UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 11, 1990

Mr. Tom Panik
Regional General Manger
Mid-Atlantic Office
6480 Dobbin Rd.
Suite H
Columbia, Md. 21045

Dear Mr. Panik:

Enclosed you will find a copy of the brochure advertising a "syringe destruction" system manufactured by the America Sterilizer Company (AMSCO). After reviewing the informational material contained in the brochure, there appear to be some inaccuracies regarding this system's ability to meet EPA standards for the management of sharps. On the fourth page of your brochure AMSCO indicates, "Eagleguard Collection and destruction processes meet EPA and JCAH requirements for sharps handling and disposal."

The 40 CFR Part 259, Standards for the Tracking and Management of Medical Waste requires that regulated medical wastes (RMW), including sharps, be treated and destroyed or tracked from point of generation to disposal. The Part 259 regulations do not contain medical waste disposal standards.

Section 259.10(b) defines destroyed regulated medical waste as RMW which "has been ruined, torn apart, or mutilated through processes such as thermal treatment, melting, shredding, grinding, tearing or breaking, so that it is no longer generally recognizable as medical waste. It does not include compaction." The intent of this requirement was to ensure that the RMW has been subject to a process or procedure which physically changes the appearance of the waste rendering it generally non-recognizable as medical waste. Encapsulation does not "destroy" RMW under Part 259. Thus, encapsulated waste must still comply with Part 259 requirements.

Consequently, the language in your promotional brochure is misleading or inaccurate concerning the ability of your system to "meet" the EPA medical waste standards.

If you have further questions or need more information please contact Mary Greene at 202-475-7736.

Sincerely,

David Bussard, Director
Characterization and Assessment
Division

FaxBack # 11530