

Biomedical Waste Regulation Enforcement

Report No. 95-07 -- Report Summary

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INTRODUCTION AND BACKGROUND

The study of biomedical waste regulations enforcement was included in the 1994 County Auditor's Office work program. The study was requested by the County Council in response to health concerns relating to the potential effects of improper disposal of biomedical waste.

The Environmental Health Division of the Health Department is charged with the responsibility of protecting the public from the hazards of improper disposal of solid waste, including biomedical waste, by regulating its handling, storage, collection, transportation, treatment, and disposal. The biomedical waste regulations in Title 10 of the King County Solid Waste Regulations were adopted in 1989 by the King County Board of Health.

OBJECTIVE AND SCOPE

The purpose of the study was to evaluate the Health Department's biomedical waste regulations and enforcement of the regulations in the generation, handling, transportation, storage, treatment and disposal of biomedical wastes in King County.

The scope of the study was limited to the review of biomedical waste regulations, Title 10 of the County's Solid Waste Regulations, Solid Waste Division Special Waste Acceptance Policy, a review of the files of transporters of biomedical waste, including application for permit, transporter checklist, biomedical waste transport management program, prior years inspection reports, and some complaints received by the Health Department relating to biomedical waste. Study procedures also included observation of Health Officer's inspections of the facility and vehicles of a generator and transporter of biomedical waste, and interviews with management and staff involved in the enforcement of the biomedical waste regulations.

SUMMARY STATEMENT OF FINDINGS

The general conclusion was that the Environmental Health Division was deficient in its monitoring

of the generators and transporters of biomedical waste to determine their compliance with the County's biomedical waste regulations. To increase its regulatory and monitoring activities, the Health Department needed to raise sufficient funds to support its activities relating to biomedical waste.

MAJOR FINDINGS AND RECOMMENDATIONS

Finding II-1. The Environmental Health Division did not conduct on-site monitoring reviews in 1993 and 1994.

The Environmental Health Division was deficient in its monitoring of generators and transporters of biomedical waste to determine their compliance with the County's biomedical waste regulations. The Division's records showed that it had 440 and 228 public and biomedical waste generator consultations in 1993 and 1994, respectively. Consultations primarily included responding to public complaints and providing information to the public and generators who called the Environmental Health Division for assistance. The Division, however, did not conduct random or scheduled on-site inspection or monitoring reviews of generators and transporters of biomedical waste in 1993 and 1994.

The study recommended that the Environmental Health Division should develop an annual program for on-site inspections of generators and transporters of biomedical waste to determine their compliance with the County regulations. After every inspection, a written report should be issued to monitored entities. Environmental Health should require them to respond in writing regarding the violations, if any, and include corrective plans and actions that are to be implemented.

Finding II-2. Permit fees were not sufficient to cover monitoring costs.

The Environmental Health Division did not earn enough revenue to support its regulatory and monitoring activities relating to biomedical waste. The Division's 1994 work plan for medical waste activities included consultation, response to public complaints, and routine field inspection and reinspection. The Division incurred costs of about \$12,000 for public and industry consultations and responding to public complaints concerning medical waste. The revenue generated that year from permit fees was only \$1,260, generally coming from permits issued to transporters of biomedical waste. The Health Department was not required to issue permits to generators of biomedical waste in incorporated and unincorporated areas of King County. Thus, no revenue was collected from them although they received services (e.g., consultations and responding to complaints) from the Environmental Health Division.

The study recommended that Health Department should consider requiring annual permit fees from generators of biomedical waste. The Department should also review the current structure of permit fees for transporters of biomedical waste and operators of storage and treatment facilities to reasonably cover its costs associated with enforcement and compliance monitoring activities.

Finding II-3. Records were not clearly required in the regulations.

The County's biomedical waste regulations were not specific as to what types of records should be maintained by the generators, transporters, and operators of storage and treatment facilities for biomedical waste.

Some types of records that are relevant in regulating biomedical waste that are not clearly required and specific in the current regulation are records that would show the type and volume of biomedical waste produced; the type and volume of biomedical waste, by customer, transported by transporter; the type and volume of medical waste stored and treated by operators of facilities; and the date, time, and name of persons involved, and description of events relating to any biomedical waste spills.

The study recommended that Health Department should review and amend the current County

biomedical waste regulations to include provisions that clearly specify the type of records to be maintained and record keeping standards for generators, transporters, and storage and treatment facility operators.

Finding II-4. The Health Department had limited informational materials.

The Environmental Health Division did not have adequate brochures or other educational materials relating to biomedical waste to promote awareness and information about the proper handling, transportation, storage, treatment, and disposal of biomedical waste.

The increase in the availability of educational materials and dissemination of information to the general public and interested businesses could reduce exposure to biomedical waste and increase compliance with County biomedical waste regulations.

The study recommended that Health Department should produce brochures and other educational materials containing information such as a description and recognition of biomedical waste, hazards, safety guidelines, proper handling and storage, emergency information resources. These materials should be made available to the general public and to generators, transporters, and operators of storage and treatment site facilities for biomedical waste.

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