

Medical Waste Compliance Checklist for Massachusetts Healthcare Providers

30 essential compliance checks — review quarterly and after any staff change

Use this checklist to audit your program against Massachusetts DEP regulations, OSHA Bloodborne Pathogen Standards, and EPA/RCRA requirements. Non-compliance can result in fines up to \$25,000/day.

1 WASTE SEGREGATION & CONTAINERS

Regulated medical waste (RMW) separated from general trash at point of generation

Sharps in FDA-cleared, puncture-resistant containers only

Red bag biohazard waste in leak-proof, labeled bags or rigid containers

Pharmaceutical waste segregated from biohazard waste

Trace chemo waste in separate yellow-labeled containers

2 LABELING & IDENTIFICATION

All RMW containers display the universal biohazard symbol

Labels include generator name, address, and date

Sharps containers labeled with waste type and generator info

No unauthorized abbreviations or symbols on labels

3 STORAGE REQUIREMENTS

Storage area is secured and access-controlled

RMW stored no longer than 90 days (30 days if >50 lbs/month)

Storage area clearly marked with biohazard signage

Refrigeration used if storing liquid or pathological waste >7 days

Storage area inspected weekly and documented

4 TRANSPORTATION & MANIFESTS

Licensed MA-registered medical waste hauler under contract

Tracking manifest completed for every pickup

Completed manifests retained for minimum 3 years

Hauler's license number verified and on file

5 OSHA BLOODBORNE PATHOGENS

Written Exposure Control Plan reviewed and updated annually

All at-risk staff offered Hepatitis B vaccination

PPE (gloves, gowns, eye protection) available and used

Needlestick/sharps injury log maintained (OSHA 300 log)

Needlestick Safety and Prevention Act requirements met

6 STAFF TRAINING

All RMW-handling staff trained at hire and annually

Training records on file for each employee

Spill response procedures posted and staff trained

Emergency contact numbers for spills posted visibly

7 PHARMACEUTICAL & CHEMO WASTE

Non-hazardous pharma waste disposed via DEA-authorized method

Hazardous pharmaceutical waste managed under EPA RCRA

Trace chemo waste (RCRA-exempt) in yellow containers

Bulk chemo waste managed as hazardous waste

8 RECORDS & REPORTING

Annual report filed with MA DEP if generating >25 lbs/month

Spill incidents reported to MA DEP within required timeframe

All compliance records available for inspection on request

Emergency response plan updated and accessible

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