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Protecting yourself, your  
employees & your organization  
during the COVID-19 pandemic.

Retail Industry Leaders Association

April 7, 2020

- 1 Pandemic planning:**  
What we need to consider & how technology can help
- 2 Keeping our workforce safe:**  
Overview of the virus and leading practices to contain and mitigate risk
- 3 Helpful tips for adjusting to your temporary “home office”:**  
Ergonomics issues for the remote worker

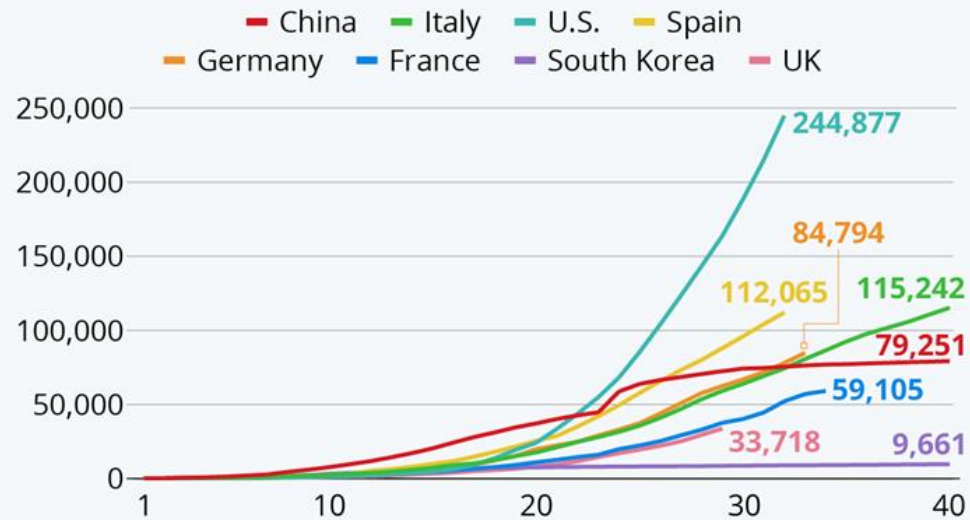
# Pandemic Planning:

What we need to consider  
& how technology can help



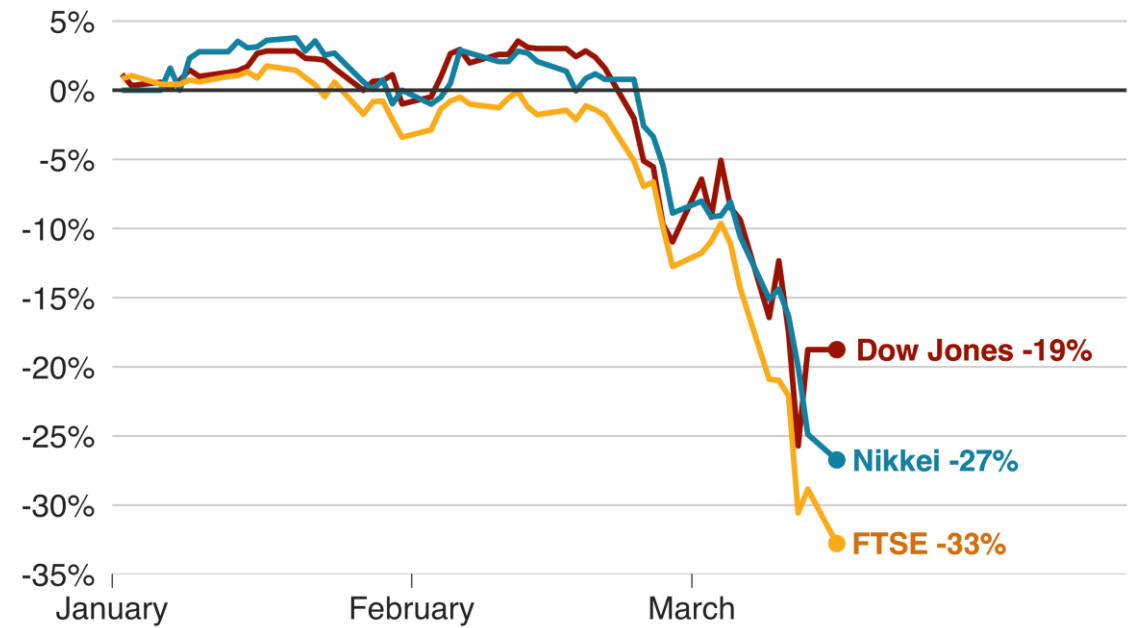
## Coronavirus: Upward Trajectory or Flattened Curve?

