



EBOLA UPDATE MEMO

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TO: Stericycle Sales Team, Operations, EQ and Safety

FROM: Selin Hoboy, Vice President Regulatory and Legislative Affairs

In August 2014, the first Ebola patients were brought into the United States via specialized air transport. Since that time, Stericycle has been aiding efforts among healthcare facilities and regulatory agencies for proper management of wastes generated from patient care. While there have been news reports of Stericycle services in Atlanta, the wastes involved in that situation were materials which had been pre-treated and thereby no longer an Ebola contaminated waste.

Currently the US Department of Transportation (DOT), who is the regulatory agency with primacy, considers this waste Category A infectious waste. At present, there are no large waste containers meeting the packaging requirements for Category A wastes. Discussions are underway at the highest levels of CDC, their parent agency, Health and Human Services (HHS), and DOT to address these issues. Stericycle is working closely with these agencies in the development of solution to ensure all implications from a waste perspective are addressed.

We will continue to update all interested parties. We want to ensure that there are proper safeguards in place to protect healthcare, healthcare waste workers and the communities we service. All parties involved take this issue very seriously. Decisions about how this waste should be managed require careful consideration. We appreciate everyone's patience through this process.

Finally, it is important to note that any healthcare facility that has a suspected or confirmed case of Ebola, should contact the CDC and their local health department immediately.

Attached we have included some educational information and consideration related to packaging wastes from care of patients with Ebola.

**Considerations for In-Hospital Waste Storage and Management
Of Wastes from Ebola Patient Care
Prepared: September 26, 2014**

- Healthcare facilities should immediately notify the CDC and the local department of health of a suspected or confirmed case of Ebola.
- DOT follows UN classifications for infectious substances which consider Ebola related wastes as a Category A substance.
 - Packaging must meet the test standards of 178.609; it must be marked in conformance with 178.503(f) – not regulated medical waste.
 - Packaging must be triple package consisting of a primary watertight receptacle, secondary watertight receptacle and a rigid outer packaging which must be tested and certified.
 - While the complete package of containers for transportation has not yet been developed and approved, healthcare facilities should focus on ensuring compliance with primary and secondary package requirements, ensuring watertight receptacles.
 - Healthcare facilities should use single use containers and sharps containers as much as feasible. CDC is recommending that disposable items be used as much as possible.
 - SMS or Bio Systems containers should not be used in the patient areas.
- Wastes associated with suspected or confirmed case of Ebola should be properly segregated. Secure ALL of this waste in an area away from all other operations.
- If the facility has on site waste management capability they should work with their local health department and their infection control staff to establish protocols for the movement of the waste inside their facilities
- Healthcare facilities should follow CDC **and** DOT guidance and regulations for the management of linens, etc.
- Continued education of the public and healthcare workers and healthcare waste workers is essential to understanding and managing the risks. According to sources at CDC, this virus is not any different from a microbiological perspective than HIV or Hepatitis or other viruses encountered today in every day regulated medical waste. Continued use of universal precautions and strict adherence to proper hygiene and exposure control protocols would be effective in preventing the spread of such a virus.

NOTE: Processes and procedures related to management are under development. CDC, HHS, and DOT are currently reviewing issues associated handling materials from Ebola patient care. This guidance is subject to change.