WISCONSIN DEPARTMENT OF NATURAL RESOURCES
NOTICE OF FINAL GUIDANCE & CERTIFICATION

Pursuant to ch. 227, Wis. Stats., the Wisconsin Department of Natural Resources has finalized and hereby certifies the following guidance document.

DOCUMENT ID

WA-19-1259-C

DOCUMENT TITLE

Table of Common Wastes in Health Care

PROGRAM/BUREAU

Waste and Materials Management

STATUTORY AUTHORITY OR LEGAL CITATION

Ch. 291, Wis. Stats.

DATE SENT TO LEGISLATIVE REFERENCE BUREAU (FOR PUBLIC COMMENTS)

October 14, 2019

DATE FINALIZED

November 6, 2019

DNR CERTIFICATION

I have reviewed this guidance document or proposed guidance document and I certify that it complies with sections 227.10 and 227.11 of the Wisconsin Statutes. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is not explicitly required or explicitly permitted by a statute or a rule that has been lawfully promulgated. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is more restrictive than a standard, requirement, or threshold contained in the Wisconsin Statutes.

November 6, 2019

Signature | Date

Table of Common Wastes in Healthcare

Use this table to help identify the waste type and management method for wastes commonly generated in the healthcare industry. Your facility is responsible for identifying all of the wastes it generates, evaluating them to determine waste types, and correctly managing and disposing of them. For more information, see dnr.wi.gov search "healthcare waste."

The wastes are listed alphabetically. Wastes common to housekeeping and maintenance departments are listed separately at the end of the table. Your facility will have other wastes that are not listed in this table.

Key for waste types and disposal methods:
HW = Hazardous Waste; **IW** = Infectious Waste; **RE** = Recycle; **RW** = Radioactive Waste; **SE** = Sanitary Sewer; **SW** = Solid Waste; **TCW** = Trace Chemotherapy Waste; **UO** = Used Oil; **UW** = Universal Waste

Waste	Waste Type	Potential HW Code	Management Method	Comments
Acids (acetic, hydrochloric, nitric, oxalic, phosphoric, sulfuric, trichloroacetic)	HW, SW	D002	HW, SE	Evaluate to determine if HW. Corrosive HW if pH ≤2. May be able to neutralize and sewer with approval from sewer authority if no other contaminants.
Acid, chromic	HW	D002, D007	HW	Evaluate for HW corrosivity and toxicity (chromium).
Acid, formic	HW, SW	D002, D001	HW, SW	Evaluate for HW corrosivity and ignitibility characteristics.
Acid, picric	HW	D002, D003	HW	Evaluate for HW reactivity and corrosivity. Do not store beyond expiration date. Call bomb squad if crystallized-explosive.
Aerosol containers and inhalers, empty	SW	N/A	RE, SW	Recycle containers when possible. Must be totally empty of contents and propellant.
Aerosol containers and inhalers, not empty	HW, SW	D, F, U, P Codes	HW, SW	Evaluate to determine if contents or propellants are HW.
Alcohol (ethyl, isopropyl, methyl)	HW	D001, F003	HW, SE, RE	Liquid with >24% alcohol may be ignitable HW. Some are F-listed. Reclaim by distillation. May sewer small amounts with approval from sewer authority.
Amyl Nitrate	HW	D001	HW	Evaluate for HW ignitibility characteristic (oxidizer).
Anesthetic gases, unused	HW, SW	U or P listings	HW, SW	Evaluate for HW listings.
Antibacterial soaps	SW	N/A	SW	Sewering excess amounts is not recommended. Antibacterial agents can contaminate drinking water sources.
Arsenic containing compounds (arsenic trioxide)	HW	D004, P012	HW	Characteristic HW for arsenic toxicity or P-listed HW if unused and sole active ingredient.

