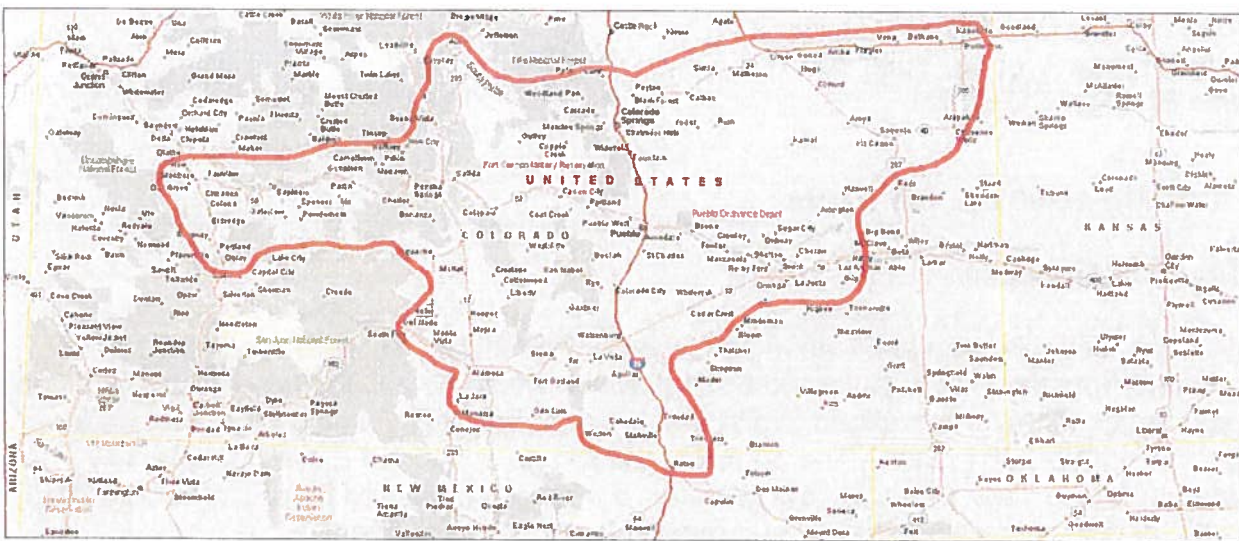


Stericycle is providing the following narrative to give the planning commission more detailed information regarding the actual operation of the facility.

Stericycle is one of the leading providers of medical waste disposal services. Stericycle specializes in proper pickup, treatment, and disposal of biohazards, such as “Red Bag” Regulated Medical Waste (RMW) and sharps containers. Hundreds of thousands of customers trust Stericycle to manage their biohazardous waste disposal.

The existing Colorado Springs location services hospital, clinics, nursing homes, labs and doctor’s offices throughout Colorado. Route map is included below.



Stericycle has such locations all over the US. The drivers at these locations pick up RMW from customers in outlying communities and combine the containers at the transfer location for more efficient transport to the Stericycle processing facilities. At the end of the day the driver transfers closed RMW containers directly into an enclosed, refrigerated 53ft trailer.

Each driver will run a designated route, leaving in the morning to return in the afternoon. Each driver will travel from site to site collecting full RMW containers replacing with an empty RMW container. Upon completion of route, drivers will then return to the waste transfer site to unload into a refrigerated transport trailer. Empty containers are then reloaded onto trucks for next day routes. When the trailer is full, load is strapped down and RMW paperwork is then placed with the trailer.

The refrigerated transport trailers from Colorado Springs are shuttled to the Dacono Autoclave facility daily (Mon – Fri) for processing.

To provide these services the following vehicles will be staged at the Colorado Springs site:

There are **three 26ft enclosed route trucks** that park in proximity to the main building. Inside the building is a small office area for drivers to keep and print paperwork.

There are up to three 53ft trailers staged in the parking area located in the NW corner of the property. One is used exclusively for storage of empty containers and supplies. The other two are for short term storage of RMW and transport to Dacono.

The trailers are hauled 1x per day Monday thru Friday - 8:00 AM to 4:30 pm

Route trucks will leave and return 99% of the time 1x a day. Exceptions are when extra empty RMW containers are needed to be delivered to a customer site due to increased waste levels. Normal daily use is as follows:

Monday – 3 vehicles exit and enter (2 route trucks, 1 trailer transfer)

Tuesday – 3 vehicles exit and enter (2 route trucks, 1 trailer transfer)

Wednesday – 4 vehicles exit and enter (3 route trucks, 1 trailer transfer)

Thursday – 4 vehicles exit and enter (3 route trucks, 1 trailer transfer)

Friday – 3 vehicles exit and enter (2 route trucks, 1 trailer transfer)

#### **Effect upon other properties in the surrounding area**

The day to day operations of this site are similar to the operations of nearby properties, including the existing air cargo freight business located at the same site as Stericycle. That business is the main lessee and occupies the majority of the property and the building.

