

2. Definition of Regulated Medical Waste Applicable to Intravenous Bags Generated by Veterinarians

A veterinarian sometimes administers sterile saline or dextrose solutions to animals when he treats these animals for various illnesses (e.g., dehydration). These sterile solutions are contained in intravenous bags which are physically and functionally identical to IV bags that are administered to human patients. After the veterinarian's IV bags are empty, can the veterinarian cut the IV bags so that they are no longer recognizable and handle them as nonregulated medical waste?

The listing description in 40 CFR 259.30(a)(3) identifies intravenous bags as regulated medical waste provided these bags are generated during the diagnosis, treatment, or immunization of human beings or animals. Intravenous bags generated in the veterinarian's office during the treatment of animals is therefore "regulated medical waste." (Note that IV bags were designated as regulated medical waste under Section 11002(a)(11) and are thus not limited to IVs used in the treatment of humans. See 54 Federal Register 12341 (March 24, 1989))

Pursuant to 40 CFR 259.30(b)(iv), residues from the treatment and destruction of regulated medical waste are excluded from the definition of regulated medical waste once the waste has been both treated and destroyed. Despite the fact that the veterinarian cuts the IV bags into strips so the IV bags are no longer recognizable medical waste, this process would not meet the definition of "treated regulated medical waste," as found at 40 CFR 259.10. Accordingly, the destroyed IV bags must be handled as regulated medical waste until subsequent treatment or final disposal of the regulated medical waste occurs.

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