

MultiCare  
Health System

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December 4, 2000

Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. S. W.  
PO Box 47250  
Olympia, WA 98504-7250

RE: Docket NO. TG-990161  
Solid Waste Rulemaking: 480-70 WAC

Written Comments on Proposed Rule  
Submitted By:

Karen Van Gelder  
Director, Environmental Services  
MultiCare Health System  
253-403-1171

WAC 480-70-451 Packaging and containment, biomedical waste: page 69

1) (d) Be labeled with the word "biomedical" and 3) (c) Labeled with the word "biomedical"

Change label requirement to allow for other verbiage such as "Infectious Waste" or "Biohazard". This will prevent the need for hand labeling each container. Commercial sharps containers are labeled "biohazard" per OSHA/WISHA Bloodborne Pathogens Standard.

WAC 480-70-461 Compaction not allowed, biomedical waste: page 70

Allow for compaction of biomedical waste that been properly autoclaved. Currently, some facilities, including MultiCare, steam sterilize their infectious waste before it leaves the building. If the sterilized waste cannot go in the general compactor, it will require additional handling by employees, increasing the risk of back or other physical injury to trash room workers. The cart with red bag waste is processed in the autoclave and then tipped directly into the dumpster/compactor which is hauled to the landfill.

Thank you for your consideration of these suggestions.

Karen Van Gelder  
Director, Environmental Services  
MultiCare Health System