

TIP No. 37-011-0122

Trauma Scene Cleanup

BACKGROUND. Following a suicide, violent death, or severe training accident, major blood contamination may occur on many and varied surfaces. The cleanup and decontamination of these surfaces is called trauma scene cleanup. Trauma scene cleanup (also referred to as crime scene cleanup) is the general term applied to the cleaning of blood, human remains, or anything bio hazardous following incidents that result in contamination of the environment from blood, body fluid spills, human tissue, and bone fragments.

A trauma scene is defined as any area outside of a medical, dental, veterinary, or research setting that has been contaminated by human blood or body fluids because of trauma. Examples of these include automobile accidents, falls, worksite injuries/deaths, and deaths in housing or recreation areas. Situations involving methamphetamine/drug lab contamination, biological terrorism, hoarding sites, and animal abuse sites are typically referred to as crime scenes requiring additional response measures beyond cleanup of blood and body fluids. A trauma scene cleanup may involve a single blood loss event following a burglary, homicide, or suicide or a larger blood loss event following a terrorist attack, mass murder, or cleanup of bio-chemicals.

REGULATIONS. The Occupational Safety and Health Administration (OSHA) Bloodborne Pathogen Standard (29 CFR 1910.1030) is the primary regulation in the United States that governs protection of those involved in the cleanup of crime and trauma scenes. This regulation specifies that no employee can be placed in a position to be exposed to blood spills without first—

- Receiving bloodborne pathogen (BBP) training;
- Having a written BBP exposure control plan in place;
- Having been provided appropriate personal protective equipment (PPE);
- Having been offered Hepatitis B vaccine, exposure evaluation, and follow-up; and
- Being provided with a method to remove and properly store the bio-hazardous waste in properly marked containers for disposal at an approved site.

As specified in MEDCOM Regulation 40-35, *Management of Regulated Medical Waste (RMW)* and Defense Health Agency (DHA) Procedural Manual DHA-PM 6050.01, *Medical Logistics (MEDLOG) Regulated Medical Waste (RMW) Management*, medical activities are not authorized to use MEDCOM and DHA funding and resources for site cleanup as it is not RMW generated in the diagnosis or treatment of patients or during research within the footprint of medical/dental activities. The installation is responsible for trauma scene cleanup and protection of all personnel exposed to bodily fluids outside of the Medical Treatment Facility (MTF). MTF personnel and contractors are not responsible for cleanup outside the MTF. Employing, by contract, a private company that is skilled in this type of job should be considered. At a minimum, installation, MTF, and/or contract personnel involved in crime and trauma scene cleanup are required to comply with the OSHA Bloodborne Pathogen Standard (29 CFR 1910.1030) when involved in the cleanup of scenes contaminated with human blood and bodily fluids.

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Some states regulate the business aspects of the crime and trauma scene cleanup industry, which resulted in changes to State environmental regulations that included categorizing crime and trauma scene wastes as infectious under certain conditions. For example, the California Trauma Scene Waste Management Act directly controls all activities of crime scene cleanup companies located within its jurisdiction. In the absence of State regulations, State agencies may provide a list of cleanup companies that are registered with the State, permitted by the State as biomedical waste generators, or otherwise deemed qualified in cleanup procedures. Table 1 provides a link for each State's regulations and references. Personnel must follow State regulations where applicable and take proactive steps to employ private cleanup companies if applicable.

RESPONSIBILITIES. The property owner (installation) is responsible for trauma scene cleanup and protection of all personnel exposed to body fluids while on the installation. MTF personnel are not responsible for physical cleanup outside of the MTF. The primary responsibility of MTF personnel is to ensure that proper procedures are implemented to protect health of exposed personnel. These responsibilities include:

- Providing information/consultation on proper cleanup procedures;
- Recommending appropriate PPE;
- Reviewing waste management procedures;
- Evaluating the scene after cleanup to ensure it is safe for occupancy/reuse:
 - Verifies proper cleaning/disinfection procedures were followed.
 - Verifies that all contaminated items were removed and there are no lingering odors.
 - Verifies that all equipment/materials used for cleanup were removed.
- Assisting installation assets with development of crime scene/trauma scene response standard operating procedure (SOP); and
- Establishing policy or memorandum of understanding with installation personnel to define responsibilities.

