DEP ISSUE PROFILE

Biomedical Waste Disposal Through the U.S. Mail

issued: April, 1999 **contact:**(207) 287-2651

- **Background**

- A veterinarian in rural Maine

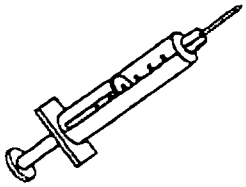
- A hotel housekeeper at a seaside resort

- An elderly man in a boarding home

What might these three people have in common?

They could all have biomedical waste sharps to dispose of.

- Discarded sharps have caused health and safety problems in the past.
- Every year there are reported cases of municipal workers receiving needlesticks from collecting and handling garbage.
- Today, with recycling and incineration, our solid waste receives much more processing and handling than it did when it simply went to the local landfill.
- As a result, the potential for exposure to items like needles is greater today than it ever was. This is unfortunate and unnecessary.



The Maine Department of Environmental Protection has regulated biomedical waste since 1990 through the Biomedical Waste Management Rules (06-096 CMR 900). One provision of those rules requires the safe packaging of "sharps." In biomedical terms, a "sharp" is an item that may cause a puncture wound or cut. This includes such devices as hypodermic needles, lancets and scalpel blades that are used in human or animal care.

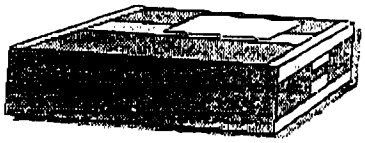
Disposal options for small rural generators of biomedical sharps waste can sometimes be difficult. Prior to 1994, there were two legal options for the small doctor, dentist, veterinarian or home-health care practice:

- They could contract with a DEP licensed biomedical waste transporter; or
- They could arrange to bring their waste to another medical facility, usually a hospital, providing the hospital was willing to accept it.

Note: Household generators of biomedical waste are exempt from all provisions of the rules, except one requiring them to package their sharps in rigid, leak- and puncture-resistant containers before disposal as solid waste.

In 1994, the Legislature enacted a law amending 38 M.R.S.A. Sec. 1319-O to allow another option: **'mail-in' sharps disposal**. Under this provision:

- A biomedical waste generator purchases a U.S. Postal Service approved container for accumulation of their discarded sharps.
- Cost depends on the size of the container and varies from about $25 dollars for a quart-sized container, up to $75 dollars for a five-gallon container. This cost includes the specialized packaging, U.S. postage and the final disposal costs.



- When the container is full, it is sealed and mailed to an approved disposal facility.
- The postal service requires the use of a four-part manifest to provide proper disposal documentation.

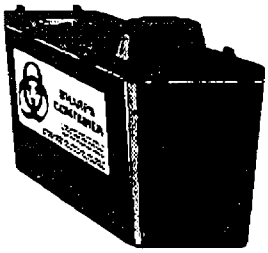
- **Who should consider using this disposal option for biomedical waste?**

Any person who generates sharps in small quantities or in remote locations may find disposal through the U.S. mail to be an attractive disposal option. Some examples are:

- Home health care providers traveling from patient to patient; these sharps containers, designed for travel, may prove safe and convenient;
- Acupuncturists;
- Rural health care professionals, such as doctors, dentists, and veterinarians;
- Tattoo artists and body piercers;
- Household generators that wish to keep their discarded sharps out of the solid waste stream; and
- Hotels and other businesses that deal with the occasional discarded syringe in a wastebasket.

- **Can you describe these packages?**

The packages are marketed by various commercial vendors (the U.S. Postal Service is not involved in marketing or distribution of these products). They are quite specialized and comply with postal service regulations. The package consists of a rigid, puncture- and leak-resistant sharps container, generally with a one-gallon capacity. Some companies offer various sizes, ranging from one quart to five gallons. Once this container is full, it is placed into a red biohazard plastic bag and securely tied. Next, the bag is placed into the outer layer of packaging, consisting of a rigid, sometimes wax-coated cardboard box, and then sealed. Finally, the four-part manifest is completed by the generator and attached to the package. The package is now ready to be mailed via either Priority or First-Class Mail.



- **Does the U.S. Postal Service have any specific requirements for this practice?**

Yes, there are some very specific requirements in place to insure the safety of postal employees. Among these are:

- Each distributor or manufacturer must obtain written authorization from the postal service;
- All packages must be labeled with the International Biohazard Symbol;
- Sharps must be securely sealed inside a puncture- and leak-resistant container. The amount of liquid is limited to 50 ml. The primary container must be able to withstand temperatures between 0 and 120 degrees Fahrenheit;
- The primary container must be packaged in a water-tight secondary container. Secondary containment may consist of a 3.0 mil plastic bag, as long as it is reinforced with a cardboard sleeve;
- The secondary containment packaging must be placed into an outer container comprised of 200-pound grade fiberboard or equivalent material;
- There must be enough absorbent material to absorb and retain three times the allowed amount of liquid (150 ml);
- The maximum weight of a package is 35 pounds; and
- All packages must be accompanied by a four-part manifest.

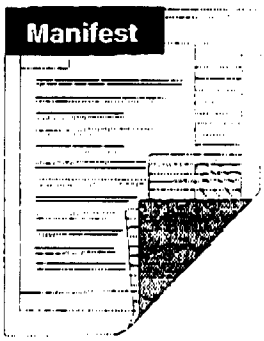
- **Can I ship my discarded sharps via other carriers such as United Parcel Service?**

No, other carriers will not accept biomedical waste for shipment.

- **Can I ship other defined categories of biomedical waste through the U.S. Postal Service?**

No, the 1994 amendments to the law restrict the type of biomedical waste that may be shipped through the mail to sharps waste only. It should be noted, however, that samples of human blood, body fluids and tissue are sometimes shipped through the U.S. mail. These items are samples and not waste. There are separate packaging requirements for this type of material.

- **How will I know if my package was properly treated?**



That is where the four-part manifest comes in. When first mailing the package, you should retain the bottom copy of the manifest. Once your biomedical waste has been received for treatment or destruction, the destination facility will return the top copy of the manifest to you, certifying that the waste was treated or destroyed.

- **Do you have a list of companies offering this service?**

Yes, the companies listed below offer sharps disposal by mail. *Please note that the following list may not be complete, nor should it be construed as a DEP recommendation or approval. We are providing information regarding companies that offer this service.*

B-D/BFI Mail Disposal Service
BFI Medical Waste Systems – Kansas City
3150 N. 7th Street
Kansas City, KS 66115
Telephone: 1-800-234-7869

Sharps Compliance, Inc.
9050 Kirby Drive
Houston, TX 77054
Telephone: 1-800-772-5657

MedTex International, Inc.
4403 Empire Way, Suite G
Lansing, MI 48917
Telephone: 1-800-999-6839

- **Where can I call or write for more information?**

For more information on the Biomedical Waste Management Rules, please write or call:

Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

Telephone: (207) 287-2651
Fax: (207) 287-7826