

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

AUGUST 16, 1991

Honorable Fred Grandy
House of Representatives
Washington, D.C. 20515

Dear Mr. Grandy:

Thank you for your letter of June 10, 1991, regarding Joel Punke's request for information on mailing medical waste through the U.S. Postal Service.

The Medical Waste Tracking Act of 1988 required that the Environmental Protection Agency (EPA) develop and implement a two-year demonstration program that provides "cradle-to-grave" medical waste tracking and establishes waste management standards. The states of Connecticut, New Jersey, New York, and Rhode Island and the Commonwealth of Puerto Rico participated in the demonstration program, which was effective June 22, 1989, through June 22, 1991. A copy of EPA's medical waste regulations, found at 40 CFR Part 259, is enclosed. Included in these regulations are the standards for shipping certain regulated medical waste items through the mail.

Specifically, generators of less than 50 pounds of regulated medical waste per month (referred to as small-quantity generators or SQGs) were permitted to send the following two waste types through the U.S. Postal Service:

Medical Waste Class (4) Sharps: Sharp objects (or "sharps") that have been used in animal or human patient care or treatment, in medical research, or in industrial laboratories, including hypodermic needles, syringes (with or without the attached needle), Pasteur pipettes, scalpel blades, blood vials, needles with attached tubing, and culture dishes (regardless of the presence of infectious agents). Also included are other types of broken or unbroken glassware that were in contact with infectious agents, such as used slides and cover slips.

Medical Waste Class (7) Unused Sharps: The following unused, discarded sharps: hypodermic needles, suture needles, syringes, and scalpel blades.

(States not participating in the EPA demonstration program may ship other waste types through the mail.

The EPA demonstration program required that sharps be packaged in containers that are puncture-resistant and that packaging for fluids be break-resistant and tightly lidded or stoppered. In addition, all medical waste containers had to be rigid, leak-resistant, impervious to moisture, of sufficient strength to prevent tearing or bursting under normal use and handling, and sealed to prevent leakage. The package had to be marked and labeled to indicate that its contents were medical waste and to identify the waste generator. It also had to be sent registered mail, return receipt requested. The generator had to compile a shipment log and maintain the original receipt and returned registered mail receipt.

It was EPA's intent that, during the demonstration program, generators would mail waste packages directly to disposal facilities. We have since learned, however, that a number of these mail-in sharps companies either transport the waste directly to a disposal facility or hire a waste hauler to dispose of the waste. Most of this waste is incinerated, and some waste is disposed of at landfills with or without prior treatment.

Based on meetings and conversations with the U.S. Postal Service and mail-in sharps companies, EPA has learned that SQGs represent the bulk of the mail-in sharps customers. These generators are located in all states and include dentists, physicians, veterinarians, and industrial clinics. SQGs have indicated that mail-in-sharps companies provide a lower-cost option with more convenience for the customer than contracting with a medical waste transporter.

EPA and the Postal Service have worked jointly to develop a strategy to ensure safe management practices for mailing medical waste. The Postal Service anticipates that its proposed rulemaking on this issue will be published in the Federal Register this summer. Currently, the Postal Service requires that inner and outer labels identify the contents of medical waste packages (e.g., clinical specimens, unsterilized medical devices, medical waste) and limits the quantities of wastes that may be shipped in one package. In addition, if materials are likely to leak, the Postal Service further requires the addition of absorbent material to the inner container and placement of the container in a plastic bag.

If you wish to contact the Postal Service directly for more information on its existing or proposed requirements, the contact there is Earl Mohbein at (202) 268-5309. Thank you for your interest in the medical waste regulations.

Sincerely yours,

Sylvia K. Lowrance, Director
Office of Solid Waste