#### **Effect on development and improvement of surrounding properties**

The area is already developed for light industrial use. This is considered a low volume low hazard operation and has no impact on the future use or value of surrounding properties.

#### **Utilities, roads, drainage and other necessary facilities.**

All necessary facilities and utilities are already located at this industrial site. Site is paved. Public road is easily accessible.

#### **Off street parking and loading facilities**

The site has ample parking for staff. One handicap parking space is located near the main entrance to the building. Vehicles are parked on hard surfaces. Loading is confined to the property and is by hand directly from route truck to trailer with no use of loading docks or other equipment such as forklifts. No containers are staged on the ground at any time.

Stericycle utilizes three parking spaces for the route trucks, three parking slots for the transport trailers. A small office space on the bottom floor is occupied only when the drivers require some administrative paperwork. This space is indicated in blue on the site plan.

## **Measures to control offensive odor, fumes, dust, noise, vibration and lighting that may cause a nuisance**

Stericycle is required to package the RMW in a manner that prevents leaking and maintains the integrity of the packaging. No waste containers are opened, treated or consolidated on site. Trucks carry spill response kits with disinfectant if required. No offensive nuisances – odor, fumes, dust, noise, vibration are expected. The day to day operation will have a minimal effect on the health, safety and general welfare of the public, as stringent packaging and transportation rules are followed. Medical waste transportation and storage is regulated by Federal and State agencies. State, county and local safety officials will be allowed unrestricted entry upon demand during regular business hours for inspections.

Trailers are refrigerated and leave the facility within 48 hrs. Refrigeration units are checked daily by drivers for proper operation. No processing or consolidation of waste takes place. No containers are stored on the ground or in the building. Trucks and trailers remain locked and sealed except during active load/unload. Waste has no dust component. Travel is across paved surfaces. Trained personnel are always present during transfer operations.

Drivers check areas around trailers daily for any litter. Unauthorized persons are not allowed in areas used to store waste. Due to the nature of the wastes, fires and explosions would not occur.

Operations occur normally during daylight hours. The property has existing security lighting and industrial lighting.

The facility has minimal risk of impacting groundwater or surface water because waste is packaged in sealed containers, is transferred by hand and is never placed on the ground.

## **Fire Marshal Review**

Stericycle is in the process of obtaining Knox padlocks from the Fire Marshall's office to fulfill that requirement. The one trailer used for storage of empty containers and small supplies has been indicated on the site plans.

In summary:

- The waste is never removed from its required packaging
- The waste is stored in a secure refrigerated container to minimize odor and hazard
- The waste is removed from the site and transported to a permitted treatment facility within 72 hrs.
- The volume of traffic is low, no more than normal use by other area businesses
- There is minimal impact to an existing facility with trucking activity

If additional information is required, please feel free to contact me at (206) 510-0867 or via email at [bridget.kelly@stericycle.com](mailto:bridget.kelly@stericycle.com).

Sincerely,

Bridget Kelly  
Regional Environmental Quality Manager - Stericycle, Inc.



**CO Springs, Colorado MEDICAL WASTE  
EMERGENCY RESPONSE CONTINGENCY PLAN**

**EMERGENCY PROCEDURES:**

**A. Fire or Explosion:**

1. Call CO Springs Fire Department - **911** or Main Number: **719-385-7204**
2. Make announcement over public address system to evacuate building.
3. Non-fire-fighting employees gather at the Rally Point, on the North East side of the building, indicated on the evacuation maps, and get a head count.
4. Employees trained in first aid will provide first aid to any injured person.
5. All employees trained in fire safety procedures are authorized to fight fires with appropriate fire fighting equipment.
6. Notify Emergency Coordinator(s) immediately. (see page 2).

**B. Tornado, Earthquake or Natural Disaster:**

1. Find cover or a safe place to avoid falling or flying objects, and remain there until the situation has subsided.
2. Provide first aid to any injured persons.
3. Notify Emergency Coordinator(s) immediately (see page 2).

**C. Personal Injury:**

1. Determine the nature and extent of the injury.
2. Call emergency medical technicians if necessary: **911**
3. Administer first aid as necessary or, if not trained, notify first aid trained co-worker.
4. Notify supervisor or Emergency Coordinator(s) immediately (see page 2).

**D. Major Medical Waste Spill (not including in-facility spills):**

1. Determine, and write down, the location and severity of incident.
2. If there are any injuries refer to *Personal Injury* section.
3. Notify Emergency Coordinator(s) immediately (see page 2).
4. The Emergency Coordinator should notify the State Hazardous Material & Waste Management, Environmental Emergency Response Department **877-518-5608**; provide necessary information.
5. If the spill is manageable, in the opinion of the Emergency Coordinator, respond with a truck to the spill with the following spill supplies:

Vermiculite	25% Bleach	Tub liners
Spray bottles	Water	Respirators
Tyvec coveralls	Gloves	Rubber overboots
Barricade Tape	Duct Tape	Cellular Telephone.
Shovels	Empty Regulated Medical Waste tubs	

Spills determined to be unmanageable should be cleaned up by the State Emergency Response Department.