Cumulative confirmed COVID-19 cases in selected countries from day 1 to 40 after 100+ cases



As of April 2, 2020  
Source: Johns Hopkins University

## Coronavirus impact on global stock markets since the start of the outbreak

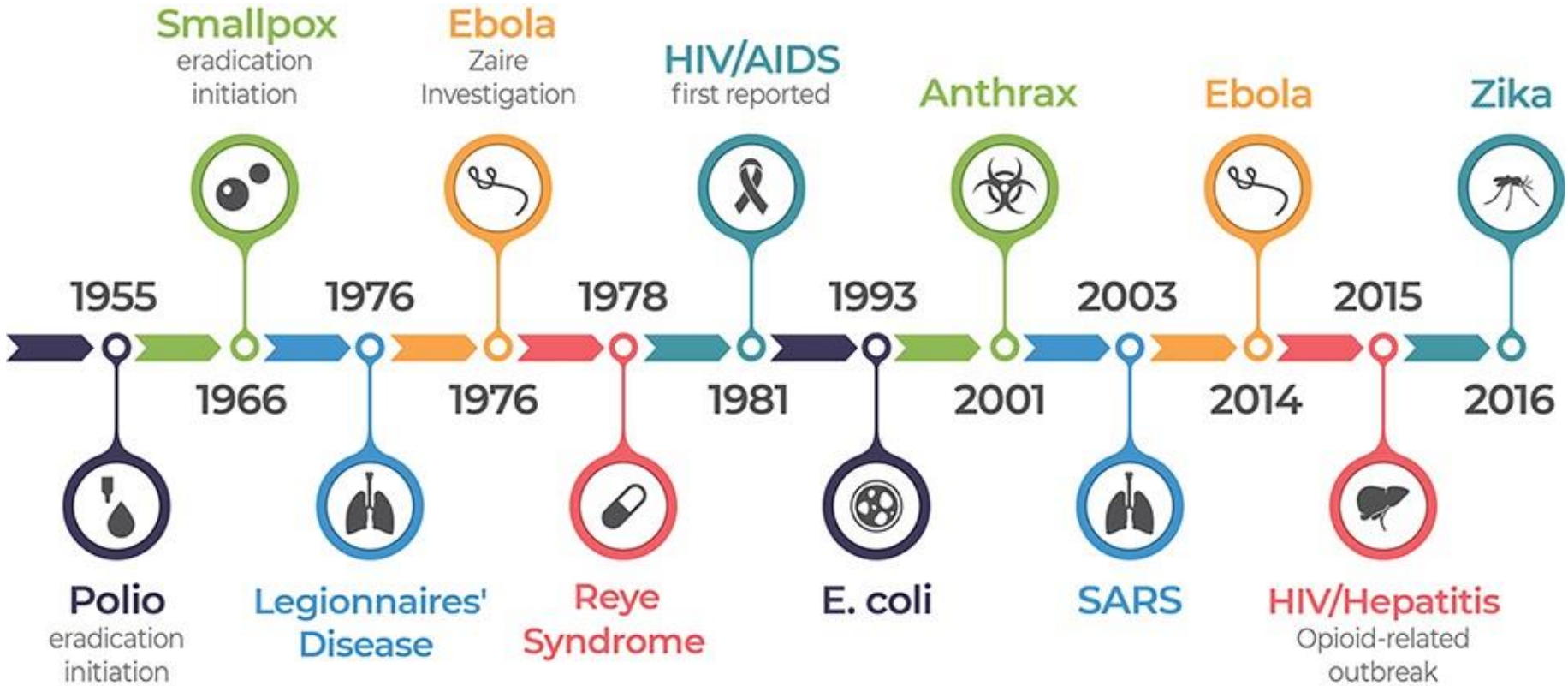


Source: Bloomberg, 16 March 2020, 08:35 GMT



Global pandemic could cost economy  
\$2.3 trillion in lost GDP in 2020

# cority Enviance The cyclical need for pandemic planning



Source: US Centers for Disease Control and Prevention, 2020

Any effective pandemic plan should include the following elements:



