responsibility of preparing your medical waste for transport, he/she must complete the training within 90 days of assignment.

Select One T F

8 DOT training must be repeated at least once every five years.

Select One T F

9 The DOT name for medical waste is “regulated medical waste.”

Select One T F

10 A representative of the waste hauler must also date and sign the shipping papers, and leave the original with your facility.

Select One T F