

# SAFETY COMPENDIUM – SHARPS CONTAINERS AND LOGS

Under the direction of OSHA through 29 CFR 1910.1030 the Postal Service is required to provide sharps containers in postal facilities to accommodate the disposal of contaminated sharps generated within the workplace. This includes employees who self-inject medications during work hours.

The decision to locate sharps containers follows a hazard assessment of the facility. The number and location should be based on a hazard assessment with a minimum of 2 recommended for large facilities. These should be easily accessible, generally in restrooms.



Regular preventive maintenance of the sharps containers needs to be included in the facility Bloodborne Protection written program as well as the disposal method for containers which contain potentially contaminated sharps. Maintenance and disposal should be as needed or at a minimum monthly. A sharps container that is found to be  $\frac{3}{4}$  full should be replaced and disposed of properly. As regulated waste it cannot be placed in regular trash. Disposal of all regulated waste shall be in accordance with applicable regulations of the United States, States and Territories, and political subdivisions of States and Territories. A Job Safety Analysis must be completed for the maintenance, removal and disposal of sharps containers. Information regarding the sharps containers also needs to be included in the written Spills and Leaks Program.

Contaminated Sharps means any contaminated object that can penetrate the skin including, but not limited to, needles, scalpels, broken glass, broken capillary tubes, and exposed ends of dental wires.

Contaminated sharps shall be discarded immediately or as soon as feasible in containers that are closable, puncture resistant, leakproof on sides and bottom; and labeled with the biohazard label or color-coded (red or orange-red), with lettering and symbols in a contrasting color. Red bags or red containers may be substituted for labels.



During use, containers for contaminated sharps shall be easily accessible to personnel and located as close as is feasible to the immediate area where sharps are used or can be reasonably anticipated to be found, maintained upright throughout use, and replaced routinely and not be allowed to overfill.

Items in sharps containers are considered regulated waste. Regulated waste means liquid or semi-liquid blood or other potentially infectious materials; contaminated items that would release blood or other potentially infectious materials in a liquid or semi-liquid state if compressed; items that are caked with dried blood or other potentially infectious materials and are capable of releasing these materials during handling; contaminated sharps; and pathological and microbiological wastes containing blood or other potentially infectious materials.

When moving containers of contaminated sharps from the area of use, the containers shall be closed immediately prior to removal or replacement to prevent spillage or protrusion of contents during handling, storage, transport, or shipping, placed in a secondary container if leakage is possible. If needed, the secondary container must meet all of the requirements for the primary container.

Reusable containers shall not be opened, emptied, or cleaned manually or in any other manner which would expose employees to the risk of percutaneous (effected or performed through the skin) injury.

Employees are not permitted to bring their used needles/sharps from home and dispose of them through the postal serviced provided sharps containers.

## Reporting Requirements

Each facility must record all work-related needlestick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material. You must enter the case on the OSHA 300 Log as an injury. To protect the employee's privacy, you may not enter the employee's name on the OSHA 300 Log.

This does not mean that you must record all cuts, lacerations, punctures, and scratches. You need to record cuts, lacerations, punctures, and scratches only if they are work-related and involve contamination with another person's blood or other potentially infectious material. If the cut, laceration, or scratch involves a clean object, or a contaminant other than blood or other potentially infectious material, you need to record the case only if it meets one or more of the recording criteria in § 1904.7.

Each postal facility shall establish and maintain a sharps injury log for the recording of percutaneous injuries from contaminated sharps. The information in the sharps injury log shall be recorded and maintained in such manner as to protect the confidentiality of the injured employee. The sharps injury log shall contain, at a minimum:

- The type and brand of device involved in the incident,
- The department or work area where the exposure incident occurred, and
- An explanation of how the incident occurred.

The requirement to establish and maintain a sharps injury log shall apply to any employer who is required to maintain a log of occupational injuries and illnesses under 29 CFR 1904. The sharps injury log shall be maintained for the period required by 29 CFR 1904.6.

You need to record an incident if an employee is splashed or exposed to blood or other potentially infectious material without being cut or scratched on the OSHA 300 Log as an illness if it results in the diagnosis of a bloodborne illness, such as HIV, hepatitis B, or hepatitis C; or it meets one or more of the recording criteria in § 1904.7.

Sources: OSHA 29 CFR 1910.1030; 29 CFR 1904