Leadership



Communication



Risk Management &  
Containment



Continuity



Recovery

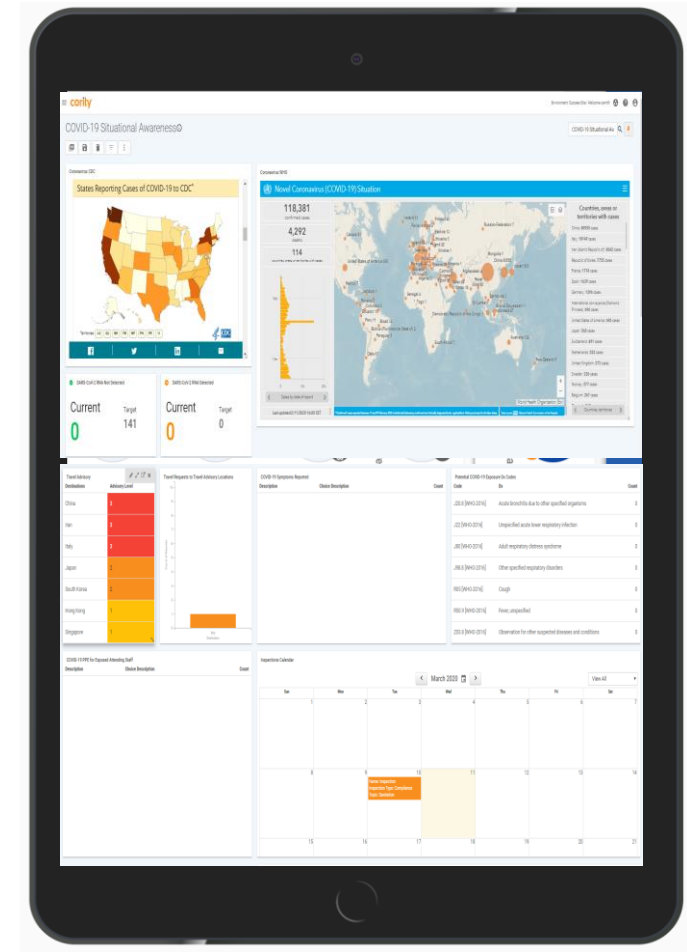
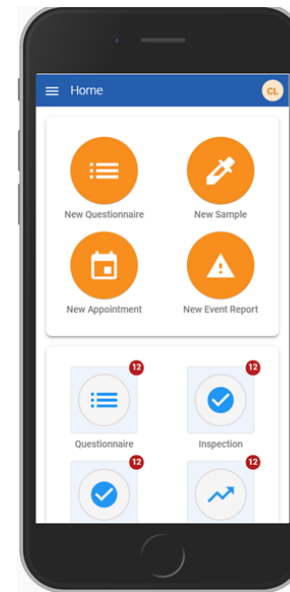


## Common challenges

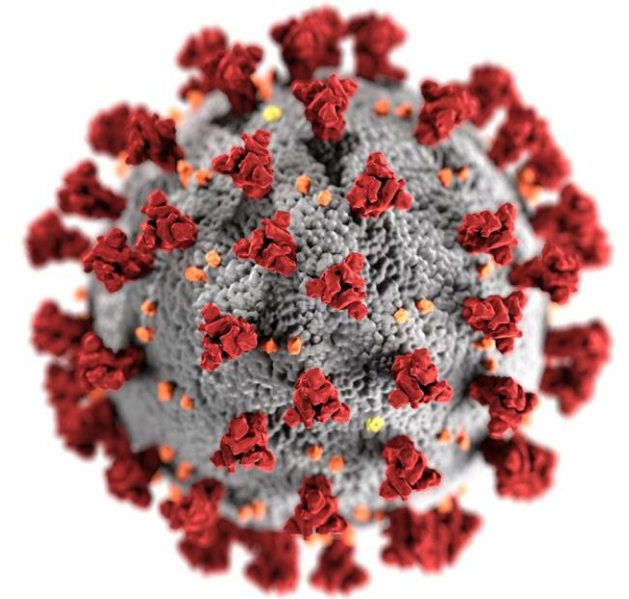
- Data gathering slow, clumsy
- People are unaware of responsibilities
- Low data quality impacts decision quality
- Lack of oversight reduces compliance

