



Clinical Waste & Offensive Waste Disposal Procedures



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Introduction

This clinical and offensive waste procedure document covers the ownership, segregation, treatment, handling, transport and disposal of clinical and offensive wastes so as to minimise the risk to health and safety of the population of UCL whilst implementing industry best practice in wastes management.

Underpinning this document are UCL's commitments to three core values: the prevention of pollution, compliance with legislative requirements and continual improvement.

The list of parties involved in Clinical and Offensive waste disposal referred to in this document:

All waste producers have a legal responsibility to ensure that waste is produced, stored, transported and disposed of without harming the environment. This is your "duty of care".

UCL Facilities and Workplace Services, a department within UCL Estates Division, supplies a wide range of business support services such as cleaning, **domestic and special waste management**, security, mail services and telephony services.

Waste managers working from within UCL Facilities and Workplace Services have the responsibility to advise waste producers and manage waste contractors and suppliers in delivering required service standards.

Contractors and suppliers are employed to deliver safe and compliant; collection, transport and disposal of wastes produced by UCL as requested by Facilities and Workplace Services waste managers.

Clinical Wastes

Classification of clinical wastes

UCL has adopted the nationally recognised colour coding system for healthcare/clinical wastes as outlined in current legislative guidance.

The colour coding is explained in the following sections.

In the event that wastes do not clearly fit within anyone of the classification categories in this section, assistance concerning suitable packaging and disposal route **must** be sought from UCL Facilities and Workplace Services.

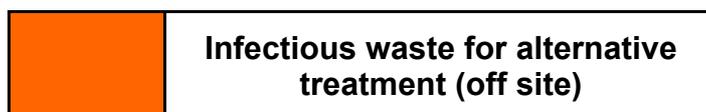
Hazardous clinical wastes



These are limited to the following:

- Solid and liquid infectious wastes which do not require inactivation, prior to disposal, in accordance with UCL's inactivation policy (see below).
- Anatomical wastes.
- Infectious wastes contaminated with hazardous chemicals. The definition of hazardous chemicals and hazard groups is found at the end of this document.
- Glass contaminated with hazardous chemicals.

All wastes listed above are to be packed in UN approved yellow receptacles and placed into yellow wheelie bins for high temperature incineration.



Waste destined for off site treatment is not currently being produced at UCL. In the event this disposal route is required in the future this document will be amended accordingly.



Cytotoxic and Cytostatic chemicals are chemicals that possess any one or more of the hazardous properties:

- H6: Toxic;
- H7: Carcinogenic;
- H10: Toxic for reproduction;
- H11: Mutagenic.

This may include drugs from a number of medicinal classes for example antineoplastic agents, antivirals, immunosuppressants and hormonal drugs.

To establish whether a chemical product has the above-mentioned hazardous characteristics, material safety data sheets (SDS) should be referred to.

Cytostatic and cytotoxic chemicals must be disposed of in yellow receptacles with purple lids and placed into yellow wheelie bins for high temperature incineration.

White	Amalgam waste for recovery
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Amalgam waste is required to be kept separate from other waste and is destined for off site recovery at an appropriate waste management facility.

In the event that amalgam waste is will be produced at UCL, UCL Facilities and Workplace Services **must** be informed prior to production to arrange for compliant recovery.

Offensive

	<i>Offensive/Hygiene waste</i>
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These are limited to the following:

- Wastes that have been autoclaved on site in accordance with UCL's inactivation policy.
- Biological Services Waste deemed to be non-hazardous.

Offensive/hygiene wastes are required to be placed into "tiger stripe" receptacles and then into yellow wheelie with black lids for incineration with energy recovery.

UCL's inactivation policy (On site treatment of biologically active wastes)

All biologically active waste must be inactivated using an appropriate and validated technique prior to release to the waste stream. Waste from containment level 2 laboratories or higher must be autoclaved before it enters the waste stream - unless the risk assessment demonstrated that the waste would be completely inactivated by chemical disinfection alone. Check your laboratory's local rules for further clarification⁷.

It is a condition of UCL's GM project notifications that viable GMOs and GMMs are inactivated prior to release to the waste stream; you **must** comply with this condition.

Any inactivation technique must be validated for the particular waste to be inactivated and records of the validation process and results must be kept. A record, demonstrating compliance with the validation requirements, must be kept for any autoclave run.

After inactivation of wastes via a validated autoclave run these wastes can now be reclassified as non-hazardous offensive and hygiene wastes.

Packaging and handling of clinical wastes for disposal

UN approved waste packaging and its correct use

In order for UCL's hazardous clinical wastes to be transported legally on the road they have to be packaged in UN approved containers and internal receptacles. The containers are the wheelie bins located around the sites and the internal receptacle is for example the clinical waste bags and sharps bins placed inside.

