

This worksheet will help infectious waste generators determine whether they must file one or both parts of the Infectious Waste Annual Report form (Form 4400-177), or if they are exempt from filing the report altogether.

The Infectious Waste Annual Report combines two separate reporting requirements into one report to minimize red tape. They are: 1) the **Off-Site Treatment Report** and 2) the **Medical Waste Reduction Progress Report**. On the online annual report form (used from 2014 onward), these reports are Sections B and C, respectively. On the former paper form (1994-2013), they were Parts II and III, respectively

These two reports have different reporting limits and apply to different generators. Use the worksheet questions below to see if you must submit one or both reports or if you may be exempt from reporting altogether. Then follow the instructions on page 2, depending on whether your facility is exempt from filing or not.

## Are you exempt from filing the Off-site Treatment Report?

Ask yourself the following three questions:

Yes No Did your facility\* transport or send away for treatment **less than** 50 pounds (lb.) of infectious waste in **every** calendar month of the calendar year?

\* Facilities that are in a “manifesting group,” which is a group of infectious waste generators who are all located on the same property and which manage their infectious waste together, should answer this question instead: Does the **manifesting group** transport or send away **less than** 50 lb. per calendar month of untreated waste away from the property in **every** calendar month of the calendar year?

Yes No Was all of the waste generated by an individual for his/her own personal health?

Yes No Was all of the infectious waste collected at a registered sharps collection station?

- If you answered "**Yes**" to **any one or more** of the three questions above, your facility is exempt from filing the Off-site Treatment Report. Hospitals, clinics and nursing homes may or may not be exempt from the Medical Waste Reduction Progress Report (see page 2).
- If you\*\* answered "**No**" to **all three** questions above, you must complete the Off-site Treatment Report.

\*\* If a manifesting group answered “No” to the first question, whoever contracted with the waste hauler (the “manifesting group leader”) must complete and submit the Off-site Treatment Report to the DNR, on behalf of the group. The other members of the group will sign the signature page (or a copy of that page) that the DNR will send to the manifesting group leader. The manifesting group leader must send all the original signatures to the DNR. The other members should not complete Section B of the online form, but may be subject to Section C. (See next page.)

**PLEASE NOTE:** The amount of waste used to determine this exemption:

- **Is** based on what was sent away from a given location for treatment elsewhere.
- **Is** based on what was actually sent away for treatment in any one calendar month according to manifests, shipping papers or other records.
- **Is not** based on an average of 12 months.

- **Is not** based on what was *generated* each month.
- **Is not** reduced by any amount of waste recycled after treatment.
- **Does** include estimates of any infectious waste your facility sewered.
- **Does** include both infectious wastes and items which contain or are mixed with infectious waste.
- **Does** include infectious wastes from other generators if you combine those wastes with your wastes and included them in your manifested amount.
- **Does not** include infectious waste collected at a registered sharps collection station or from other generators if you keep separate records of those wastes and report them separately in Section B of the annual report form.
- **Does not** include waste that you treated yourself and report as such in Section B of the annual report form.

## Are you exempt from filing the Medical Waste Reduction Progress Report?

Ask yourself the following three questions:

Yes No Is your facility something other than a clinic, hospital or nursing home? Examples include free-standing laboratories, schools, funeral homes, coroners, blood collection centers, home health agencies, and office buildings that merely manage infectious waste on behalf of tenants.

Yes No Did your facility (hospital, clinic or nursing home) **generate** less than 50 lb. of medical waste per calendar month (that is, in **every** calendar month of the reporting year), regardless of where the waste was treated?

Yes No Did your facility (hospital, clinic or nursing home) **generate** more than 50 lb. of medical waste during **only** one calendar month of a calendar year **and also** generate an average of less than 50 lb. of medical waste per month for the same calendar year?

- If you can answer "**Yes**" to **any one or more** of the three questions above, your facility is exempt from filing the progress report on waste reduction.
- If you answered "**No**" to **all** three questions above your facility must file the progress report on waste reduction. See *Medical Waste Reduction and the Annual Report*, publication WA802. It is available at: <http://dnr.wi.gov/files/pdf/pubs/wa/wa802.pdf>

## What does this mean?

### Generators who must file one or both reports

If your facility is an existing facility in the DNR database:

From now on, the DNR will notify you of annual reports only by email, so it is very important that you keep contact information and facility information up-to-date.

To notify the DNR of contact changes or if your facility has moved closed or changed ownership, click on "Notify the DNR of facility or contact information changes" on the Annual Reports web page.

<http://dnr.wi.gov/topic/HealthWaste/IWReport.html>

### If your facility is new or is not yet on the DNR database

New facilities should send an email to [DNRMedicalWaste@wisconsin.gov](mailto:DNRMedicalWaste@wisconsin.gov) stating the facility name; its street address, city and zip code; and the name, email address and phone number of the person responsible for submitting the annual report to the DNR. The DNR will assign a “Facility Identification Number” (FID number) based on your facility’s location. You will need the FID number to access the online infectious waste annual report form.

### **Generators who are exempt from filing both reports**

#### If your facility has filed an annual report before

Please notify the DNR of your exempt status by following the instructions on the “Prepare to file” tab on the Annual Reports web page.

<http://dnr.wi.gov/topic/HealthWaste/IWReport.html>

#### If your facility has never reported on infectious waste before

New facilities should send an email to [DNRMedicalWaste@wisconsin.gov](mailto:DNRMedicalWaste@wisconsin.gov) stating the facility name; its street address, city and zip code; and the name, email address and phone number of the person responsible for submitting the annual report to the DNR. The DNR will assign a “Facility Identification Number” (FID number) based on your facility’s location. You will need the FID number to access the online infectious waste annual report form to notify the DNR of your exempt status.

You will also need to:

- **Keep records** of the amount of infectious waste you are generating, treating and sending off-site for treatment (see ss. NR 526.12 and .14). Copies of manifests or simple written logs will do.
- **Retain the records for at least 3 to 5 years.** Hospitals, clinics and nursing homes which may have to prepare waste reduction plans later should keep records for at least 5 years. All others, 3 years.

### **Sharps collection stations and households**

Persons who operate a sharps collection station and individuals at home do not need to keep any records or file annual reports. They do need to manage sharps separately from other wastes.



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***Disclaimer:** This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.*

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## WISCONSIN DEPARTMENT OF NATURAL RESOURCES NOTICE OF FINAL GUIDANCE & CERTIFICATION

Pursuant to ch. 227, Wis. Stats., the Wisconsin Department of Natural Resources has finalized and hereby certifies the following guidance document.

### DOCUMENT ID

WA-19-1801-C

### DOCUMENT TITLE

Infectious Waste Annual Report Exemption Worksheet

### PROGRAM/BUREAU

Waste and Materials Management

### STATUTORY AUTHORITY OR LEGAL CITATION

Ch. 289, Wis. Stats., NR 507.26, Wis. Adm. Code

### DATE SENT TO LEGISLATIVE REFERENCE BUREAU (FOR PUBLIC COMMENTS)

November 4, 2019

### DATE FINALIZED

December 2, 2019

### DNR CERTIFICATION

*I have reviewed this guidance document or proposed guidance document and I certify that it complies with sections 227.10 and 227.11 of the Wisconsin Statutes. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is not explicitly required or explicitly permitted by a statute or a rule that has been lawfully promulgated. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is more restrictive than a standard, requirement, or threshold contained in the Wisconsin Statutes.*

A handwritten signature in black ink, appearing to read 'Joseph P. Van Rossum'.

December 2, 2019

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Signature

Date