## How EHSQ software helps

- Automated notifications
- Mobile accessibility
- Data visualization
- Analytics



# Keeping our workforce safe: Overview of the virus and leading practices to contain and mitigate risk





## Coronaviruses



Have been described for more than 70 years (1949)



Infect many species of animals including humans.



Single- stranded RNA virus



In 2003 Severe Acute Respiratory Syndrome (SARS)



Since SARS –CoV epidemic, 2 new human respiratory coronaviruses have been described.

## Coronavirus Origins

Severe Acute Respiratory Syndrome (SARS-CoV) 2002

- First pandemic transmissible disease of previously unknown etiology in the 21<sup>st</sup> century.
- Animal origin (horseshoe bats)

Middle East Respiratory Syndrome (MERS) 2010.

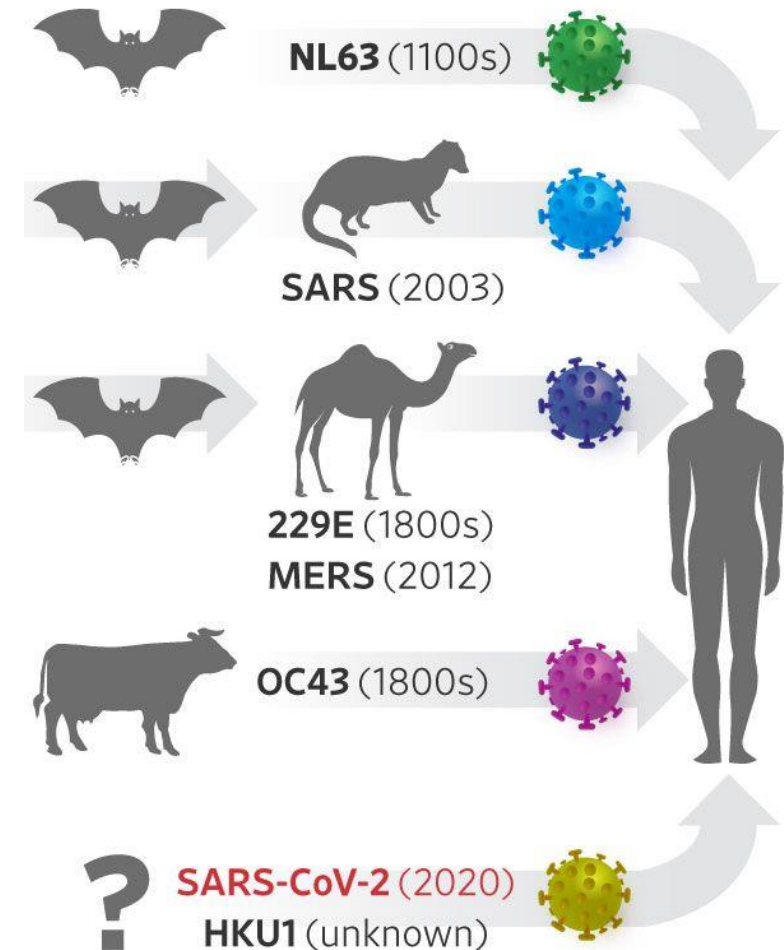
- Camels

COVID-19 (SARS-CoV-2)

- Likely origin- bats

## Epidemic Potential

Coronaviruses are jumping increasingly from animals to humans, creating new threats



Source: Timothy Sheahan, University of North Carolina

## SARS-CoV-2: Route of Transmission

- Person to person spread mainly by respiratory droplets.
- Respiratory secretions when a person coughs, sneezes or talks (6 feet).
- Some surface transmission but not the main route.
- Asymptomatic spread has been described but not well studied yet.



