



WASTE MANAGEMENT

Public Affairs

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June 30, 2011

Mr. Burke Lucy
Department of Resources, Recycling and Recovery
1001 I Street
P.O. Box 4025
Sacramento, CA 95814

Dear Mr. Burke,

On behalf of Waste Management, I am pleased to submit this year's plan in response to SB 486 (Simitian – Chapter 591, Statutes of 2009). While Waste Management is not required to submit a plan, we are doing so voluntarily, as part of our commitment to provide safe and convenient disposal options for used needles.

As California's largest provider of recycling and solid waste services, Waste Management has supported the State's efforts to protect public health from the unintended consequences of improperly disposed needles. We are proud to do our part to protect workers from the dangers of needles in the waste stream.

We welcome your review of our report. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'S. Kent Stoddard'.

S. Kent Stoddard, Vice President
Public Affairs / Western Group



SB 486 Safe Needle Disposal Plan

Introduction:

SB 486 (Simitian – Chapter 591, Statutes of 2009) requires a pharmaceutical manufacturer that sells or distributes medications in California that are self-injected at home to submit a plan describing how the manufacturer supports the safe collection and disposal of sharps. The required plans must include a description of the actions, if any, to:

- Provide for safe collection and disposal of sharps;
- Educate consumers about safe management and collection opportunities; and
- Support efforts by other organizations to promote the safe management of sharps.

As California's leading provider of comprehensive recycling and solid waste services, Waste Management (WM) is **voluntarily** submitting our current plan describing the company's on-going efforts to:

- Educate the public on safe needle disposal;
- Work cooperatively with public agencies to expand the infrastructure for the safe management of sharps waste; and
- Provide each of our California employees and their families with a free, safe and convenient program for the collection and disposal of sharps wastes.

An Urgent Need for Coordinated Action and Shared Responsibility:

An unintended consequence of California's outstanding success in recycling more than 59% of the state's solid waste stream is the increased incidence of needle stick injuries at material recovery facilities (MRFs). Despite the disposal prohibitions enacted by SB 1305 (Figueroa – Chapter 64-Statutes of 2006), large quantities of needles still appear every day on recycling sort lines throughout the state.

For the past eight years, Waste Management has been working closely with a leading manufacturer, HexArmor, on the development of puncture and needle resistant personal protective equipment including gloves and sleeves to protect our employees. After more than a dozen generations of specialized products, we believe we are using one of the best puncture resistant gloves available today. Yet despite the use of advanced personal protective equipment and specific protocols for stopping and safely removing needles from our sort lines, needle stick injuries continue to be the number one reported injury at our MRFs. Needle stick injuries also continue to occur during routine collection, transfer and disposal activities. Preliminary nationwide data suggests there are approximately 267,000 preventable community-based needle injuries in the U.S. each year, and the annual cost of needle stick injuries runs about \$175 million, including costs for injured individuals infected with blood borne pathogens such as HIV and hepatitis.

Our SB 486 Plan:

I. Free and Convenient Sharps Program for Waste Management Employees

A. Workplace Sharps Containers -- Leading by Example

While most of our major facilities have had on-site sharps containers for several years, we installed sharps containers in at least one set of men's and women's restrooms at every one of Waste Management's 110 operational locations. These containers provide a free, convenient, and safe disposal option for any employee who is required to self-inject a medication. The ongoing administration of this program is managed by our Environmental Protection Department.

B. WM Employees and Families

Starting in 2009 all of WM employees and their families were given free access to products from WM Healthcare Solutions including fully approved sharps mail back containers¹. This sharps program is part of our overall comprehensive wellness program for employees and their families and is administered in a manner that protects medical privacy.

II. Education, Coordination and Community Involvement

A. Alameda County Sharps Coalition:

In the fall of 2001, Waste Management joined the Alameda County Sharps Coalition to help promote safe needle disposal in Alameda County. Waste Management worked closely with the County and the Coalition in highlighting the risks of unsafe needle disposal and the need to close the gap in state law that allowed needles to be legally placed in municipal solid waste and recycling containers. These efforts led to the enactment of SB 1305 that prohibited the placement of sharps into the municipal waste stream effective September 1, 2008.

By 2009, membership in this coalition attracted a larger geographic audience and the organization became the California Sharps Coalition. The Coalition remains a diverse advocacy group including representatives of local and state government, patient advocacy groups, environmental health and health care organizations, and the solid waste industry.