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Waste	Waste Type	Potential HW Code	Management Method	Comments
Barbiturates	SW	N/A	SW	Follow U.S. DEA approved procedures for disposal of controlled substances. Recommend destruction at an approved incinerator.
Barium sulfate oral contrast	HW, SW	D005	HW, SW, SE	Evaluate to determine if HW for barium toxicity. May sewer small amounts with approval from sewer authority.
Batteries	UW, SW, HW	D Codes	RE, UW, SW, HW	Collect as UW and recycle or manage nonalkaline batteries as HW. Recycle alkaline batteries or dispose of as SW.
Benzidine, unused	HW	U021	HW	
Blood and body fluids, items saturated or dripping with blood/body fluids, suction canisters	IW	N/A	IW, SE	Treat solids as infectious waste. Liquids may be sewered with approval from sewer authority.
Chemotherapy (antineoplastic) waste: unused drugs and materials (gloves, gowns, etc.) contaminated with chemo drugs as a result of a spill	HW, SW	D, U or P Codes	HW, SW	Evaluate to determine if a characteristic HW or a P- or U-listed HW. Do not sewer; incineration at an approved facility is recommended for all chemotherapy waste.
Chemotherapy (antineoplastic) contaminated waste from administering chemo drugs, including needles, empty syringes, empty vials, empty IV bags, gowns, wipes, gloves, etc.	TCW	N/A	TCW	Incinerate at an approved facility as TCW.
Chemotherapy (antineoplastic) drugs and blood soaked gauze from blown needle	IW or HW + IW	D, U or P Codes	IW or HW + IW	Evaluate to determine if a characteristic HW or a P- or U-listed HW and send to HW facility that can also handle IW. If nonhazardous, handle as IW. Incineration at an approved facility is recommended for all chemotherapy waste.
Chemotherapy waste: Hood filters from chemotherapy drug prep areas	TCW, HW	D004	TCW, HW	Evaluate to determine if a characteristic HW (arsenic trioxide). If nonhazardous, manage as TCW.
Chloral hydrate, unused	HW	U034	HW	Do not sewer. May cause genotoxicity. Follow U.S. DEA approved procedures for disposal of controlled substances.
Chlorambucil, unused	HW	U035	HW	
Cleaners	HW, SW	D001, D002, D007	HW, SW, SE	Evaluate to determine if HW for ignitibility, corrosivity and chromium toxicity.
Clini-test Tablets	HW, SW	D003	HW, SW	Evaluate for HW reactivity characteristic.
Colloidion	HW	D001	HW	Evaluate for HW ignitibility characteristic.
Cyclophosphamide, unused	HW	U058	HW	
Daunomycin, unused	HW	U059	HW	

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Waste	Waste Type	Potential HW Code	Management Method	Comments
Dental amalgam and vacuum line waste	HW	D009	HW, RE	Collect and recycle. Contains mercury.
Dental trap filters	HW	D009	HW, RE	Collect and recycle. Contains mercury amalgam.
Dental bite wings	HW	D008	HW, RE	Contains lead. Collect and recycle.
Developer, used and unused	HW	D002	HW, SE	Corrosive HW if pH ≥ 12.5. Used developer solutions may be neutralized and sewered without permission. If unused, use it up or find someone who can.
Dichlorodifluoromethane, unused	HW	U075	HW	
Diethylstilbestrol, unused	HW	U089	HW	
Disinfectants, concentrated (Quat based)	SW	N/A	SW	Do not sewer. May contain carcinogens; toxic to aquatic life. May require solidification before landfilling.
Disinfectants, diluted to <10% (Quat based)	SW	N/A	SE	If used at manufacture's recommended dilution rate, may sewer with approval from sewer authority.
Disinfectants and sterilants	HW, SW	D codes	HW, SW	Evaluate to determine waste type and disposal method. Sewering of excess is not recommended.
Electronics and computers	UW, HW	D Codes	RE, SW, HW	Recycle as UW or evaluate and manage as HW or SW. See https://dnr.wi.gov/topic/Ecycle/.
Epinephrine, empty or partially used containers (vial, ampoule, IV bag) or delivery devices (syringe, pen, inhaler)	IW, SW	N/A	IW, SW	Evaluate to determine if IW. Incineration at an approved facility is recommended disposal method.
Epinephrine, unused	HW, SW	P042	HW, SW	Evaluate to determine if epinephrine base or salt. Epinephrine salts are not P-listed HW. See "Management of Waste Epinephrine Salts" at https://dnr.wi.gov/files/pdf/pubs/wa/wa1208.pdf. Incineration is recommended method of SW or HW disposal.
Equipment cleaner, chromium based	HW	D007, D002	HW	Contains chromium. May be corrosive HW. Look for non-hazardous substitutes.
Equipment cleaner, non-chromium based	HW, SW	D002	HW, SW	Evaluate for corrosivity characteristic. Neutralize, if necessary, and sewer with permission. Look for non-hazardous substitutes.
Erythromycin Topical Solution	HW	D001	HW	May be ignitable HW due to alcohol.
Ethidium dibromide	SW	N/A	SW	Mutagen. Investigate methods to neutralize before disposal or sewering. Substitute or eliminate.

