



Upper Valley Waste Management Agency Board Agenda Letter

TO: Board of Directors
FROM: Lederer, Steven - Manager
Upper Valley Waste Management Agency
REPORT BY: David Briggs, Environmental Resource Specialist - (707) 253-4094
SUBJECT: MANAGEMENT OF NEEDLES AND LANCETS (SHARPS)

RECOMMENDATION

MANAGEMENT OF NEEDLES AND LANCETS (SHARPS)

DISCUSSION AND POSSIBLE ACTION: Staff recommends the Board of Directors provide direction to staff regarding options or combination of options for expanded sharps collection and disposal and/or related public education/information activities.

EXECUTIVE SUMMARY

Collection and disposal of needles and lancets, or "sharps," has become an area of focus to waste managers since the State of California banned them from landfills in the year 2008. Napa County and other local agencies and groups have taken a number of steps to establish local sharps collections and improve public understanding of problems associated with sharps over the past four years. Nonetheless, used sharps still present some risk to the public and, perhaps to a relatively greater extent, to local waste handlers. The Upper Valley Waste Management Agency Board of Directors may choose from a variety of steps to expand up-valley collection opportunities and/or improve public education and information efforts related to proper disposal of used sharps.

FISCAL IMPACT

Is there a Fiscal Impact? No

ENVIRONMENTAL IMPACT

ENVIRONMENTAL DETERMINATION: The proposed action is not a project as defined by 14 California Code of Regulations 15378 (State CEQA Guidelines) and therefore CEQA is not applicable.

BACKGROUND AND DISCUSSION

The Problem With Sharps

Needles and lancets and devices containing them (Sharps) are often used by those who work in the fields of medicine, veterinary care, research, dentistry, acupuncture, and tattooing. They are also in common use by individuals involved in home-based health care or those who “self-medicate” at home. Sharps are also used by some outside of the home or office for non-medical purposes, including substance abuse.

In recent years, the pharmaceutical industry has introduced a growing number of devices that use some form of sharps for testing or delivery of medication such as for diabetes testing and treatment. Though these often feature a protective cap or cover designed to avoid unintended “sticks,” many of the devices present some risk to human health and safety if not handled or disposed of properly. These devices, when improperly handled, can easily expose family members, waste handlers, and pets to accidental sticks.

According to the U. S. Department of Health and Human Services Center for Disease Control, most needle stick injuries do not result in exposure to an infectious disease, and of those that do, the majority do not result in the transmission of infection. Nevertheless, needle stick injuries may expose people to blood borne pathogens such as human immunodeficiency virus (HIV), hepatitis B virus, and/or hepatitis C virus.

Local residents who use sharps, and workers who handle refuse and recyclables stored in opaque or colored bags, those who hand-sort material from recycling facility picking lines or conveyor belts, and those who remove litter from public parks or roads are subject to potential injury from sharps. While offering or requiring Hepatitis B immunization may be reasonable for those who work with sharps, no immunization is available to protect against HIV.

State Regulation of Sharps

California state law requires commercial “generators” of sharps to handle them as hazardous waste. Businesses that generate less than 200 pounds per month of sharps and other medical wastes may use household hazardous waste collection facilities for disposal. Businesses generating greater quantities must hire a licensed medical waste or hazardous waste hauler for transport and disposal.

In September, 2008, the California Legislature enacted the “Medical Waste Management Act,” which banned home-generated sharps from landfills. The law prohibits disposal of sharps in residential or commercial collection containers used for storage of recyclables, compostables, or trash. Residents therefore must handle and dispose of their home-generated sharps as household hazardous waste.

Local Regulation and Management of Sharps

The Napa County Local Enforcement Agency enforces state and local regulations that apply to waste handling, transportation, and landfill activities. Agency staff inspects work conducted by Upper Valley Disposal Service (UVDS) at its Whitehall Lane facility according to the company’s “Report of Composting Site Information” and “Transfer Processing Report.” These documents detail procedures the company will follow to assure that loads of recyclables, compostables, and trash that it handles do not contain HHW materials, including sharps. Staff also assures that operations of Clover Flat Landfill are in accordance with procedures and protections described in the “Joint Technical Document” that supports permit conditions that the State and County approved for Clover Flat Landfill. The document describes the load check and screening procedures that landfill operators conduct on waste deliveries to avoid entry of HHW to the landfill.

The statewide landfill ban of 2008 led to direct local action to divert sharps from landfills. Over the past three years, several community organizations have successfully created and promoted a sharps disposal program in Napa County. Volunteers from Napa Valley CanDo, a Napa-based non-profit, worked with Clinic Ole to arrange for regular collection of old sharps and unwanted medications at Clinic Ole offices in Napa, St. Helena, and Calistoga.