If properly trained, MTF personnel may assist in the cleanup. MTF personnel should coordinate with the Infection Control Officer (ICO) and the installation (or site) safety officials for additional input and guidance per the installation (or site) exposure control plan.

CLEANUP PROCEDURES. Two options exist for trauma scene cleanup: (1) the installation may utilize installation assets for cleanup (hazardous material response team, garrison staff, or mission personnel); or (2) the installation may hire a certified company qualified to perform site cleanup. The installation bears responsibility for disposal costs, establishing cleaning contracts, and ensuring compliance with applicable waste regulations. Contract cleaning companies will take their cleanup wastes to a permissible landfill or treatment site as specified in the contract and in accordance with applicable waste regulations. Installation assets will treat and dispose of cleanup wastes according to applicable waste regulations.

Installation and MTF personnel should establish SOPs that address casualty- or trauma-related incidents following a suicide, violent death, or severe training accident in which a major blood contamination may occur. At a minimum, these procedures should include instruction on the following:

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- Avoid assigning personnel to cleanup trauma scenes who had a relationship to the deceased.
- Disinfection and cleanup of contaminated items and surfaces for reuse or disposal is permissible and often includes floors, walls, pavement, furniture, mattresses, upholstery, etc. The following precautions must be applied when disinfecting contaminated items:
 - Disinfectants must be of 10:1 water/bleach solution, or
 - Hospital grade disinfectant.
- Use of appropriate PPE (e.g., gloves, eye protection, water resistant over-clothes).
- Sharps must be placed in a puncture resistant container to protect waste handlers.

WASTE DISPOSAL. Waste disposal following cleanup of a crime and trauma scene is dependent upon who conducts the cleanup. If a private company is contracted, the company is required to remove wastes to a permissible treatment/disposal facility and to comply with all HAZMAT transportation requirements. The following apply if installation personnel conduct the cleanup:

- Universal precautions should be exercised when handling contaminated items.
- Cleaned/disinfected items should be handled as solid waste.
- Contaminated items placed in red bags and sharps containers are considered RMW and may require contract removal.

NOTE: MTFs may accept the RMW from a trauma scene to ensure proper disposal, if the disposal cost is reimbursed.

Table 1. State Regulations and References (as of January 2022)

State Regulations and References	
State	Regulation/Reference
Alabama	Alabama Department of Environmental Management (ADEM), Land Division – Solid Waste Program regulates disposal of medical waste. ADEM Admin Code r.335-13-7.01 requires those generating medical waste to provide a one-time Medical Waste Generator Notification to the State.
Alaska	Alaska Department of Environmental Conservation (ADEC) Solid Waste Program has developed numerous disposal guidance documents, including one for Medical Waste Disposal . Other references: <ul style="list-style-type: none"> • Drug Lab Cleanup • Municipality of Anchorage Medical Waste Disposal Policy