**E. Natural & Man-Made Disasters**

Stericycle maintains the necessary supplies on-site to service our customers in the event of a natural or man-made disaster. Extra equipment, containers and supplies are stored on-site for use in the event of an emergency.

In addition, Stericycle is a nation-wide company capable of calling in equipment and personnel from across the nation to provide assistance as needed. Our ability to respond in such a manner makes it unlikely that Stericycle customers would suffer lengthy interruption of service due to natural or man-made disasters.



*Insert Facility Name Here* **MEDICAL WASTE  
EMERGENCY RESPONSE CONTINGENCY PLAN**

One of the following Emergency Coordinators will always be available:

**Ron Grannis**, Transportation Supervisor  
Cell: 303-868-7109 or 303-720-4596

**Doug Nix**, Transportation Supervisor  
Cell: 303-901-3617

**Alan Inkley**, Area Safety Manager:  
Cell: 801-503-5985

Medical arrangements can be accommodated by the Emergency Coordinator at the following facilities:

*For non-urgent weekday care*

**Concentra**  
5320 Mark Dabling Blvd,  
Bldg 7, Ste 100  
CO Springs, CO 80918  
**719-592-1584**

*For urgent night and weekend care (24 hrs):*

**Penrose Hospital**  
2222 N. Nevada Ave.  
CO Springs, CO 80907  
**719-776-5000**

**IN THE EVENT OF MAJOR FIRE, NATURAL DISASTER, FATALITY OR MAJOR SPILL:**

Emergency Coordinator will notify the following individuals immediately:

**Chris Stromerson**, Area Director – Safety & Health **425-338-5249**

**IN THE EVENT OF A DISCHARGE OF UNTREATED PROCESS WASTE WATER INTO THE SANITARY SEWER:**

Emergency Coordinator will notify the following individuals immediately:

**Ron Grannis**, Transportation Supervisor: Cell: 303-868-7109 or 303-720-4596

**Doug Nix**, Transportation Supervisor: Cell: 303-901-3617



# PACKAGING PROCEDURES

FOR MEDICAL WASTE DISPOSAL • Reusable Containers\* and Corrugated Boxes

Waste2Green4Healthcare™

**SET UP**

**CORRUGATED BOXES:**

- Turn over and seal bottom flaps with tape
- Auto-locking boxes, engage bottom flaps

*No set up required for Reusable Containers*

**STEP 1**

**LINE CONTAINER OR BOX WITH RED BAG\*\***

**STEP 2**

**TIE BAG WHEN BOX OR CONTAINER IS FULL**

**STEP 3**

**CORRUGATED BOXES:**

- Seal top of box with tape
- Auto-locking boxes, engage top flaps

**REUSABLE CONTAINERS:**

- Secure lid on container
- Ensure all closure and/or locking mechanisms are engaged

**STEP 4**

**CHECK MARKINGS**

- Federal markings (see picture above)
- Additional state and local regulations may apply
- Apply bar code label where available

**UNACCEPTABLE**

\* Instructions not applicable for reusable sharps containers.  
 \*\* For large or bulk reusable containers (greater than 119 gallons), bag must meet and be marked per current ASTM requirements, limited to a maximum 46 gallons and 22 lbs.  
 All containers pictured here have a maximum weight limit of 50 pounds.  
 The information on the poster is based on current federal laws and regulations. Additional state specific regulations may apply. Please be advised that regulations are subject to change.

## REGULATORY REQUIREMENTS

### GENERAL

- Generators are responsible for packaging their wastes.
- Each bag must be hand tied by gathering and twisting the neck of the bag and using a tie or hand knot to secure the bag, and each container must be securely closed.
- Closed bags must not be visible once secondary container is closed.
- Improperly packaged containers or damaged containers will be denied pick-up or returned to the generator.
- Only Regulated Medical Waste can be placed in Stericycle containers.

### SHARPS

- Sharp materials ("sharps") must be placed in a puncture-resistant container designed for "sharps" waste. "Sharps" include needles, syringes, broken glass, scalpels, culture slides, culture dishes, broken capillary tubes, broken rigid plastic and exposed ends of dental wires.
- All sharps containers should be properly closed before being placed into secondary containers.
- No loose sharps are permitted outside of sharps containers.

For more information, contact Stericycle at (866) 338-5120



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FIGURE 2



4120 Mark Dabling Blvd.  
Colorado Springs, CO 80905

# OPERATING PLAN

**November 2015**



## 1.0 INTRODUCTION

Stericycle, Inc. would like to operate a regulated medical waste transportation facility located at 4120 Mark Dabling Blvd, Colorado Springs, CO.