Napa Valley CanDo volunteers transport the sharps and medications from the collection sites to the Devlin Road HHW Collection Facility near American Canyon on a regular basis. Napa County pays for the waste disposal costs. The Napa County Public Health Division and Napa County Animal Shelter also accept sharps from the public on a regular basis at no charge.

Starting in 2009 and continuing today, some up-valley organizations, led by Soroptimists International of Calistoga and supported by local police departments and St. Helena Hospital in Deer Park, have organized semi-annual public collection events to which residents have been allowed to deliver old sharps and medications at no charge. Hospital staff has provided collection containers and covered the costs of disposal.

A variety of agencies and organizations have been involved in activities to educate and inform the public about sharps collections. In the fall of 2008, Napa County Department of Environmental Management staff developed a brochure describing the risks of improper disposal of sharps and the law banning them from landfills. The brochure also describes collection opportunities available to local residents and small businesses (see **Attachment A**). County staff has distributed the brochure through displays at pharmacies, doctor's offices, and veterinary hospitals throughout the County. Each year, Napa County and Upper Valley Waste Management Agency (UVA) staff includes information on sharps collection in the hazardous waste section of the *Reduce, Reuse, and Recycling Guide for Napa County*. They distribute the guide at passive displays at public gathering places and special events throughout the year. UVDS staff has also included articles on sharps collection in the quarterly newsletter it distributes to its customers.

UVDS representatives reported to the UVA Board of Directors at its regular meeting of August 20 their concerns about sharps improperly placed in recycling, greenwaste, or trash containers and the risk this poses to company workers. Company representatives expressed their desire for additional collection opportunities or increased educational efforts for up-valley residents to correct for this perceived problem. Though the source or extent of this problem is still unclear both for the Whitehall Lane recycling facility and Clover Flat Landfill, the Board may wish to select from options it may have for further staff assessment of the problem or development of plan for expanded collection opportunities and or improved public education measures.

Options for Expanded Sharps Collections and Disposal and Related Public Education/Information Activities

A number of California communities have created new programs for sharps collection and related public education, many in response to the statewide landfill ban. Most of the programs include expansion of household hazardous waste collection services to include drop-off or curbside collection of sharps. Others have gone further, requiring retail stores or manufacturers to take responsibility for acceptance and disposal of sharps. Some of these may serve as models for an expanded local program.

The Board may wish to consider the following set of options if it chooses to ask staff to develop an expanded sharps program.

Option 1. Expanded Public Education and Information Efforts

UVA and UVDS staff would work to improve public understanding of the collection opportunities currently available and the risks of improper disposal of sharps. Actions might include the following efforts to expand upon activities that have been undertaken locally.

- Distribution of billing inserts in the utility bills of member agencies
- Issuance of public service announcements to local newspapers and magazines
- Posting of messages on local TV
- Additional newspaper or magazine advertisements by UVDS and UVA
- Additional outreach by UVDS and UVA staff to schools and community groups, including Spanish speaking groups, to encourage placement of articles in newsletters and provision of presentations and

printed information on sharps

Option 2. Expansion of Sharps Collection Opportunities

UVA and UVDS staff would develop scenarios for expanded collection at key drop-off locations other than the existing sites at Clinic Ole offices. Based on the results of County and UVA staff efforts to establish motor oil and fluorescent lamp collection sites, this effort would likely be able to add to the number of collection sites without substantial increase in costs of collection and disposal. Expanded collection opportunities would likely improve the convenience for the public and boost the local sharps recovery rate. This effort may include the following.

- Solicitation of retail establishments such as local pharmacies or medical and veterinary centers to become collection points.
- Establishment of collection point at Clover Flat Landfill or Whitehall Lane Recycling Facility Office.
- Development of an option for UVDS to add sharps to a regular residential collection route.

Option 3. Development of Ordinance Requiring Retailer/Manufacturer Responsibility for Collection and Disposal of Sharps

UVA staff would develop a sample ordinance that would require manufacturers of sharps containing devices or local retail establishments that sell sharps to collect and dispose of sharps from local residents. Staff would assist member agencies in bringing the ordinances to their City Councils and the County Board of Supervisors for approval. This would allow the agency to pass on-going collection and disposal costs of the program to companies involved in their production and sales but would require unusual cooperation amongst jurisdictions, establishment of an enforcement program, and the ability to withstand potential legal challenge from industry groups who may oppose the measures.

Staff will perform a budget analysis of any options the Board has an interest in pursuing. UVA has approximately \$30,000 in the current reserve account.

SUPPORTING DOCUMENTS

A . Brochure on Home-generated Sharps Disposal

Recommendation: Approve
Reviewed By: Steven Lederer