State Regulations and References	
State	Regulation/Reference
Arizona	<p>Article 14 of the Arizona Administrative Code, Title 18, Environmental Quality, Solid Waste Management, regulates biohazardous medical waste and requires biohazardous medical waste transporters to be registered with the State.</p> <p>The Arizona Department of Environmental Quality (ADEQ) Waste Programs Division, Biohazardous Medical Waste Section maintains a Directory of Biohazardous Medical Waste Transporters that is registered with the State.</p>
Arkansas	<p>Arkansas Rules and Regulations pertaining to Management of Medical Waste from Generators and Health Care Related Facilities have not changed since 2017.</p> <p>Other References:</p> <ul style="list-style-type: none"> • Arkansas Medical Waste Program
California	<p>The California Trauma Scene Waste Management Act (reference Chapter 9.5 of the CA Medical Waste Management Act) regulates the State's Crime and Trauma Scene Industry.</p> <p>The California Department of Public Health (CDPH) oversees the State's Medical Waste Management Program, which sets forth requirements for Trauma Scene Waste Management Practitioners.</p> <p>Other References:</p> <ul style="list-style-type: none"> • CDPE list of registered trauma scene practitioners
Colorado	<p>The Colorado Department of Public Health and Environment (CDPHE), Hazardous Materials and Waste Management Division, regulates the disposal of medical waste (see Colorado Solid Waste Regulations 6 CCR 1007-2, Part 1, Section 13). This regulation defines trauma scene waste and includes trauma scene cleanup sites in its category of medical waste generators.</p>
Connecticut	<p>Trauma scene responders are not subject to biomedical waste (BMW) regulations; however, any BMW generated at trauma scenes must be managed according to BMW regulations. Entities engaged in this business should provide appropriate training to their employees and contract with a licensed transporter to ensure compliance with current regulations.</p> <p>BMW requirements are found in Section 22a-209-15 of the Regulations of Connecticut State Agencies of the Connecticut General Statutes (CGS).</p> <p>Other references:</p> <ul style="list-style-type: none"> • Biomedical Waste FAQs • Connecticut Department of Energy and Environmental Protection (DEEP) Biomedical Waste homepage

State Regulations and References	
State	Regulation/Reference
District of Columbia (D.C.)	See Washington, D.C.
Delaware	Delaware Department of Natural Resource and Environmental Control (DNREC), Division of Solid and Hazardous Waste Management Branch regulates infectious waste.
Florida	Florida Department of Health (FLDOH) Biomedical Waste Program . The FLDOH does not regulate cleanup procedures used by cleanup companies but does permit them as biomedical waste generators. Other references: <ul style="list-style-type: none"> • Trauma Scene Cleanup Providers • Cleaning up After Injury or Accident in Your Home
Georgia	The generation and disposal of biomedical waste is governed by the Georgia Department of Natural Resources Rules for Solid Waste Management (391-3-4.15 Biomedical Waste).
Hawaii	The Hawaii Rules for the Management and Disposal of Infectious Waste (Title 11, Chapter 104) govern the generation and disposal of infectious waste. Medical waste is categorized as a “special waste” and subject to Hawaii Solid Waste Management Requirements (Title 11, Chapter 58.1) . Other references: <ul style="list-style-type: none"> • Hawaii Admin Rules, Title 11 Chapter 452 – Requirements for the decontamination of and cleanup of Meth manufacturing sites
Idaho	There does not appear to be any State regulations for the management of infectious medical waste; however, best management practices do apply. The Idaho Department of Environmental Quality (IDEQ) , Waste Management and Remediation Division is responsible for the management and disposal of wastes. Applicable facilities must comply with OSHA’s Bloodborne Pathogen Standard. Other references: <ul style="list-style-type: none"> • IDEQ Medical Waste Best Management Practices • Solid Waste Management Rules
Illinois	Title 35 of the Illinois Environmental Protection Act (IEPA) establishes requirements to ensure that potentially infectious medical waste is handled in a safe and responsible manner. The Trauma Scene Waste Management Registration Act of 2021 (HB3340) requires practitioners to be registered. This Act’s definition of trauma scene excludes the scene of a motor vehicle accident or locations subject to OSHA.

State Regulations and References	
State	Regulation/Reference
Indiana	<p>Indiana State Department of Health regulates medical waste.</p> <ul style="list-style-type: none"> • Indiana Infectious Waste Rule, Title 40, Article 1, Rule 3 <p>Other references:</p> <ul style="list-style-type: none"> • Cleanup of Illegal Drug Labs • Indiana Department of Environmental Management (IDEM)
Iowa	<p>Medical and infectious waste is regulated under the State’s solid waste program. Infectious waste can potentially be considered “special waste,” which includes blood and blood products.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Iowa Department of Natural Resource Management (IDNRM) • IDNRM list of Emergency response contractors, which include crime and trauma scene cleanup companies
Kansas	<p>Kansas Department of Health and Environment, Bureau of Waste Management regulates infectious waste as solid waste.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Medical Waste Management Technical Guidance Document SW-2000-G1 • Meth Lab Guidance
Kentucky	<p>In Kentucky, there are no specific regulations pertaining to medical waste, and there is no one agency with jurisdiction over medical waste. There are, however, regulations that reference the characterization, treatment, handling, labeling, storage, transport, and disposal of this waste. These State regulations overlap between environmental, public health, labor, and transportation.</p> <p>The Kentucky Energy and Environment Cabinet, Division of Waste Management, provides an overview of these regulations.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Meth Lab Cleanup
Louisiana	<p>Medical waste is regulated by the Louisiana Department of Environmental Quality (LDEQ), Louisiana Department of Health and Hospitals and OSHA.</p> <p>Other references:</p> <ul style="list-style-type: none"> • LDEQ - Medical Waste Considerations for Waste Handlers summarizes relevant regulations

