



# Minnesota Pollution Control Agency

Office of the Commissioner

March 12, 2004

Mr. Gary Miller, President  
MedTech Systems, Inc.  
1304 Fir Avenue North  
Glencoe, MN 55338

RE: Infectious Waste Regulatory Concern

Dear Mr. Miller:

The Minnesota Pollution Control Agency (MPCA) has reviewed your request for consideration of an infectious waste sharps treatment and disposal method dated February 5, 2004. Minn. Stat. 116.76 defines a sharp as:

Subd. 18. Sharps. "Sharps" means:


- (1) discarded items that can induce subdermal inoculation of infectious agents, including needles, scalpel blades, pipettes, and other items derived from human or animal patient care, blood banks, laboratories, mortuaries, research facilities, and industrial operations; and*
- (2) discarded glass or rigid plastic vials containing infectious agents.*

MedTech Systems, Inc. (Company) proposes to process the sharps generated in a medical facility such that the syringe portion is removed from the needle for separate disposal. The needles would be properly containerized and treated as regulated infectious waste. The statute does not prohibit the use of alternative treatment technologies as long as they are utilized at the facility where the infectious waste was generated and the treatment technology is demonstrated to be effective. Your method does not need specific approval from the MPCA as long as it is performed on-site at the facility where the waste was generated, the treatment method is proven effective, and the treatment system is described in the facility's infectious waste management plan.

The MPCA reminds the Company, however, that the statute listed above includes two elements that are not addressed by the Company's needle removal method, the first is that the statute includes any discarded items that can induce subdermal inoculation of an infectious agent and any discarded items must also not contain any infectious agents. As long as these conditions are addressed by the treatment method proposed the disposal outlined in the letter appears to be appropriate.

If you have any questions or comments, please feel free to contact me at (651) 296-7271.

Sincerely,

  
Jeff T Connell  
Compliance Coordinator  
Regional Environmental Management Division

JTC:dac