

# Potentially Infectious Medical Waste and Sharps Disposal



*The following information has been compiled and was originally published in the ISVMA newsletter, the EPITOME. It is reprinted here for ISVMA member convenience.*

## What do I tell a client when they ask me about disposing of used syringes for a diabetic pet?

June/July2008

**Q:** I have a client with a pet that I just diagnosed as diabetic and have prescribed insulin. Are there regulations on how this client must dispose of their used sharps? If I provide a sharps container for them to use, can they return the filled, used sharps container back to my hospital for us to dispose of?

**A:** For this answer, the ISVMA office contacted the Illinois Environmental Protection Agency. According to Cindy Bahner and Beverly Albarracin, PIMW specialists at the state office, this is an issue that does not appear in the regulations, per se. Since the sharps are taken into the pet owner's home, and used at home, the regulations become like those for human household-generated sharps. According to Albarracin, they "recommend [placing the used sharps in] a tough plastic bottle that is puncture resistant (e.g., empty laundry detergent bottle), taping the lid on when it's full, and marking it 'DO NOT RECYCLE'." As the used sharps container is considered "household" waste, and Potentially Infectious Medical Waste does not include waste generated as general household waste, it can be

thrown into the regular trash and may be disposed of into any landfill permitted by the Illinois EPA to accept municipal waste.

Do not provide a PIMW sharps container for them to use and return unless your hospital has its own permit to be a transfer station authorized for the treatment, storage or transfer of PIMS. It is currently illegal for vets to accept these sharps without first obtaining this permit. Since most clinics and hospitals are not transfer stations or treatment sites for transfer, disposal in the trash is really the only alternative for your client.

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## What are my legal responsibilities for used sharps disposal?

June/July2008

**Q:** My clinic does not generate a large amount of used sharps each month. What are my legal responsibilities for used sharps disposal?

**A:** Before answering your question, let's make sure that what you consider to be used sharps are, indeed, used sharps. According to the Potentially Infectious Medical Wastes subchapter of the Illinois Environmental Protection Act, "Used Sharps" are defined as "discarded sharps used in animal or human patient care, medical research, or clinical or pharmaceutical laboratories; hypodermic, intravenous, or other medical needles; hypodermic or intravenous

syringes; Pasteur pipettes; scalpel blades; or blood vials. This waste shall also include, but not be limited to, other types of broken or unbroken glass (including slides and cover slips) in contact with infectious agents."

Whether your business produces a large or small amount of used sharps each month, **the ideal means of removing it is to hire a waste hauler who is properly licensed by the Illinois Environmental Protection Agency to transport Potential Infectious Medical Waste (PIMW).** These licensed PIMW haulers must comply with specifications to insure that the waste is handled in a safe and responsible manner. Fees to remove PIMW vary by hauler and may be assessed by volume OR by frequency. Payment is typically not assessed as a flat rate per month. A used sharps container should be provided by the PIMW Hauler.

**A business that generates a small amount of used sharps should NEVER package used sharps for disposal as general waste.** There are significant fines assessed for doing so. The writers of the Environmental Protection Act made provisions for businesses that create less than 50 pounds of used sharps each month. Considered "small quantity generators," there are additional options available in addition to hiring a PIMW Hauler.

**Option A.** According to Section 1420.105, Permit and Manifest Requirements and Exceptions, subsection b, small quantity generators are not required to obtain a PIMW hauling permit from the Agency for the noncommercial transportation of less

than 50 pounds of PIMW at any one time. This means that *the business may properly package their used sharps and transport it themselves, or ship their used sharps through the U.S. Postal Service, to a permitted treatment facility without having to apply for, and pay for, a PIMW permit or manifest.*

*What is proper packaging for the transportation of used sharps?*

According to the Illinois Environmental Protection Act, the container(s) used to dispose of used sharps must be: rigid, leak-resistant, impervious to moisture, of a strength sufficient to prevent tearing or bursting under normal conditions of use and handling and sealed to prevent leakage during transport and puncture-resistant. It is the responsibility of the business to provide suitable containers.