Facility Information: Stericycle, Inc.  
Doug Nix, Transportation Manager  
4120 Mark Dabling Blvd.  
Colorado Springs, Colorado 80905  
Office Phone: 303-371-8170 ext. 11  
Mobile: 303-901-3617  
**Emergency 24 Hour Contact # Doug Nix 303-901-3617**  
Alan Inkley (Safety and Health) 801-503-5985

Contact Information: Bridget Kelly  
Stericycle, Inc.  
Regional Environmental Compliance Manager  
5355 Colorado Blvd., Dacono CO 80514  
Phone: 206-510-0867  
eFax: 800 568-6142  
[bridgetkelly@stericycle.com](mailto:bridgetkelly@stericycle.com)

Landowner Information: Merrill Austin, V.P. - Thunderbolt Management Group.  
1309 E.Cheyenne Road  
Colorado Springs, CO 80905  
719-391-0196 phone

## 2.0 OPERATIONAL PROCEDURES

Operations at the Colorado Springs facility will include:

- Regulated medical waste storage and transfer;
- Non-hazardous waste pharmaceutical collection for transfer to an incineration facility for destruction;
- Regulated Garbage/APHIS

### 2.1 Waste Receipt and Transportation

Regulated medical waste and non-hazardous pharmaceuticals is picked up from generators on a scheduled or on-call basis in South Dakota, Wyoming and Nebraska.

It is the responsibility of the waste generator to properly package their waste in accordance with all state and federal guidelines. Stericycle does not transport, or accept for transport, waste that is improperly packaged or classified.

Stericycle does not accept waste for pick-up or treatment if the package is:

- leaking,
- packaged incorrectly,
- not labeled or labeled incorrectly,
- structurally compromised,
- visibly contaminated,
- non-compliant, or
- non-conforming waste.

Prevention programs require proper notification and training about wastes not acceptable for treatment via autoclaving and/or incineration. Stericycle's Waste Acceptance Protocol is included as Appendix A.

Stericycle transports all wastes under the following policies:

- Transporters shall not accept waste that is improperly packaged.
- Regulated medical waste shall be transported in a manner that prevents leakage of the contents of the package.
- The integrity of the package shall be maintained at all times.
- The labeling and marking of the package shall be maintained at all times.
- All loads containing regulated medical waste shall be covered during transportation.
- A contingency plan shall be prepared and maintained in each vehicle used in the transporting of regulated medical waste. The operator of each vehicle shall be knowledgeable of the plan.
- Vehicles used for the transportation of regulated medical waste shall be thoroughly cleaned and disinfected before being used for any other purpose and in the event of leakage from packages.

Stericycle's BioTrack system tracks all waste containers from the point of generation, through transportation, to treatment at the processing facility.

## **2.2 Container Unloading and Handling**

The waste is handled in the following steps once it arrives at the Colorado Springs transfer facility:

1. Containers are removed from the route truck and transported to tractor trailer via a two-wheeled dolly.

2. Racks of reusable sharps containers are rolled off the route truck and immediately loaded onto a trailer.

Stericycle, Inc. employs its own proprietary bar code identification and tracking system, *SteriWorks*, in which each container is labeled with the generator's unique code. At the time of collection, the driver scans the containers to be collected with a handheld computer which prints a receipt indicating the date and time of collection. The receipt is given to the generator. The *SteriWorks* document provides the generator with verification of collection and provides Stericycle, Inc. one of the means to track the waste from collection to treatment. Each month customers are sent an invoice, which summarizes their collections for the month.

## **TRACKING DOCUMENTS FOR MEDICAL WASTE**

### **STERICYCLE, INC. "SteriWorks™" System for Tracking Waste:**

All waste collected by a medical waste transporter from the generating facility/person for treatment must be accompanied by a tracking document.

STERICYCLE, INC. has a unique approach to the tracking process known as "SteriWorks™". Barcodes and optical scanners or "readers" record pertinent data required for tracking and billing.

The tracking document must meet US DOT and State requirements, which include, but are not limited to:

Name, address, telephone number of medical waste hauler

Type and quantity of medical waste transported

Generator name, addresses and phone number

Name, address, telephone number of permitted medical waste treatment facility

Authorized signature at the permitted treatment facility receiving the waste (treatment facility copy only)

A signed copy of the tracking document(s) will be provided to the customer at the time of waste collection or acceptance.

The tracking document(s) will be in the custody of the STERICYCLE, INC. driver hauling the medical waste to its treatment destination at all times.

Once the waste is treated copies of the completed manifest is scanned and customers are available to view online and print.

STERICYCLE, INC. will maintain signed copies of all tracking documents for a minimum of 3 years.

### 2.3 Unacceptable Waste

Waste not accepted for transfer at the Colorado Springs facility includes:

- Radioactive waste
- Hazardous waste as defined by the US EPA
- Explosive materials, including aerosol cans.

### 2.4 Waste Treatment

Waste that is received at the facility that is packaged by the generator in cardboard or plastic containers and is labeled with a bar code. Waste accepted by the Stericycle Colorado Springs facility will be transported to an autoclave, primarily:

Stericycle – Dacono, CO  
5255 Colorado Blvd  
Dacono, CO 80514

### 2.5 Storage

Regulated medical waste and non-hazardous waste pharmaceuticals are stored in a manner that prevents leakage and maintains the integrity of the packaging at all times.

