



County of Sacramento

December 15, 2014

To Whom It May Concern:

SUBJECT: IMPACTS OF ASSEMBLY BILL NUMBER 333 ON THE MEDICAL WASTE MANAGEMENT PROGRAM

Sacramento County Environmental Management Department (EMD) acts as the enforcement agency for the Medical Waste Management Act in Sacramento County, on behalf of the California Department of Public Health. On September 25, 2014, Assembly Bill 333 (AB 333) was signed by the Governor and filed with the Secretary of State. AB 333 amends multiple sections of the Medical Waste Management Act MWMA.

Upon review and analysis of AB 333, EMD has determined that medical waste generators will be impacted as follows, beginning on January 1, 2015:

- 1) **MWMA Section 117890: Facilities are now required to notify EMD of participation in temporary offsite events.** Temporary events include, but are not limited to, health fairs, vaccination clinics, and veteran stand downs. Facilities must notify the local enforcement agency of their intended participation at least 72 hours before the event, unless the sponsor of the temporary event previously notified the local enforcement agency. EMD will charge a notification processing fee of \$107 per event; the notification forms will be posted to the EMD website. Keep a copy of your completed form(s) and have them available for review by regulatory agencies during your facility's routine inspections.
- 2) **MWMA Sections 117946 & 117976: EMD will no longer issue Limited Quantity Hauling Exemptions (LQHE).** Medical waste generating facilities may transport up to 35.2 pounds of medical waste, pursuant to the Materials of Trade Exemption contained in Section 173.6 of Title 49 of the Code of Federal Regulations. There is no requirement to register with EMD for the Materials of Trade Exemption.
- 3) **MWMA Section 117935 and 117960: Additional information must be included in the Medical Waste Management Plan (MWMP).** The MWMP must include the steps taken to categorize pharmaceutical wastes. If there is onsite treatment, the MWMP must include a closure plan for the termination of treatment. Please see the attached fill-in-the blank MWMP; updated MWMPs may be submitted with the annual permit application.
- 4) **MWMA Section 117967: Facilities with onsite treatment must provide training.** Annual training compliant with Occupational Safety and Health Administration (OSHA) standards is required on the use of the equipment, the proper protective equipment to wear, and how to clean up spills.
- 5) **MWMA Section 117630: Biohazard bags must meet updated requirements.** The bags must meet the standards of the American Society for Testing Materials and biohazardous waste bags must be red, except when yellow bags are used to further segregate trace chemotherapy waste and white bags are used to further segregate pathology waste.

Additional information and updates will be posted to EMD's website at:

<http://www.emd.saccounty.net/EnvComp/MedWaste/MedWaste.html>

Please note that there are additional changes to the MWMA as a result of AB 333, the full text of the bill may be viewed at:

<http://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml>

Please contact me at (916) 875-8468 or GibsonLea@saccounty.net with any questions concerning the Medical Waste program. You may also contact Victoria Pena at (916) 876-8870 or PenaV@saccounty.net, or Lisa Jameson, Program Supervisor, at (916) 876-7883 or JamesonL@saccounty.net.

Sincerely,



Lea Gibson
Environmental Specialist, Medical Waste Program

Attachments: Updated fill-in-the-blank Medical Waste Management Plan
Offsite event notification form

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