## What we know about SARS-CoV-2

- Enveloped virus with lipid coating- easiest type to deactivate
- Studies still ongoing on surface contamination
- Many of us have experiences with Bloodborne Pathogen Plans.
  - Similar principles
  - EPA List N
- Once an area is clean
  - Keep clean through good hand hygiene
  - Encourage hand sanitation before retail space entry



Efforts in your pandemic plan should center around 3 non-pharmaceutical intervention (NPI) categories:



**Personal NPIs:** Everyday preventive actions that help keep people from getting or spreading the virus



**Community NPIs:** Strategies that organizations can take to re-organize work to limit sources of potential exposure



**Environmental NPIs:** Measures taken to control presence of the virus within the workplace



# Helpful Tips for Your “Home Office”: Ergonomic issues & the remote worker



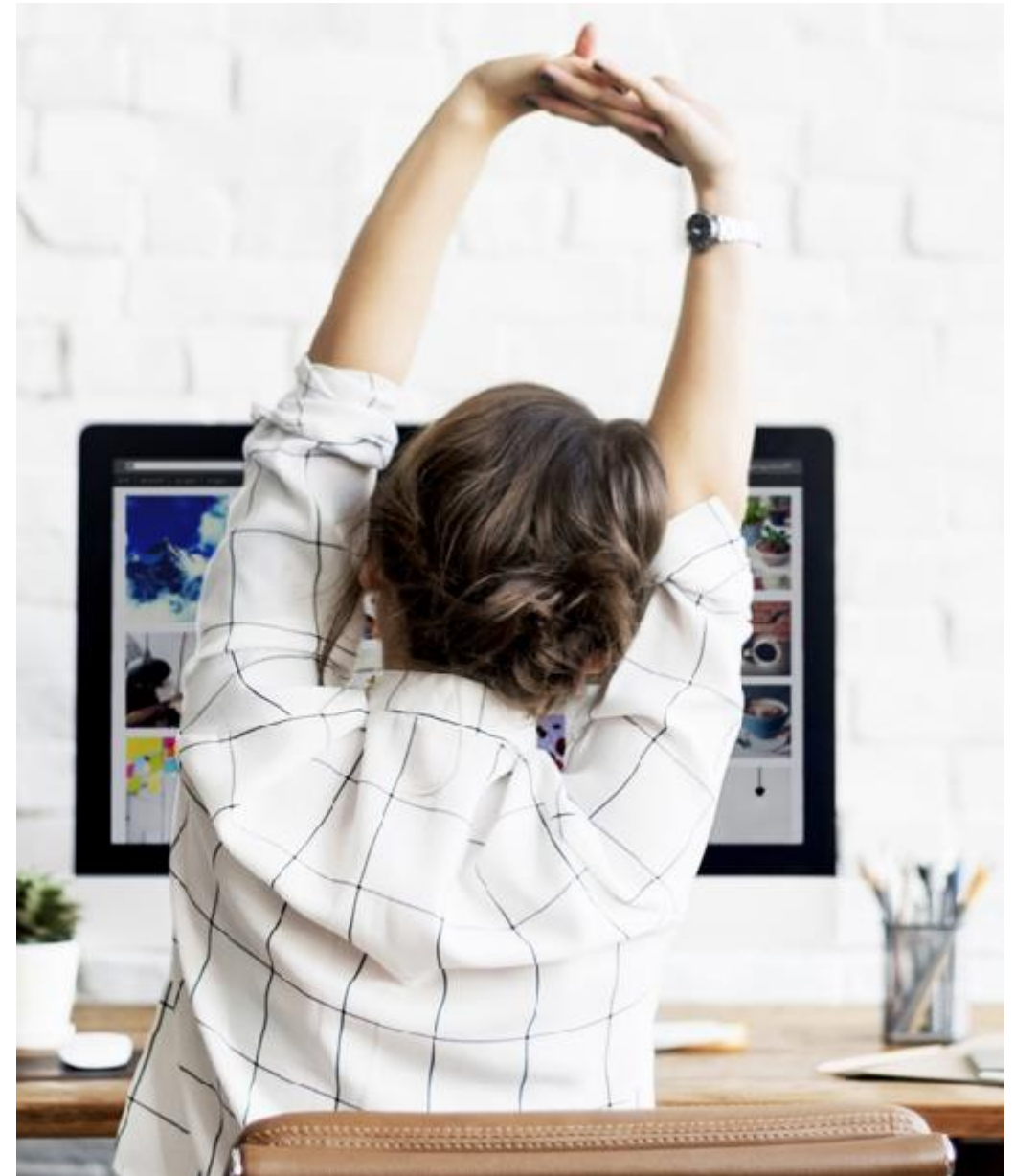