Waste that is collected for transfer in Colorado Springs is transported in closed, secured trucks/trailers. The doors to the storage area of each collection truck/trailer are locked during all times except during loading. Trucks and trailers are labeled to alert the public regarding the type of waste being transported or handled. Once a trailer is filled it is normally hauled to a treatment facility within 48 hours. On the weekends trailers may be swapped out. Trained personnel are always present during transfer operations. Unauthorized persons are not allowed in areas used to store waste. All trailers and vehicles are locked and sealed when the facility is vacated. No waste materials will be stored outside of the trailers.

### 2.6 Record Keeping

All containers must be labeled at the generating location before being accepted for transportation. SteriWorks optical scanners record when a container is picked up. Each container is scanned again at the Colorado Springs facility prior to transfer. This process not only provides a typed manifest for tracking purposes, but it produces verifiable documentation of the waste trail for each container the company handles.

Records of waste are maintained for each shipment of and include the following:

- Name and address of generator,
- Date received,
- Amount of waste received by container number from each generator,
- Date treated,
- Name and address of ultimate disposal facility.

## **2.7 Vector Control**

The Colorado Springs facility is maintained and cleaned to minimize odors and vectors, and to provide a safe working environment and protect the safety and health of the public. The systematic waste process, which includes storage and handling specifications and policies, inhibits vector exposure to the waste materials. No waste materials will be stored outside of the locked and sealed trailers. Refrigerated trailers are utilized and waste is transported from the facility to the processing facility when full. Due to the nature of the wastes stored, explosions and fires will not occur.

## **3.0 HOURS OF OPERATION**

The Stericycle Colorado Springs facility can operate 24 hours a day, 7 days a week for transfer. Normal operational days are Mon-Fri. Office hours for Regional Transportation Management are Monday through Friday from 8:00 a.m. to 4:30 p.m. Emergency contact information is provided.

## **4.0 FACILITY EQUIPMENT**

At present, equipment used for the storage operation will be limited to van trucks, enclosed trailers and a small office.

Because this facility will be limited to only storage and transfer of medical waste, operations and maintenance activities will be minimal.

## **5.0 STORAGE AND CAPACITY LIMITS**

All untreated waste is stored in enclosed, locked 48 or 53 ft trailers located within the secure area of the premises pending transfer. Once a trailer is filled it is normally hauled to a treatment facility within 48 hours.

## **6.0 BYPASS AND RESIDUAL PLAN**

The Stericycle facilities listed below act as backup treatment facilities in the event the primary treatment facilities are down for an extended periods of time.



**North Salt Lake, Utah**

Incinerator  
90 North Foxboro  
North Salt Lake, UT 85054

**Butte, MT**

Autoclave Facility  
107 S. Parkmont  
Butte, MT 59701

**Lincoln, NE**

Autoclave Facility  
6100 N. 60<sup>th</sup> Street  
Lincoln, NE 68507

Additional transportation capabilities are available in a contingency, if needed, from these and other Stericycle facilities in the region.

**7.0 EMPLOYEE TRAINING PROGRAM**

Employees receive the following training upon hire and annually:

- OSHA Bloodborne Pathogens (29 CFR 1910.1030)
- Bloodborne Diseases
- Hepatitis B Vaccination Program
- Exposure Protocol
- Personal Protective Equipment
- Hazard Communication (29 CFR 1910.1200)
- Lock-Out/Tag Out Policy & Procedures
- Radiation Safety and Monitoring
- First Aid and CPR
- Emergency Response Procedures
- Fire Safety
- Spill Response
- Driver training programs, including DOT Hazardous Materials Training and other DOT required training
- Waste Acceptance Protocol
- Additional function-specific training (Welding Safety, Forklift Safety, etc.) is completed as required.
- All equipment operators will receive training and will become knowledgeable of the procedures, equipment and sterilization process. Training programs are oriented towards maintenance and safe operation of the facility.



**APPENDIX A**

**WASTE ACCEPTANCE PROTOCOL**

Stericycle Health Care Services route truck. Regulated Medical Waste, non-hazardous pharmaceuticals and Regulated Garbage (USDA) is collected from generators on a scheduled or on-call basis