*How does the package have to be marked?*

The Act also specifies that the exterior of the outer package must be marked by the business (generator) prior to shipment:

- mark on opposite sides of the outer package in lettering readable at a minimum distance of five (5) feet the word “sharps” and the International Biohazard Symbol and the word Biohazard.
- Mark legibly with indelible ink on a water-resistant label or tag securely attached to outer package OR mark on the outer package the hospital’s name, address and phone number.

*Where is my nearest permitted treatment facility?*

In Illinois, the only facility that has obtained a permit to receive used sharps *delivered personally* from a small quantity generator is the Stericycle facility in Clinton, IL.

*I don’t live anywhere near Clinton and cannot transport my used sharps there. How do I mail my sharps to be compliant with state and/or federal regulations?*

Stericycle has a mailback program that has been approved by the U.S. Postal Service that complies with federal and state regulations, specifically for small generators of PIMW. According to information forwarded to the ISVMA office by Jose Torres, Healthcare Compliance Representative for the Stericycle company, their program includes all components required for collection and transportation of sharps and small quantities of regulated medical waste. Your participation in this program includes:

- Step-by-step instructions
- Bar-coded waste shipping containers
- Prepaid and pre-addressed shipping labels
- Prepaid disposal
- Tracking documents for cradle to grave audit trail

*For specific questions regarding Stericycle’s Mailback Program for removal of used sharps, contact Jose Torres by phone at 847/943-6728 or Toll Free at 1-888-858-2360 x 6728. He can also be reached by email at [JTorres@STERICYCLE.com](mailto:JTorres@STERICYCLE.com).*

**Option B.** PIMW is banned from all landfills; however, an exception exists for sharps if both the infectious nature is removed and the sharps are either rendered unrecognizable or packaged in accordance with the Act prior to disposal. Treatments to render the PIMW non-infectious can include, but are not limited to, sterilization in an autoclave or ethylene oxide unit and incineration. If this option is chosen, the autoclave, ethylene oxide unit and incinerator must be approved by the IEPA for use.

## Illinois EPA Fact Sheet

The Illinois Environmental Protection Agency provides a fact sheet on their website that gives a summary of Title XV of the Illinois Environmental Protection Act, the regulations prescribing the standards and criteria for the handling of PIMW.

The purpose of this fact sheet is to provide some of the PIMW requirements, found in both the Act and the Board’s regulations. For the complete requirements, please see Title XV of the Act and 35 Illinois Administrative Code (Ill. Adm. Code): Subtitle M.

To access this information, go online at [www.epa.state.il.us/land/waste-mgmt/factsheets/general-reg.html](http://www.epa.state.il.us/land/waste-mgmt/factsheets/general-reg.html).

For specific questions regarding PIMW regulations in Illinois, contact the PIMW Coordinator at the Illinois EPA, Bureau of Land by calling 217/524-3289 or by email at [beverly.albarracin@illinois.gov](mailto:beverly.albarracin@illinois.gov).

To obtain a list of permitted PIMW facilities, visit the Waste Management – Illinois EPA – Bureau of Land page of Waste Management Programs online at [www.epa.state.il.us/land/waste-mgmt/](http://www.epa.state.il.us/land/waste-mgmt/). Select the link for “Medical waste”, and then select the link for “PIMW Facilities.” A list can also be obtained by contacting Beverly Albarracin at the Illinois EPA at 217/524-3289.

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## Is Stericylce really the ONLY facility?

August/September 2008

Last issue there was extensive information given on disposal of sharps with specific recommendations **FOR SMALL QUANTITY GENERATORS.**

The ISVMA office received calls from concerned members who engage haulers other than Stericylce. Please be advised of the fine details that follow.