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Waste	Waste Type	Potential HW Code	Management Method	Comments
Ethyl ether	HW	D001, D003, U117	HW	U117 listed HW if unused. Evaluate for reactivity and ignitibility HW characteristics. Call bomb squad if crystals are present-explosive.
Ethylene oxide	HW	U115, D001	HW	
Fixer, spent	HW	D011	HW, RE, SE	Recover silver on-site or send off-site as HW for silver recovery. Discharge wastewater after on-site treatment with approval of sewer authority.
Formalin	HW, SW	D001, U122	HW, RE, SE	Contains formaldehyde. Unused formalin may be U122 HW. Formalin containing methanol may be D001 ignitable HW. Carcinogen. Sewering is discouraged in favor of substitution or recycling. If sewered, must have sewer authority approval.
Germicidal soaps and detergents, unused	SW	N/A	SW	Do not sewer excess. Germicidal agents may enter surface or groundwater.
Glutaraldehyde, concentrated (Cidex)	SW	N/A	SE	Aquatic toxicant. Recommend neutralizing with glycine before sewering. Sewer with prior approval from sewer authority.
Hand cleaners, antibacterial	SW	N/A	SW	Do not sewer excess amounts. Antibacterial agents may enter surface or groundwater.
Hand cleaners, alcohol based	HW, SW	D001	HW, SW	Evaluate to determine if ignitable HW due to alcohol.
Hemoccult developer	HW	D001	HW	Contains alcohol and hydrogen peroxide Evaluate for HW characteristic of ignitibility (oxidizer).
Hexachlorophene, unused	HW	U132	HW	Found in commercial cleaning solutions. Evaluate to determine if sole active ingredient.
Hydrogen peroxide (includes cold sterilants)	HW, SW	D001	HW, SE	Evaluate for HW ignitability characteristic (oxidizer). Dilute solutions may be flushed with water and discharged to sewer with approval from sewer authority.
Icotest™ tablets	HW, SW	D003	HW, SW	Evaluate for HW characteristic of reactivity.
Indicator tape and cards	HW, SW	D008	HW, SW	Evaluate for HW characteristic of lead toxicity. Send off-site for lead reclamation.
Iodine tincture	HW, SW	D001	HW, SE	May contain alcohol. Evaluate to determine if ignitable HW. Small amounts may be sewered with approval from sewer authority.

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Waste	Waste Type	Potential HW Code	Management Method	Comments
IV bag of epinephrine in saline (leftover fluid or empty bag)	SW	N/A	SW	P-listing does not include epinephrine salts. See "Management of Waste Epinephrine Salts" at https://dnr.wi.gov/files/pdf/pubs/wa/wa1208.pdf.
Laboratory waste, general (analyzer waste, prep area waste, spills, etc)	HW, SW	D, U, P codes	HW, SW	Evaluate each waste to determine if a characteristic or listed HW.
Lead aprons, lead foil	HW	D008	HW, RE	Collect and recycle by sending to HW facility that recovers lead.
Lindane	HW	D013	HW	
Lubricating oil	UO	N/A	UO, RE	Recycle as used oil. Do not mix with listed or characteristic HW.
Melphalan, unused	HW	U150	HW	
Mercury-containing equipment (thermometers, sphygmanometers, switches, barometers, esophageal dilators, etc)	UW, HW	D009	RE, HW	Recycle to reclaim mercury. See "How to Handle Universal Waste: Mercury Containing Equipment" at https://dnr.wi.gov/files/PDF/pubs/wa/WA1811.pdf
Methyl acrylate	HW	D001	HW	Ignitable HW.
Mitomycin C, unused	HW	U010	HW	
Nicotine, unused	HW	P075	HW	Nicotine patches, gum, etc. Packaging and wrappers may be P075 waste.
Nitroglycerin	HW, SW	D003	HW, SW	Evaluate to determine if a reactive HW - P081 HW if unused; D003 HW if used. In most applications, medical-grade nitroglycerin is not a reactive HW.
Orthopthalaldehyde (OPA)	SW	N/A	SW, SE	Aquatic toxicant. Neutralize with glycine before sewering; obtain prior approval from sewer authority.
Paraldehyde, unused	HW	U182	HW	Follow U.S. DEA-approved procedures for disposal of controlled substances.
Pharmaceuticals, outdated or unused that can be used as product	N/A	N/A	N/A	Return as product to vendor or manufacturer for re-use or credit by reverse distribution program. See https://dnr.wi.gov/topic/waste/hazardousfaq.html#no13.
Pharmaceuticals, outdated, used or unused that cannot be used as product	HW, SW	D, P, U Codes	HW, SW	Evaluate each pharmaceutical to determine if HW or SW. Recommend incinerating all pharmaceuticals.
Phenol, unused	HW	U188	HW	
Physostigmine	HW, SW	P204	HW, SW	P-listed HW if unused. If used, evaluate for HW characteristics.
Poisonous compounds	HW, SW	D, U or P codes	HW, SW	Evaluate for U- or P-listing if unused; evaluate for HW characteristics, such as toxicity.

