

Exhibit A
Switch Medical Waste Services'
Waste Acceptance Policy

Switch will pick up, transport, treat and dispose of Regulated Medical Waste in a manner consistent with all State and/or Federal laws. Federal Department of Transportation (DOT) Regulations require the generator of regulated medical waste to certify that the packaging & documentation of transported regulated medical waste complies with DOT regulations regarding waste classification, packaging, labeling, & shipping documentation. To ensure that neither *Switch* nor the generator of regulated medical waste violates applicable regulations, it is imperative that all parties understand the rules regarding proper identification, classification, segregation & packaging of regulated medical waste. The purpose of this policy is to summarize the minimum requirements for preparing your medical waste for collection, transportation & treatment.

REGULATED MEDICAL WASTE

Switch accepts medical waste generated in a broad range of medical, diagnostic, therapeutic & research activities. The term "medical waste" includes bio-hazardous, biomedical, infectious, or regulated medical waste as defined under federal, state or local laws, rules, regulations, & guidelines. This **excludes** RCRA pharmaceuticals, all DEA scheduled drugs including "controlled substances, bulk chemotherapy, waste containing mercury or other heavy metals, batteries of any type, non-infectious dental waste, chemicals such as solvents, reagents, corrosives or ignitable materials classified as hazardous waste under Federal & State EPA Regulations. In addition, *Switch cannot accept* bulk liquids, radioactive materials, or complete human remains. *Switch cannot accept* these excluded materials packaged as regulated medical waste. Separate protocol & packaging requirements apply for the disposal of non-hazardous pharmaceuticals.

WASTE SEGREGATION AND PACKAGING

The generator is solely responsible for properly segregating, packaging, & labeling of regulated medical waste. Proper segregation & packaging reduces the potential for accidental release of the contents & exposure to employees & the general public. DOT regulations require (49 CFR 173.197) that all packages of regulated medical waste be prepared for transport in containers meeting the following requirements. 1) rigid 2) leak resistant 3) impervious to moisture 4) of sufficient strength to prevent tearing or bursting under normal conditions of use and handling 5) sealed to prevent leakage during transport 6) puncture resistant for sharps. All regulated medical waste must be accompanied by a properly completed shipping document (See 49 CFR 172.202).

MANAGEMENT OF NON-CONFORMING WASTE

As required by regulation & company policy, *Switch* employees may refuse containers that are non-conforming because of their contents or are improperly packaged, leaking, damaged, or likely to create a risk of exposure to employees or the general public. Any non-conforming waste identified in route to or at a *Switch* location may be returned to the generator for proper packaging or disposal. Proper segregation & packaging is essential to ensure compliant & safe handling, collection, transportation & treatment of regulated medical waste.

RCRA Hazardous Pharmaceutical Waste & all DEA controlled drugs, including controlled substances

- *Chemicals* – Formaldehyde, formalin, acids, alcohol, waste oil, solvents, reagents, fixer developer
- *Hazardous Waste* – Drums or other containers with a hazard warning symbol, batteries and other heavy metals
- *Radioactive Waste* – Any container with a radioactivity level that exceeds regulatory or permitted limits; lead-containing materials
- *Complete Human Remains:* - Cadavers, complete torsos
- *Bulk Chemotherapy Waste*
- *Compressed Gas Cylinders, Canisters, Inhalers and Aerosol Cans*
- *Mercury Containing material or Devices* – Any mercury thermometers, sphygmomanometers or lab or medical devices, any dental waste containing mercury
- *Loose Liquids exceeding 20cc*
- *Improperly Packaged Waste* – Loose sharps; Leaking, Damaged Containers. Overweight Container. Overfilled Containers

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NONCONFORMING WASTE

- *Sharps* – Means any object contaminated with a pathogen or that may become contaminated with a pathogen through handling or during transportation & also capable of cutting or penetrating skin or a packaging material. *Sharps* include needles, syringes, scalpels, broken glass, culture slides, culture dishes, broken capillary tubes, broken rigid plastic, & exposed ends of dental wires. ***Sharp items must be placed in specialized “sharps containers”. Once full, sealed sharps containers should be placed into Switch provided waste containers.***
- *Regulated Medical Waste or Clinical Waste or (Bio) Medical Waste* – Means a waste or reusable material derived from the medical treatment of an animal or human, which includes diagnosis and immunization, or from biomedical research, which includes the production & testing of biological products.
- *Trace Chemotherapy Contaminated Waste* – RCRA Empty drug vials, syringes & needles, spill kits, IV tubing and bags, contaminated gloves & gowns, & related materials as defined in applicable laws, rules, regulations or guidelines
- *Pathological Waste* – Human or animal body parts, organs, tissues & surgical specimen (***decanted*** of formaldehyde, formalin or other preservatives)
- *Non-RCRA Pharmaceuticals* – Must be characterized & certified as non-RCRA hazardous material by the generator. **Excludes** all DEA scheduled drugs, including controlled substances

ACCEPTED WASTE

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