FIGURE 2

# A Route Truck backs up to the transport trailer

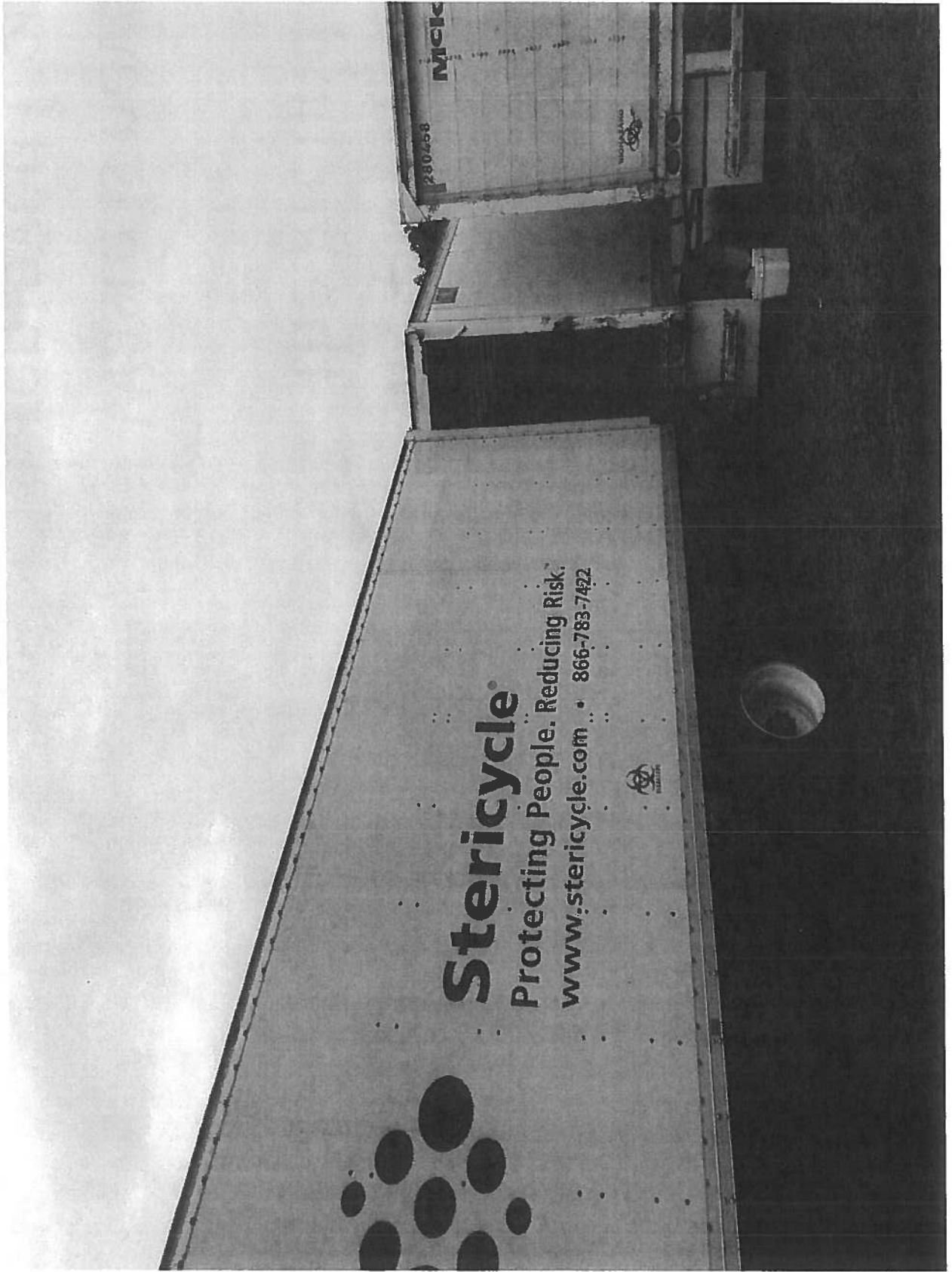


FIGURE 2



Truck to trailer  
transload.

No containers  
are placed on  
the ground.

Waste is never  
removed from  
containers



FIGURE 2



All waste is containerized. Stericycle does not accept for transport containers that are: leaking, not labeled, incorrectly labeled, visibly contaminated, non-compliant or contains non-conforming waste.



FIGURE 2



Containers  
are properly  
stacked and  
secured for  
transport.



FIGURE 2

All vehicles have an adequate supply of disinfectant chemical and spill control supplies.

VIRKON-S is both EPA and USDA registered as an effective disinfectant, the only disinfectant Stericycle will use in our APHIS Spill control kits.



FIGURE 2



All trailers are padlocked when not being actively loaded.



FIGURE 2



Route trucks are equipped with a padlock and a roll-up door lock enforcer or “slam lock” that locks without a key. When door is closed, the door is securely locked.