UN approved containers and receptacles have been rigorously tested for purpose by the VCA and given a certificate for approved dangerous goods packaging.

You will know if your waste receptacle is UN approved because it will have the following symbol and a unique UN number located on it. An example is shown below.



UN symbol



UN Number

UN approved waste receptacles are only approved for transport if they are used and sealed correctly.

Some UN approved receptacles have closure instructions on their outer. It is advised that if someone is unsure about how to correctly seal their waste receptacle then guidance should be sought from Facilities and Workplace Services.

Type of receptacle	Fill level	Closure instructions	Handling instructions	Disposal instructions
Yellow clinical waste bags 	3/4 full (max weight 10 Kg)	Hand knotted or cable tie		
Sharps bins 	Fill to fill level as stated on the bin. Please note that a specific maximum weight applies to the various sizes of bin.	Lid must be clicked firmly onto the body of the bin. When full the aperture must be securely locked.	Carry by the neck only. See UCL Safety services manual handling guidance and training ⁸ .	All waste must be traceable to the waste production area. Leave in the agreed collection point or place the bags directly into the yellow wheelie bin. Ensure the bin is locked after use.
Bio bins 	Fill to fill level as stated on the bin. Please note that a specific maximum weight applies to the various sizes of bin.	Temporary and final closure instructions can be found on the bin.		
WIVA/ Burn/ Medi bins 	Maximum weight limits apply. 30L (Left) = 8KG 60L (Right) = 10Kg's	Lid must be clicked firmly onto the body of the bin.		
Glass bins 	Fill to fill level as stated on the bin. Please note that a specific maximum weight applies to the various sizes of bin.	Temporary and final closure instructions can be found on the bin.		

Packaging and handling of Offensive wastes

Type of receptacle	Fill level	Closure instructions	Handling instructions	Disposal instructions
Offensive waste bags 	3/4 full (max weight 10 Kg)	Hand knotted or cable tie	Carry by the neck only. See UCL Safety services manual handling guidance and training ⁸ .	Leave in the agreed collection point or place the bags directly into the Yellow and Black wheelie bin. Ensure the bin is locked after use.

Purchasing clinical waste packaging receptacles

It is advised that all clinical waste receptacles be purchased using UCL's approved clinical waste packaging catalogues via the UCL Market place.

Fisher Scientific and SLS both supply waste packaging that have been approved by Facilities Services for use in the disposal of clinical wastes at UCL, and therefore meet or go beyond the legislative requirements for their intended use. UCL Marketplace can accessed by via FIS.

Internal collection and storage of laboratory wastes

The role of the O&G cleaning¹ staff

All laboratory waste receptacles and non-hazardous wastes produced in laboratories will be appropriately sealed, traceable and placed in the designated waste collection point by the waste producer.

This collection point is to be agreed prior to the production of the waste by the nominated laboratory supervisor/manager and the UCL Waste Manager. From this location, a trained member of the O&G cleaning staff will pick up the wastes and place it into the correct wheelie bin outside for external collection.

This excludes the collection of clean glassware for recycling. O&G cleaning staff do not collect or remove glass for recycling. This responsibility falls to the waste producer.

If your internal waste collection is not currently covered by the O&G Service Team, then the responsibility of placing the waste package into the correct wheelie bin falls to the waste producer.

Yellow and yellow and black wheelie bins must be locked at all times. Departments who dispose of bags of waste directly into external bins are provided with keys on request.

Entering waste production areas

If the designated waste collection point is within a laboratory or restricted area, O&G cleaning staff may only enter laboratories when an approved UCL “safe to clean” sign is displayed on the door. (Shown below) The sign must be filled in with the correct room number, name, signed and dated.



This Laboratory, Room no. _____
has been checked and is
SAFE TO CLEAN
with respect to matters under the control of
this Department

Name : _____
Signature : _____
Date : _____

O&G cleaning staff will not remove clinical waste bags from within a laboratory unless this has been arranged with Facilities and Workplace Services. Usually bags will be collected from a designated area **outside** of the lab.

Disposal of laboratory wastes non-compliance procedure

Yellow Clinical / Offensive waste bags that have been placed in the designated location for collection by UCL’s domestic staff that are deemed to fall out of the requirements stated in this document concerning the safe packaging and disposal of laboratory wastes, will not be picked up for disposal.

The domestic staff building supervisor will place a sticker on the offending waste receptacle stating the reason it is non-compliant and therefore has not been picked up for disposal. Example of waste Sticker below:

URGENT ATTENTION REQUIRED

This waste has not been collected because (please tick):

Leaking bag

Punctured/pierced bag

Open or incorrectly sealed bag

If you require assistance regarding disposal of clinical wastes please contact
Estates and Facilities. T: 020 7679 7001

 **UCL**
Estates and Facilities Services

 **MITIE**

Under duty of care the responsibility to repackage the waste so it is compliant for collection falls with the waste producer. If the waste producer has further issue with this non-compliant receptacle contact details of UCL Estates are found at the bottom of the label.

