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# ENVIRONMENTAL Fact Sheet

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## Management of Veterinarian Wastes

The New Hampshire Department of Environmental Services (NHDES) receives many inquiries concerning the regulatory status of veterinary chemicals/materials that are considered hazardous waste. This fact sheet helps to clarify NHDES' position regarding the management of wastes generated by veterinary facilities.

### 1. What is hazardous waste?

A hazardous waste is any waste that, because of its chemical or physical makeup or because of its potential for mismanagement, may pose a threat to human health or the environment. How do you know if your waste is hazardous or whether it can be managed simply as a solid waste? First, you determine whether the waste is exempt from the rules, which can be done by viewing the specific exemptions found at Env-Hw 401. Secondly, if the waste is not exempt, you should look at the lists of wastes found at Env-Hw 402.04 through 402.07. If you find your waste listed, it is automatically a hazardous waste. If not listed, then you have to determine whether the waste exhibits any of the hazardous waste characteristics described in Env-Hw 403.03 through Env-Hw 403.06 (ignitability, corrosivity, reactivity, or toxicity). Finally, be aware that your waste may be a "hazardous waste mixture" per Env-Hw 404.01. This occurs when a waste or material is mixed with a hazardous waste. Additional information on hazardous waste mixtures or characteristics may be found on NHDES fact sheet WMD-HW-11, which will guide you through the hazardous waste determination process.

### 2. What is a hazardous waste generator?

A "generator" is any person who owns or operates a facility where hazardous waste is generated. Generators in New Hampshire are classified as either small quantity generators (SQGs) or full quantity generators (FQGs).

- a. Small Quantity Generator: A generator who produces less than 100 kilograms (220 pounds) of a hazardous waste per month, or who produces less than 1 kilogram (2.2 pounds) of acutely hazardous waste per month.
- b. Full Quantity Generators: A generator who produces greater than 100 kilograms (220 pounds) of hazardous waste per month or greater than 1 kilogram (2.2 pounds) of acutely hazardous waste per month.

### **3. Are veterinarian chemicals/materials considered hazardous waste?**

Some spent veterinarian chemicals/materials are considered hazardous wastes and some are not. Persons generating such wastes should contact the supplier to obtain safety data sheets (SDS) pertaining to the products they use. The SDS should list any hazardous constituents and hazardous characteristics of the product and should also have a number to call to obtain more information. Although this information is very helpful, the spent chemicals/materials may be different from the unused product, therefore the wastes may require testing to determine if they are hazardous wastes. Analyses should be performed on the spent solution, i.e., the waste.

### **4. How must hazardous waste be managed?**

- a) If a waste is hazardous and must be transported to a treatment, storage, or disposal facility, the generator must first obtain an US Environmental Protection Agency (USEPA) identification number. This number can be obtained by calling NHDES' Reporting Information Management Section at (603) 271-2921. Prior to transport, hazardous wastes may generally be stored on-site without a permit for up to 90 days from the date that waste is first deposited in the container. Specific guidelines must be met during this 90-day storage period.
- b) Generators must use a uniform hazardous waste manifest when shipping hazardous waste.
- c) The hazardous waste must be transported to an authorized facility via a New Hampshire registered Hazardous Waste Transporter.

### **5. Are waste photoprocessing solutions considered hazardous wastes?**

Some spent photoprocessing solutions are considered hazardous wastes and some are not. Persons generating photoprocessing wastes that are hazardous should follow the same procedures as described in question #4. For more information on the proper management of photoprocessing wastes, please refer to NHDES fact sheet WMD-HW-2 Management of Waste Photoprocessing Solutions.

### **6. How should infectious waste be handled?**

All infectious wastes that do not also meet the definition of hazardous wastes must be adequately treated before disposal to meet the standards in Section Env-Sw 904.03(a) of the Solid Waste Rules. Those wastes include needles, syringes, vaccines, and laboratory cultures. For more information on the regulatory requirements for managing infectious wastes, contact NHDES' Solid Waste Compliance Section at (603) 271-2925.

### **7. How should pharmaceutical and chemotherapy wastes be handled?**

Medications, containers, etc. may be hazardous or acutely hazardous wastes depending on constituents. Contents should be checked against the listed wastes found in chapter Env-Hw 400 in the Hazardous Waste Rules. Chemotherapy wastes containing listed hazardous constituents should be managed as a hazardous waste as discussed in question #4.

### **For more information**

For more information, call NHDES at (603) 271-2942 or toll free within New Hampshire at 866-HAZWAST. For a complete description of the requirements, refer to the Hazardous Waste Rules Env-Hw 100-1200, available at [www.des.nh.gov](http://www.des.nh.gov).