

Sharps Collection: Requirements for Collectors

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Public education and low-cost, convenient sharps collection programs encourage proper disposal of sharps such as needles and lancets. If you would like to collect sharps as a public service, this fact sheet answers basic questions about how to set up and operate a sharps collection station to protect waste handlers, the public and the environment, according to state law.

What are sharps?

Sharps are medical equipment or clinical laboratory items that may cause punctures or cuts, such as syringes with needles attached, lancets, and scalpel blades. Used (contaminated) and even unused or disinfected items, as listed in s. NR 26.05(1)(a), Wis. Adm. Code, are “sharps.”

Why should sharps be collected separately?

- When sharps are mixed with household trash, waste handlers may be injured and may be at risk for contracting infectious diseases.
- When sharps are mixed with recyclables, they may cause whole loads of recyclables to be rejected and sent to landfills instead.
- When sharps are found loose in the environment, they are public health hazards.

What is a sharps collection station?

A sharps collection station is a place that voluntarily accepts sharps from persons who generate less than 50 pounds of infectious waste each month.

Who can set up a station?

Anyone may operate a sharps collection station as long as the person (or group) follows state law in doing so.

Potential collectors include municipalities, hospitals, clinics, pharmacies, assisted living complexes, college dorms, dentists, community health agencies, fire stations, recycling centers, veterinarians, visiting nurses, diabetic

support groups, clubs (e.g., 4-H, kennel clubs) and needle-exchange programs.

Who can use the stations?

Individuals, businesses and institutions which generate less than 50 pounds of sharps each month may use sharps collection stations.

Potential sharps users include those who administer their own medications, home health care patients, pet owners, livestock producers, dental clinics, veterinarians, schools, business first aid stations and adult family homes.

A station operator may choose to accept waste only from households or only from its patients, customers or residents. Although you may choose to limit your clientele, the DNR encourages you to serve as many people as possible.

How must sharps be packaged?

Sharps should be put into rigid, puncture-resistant containers with secure lids or caps.

Acceptable containers include commercially available sharps containers or thick-walled plastic detergent or bleach bottles with screw caps. Unacceptable containers include coffee cans (the lids are too easily punctured), plastic milk jugs, aluminum cans, soda bottles and plastic or paper bags.

The container should be visibly labeled with the words "biohazard," "infectious waste" or "sharps," or with the

bio-hazard emblem. If the sharps are in a recyclable container, it could be labeled "Do not recycle" as well.

What must collectors do with the sharps?

People who collect sharps must ensure the sharps are safely handled, stored and transported, and ultimately treated according to state law.

Specifically, in s. NR 526.09(5), Wis. Adm. Code, requires stations to:

- Ensure containers brought to you are properly sealed and labeled. You may either refuse improper sharps containers or have an oversized container available.
- Handle containers safely and as little as possible. Never open sharps containers.
- Keep sharps in a box in a designated area within a room, separate from other wastes.
- Store no more than 500 lb. of sharps at one time.
- Send sharps away for disposal at least every 90 days.
- If you transport the sharps, put them in an enclosed portion of a vehicle (e.g., in the trunk). If the vehicle is transporting less than 50 pounds of infectious waste per month (every month), you don't need an infectious waste transportation license. Transport the sharps only to another collection station or to a licensed infectious waste treatment facility.
- If you do not transport the sharps, arrange for a licensed infectious waste hauler to pick it up. Note: Commercial waste haulers will use infectious waste manifests, and a trained person must sign them.

Will the DNR inspect the station?

The DNR does not routinely inspect sharps collection stations, but will investigate any complaints of violations of safety requirements.

What can collectors charge for accepting sharps?

Station operators may charge only what it costs them to dispose of the waste; that is, on a non-profit and cost-only basis. Many stations collect for free and some stations ask for a small donation or charge a few dollars.

Operators may offset costs by:

- seeking funds from local governments or private organizations or citizens;
- asking for reduced transportation and disposal rates from waste haulers; and

- requesting donations of sharps containers from supporting organizations.

Does Medicaid reimburse any costs of collecting sharps?

For collection stations, no. For users insured by Medicaid, yes. Medicaid will reimburse for purchased containers but not for transportation, treatment or disposal of full containers. Specifically, Medicaid will pay for "disposable containers," a category that includes sharps containers, in sizes from one quart to eight gallons. Questions about Medicaid reimbursements should be directed to the user's medical provider.