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Waste	Waste Type	Potential HW Code	Management Method	Comments
Radioactive injectables	RW	N/A	RW	The Nuclear Regulatory Commission sets rules for radioactive waste management. See https://www.nrc.gov or https://www.dhs.wisconsin.gov/radiation/radioactivematerials/index.htm.
Reagents containing mercury (mercuric nitrate, mercuric oxide, mercuric chloride, thimerosal as preservative)	HW	D009	HW	Evaluate to determine if characteristic HW for mercury toxicity.
Reagents containing metals (arsenic, barium sulfate, chromium trioxide, lead compounds, selenium, silver nitrate.)	HW	P, U or D Codes	HW	May be U- or P-listed HW if unused or characteristic HW for metal toxicity: arsenic (D004), barium (D005), chromium (D007), lead (D008), mercury (D009), silver (D010) or selenium (D011).
Renalin (hydrogen peroxide based cold sterilants)	HW	D001	HW, SE	Evaluate to determine if HW for ignitability characteristic (oxidizer). Sewer with approval from sewer authority.
Reserpine, unused	HW	U200	HW	
Resorcinol, unused	HW	U201	HW	
Saccharin	HW, SW	U202	HW, SW	U-listed HW if unused. If dissolved in solvent, evaluate for HW ignitibility characteristic.
Selenium sulfide	HW, SW	U205, D010	HW, SW	U-listed HW if unused. If used, evaluate for HW characteristic of toxicity for selenium.
Septisol foam, unused	HW	U132	HW	U-listed HW if sole active ingredient is hexachlorophene.
Sharps and needles	IW	N/A	IW	Place in sharps container and manage as IW.
Silver Nitrate	HW	D001, D011	HW, RE	HW characteristics of ignitability (oxidizer) and silver toxicity. Send off-site of silver recovery.
Skin disinfectants, unused or concentrate (iodophor, phenol, others)	HW, SW	D, P- or U-codes	HW, SW	Evaluate to determine if HW. Do not sewer excess.
Solvents (acetone, xylene, alcohols, "Americlear," benzene, cyclohexane, ethyl acetate, toluene, carbon tetrachloride, methylene chloride)	HW	U, P, F Codes D001	HW, RE	If unused, evaluate for P- or U-listed HW. If used, evaluate for ignitibility characteristic or F-listed HW. Solvents may be reclaimed on-site or off-site.
Spot remover (carbon tetrachloride, alcohols, benzene, chloroform)	HW, SW	F002, F005 U211, U019, U044, D001, D022	HW, SW	Evaluate to determine ingredients. May be a listed or characteristic HW. If unused, may be U-listed HW.

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Waste	Waste Type	Potential HW Code	Management Method	Comments
Stains and fixatives (containing heavy metals, benzidine, iodine, uranyl nitrate)	HW, SW	D Codes	HW, SE	Evaluate for HW characteristics of ignitability, including oxidizing properties, and toxicity (metal content). Capture all recoverable amounts. Sewer rinses with sewer authority approval.
Sterilants	HW, SW	D Codes	HW, SW	Evaluate to determine if HW. Do not sewer excess.
Streptozotocin, unused	HW	U206	HW	
Surgical scrub, unused	SW	N/A	SW	Do not sewer excess.
Surgistain	HW	D001, D002	HW	Contains isopropyl alcohol and phosphoric acid. Evaluate for HW characteristics of ignitibility and corrosivity.
Toner	HW, SW	D010	HW, SW	Evaluate to determine if a characteristic HW for selenium toxicity.
Trace chemotherapy waste – see chemotherapy	TCW	N/A	TCW	
Trichloromonofluoromethane, unused	HW	U121	HW	
Uranyl nitrate	HW, RW	D002	HW, RW	Radioactive waste and corrosive HW. Manage and dispose of as "mixed" waste.
Uracil mustard, unused	HW	U237	HW	
Vaccine (excess in syringe or liquid in vial)	HW, IW	D009	HW, IW	Evaluate to determine if vaccine contains mercury preservative. May also be IW. See "Managing Excess Vaccines" at https://dnr.wi.gov/files/pdf/pubs/wa/wa841.pdf.
Warfarin and salts (sodium and potassium), >0.3%, unused	HW	P001	HW	If used, evaluate for HW characteristics.
Warfarin and salts (sodium and potassium), <0.3%, unused	HW	U248	HW	If used, evaluate for HW characteristics.
Wound prep applicators	HW, SW	D001	HW, SW	If empty, SW. Contains alcohol. Evaluate liquid left in applicator to determine if ignitable HW.
Wound prep gauze pads, pre-moistened, individually foil packaged	HW, SW	D001	HW, SW	May contain an ignitable alcohol-based disinfection agent. If free liquids are present, evaluate for HW characteristic of ignitibility.
X-ray film and negatives	HW, SW	D011	HW, SW, RE	Evaluate to determine if HW for silver toxicity characteristic. Send off-site for silver reclamation.
Additional Wastes Common to Housekeeping and Maintenance Departments				
Boiler chemicals	HW, SW	D002, D007	HW, SE	Evaluate for HW characteristics of corrosivity and metals toxicity. Sewer with approval from sewer authority.