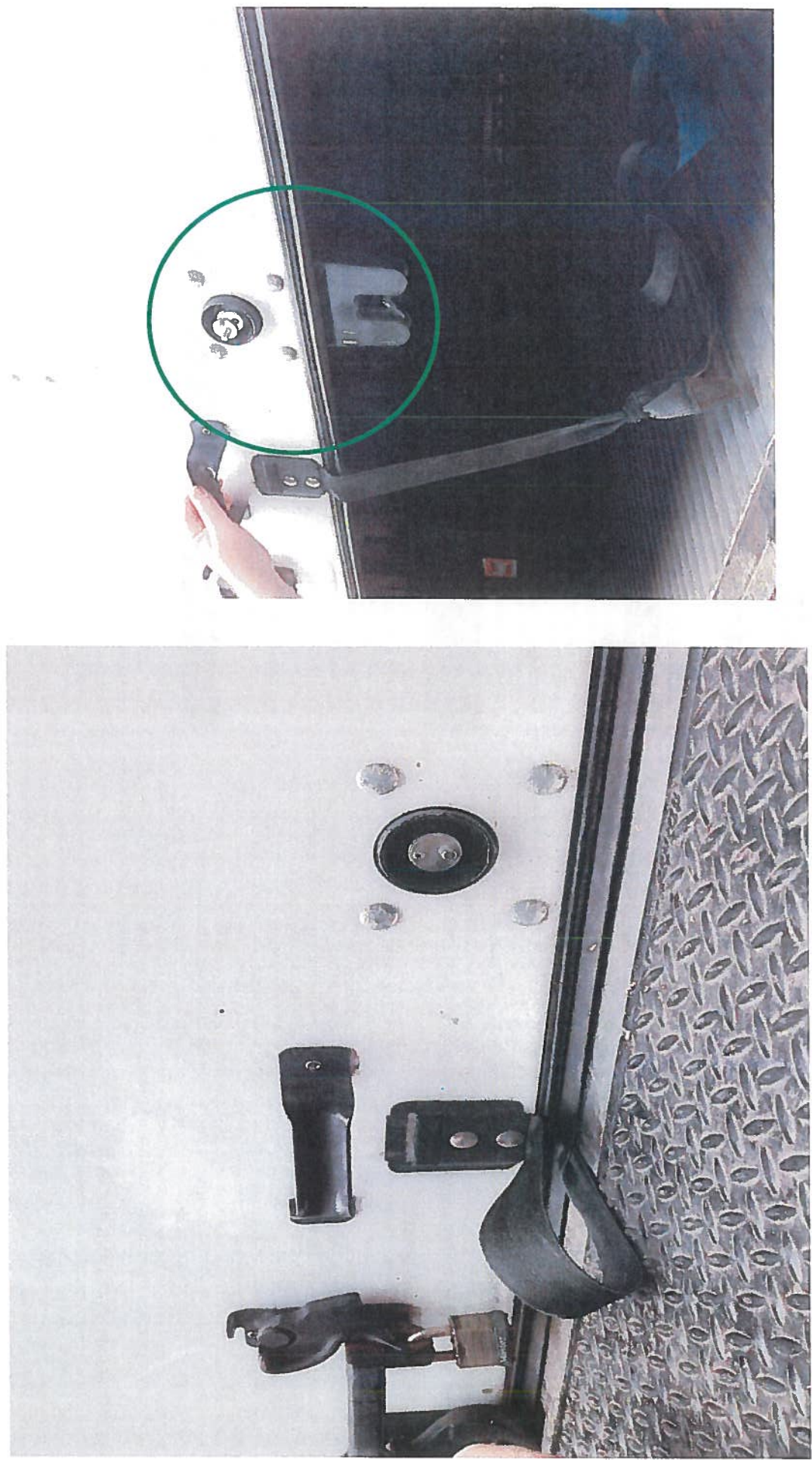


FIGURE 2



# REGULATED MEDICAL WASTE ACCEPTANCE POLICY

Stericycle policy requires compliance with all applicable regulations regarding the collection, transportation and treatment of regulated medical waste. Federal Department of Transportation (DOT) Regulations require the generator of regulated medical waste to certify that the packaging and documentation of transported regulated medical waste complies with DOT regulations regarding waste classification, packaging, labeling and shipping documentation. To ensure that neither Stericycle nor the generator of regulated medical waste violates applicable regulations, it is imperative that all parties understand the rules regarding proper identification, classification, segregation and packaging of regulated medical waste. The purpose of this policy is to summarize the minimum requirements for preparing your medical waste for collection, transportation and treatment. Additional facility or state-specific waste acceptance policies may apply based on permit specifications. Please contact your local representative for further information. You may also call (866) 338-5120.

## REGULATED MEDICAL WASTE

Stericycle accepts medical waste generated in a broad range of medical, diagnostic, therapeutic and research activities. The term "medical waste" includes biohazardous, biomedical, infectious or regulated medical waste as defined under federal, state or local laws, rules, regulations and guidelines. Except as defined by specific state regulations, this **excludes** RCRA hazardous waste pharmaceuticals, all DEA scheduled drugs including controlled substances, bulk chemotherapy, waste containing mercury or other heavy metals, batteries of any type, cauterizers, non-infectious dental waste, chemicals such as solvents, reagents, corrosives or ignitable materials classified as hazardous waste under Federal and State EPA Regulations. In addition, Stericycle **cannot accept** bulk liquids, radioactive materials, or complete human remains (including heads, full torsos and fetuses). Stericycle **cannot accept** these excluded materials packaged as regulated medical waste. All lab wastes or materials which contain or have the potential to contain infectious substances arising from those agents listed under 42 CFR 72.3 are strictly prohibited from medical waste by federal law and must be pretreated prior to disposal. Separate protocol and packaging requirements apply for the disposal of non-hazardous pharmaceuticals. Hazardous waste transportation services may be offered in certain geographical locations, under separate contract. Please contact your local representative for details and packaging specifications.