**Within the text from *Option A*, it included the statement “the only facility that has obtained a permit to receive used sharps from a small quantity generator is the Stericycle facility in Clinton, IL.”**

*Where is my nearest permitted treatment facility?*

*In Illinois, the only facility that has obtained a permit to receive used sharps from a small quantity generator is the Stericylce facility in Clinton, IL.*

The Stericycle facility in Clinton, IL is the only **facility permitted to receive small quantities of used sharps by U.S. Mail AND by personal transport for treatment** where a PIMW permit or manifest is not required of the business who generated the waste.

The only other treatment facility in Illinois that is permitted to receive veterinary medical PIMW by a small waste generator, if personally transported from their hospital to the facility, is Clean Earth Pet Systems of Rockford, IL. Clean Earth is not permitted to receive this PIMW by U.S. Mail.

## GOING GREEN WITH POTENTIALLY INFECTIOUS MEDICAL WASTE

August/September 2008

In the June/July 2008 issue of the *EPITOME*, the ISVMA reported that Potentially Infectious Medical Waste (PIMW) must be removed from a place of business by a licensed hauler. These haulers are responsible for moving the waste to a facility that is permitted to receive PIMW. Usually, the facility is someplace that is either a transfer station (where the waste will be picked up and moved again) or an incinerator (where the waste will have all infectious nature removed so it can be placed in a landfill).

Illinois is unique in that it has a company that offers another alternative for PIMW. Instead of being placed in a landfill, used and discarded sharps used in animal care and medical research PLUS syringes used in connection with the care and treatment of animals are now able to be recycled. On January 16, 2008, the Illinois EPA granted to Clean Earth Pet Systems of Rockford, Illinois a permit to transport, receive, store, treat and recycle the above mentioned PIMW. The goal of the company is to minimize the impact of waste to our fragile environment, yet still provide professional services at an affordable fee.

The process is simple: After contracting with Clean Earth Pet Systems and completing the necessary paperwork, they will supply you with the appropriate storage containers. You tell them how often you want your PIMW removed for recycling. They pick up your container(s), take it to their

facility, sterilize the material in their autoclave and recycle the items into usable products.

Their end products are bowls for use by pets for food and water. The steel and plastic bowls come in a variety of sizes and are available to veterinary clinics, hospitals and other animal facilities.

As an added bonus, Clean Earth Pet Systems collects clear plastic from its veterinary clients and recycles it to manufacture its red PIMW containers. Clients who participate in this program receive payment for their clear plastic in the form of credit towards their bill.

Currently, Clean Earth picks up PIMW for recycling throughout Northern Illinois and part of Central Illinois.

*If you are interested and want to learn more, contact Clean Earth Pet Systems at 630/766-3646 or visit them online at [www.vetsharps.com](http://www.vetsharps.com).*



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## WHO CAN REMOVE USED SHARPS FROM MY BUSINESS?

Regardless of the amount of used sharps your business generates, the ideal means of removing this Potentially Infectious Medical Waste (PIMW) is to hire a **waste hauler** who is properly licensed by the Illinois Environmental Protection Agency to transport it to a permitted facility.



[www.isvma.org](http://www.isvma.org)

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## Is a used syringe considered PIMW?

April/May 2009

**Q:** Can a used syringe (without the needle) be disposed of as general waste?

**A:** The short answer is no.

The long answer, which consists of definitions and the details, follow.

Potentially Infectious Medical Waste (PIMW) includes waste generated in connection with the diagnosis, treatment, or immunization of human beings or

animals. According to the Potentially Infectious Medical Wastes subchapter of the Illinois Environmental Protection Act (35 Illinois Administrative Code 1420.102.), all PIMW must be treated to eliminate infectious potential prior to disposal.

**The following types of PIMW pertain to veterinary medicine.**

- **CULTURES AND STOCKS**

This waste shall include but not be limited to cultures and stocks of agents infectious to humans, and associated biologicals; cultures from medical or pathological laboratories; cultures and stocks of infectious agents from research and industrial laboratories; wastes from the production of biologicals; discarded live or attenuated vaccines; or culture dishes and devices used to transfer, inoculate, or mix cultures.