State Regulations and References	
State	Regulation/Reference
Maine	<p>The Maine Department of Environmental Quality (MDEP) oversees implementation of the Biomedical Waste Management Rules (Chapter 900), which defines a biomedical waste generator as any person or medical facility whose act or processes produce biomedical waste in any quantity.</p> <p>Biomedical waste generators must be registered with the State. An active list of biomedical waste transporters is maintained by the MDEP, Bureau of Remediation & Waste Management.</p>
Maryland	<p>The Maryland Department of the Environment (MDE) is responsible for permitting and regulating all aspects of special medical waste transportation and requires medical waste handlers to notify MDE of medical waste activity.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Special Medical Waste Regulation - Code of Maryland Regulations 10.06.06
Massachusetts	<p>Infectious waste is regulated by the Massachusetts Department of Public Health and the Massachusetts Department of Environmental Protection (MassDEP). See the MassDEP Infectious Waste Disposal and Transport Fact Sheet for links to relevant regulations. All transporters of infectious waste must be permitted.</p>
Michigan	<p>The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Medical Waste Program, administers and enforces the State's Medical Waste Regulatory Act.</p>
Minnesota	<p>The Minnesota Medical Waste Regulatory Act and Rules governs the management of medical waste. Generators of medical waste are required to register with the State.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Minnesota Department of Environmental Quality Medical Waste Program • Solid Waste Management Rules • Meth Lab Awareness
Mississippi	<p>The Mississippi Department of Environmental Quality (MDEQ) regulates medical waste as a "special waste" under the Solid Waste Management Program.</p> <p>Other references:</p> <ul style="list-style-type: none"> • MDEQ Medical Waste Fact Sheet

State Regulations and References	
State	Regulation/Reference
Missouri	<p>The Missouri Department of Natural Resources manages the disposal of infectious waste. Regulations governing the management and disposal of these wastes are found in the Missouri Revised Statutes, Section 260.203 and the Missouri Solid Waste Management regulations, located in the Code of State Regulations (CSR), 10 CSR 80-7.010. The State requires all transporters of infectious waste to obtain a hazardous waste transporter license from the Missouri Department of Transportation (MoDOT).</p> <p>Other references:</p> <ul style="list-style-type: none"> • The Missouri Department of Natural Resources maintains a list of infectious waste transporters
Montana	<p>Montana's medical waste regulations are managed by the Montana Department of Environmental Quality (MDEQ).</p> <p>Other references:</p> <ul style="list-style-type: none"> • Montana Infectious Waste Management Act (MT Code Annotated, Title 75, Chapter 10) • MDEQ Meth Lab Cleanup Program
Nebraska	<p>Nebraska waste regulations do not discuss biohazard waste; however, infectious waste is regulated at Title 132, Chapter 13, Special Wastes, which specifies that infectious waste cannot be disposed of at municipal solid waste landfill until it is rendered non-infectious.</p>
Nevada	<p>The Nevada Department of Environmental Protection (NDEP) oversees the management and disposal of infectious medical waste. The regulatory framework is described in the NDEP Fact Sheet on Treatment and Collection and Disposal of Infectious Medical Waste.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Nevada Solid Waste Disposal Regulation
New Hampshire	<p>The New Hampshire Department of Environmental Services (NHDES) regulates the management of infectious waste.</p> <p>Other References:</p> <ul style="list-style-type: none"> • New Hampshire Env-SW 904 Infectious Waste Rules • New Hampshire Infectious Disease Fact Sheets