## Get Setup at Home

Set up your workspace

Line up in neutral body position

Get up and move around



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- Environment



Good lighting that doesn't cause monitor glare



Low background noise



As few distractions as possible

- Equipment



A desk or table that is stable and flat, preferably height adjustable if available)



An adjustable chair that supports your back



An external monitor, keyboard, and pointing device when using a notebook computer

- Location



Desk (adjustable if available)



Kitchen table



Couch or easy chair



Bed



A hands-free phone, such as a headset, computer audio, or speakerphone, for calls



A document holder if referencing documents

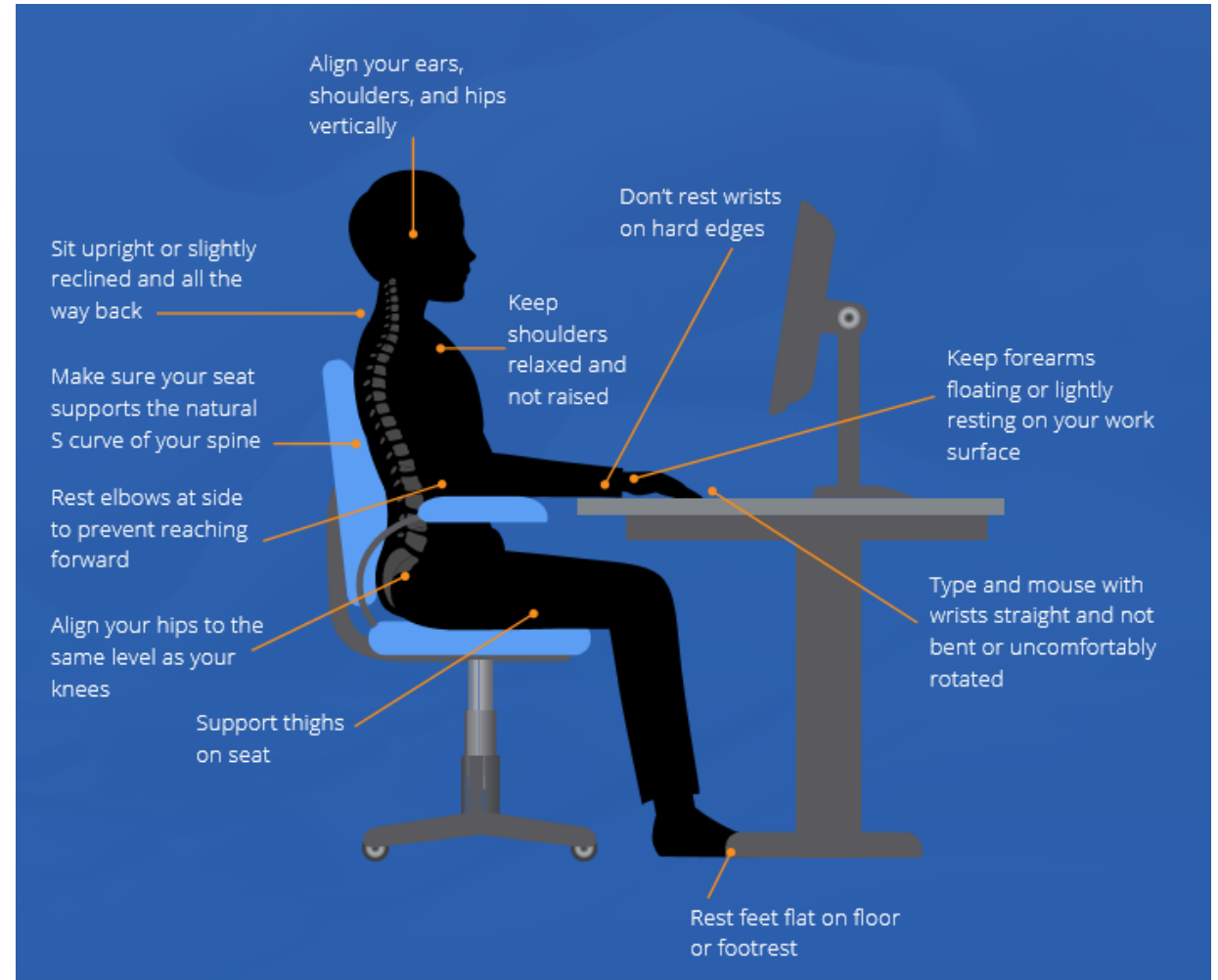
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## Set up your workspace