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Brake cleaner	HW	D, F-codes	HW	Evaluate to determine if chlorinated or non-chlorinated solvents. If unused, evaluate for HW characteristics of ignitibility and toxicity. If used, evaluate to determine if F-listed HW.
Degreasers	HW	D001, D002, F-listed	HW	Evaluate to determine if an ignitable, corrosive or F-listed HW.
Disinfectants, concentrated	HW, SW	D001	HW, SW	May be ignitable HW due to alcohol base or oxidizers. Evaluate and manage as HW or SW. Do not sewer excess.
Electronics and computers	UW, HW, SW	D Codes	RE, UW, HW, SW	Recycle as UW or evaluate and manage as HW or SW. For more information, see https://dnr.wi.gov/topic/Ecycle/.
Ethylene oxide	HW	U115, D001	HW	U-listed HW if unused and sole active ingredient.
Gasoline	HW	D001, D018	HW	
Lamps, spent fluorescent and others	UW, HW	D009	UW, RE, HW	Recycle as UW or HW.
Mercury-containing equipment (thermostats, switches)	UW, HW	D009	RE, UW, HW	Recycle as UW or HW. See "How to Handle Universal Waste: Mercury Containing Equipment" at https://dnr.wi.gov/files/PDF/pubs/wa/WA1811.pdf
Paint, latex	SW	N/A	SW	Allow to harden and throw in the trash.
Paint, solvent based	HW	D001	HW	May be ignitable HW. Do not evaporate solvents.
Paint, specialty	HW, SW	D-codes	HW, SW	Evaluate to determine if characteristic HW. May be ignitable (D001) and/or contain metals – lead (D008), cadmium (D006), selenium (D011), barium (D005).
Peracetic acid (Steris), concentrate	HW	D001, D002	HW	May be ignitable HW (oxidizer) or corrosive HW.
Pesticides	HW, SW	D, P or U codes	HW, SW	Evaluate to determine if HW for toxicity (see TCLP contaminants) or P- or U-listings. Dispose empty containers according to label directions.
Refrigerants (freon, etc)	HW	F002, D002	RE, HW	All refrigerants, including chlorofluorocarbons (CFCs), must be captured and recycled.
Solvents (acetone, toluene, xylene, carbon tetrachloride, chloroform, alcohols, methyl ethyl ketone (MEK), lacquer thinner, methylene chloride)	HW	D001, D035, F-codes	HW, RE	Evaluate for HW ignitability and toxicity characteristics and F-listings. If unused, evaluate for P- or U-listings. Solvents may be reclaimed on-site or off-site.
Solvents, mineral spirits	HW, SW	D001	HW, SW, RE	Evaluate for HW ignitibility. Recycle ignitable and "hi flash" solvents.

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Waste	Waste Type	Potential HW Code	Management Method	Comments
Towels, wipes, sorbents contaminated with oils, solvents or paint	HW, SW	D, F, U, P codes	HW, SW	Send to towel laundering facility. Otherwise evaluate to determine if HW or SW. See "Handling Solvent-laden Cleaning Towels, Wipes and Rags" at https://dnr.wi.gov/files/pdf/pubs/wa/wa1207.pdf.
Used oil	UO	N/A	UO	Collect and recycle as used oil. Do not mix with HW.

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