State Regulations and References	
State	Regulation/Reference
New Jersey	<p>The New Jersey Department of Environmental Protection (NJDEP), Division of Solid and Hazardous Waste, manages the State's Regulated Medical Waste program. The NJDEP Guidance Document for Regulated Medical Waste provides a great summary of requirements.</p> <p>Other References:</p> <ul style="list-style-type: none"> • New Jersey Regulated Medical Waste Program (Title 7, Chapter 26, Subchapter 3A)
New Mexico	<p>Infectious waste is categorized as a "special waste" in New Mexico and the New Mexico Admin Code, 20.9.8.13, Solid Waste; Special Waste Regulations apply to generators of infectious waste.</p>
New York	<p>The New York Department of Environmental Conservation manages the State's Regulated Medical Waste Program.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Trauma Scene cleanup is regulated in NYC at New York City Admin Code Title 17-193 - Trauma Scenes • NYC Guidelines for Trauma Scene Management
North Carolina	<p>The North Carolina Department of Environmental and Natural Resources (NCDENR) and the NC Medical Waste Rules (15A NCAC 13 B, Section 1200) define medical waste as "waste generated in the diagnosis, treatment, or immunization of humans or animals." As the waste generated at trauma scenes does not meet this definition, the NCDENR has specified that the waste is exempt from medical waste rules. However, the presence of human tissue or body fluids renders the waste biohazardous and universal precautions apply.</p>
North Dakota	<p>Waste generated from trauma scenes is managed as infectious waste. The North Dakota Department of Health, Division of Waste Management is responsible for monitoring compliance with Infectious Waste Regulations and has developed a Guide to Understanding North Dakota's Infectious Waste Regulations.</p>
Ohio	<p>Infectious waste generator requirements are set forth at OH Admin Code Rule 3745-27-36.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Ohio Trauma Scene Cleanup FAQs • Ohio EPA Infectious Waste home page
Oklahoma	<p>The Oklahoma Solid Waste Management Act and Oklahoma Admin Code OAC 252:515: Management of Solid Waste regulates RMW at Subchapter 23.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Meth Lab Cleanup

State Regulations and References	
State	Regulation/Reference
Oregon	<p>The Oregon Department of Environmental Quality (DEQ) has adopted solid waste requirements for the management and disposal of infectious (medical) waste.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Oregon Infectious Waste Rules (OAR 333-056-0010) • Oregon Statutes and Laws that regulate Meth Labs
Pennsylvania	<p>Regulations pertaining to the management of medical and infectious waste are found in Pennsylvania Admin Code, Title 25, Chapters 271 (Municipal Waste Management) and 284 (Regulated Medical and Chemotherapeutic Waste).</p> <p>All transporters of infectious waste must be licensed by the Pennsylvania Department of Environmental Protection (see Title 25, Chapter 284, Subchapter G).</p>
Rhode Island	<p>Regulations pertaining to the management of medical waste are found in the Rhode Island Code of Regulations at 250-RICR-140-15-1.</p> <p>State Crime Scene/ Accident Cleanup Waste is defined as RMW at Section 1.2(C)(9) and includes “any waste generated by commercial entities hired to clean scenes or accidents that are saturated with human blood or are sharps or sharp objects contaminated with human blood.”</p> <p>Transporters of RMW are required to obtain a permit from the Rhode Island Department of Environmental Management.</p>
South Carolina	<p>Infectious waste is regulated by the South Carolina Board of Health and Environmental Control at Title 44, Chapter 93, Infectious Waste Management. The South Carolina Infectious Waste Management Regulation (R.61-105) establishes the program to carry out the South Carolina Infectious Waste Management Act</p>
South Dakota	<p>Infectious medical waste is regulated by the South Dakota Department of Environmental and Natural Resources (DANR). The State has adopted by referencing the Federal definition of infectious waste. Infectious waste is regulated under the South Dakota Solid Waste Administrative Rules as Special Waste (see Article 74:27:13:17). All medical-infectious waste that cannot be disposed of at a municipal landfill must be rendered non-infectious and incinerated at a permitted facility.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Cleanup of Clandestine Meth Labs