- Limit consistent muscle engagement
- Worksurface height
- Adjustable chairs
- Monitor positioning
- Keyboard positioning

## Line up

- Neutral positions
- Sit upright or slightly reclined
- Alignment of body
- Supported



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## Get Up



Use a behavior-based, “smart” break timing tool, which is much more useful than a straight timer.



Drink water throughout the day



Stretch



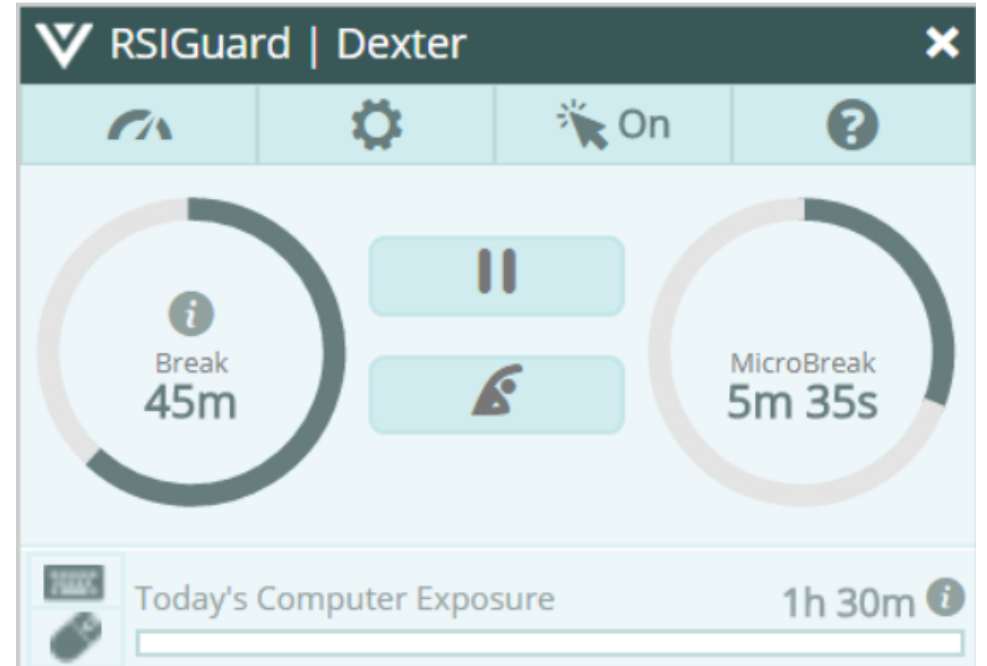
Take calls away from your computer



When you're on a break, walk away from all screens, not just work



Keep regular hours to prevent overexposure



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- 1 Problem:** Your coffee table is too low.

**Solution:** Limit working on the couch or easy chair to short periods of time. When you do, keep your laptop on your lap and raised with a tray or other flat surface.
- 2 Problem:** You work from the bedroom.

**Solution:** Only work from the bedroom when necessary and in short durations. When working on the bed, sit up and use pillows to support your back and neck.
- 3 Problem:** Your wrist rests on a hard edge.

**Solution:** Raise your chair or lower your desk while keeping other alignment neutral. Alternatively, use a wrist support like a gel wrist rest or a small bag of rice.
- 4 Problem:** Your desk or table is too high.

