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University Park, PA 16802  
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September 18, 2013

Environmental Quality Board  
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ENVIRONMENTAL QUALITY BOARD

To Whom It May Concern:

I wish to submit comments regarding the Notice of Proposed Rulemaking published in the Pennsylvania Bulletin on 8/24/2013 relating to Regulated Medical and Chemotherapeutic Waste.

I find the new definitions in this Proposed Rulemaking to be quite confusing:

Under the definition of *Infectious Waste*:

(F) *Used sharps*. Sharps that have been in contact with infectious agents or have been used in animal or human patient care or treatment [, **at medical, research or industrial laboratories**].

Later, another definition is used:

*Sharps*-Broken glass [**that has been in contact with pathogenic organisms**], hypodermic needles [**and**], syringes to which a needle...

Initially reading this information, it appeared to me that all broken glass was now going to be treated as regulated medical waste. After discussion with Ali Tarquino Morris, I was informed that this is not the intention of the new proposed regulations. Nonetheless, the definitions remain confusing. Why do you need two definitions for sharps if only used sharps are covered as regulated medical waste? Penn State University generates tons of broken glass each year in the form of reagent bottles, window glass, light bulbs and other such material.

Further clarification or a rewrite of the sharps definition to clarify this issue would be greatly appreciated. Thank you for considering my comments.

Sincerely,

Curtis S. Speaker  
Biosafety Officer, Program Manager