State Regulations and References	
State	Regulation/Reference
Tennessee	<p>The Tennessee Department of Environment and Conservation (TDEC), Division of Solid and Hazardous Waste Management consider medical wastes as “special wastes.” Generators who wish to dispose of “special wastes” at a permitted landfill or have it processed at a permitted processing facility must obtain Special Waste Approval from the State.</p> <p>Other references:</p> <ul style="list-style-type: none"> • TDEC Special Waste Guidance • Tennessee Solid Waste Management Program Policy and Guidance Manual
Texas	<p>Texas Commission on Environmental Quality (TCEQ) regulates medical waste. Cleanup companies are unregulated; however, they must “appear” qualified.</p> <p>Other references:</p> <ul style="list-style-type: none"> • TCEQ Regulatory Guidance: Texas Regulations on Medical Waste • TCEQ Municipal Solid Waste Rule (Chapter 330, Subchapter Y: Medical Waste Management)
Utah	<p>The Utah Administrative Code R315-316 sets forth requirements for the management and disposal of infectious waste.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Utah Infectious Waste Management Guidance • UT Admin Code R311-500 – Illegal Drug Operations Site Reporting and Decontamination Act, Decontamination Specialist Certification Program
Vermont	<p>The Vermont Department of Environmental Conservation (VDEC) regulates the regulated medical waste, and infectious waste is categorized as a “special waste.”</p> <p>Other references:</p> <ul style="list-style-type: none"> • VDEC Procedure Addressing RMW Definitions and the Handling and Treatment of RMW • Solid Waste Management Rules, Subchapter 14, Special Wastes (RMW)
Virginia	<p>All transporters of RMW must be registered with the Virginia Department of Environmental Quality. A medical waste permit is required for facilities that treat, store, or dispose of regulated medical waste.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Virginia RMW Regulations (9VAC20-120) • Transportation of Solid and Medical Waste on State Waters (9VAC20-170) • Medical Waste Permits

State Regulations and References	
State	Regulation/Reference
Washington	<p>Medical waste disposal is outlined by the Washington Department of Ecology and requires infectious waste transporters to be permitted; however, local governments regulate medical waste and should be consulted.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Revised Code of Washington, Title 70, Chapter 70.95K, Biomedical Waste • Seattle Municipal Code, Chapter 21.43 Infectious Waste Management • Washington Department of Health Drug Lab Cleanup Program
Washington, D.C.	<p>Washington D.C.'s Department of Energy and Environment manages medical/infectious waste disposal regulations. Infectious waste is defined in Washington D.C. Code, Title 8, Environmental and Animal Control and Protection, Section 1051. The D.C. Hazardous Waste Management Act, defined in Section 8-902, Prohibition and Penalties, prohibits the disposal of medical waste at any site not authorized by the Mayor.</p>
West Virginia	<p>The West Virginia Medical Waste Rules (64CSR56) regulates the generation and disposal of infectious medical waste.</p> <p>Other references:</p> <ul style="list-style-type: none"> • West Virginia Department of Human Health and Resources Infectious Medical Waste Program • Meth Lab Cleanup (WV Annotated Code 60A-4-411)
Wisconsin	<p>Wisconsin Department of Natural Resources (DNR) oversees the State's Infectious Waste Program.</p> <p>Other references:</p> <ul style="list-style-type: none"> • Wisconsin Medical and Infectious Waste Administrative Code and Statutes • Wisconsin Department of Health Services Fact Sheet on Meth Lab Cleanup
Wyoming	<p>The Wyoming Department of Environmental Quality Solid and Hazardous Waste Division and Wyoming Department of Health oversee the disposal of medical waste. However, with the exception of healthcare facilities operating an incinerator to process medical/infectious waste, the State of Wyoming does not have any specific regulations that govern infectious waste management. The State only stipulates that medical waste generators treat medical or infectious waste prior to disposal, whether it is through incineration, autoclaving, or other approved methods.</p>