\* *Un-dispensed from DEA Registrant*

## WASTE SEGREGATION AND PACKAGING

The generator is solely responsible for properly segregating, packaging and labeling of regulated medical waste. Proper segregation and packaging reduces the potential for accidental release of the contents and exposure to employees and the general public. DOT regulations require (49 CFR 173.197) that all packages of regulated medical waste be prepared for transport in containers meeting the following requirements: 1) rigid; 2) leak resistant; 3) impervious to moisture; 4) of sufficient strength to prevent tearing or bursting under normal conditions of use and handling; 5) sealed to prevent leakage during transport; and 6) puncture resistant for sharps. All regulated medical waste must be accompanied by a properly completed shipping document (See 49 CFR 172.202).

## MANAGEMENT OF NON-CONFORMING WASTE

As required by regulation and company policy, Stericycle employees may refuse containers that are non-conforming because of their contents or are improperly packaged, leaking, damaged or likely to create a risk of exposure to employees or the general public. Any waste found to be non-conforming to this Waste Acceptance Policy identified in route to, or at a Stericycle location, may be returned to the generator for proper packaging and disposal, or may be rerouted for appropriate destruction; this may include improperly marked regulated medical waste which should have been identified for incineration (i.e. pathological, chemotherapy or non-hazardous pharmaceuticals). Proper segregation and packaging is essential to ensure compliant and safe handling, collection, transportation and treatment of regulated medical waste.

## STERICYCLE REGULATED MEDICAL WASTE ACCEPTANCE POLICY CHECKLIST

### ACCEPTED REGULATED MEDICAL WASTE

- Sharps - Means any object contaminated with a pathogen or that may become contaminated with a pathogen through handling or during transportation and also capable of cutting or penetrating skin or a packaging material. Sharps includes needles, syringes, scalpels, broken glass, culture slides, culture dishes, broken capillary tubes, broken rigid plastic, and exposed ends of dental wires.
- Regulated Medical Waste or Clinical Waste or (Bio) Medical Waste - Means a waste or reusable material derived from the medical treatment of an animal or human, which includes diagnosis and immunization, or from biomedical research, which includes the production and testing of biological products.

### ACCEPTED REGULATED MEDICAL WASTE WHICH MUST BE IDENTIFIED AND SEGREGATED FOR INCINERATION

- Trace Chemotherapy Contaminated Waste - RCRA Empty drug vials, syringes and needles, spill kits, IV tubing and bags, contaminated gloves and gowns, and related materials as defined in applicable laws, rules, regulations or guidelines
- Pathological Waste - Human or animal body parts, organs, tissues and surgical specimen (decanted or formaldehyde, formalin or other preservatives as required per hazardous waste rules).
- Non-RCRA Pharmaceuticals - Must be characterized and certified as non-RCRA hazardous material by the generator. Excludes all DEA scheduled drugs, including controlled substances\*
- California Only - Solidified Suction Canisters - Suction canisters that have been injected with solidifier materials to control liquids or suction canisters made of high heat resistant plastics such as polysulfone

### REGULATED MEDICAL WASTE NOT ACCEPTED BY STERICYCLE

- Untreated Category A Infectious Substances
- Complete Human Remains (including heads, full torsos, and fetuses)
- Bulk Chemotherapy Waste
- Mercury-Containing Dental Waste - Non-contact and contact amalgam and products, chairside traps, amalgam sludge or vacuum pump filters, extracted teeth with mercury fillings and empty amalgam capsules
- Any Mercury Containing Material or Devices - Any mercury thermometers, Sphygmomanometers, lab or medical devices
- RCRA Hazardous Pharmaceutical Waste and all DEA Federal and State controlled substances\*
- Chemicals - Formaldehyde, formalin, acids, alcohol, waste oil, solvents, reagents, fixer developer, fluorescein
- Compressed Gas Cylinders, Canisters, Inhalers and Aerosol Cans
- Hazardous or Universal Waste - any other waste determined by Federal or State EPA regulations including but not limited to batteries, bulbs, heavy metals, etc.
- Radioactive Waste - Any container with a radioactivity level that exceeds regulatory or permitted limits; lead-containing materials

\* Consult Stericycle Representative for specific requirements

Additional waste acceptance policies may apply based on state or permit specific requirements. Hazardous waste transportation services may be offered in certain geographical locations, under separate contract. Please refer to your local Stericycle Representative for additional information and options for possible hazardous waste handling. For additional information on container and labeling requirements contact our Stericycle Customer Service Department at (866) 338-5120.

FIGURE 2