Which sharps collection stations must register with the DNR?

You must register the station if it collects more infectious waste than your own business or institution generates in the same location, even if you accept sharps only from your customers or patients. Most retail pharmacies must register.

Registration is the only required paperwork. Registration exempts the station from storage facility licensing, waste tracking requirements and other paperwork.

You do not need to register your station if it:

1. generates sharps in the course of its own activities (e.g., a hospital) in the same location, and
2. accepts less infectious waste from its users than it generates or less than 500 pounds per month, whichever is less.

Typically, this is true only for medical facilities.

Even if your station is exempt from registering, the DNR encourages you to register the station, so that users can find it through the DNR's online list. Local public health departments should be notified for the same reason.

What if we fail to register?

If you do not register and don't qualify for the exemption from registration, the DNR could take enforcement action against you for storing others' sharps without a license.

How do we register a station?

The DNR accepts registrations online at dnr.wi.gov (search for "sharps collection").

If you are unable to submit an online registration, you may register your station with the DNR by sending a letter providing all of the following information:

- the station's name, street address, phone number and county;
- the operator's name, mailing address, and phone number;
- the owner's name, address and phone number;
- the amount of any fee you charge users, and what the fee covers; and
- other pertinent details such as your clientele, relationship to area-wide collection programs, location within a building or starting date.

Send your letter to Medical Waste Coordinator, WA/5, WDNR, PO Box 7921, Madison, WI 53707-7921. You may register more than one station with the same letter.

What will the DNR do with the information?

The DNR will add your station to its list of registered sharps collection stations.

How can a person learn where the nearest sharps station is?

Visit dnr.wi.gov and search for “sharps disposal.”

What if we want to gather all the sharps in a central location?

If you gather collected sharps in a central location to save on waste disposal costs, that central location must either qualify for the exemption (see **Which sharps collection stations must register with the DNR?**) OR it must be registered as a separate sharps collection station. If you do not want the public to bring sharps to the central location, you still must register it, but you may request that the DNR leave this location off its published list.

This answer applies whether you operate several sharps collection stations yourself, or you manage waste on behalf of a number of generators of small amounts of sharps (e.g., several veterinarians).

Does the station have to be accessible?



The station should be accessible to people with disabilities **or** be able to accommodate them. For example, people could call ahead to have someone meet them at the curb.

Do people working in the station need to have the OSHA bloodborne pathogen training and program?

If collection stations are simply drop-off sites where generators place their sharps containers into a larger shipping container, station operators don't need the OSHA training and program. If, however, station operators themselves transfer sealed sharps containers, they must have the OSHA training and program. Contact your local OSHA office for more information.

What if someone leaves sharps in an improper container in or near the station?

Have a contingency plan in case you find improper containers, such as sharps in milk bottles or in plastic bags. For example, have an oversized sharps container available. Use tools (not your hands) to put the whole improper container into a larger container.

What is the liability regarding other generators' sharps?

Generators are responsible for proper packaging and labeling of sharps and for ensuring their waste is taken to a sharps collection station. Sharps collection station workers should visually check the containers before accepting them. After accepting sharps, the station operator bears primary responsibility for sending the sharps to a place where they will be properly treated and disposed of.

Where can we get brochures and publicity information?

Generic fliers, posters and brochures describing what to do are available on the DNR website (dnr.wi.gov and search for “sharps collection”).

How will collecting sharps affect medical facilities required to reduce the amount of medical waste generated?

Medical waste reduction requirements apply only to medical waste your facility generates itself, not to medical waste accepted from other generators. If you have other questions about reporting requirements, visit dnr.wi.gov and search for “infectious waste annual report.”

For more information

Go to dnr.wi.gov and search for:

- “healthcare waste” for generators of other healthcare wastes.
- “sharps collection” for sharps collectors
- “sharps disposal” for generators of household sharps

Access Wisconsin’s infectious waste rules about sharps collection in s. NR 526.09(5).

https://docs.legis.wisconsin.gov/code/admin_code/nr/500/526

Send an email to: DNRMedicalWaste@Wisconsin.gov or a letter to:

DNR Medical Waste Coordinator

Waste and Materials Management (WA/5)

PO Box 7921

Madison, WI 53707-7921

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