- **USED SHARPS**

This waste shall include but not be limited to discarded sharps used in animal or human patient care, medical research, or clinical or pharmaceutical laboratories; hypodermic, intravenous, or other medical needles; hypodermic or intravenous syringes; pasteur pipettes; scalpel blades; or blood vials. This waste shall also include but not be limited to other types of broken or unbroken glass (including slides and cover slips) in contact with infectious agents.

- **ANIMAL WASTE**

Animal waste means discarded materials, including carcasses, body parts, body fluids, blood, or bedding originating from animals inoculated during research, production of biologicals, or pharmaceutical testing with agents infectious to humans.

- **UNUSED SHARPS.**

This waste shall include but not be limited to the following unused, discarded sharps: hypodermic, intravenous, or other needles; hypodermic or intravenous syringes; or scalpel blades.

PIMW classified as “used sharps” specifically includes hypodermic or intravenous syringes. As such, they should be discarded in a used sharps container provided by a licensed PIMW hauler who will take the waste to a licensed PIMW treatment facility to eliminate the infectious potential of the waste.

There is a subpart to the Act that addresses segregating PIMW (35 Illinois Administrative Code 1421.102.). Waste generators must segregate and properly package the waste they generate into three different categories: (1) Sharps, (2) Oversized PIMW, and (3) all other PIMW.

*Although used syringes must be disposed of as PIMW, and are considered to be “used sharps”, they may be collected in a separate package than the used needles.* The subpart also specifies that “previously segregated and properly packaged

sharps” may be placed with other PIMW for removal. If a sharps container is packaged within an outer container, the inner sharps container must be marked with the word ‘BIOHAZARD’, the word ‘SHARPS’, and the International Biohazard Symbol.

The ideal means to have PIMW removed from a clinic or hospital is by a licensed PIMW hauler. However, for businesses that create less than 50 pounds of used sharps each month, considered a “small quantity generator,” they may transport their properly packaged used sharps themselves to a permitted treatment facility without having to apply for, and pay for, a PIMW permit or manifest. (Section 1420.105, Permit and Manifest Requirements and Exceptions, subsection b.) Small quantity generators are not required to obtain a PIMW hauling permit from the Agency for the noncommercial transportation of less than 50 pounds of PIMW at any one time.

#### What is proper packaging for the transportation of used sharps?

According to the Illinois Environmental Protection Act, all PIMW which is to be shipped OFF-SITE, must be placed in containers that are:

- (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, and
- (5) sealed to prevent leakage during transport.

In addition to the requirements listed above, sharps (e.g., needles, pipettes, scalpels, glass) must be

packaged in containers that are also puncture-resistant.

It is the responsibility of the business to provide suitable containers.

#### How does the package have to be marked?

The exterior of the outer package must be marked by the business (generator) prior to shipment:

- mark on opposite sides of the outer package in lettering readable at a minimum distance of five (5) feet the word “sharps” and the International Biohazard Symbol and the word Biohazard.
- Mark legibly with indelible ink on a water-resistant label or tag securely attached to outer package OR mark on the outer package the hospital’s name, address and phone number.

#### Where is my nearest permitted treatment facility?

A list can also be obtained by contacting Beverly Albarracin at the Illinois EPA at 217/524-3289 or by email at [beverly.albarracin@illinois.gov](mailto:beverly.albarracin@illinois.gov).

Permitted PIMW facilities are also posted online at [www.epa.state.il.us/land/waste-mgmt/](http://www.epa.state.il.us/land/waste-mgmt/). Select the link for “Medical waste”, and from there select the link for “PIMW Facilities.”

The Illinois Environmental Protection Agency provides a summary of regulatory requirements on their website about criteria for the handling of PIMW at [www.epa.state.il.us/land/waste-mgmt/factsheets/general-regs.html](http://www.epa.state.il.us/land/waste-mgmt/factsheets/general-regs.html).



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**Remember, untreated  
medical waste cannot be  
disposed of into any  
landfill!**