All non-compliances regarding the internal collection of clinical wastes from waste producers by domestic staff are logged by the building supervisor and a weekly log is passed to the waste management team for review.

Storage of laboratory wastes

Internal storage

Clinical and offensive wastes

Clinical waste receptacles should be stored securely so as to prevent the escape of waste, harm to the environment, and harm to human health. This applies to the storage at the point of production.

Storage areas should be secure and away from public areas. They should also be of sufficient size to allow wastes to be segregated by type.

Anatomical waste must be stored in a freezer and collected from the freezer by the waste contractor on the morning of the waste collection.

External storage

Wheelie bins types and intended use

Wheelie bins are provided by the waste contractors.

It is a legal requirement that all wheelie bins used for the storage of hazardous wastes be locked at all times when not in direct use. Keys for the bins can be provided by UCL Facilities and Workplace Services.

**Yellow wheelie bins:
clinical waste for incineration**

Only UN approved clinical waste receptacles are permitted to be disposed of in the yellow wheelie bins for high temperature incineration at a permitted licensed facility.

Examples of these items are limited to the following

- Yellow clinical waste bags
- Yellow WIVA bins (aka -medi or burn bins)
- Yellow sharps bins
- Yellow and purple sharps bins
- Yellow Bio-bins
- Yellow and purple Bio-bins
- Yellow 4GSafe bins
- Cardboard laboratory glass bins
- Other UN approved clinical waste receptacles destined for high temperature incineration.



**Yellow with Black stripes:
Offensive/Hygiene waste for
Incineration with energy recovery**

Only yellow bags with a black stripe are to be disposed of into these wheelie bins. No other waste receptacle is permitted.



Clinical waste is classified as hazardous and offensive waste as non-hazardous. Therefore the two types should always be segregated into the correct bins. It is a breach of the waste regulations to mix non-hazardous and hazardous wastes together.

Final collection and disposal of laboratory wastes from UCL

Clinical and offensive wastes

Clinical waste is collected, transported and disposed of by the nominated waste contractor. The contractor will fulfil the demands of the collection in accordance with local site and legislative requirements.

Each waste collection is accompanied by the relevant paperwork. Either waste transfer notes or wastes consignment notes, or both, where appropriate. These are signed by the nominated consignor and the documents are kept for a minimum of two years. Current documents are held in the UCL Estates Offices at Bidborough House, Bidborough Street and older documents are held at the UCL Archive store.

UCL Facilities Services also maintains daily collection records provided by the contractor. These detail the amount and location of clinical and offensive wastes collected and any details regarding non-compliant disposal of wastes to these wheelie bins. This information is collated and reported on in monthly meetings.

The wastes are stored externally in 770L wheelie bins for collection and transport, with the exception of anatomical wastes and some BSU waste which are collected directly from freezers and placed into wheelie bins.

The contractor operates a "milk round" collection, visiting each waste collection point according to the schedule devised by the nominated UCL Facilities Services waste manager.

This collection is made during unsociable hours before 09.00 hours to reduce vehicle movements on site.

Missed collections from specific locations.

In the event that your waste bins have not been collected please contact the Customer Services Centre. At this point the waste team will contact the waste contractor to determine the cause of the missed service and ensure rectifying measures are taken to get the waste bins emptied at the earliest opportunity.

Ongoing monitoring:

Continual compliance monitoring of the site is in operation. The nominated waste contractor also records any issues the driver experiences on daily collection log sheets.

Domestic staff have a non-compliance log specifically regarding waste bags left for collection which are unsuitable.

All this information is collated and feed into monthly reports and inform service level agreements.

Auditing

Auditing of clinical waste is a legal requirement annually. Pre-acceptance of waste audits are required to be conducted with waste producers and a summary report submitted to the waste contractor.

Clinical waste bag compliance audits are conducted to monitor the composition of the waste being disposed of. This is an ongoing recording system.

Training

O&G cleaning staff are fully trained to perform all their waste related duties.

Training resources are available, to all staff and students, from UCL Facilities and Workplace Services regarding all waste streams and their management. This information can then be translated into introductory information and training for new starters.

Information regarding all waste disposal procedures and contacts can be found on UCL's waste website. This website is kept up to date as new information, procedures and resources are available. <http://www.ucl.ac.uk/estates/waste/>

Waste Reporting

The types of waste disposed of, quantity of each waste stream and the method by which it is disposed is reported on a monthly basis.

¹ O&G are the provider for UCL's Soft Services contract which includes the provision of cleaning and non-hazardous waste disposal services.