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Small Quantity Generator Registration and Waste Management Requirements for California Acupuncturists

A Small Quantity Generator (SQG) is a medical waste generator that generates less than 200 pounds of medical waste per month. Acupuncture needles are considered medical waste, therefore acupuncturists and acupuncture clinics are subject to the requirements of the Medical Waste Management Act (MWMA), California Health and Safety Code (HSC) sections 117600 – 118360.

The California Department of Public Health, Medical Waste Management Program (Department) is the enforcement agency for medical waste generators in the following counties:

<i>Alpine</i>	<i>Glenn</i>	<i>Los Angeles</i>	<i>Placer</i>	<i>Sierra</i>
<i>Amador</i>	<i>Humboldt</i>	<i>Mariposa</i>	<i>Plumas</i>	<i>Solano</i>
<i>Butte</i>	<i>Imperial</i>	<i>Mendocino</i>	<i>San Benito</i>	<i>Sutter</i>
<i>Calaveras</i>	<i>Inyo</i>	<i>Mono</i>	<i>San Luis Obispo</i>	<i>Trinity</i>
<i>Fresno</i>	<i>Lake</i>	<i>Nevada</i>	<i>Santa Barbara</i>	<i>Yolo</i>

In addition, the Department is the enforcement agency for the City of Berkeley. HSC 117924(a) states:

When the Department is the enforcement agency, the Department shall impose and cause the collection of an annual medical waste generator fee in an amount not to exceed twenty-five dollars (\$25) on small quantity generators of medical waste.

The SQG registration form is available on the Department's website at cdph.ca.gov/MedicalWaste

The following counties that are regulated by a Local Enforcement Agency (LEA), rather than by the Department:

<i>Alameda</i>	<i>Lassen</i>	<i>Orange</i>	<i>San Mateo</i>	<i>Tehama</i>
<i>Colusa</i>	<i>Madera</i>	<i>Riverside</i>	<i>Santa Clara</i>	<i>Tulare</i>
<i>Contra Costa</i>	<i>Marin</i>	<i>Sacramento</i>	<i>Santa Cruz</i>	<i>Tuolumne</i>
<i>Del Norte</i>	<i>Merced</i>	<i>San Bernardino</i>	<i>Shasta</i>	<i>Ventura</i>
<i>El Dorado</i>	<i>Modoc</i>	<i>San Diego</i>	<i>Siskiyou</i>	<i>Yuba</i>
<i>Kern</i>	<i>Monterey</i>	<i>San Francisco</i>	<i>Sonoma</i>	
<i>Kings</i>	<i>Napa</i>	<i>San Joaquin</i>	<i>Stanislaus</i>	

The City of Long Beach and the City of Vernon are also regulated by a LEA. Acupuncturists in these cities and counties need to contact their LEA to register, rather than the Department and the fees vary depending on the city or county. A list of LEA contacts is available on the Department's website at cdph.ca.gov/MedicalWaste



Small Quantity Generator Registration for California Acupuncturists

Acupuncturists are defined as health care professionals; HSC Section 117662:

“Health care professional” means any person licensed or certified pursuant to Division 2 (commencing with Section 500) of the Business and Professions Code. (Acupuncturists are listed in Division 2, Chapter 12)

As such, any biohazardous or sharps waste generated in the treatment of patients is considered medical waste; HSC Section 117690(a):

“Medical waste” means any biohazardous, pathology, pharmaceutical, or trace chemotherapy waste... sharps and trace chemotherapy waste generated in a health care setting in the diagnosis, treatment, immunization, or care of humans.

Acupuncture needles fall under the definition of sharps waste; HSC Section 117690(b)(4):

“Sharps waste” means a device that has acute rigid corners, edges, or protuberances capable of cutting or piercing, including, but not limited to, hypodermic needles, hypodermic needles with syringes, blades, needles with attached tubing, acupuncture needles, root canal files, broken glass items used in health care such as Pasteur pipettes and blood vials contaminated with biohazardous waste, and any item capable of cutting or piercing from trauma scene waste.

Sharps waste must be containerized and managed in the following ways; HSC Section 118285:

- *Place all sharps waste into a sharps container;*
- *Tape closed or tightly lid full sharps containers ready for disposal to preclude loss of contents;*
- *Store sharps containers ready for disposal for not more than thirty days; and*
- *Label sharps containers with the words “sharps waste” or with the international biohazard symbol and the word “BIOHAZARD.”*

Since acupuncture waste is medical waste, it cannot be disposed of at a household hazardous waste facility or by placing into the solid waste. Sharps waste must be rendered noninfectious prior to disposal by one of the following methods; HSC Section 118225:

- *Incineration;*
- *Steam sterilization; or*
- *Disinfection using an alternative treatment method approved by the Department.*

Medical waste can only be transported to a transfer station or treatment facility by: HSC Section 118025:

- *The United States Postal Service, or*
- *A medical waste transporter*

This means that acupuncturists can either hire a medical waste transporter for their sharps waste, use a medical waste mail-back system, or treat the needles onsite using a treatment technology approved by the Department. A list of both approved technologies and registered transporters can be found on the Department’s website at cdph.ca.gov/MedicalWaste