B. Coalition for Safe Community Needle Disposal:

In 2002, Waste Management's CEO directed the company to take a leadership role in reducing the number of needles improperly placed in solid waste and recycling containers. In August of the same year, the company helped establish the Coalition for Community Safe Needle Disposal, a collaboration of businesses, public health organizations, and patient advocacy groups organized to promote coordinated solutions for safe needle disposal and collection. For more than eight years, both through the Coalition and independently, Waste Management has actively supported new policies, specific legislative, regulatory, and community initiatives that will better protect our employees and the communities we serve from preventable needle stick injuries.

C. Product Stewardship Institute:

Beginning in 2007 WM became a major sponsor of the Product Stewardship Institutes' efforts to bring pharmaceutical manufacturers and healthcare professionals to discuss methods for advancing safe disposal practices for sharps.

D. California Product Stewardship Council

In 2010 WM joined the California Product Stewardship Council. The council had made proper disposal of sharps a top priority for 2011.

E. Public Education:

In February 2004, Waste Management widely publicized the U.S. EPA's new guidance for the safe disposal of home-generated sharps, which no longer included placement of sharps in a "sturdy household container, and disposal in household garbage." The company prepared and issued press releases on the new EPA guidelines and briefed local officials throughout the state on approaches for complying with the EPA guidance.

Later that year Waste Management began educating our municipal customers on the scope of the needle waste problem, options for safe community needle disposal, and the need to incorporate free or subsidized needled collection and disposal programs into the overall solid waste services provided to residential households.

F. Coordination with Public Agencies:

WM co-sponsored legislation (SB 1362 – Figueroa, Chapter 157, Statutes of 2004) to allow local household hazardous waste programs to accept home-generated sharps consistent with existing requirements for state-approved needle consolidation locations. This legislation significantly increased the number of safe needle disposal locations available to residents throughout the state.

In 2005, Waste Management worked with Cathedral City to establish one of the first free programs to help residents safely dispose of hypodermic needles, syringes, and lancets. Under the new pilot program, all residents received a postcard they could take to a participating local pharmacy to pick up an approved free mail-back sharps container.

Since the Cathedral City pilot program Waste Management's public sector team has worked with our municipal customers to help establish convenient new needle collection programs in the following cities

Arcadia
 Agoura Hills
 Baldwin Park
 Beaumont
 Belmont
 Castro Valley
 Central Contra Costa County
 Chino
 Chula Vista
 Costa Mesa
 Covina
 Cupertino
 Cypress
 Danville
 Diamond Bar
 East Palo Alto
 Foster City
 Fowler
 Hillsborough
 Huntington Park
 Indian Wells
 Indio
 Inglewood
 Irvine
 Lafayette
 Laguna Beach
 Lake County
 La Palma
 La Quinta

Manhattan Beach
 Menifee
 Menlo Park
 Merced County
 Mission Viejo
 Monrovia
 Moraga
 Moreno Valley
 Murrieta
 Newport Beach
 Norco
 Norwalk
 Orinda
 Palmdale
 Rancho Mirage
 Rolling Hills Estates
 Rossmore
 San Carlos
 San Dimas
 San Mateo
 San Ramon
 Santa Ana
 Santa Clarita
 South Gate
 Stanton
 Walnut Creek
 Westlake Village

In December, 2010 WM acquired Curbside Inc., which manages hazardous waste generated by households and small businesses. The company, now named *At Your Door Special Collection (AYD)*, was founded in 1995 and was a pioneer in collecting household hazardous waste directly from homes. AYD works in conjunction with WM Healthcare Solutions to provide a range of programs to safely manage sharps. AYD's Sharps collection program includes mail back as well as home collection of sharps. In addition, AYD has provided drop boxes at some three dozen locations throughout California, including sheriff's stations, pharmacies and senior centers and has instituted a program at its two transfer stations where home healthcare aides can drop off sharps from their resident patients.

G. Support for SB 486

In 2009, WM also worked closely with the Multiple Sclerosis Society, California Sharps Coalition, local governments, the Alameda County Sharps Coalition, and many others in supporting SB 486 to ensure shared responsibility for safe needle disposal. WM also supported legislation (SF 1323 enacted in Minnesota) that is nearly identical to SB 486.

¹ The U.S. Postal Service and the California Department of Public Health have approved the mail-back sharps containers provided by WM Healthcare Solutions.