**Solution:** Raise yourself in your chair by sitting on a cushion.
- 5 Problem:** Your laptop monitor is too low.

**Solution:** If you have an external keyboard and mouse, use them and raise your laptop with reams of paper or a stable box. If available, a laptop stand can also be helpful.
- 6 Problem:** You have poor neck posture from looking at reference documents.

**Solution:** Use a recipe or book holder to hold your paper documents in front of or next to your monitor.
- 7 Problem:** You don't have access to a sit-stand desk.

**Solution:** Use an ironing board as a desk for periodic standing.
- 8 Problem:** You don't have an adjustable chair with back support.

**Solution:** Use a rolled-up towel to place behind your back for support.

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You can find more resources on how Cority can support you during COVID-19 at <https://ehsq.cority.com/covid-19>

If you have questions, please contact  
[start@enviance.com](mailto:start@enviance.com)





# COVID-19 Waste Management Protocols and Federal and State Enforcement Discretion

April 7, 2020

**RILA – Environmental Compliance Committee Webinar**

**NOTE TO ALL:**

Information provided here is not intended to be legal guidance and is subject to change as new information becomes available or as regulatory circumstances change.

We protect what matters.



***What are the only kind of jokes the CDC is recommending at this time?***

# *Inside Jokes*

# Agenda

- ✓ Waste Management Protocols
- ✓ Federal Enforcement Discretion
- ✓ State-Level Enforcement Discretion
- ✓ Communication and Resources

# COVID-19 Waste Management Protocols

# COVID-19 Waste Regulations?

- There are no additional or more stringent regulatory requirements regarding waste management
- Waste materials are not a Category A infectious substance for purposes of packaging and transport
- CDC site states: "Medical waste (trash) coming from healthcare facilities treating COVID-2019 patients is no different than waste coming from facilities without COVID-19 patients. CDC's guidance states that management of laundry, food service utensils, and medical waste should be performed in accordance with routine procedures. There is no evidence to suggest that facility waste needs any additional disinfection."
- <https://www.cdc.gov/coronavirus/2019-ncov/hcp/faq.html>
- OSHA's Waste-Related Guidance: "Generally, management of waste that is suspected or known to contain or be contaminated with COVID-19 does not require special precautions beyond those already used to protect workers from the hazards they encounter during their routine job tasks in solid waste and wastewater management."
- <https://www.osha.gov/SLTC/covid-19/controlprevention.html>
- State Department of Health and State Environmental Agencies starting to publish guidelines for waste management protocols





# Packaging Guidelines and Waste Acceptance Policy (WAP)

Following DOT packaging and tying off of bags is critical to minimize exposure. As always it is important to follow the Waste Acceptance Plan of your vendor.

## Packaging Procedures For Reusable Containers and Corrugated Boxes\*

### How to Prepare Your Waste Container for Pickup

- 1 

**Corrugated Boxes:**

  - Turn over and seal bottom flaps with tape
  - Auto-locking boxes, engage bottom flaps
  - No set up required for reusable containers
- 2 

Line the container or box with red bag\*\*
- 3 

Tie bag when box or container is full
- 4 

**Reusable Containers:**

  - Secure lid on container
  - Ensure all closure and/or locking mechanisms are engaged

**Corrugated Boxes:**

  - Seal top of box with tape
  - Auto-locking boxes, engage top flaps
- 5 

**Check markings**

  - Federal markings (see picture above)
  - Additional state and local regulations may apply
  - Apply barcode label where available

Order more red bags, liners, sharps

### Regulatory Requirements

**GENERAL**

- Generators are responsible for packaging waste.
- Each bag must be hand tied by gathering and twisting the neck of the bag and using a tie or hand knot to secure the bag, and each container must be securely closed.
- Closed bags must not be visible once secondary container is closed.
- Improperly packaged containers or damaged containers will be denied pickup or returned to the generator.
- Only regulated medical waste can be placed in Stericycle containers

**SHARPS**

- Sharp materials ("sharps") must be placed in a puncture-resistant container designed for sharps waste. Sharps include needles, syringes, broken glasses, scalpels, culture slides, culture dishes, broken capillary tubes, broken rigid plastic and exposed ends of dental wires.
- All sharps containers should be properly closed before being placed into secondary containers.
- No loose sharps are permitted outside

### Regulated Medical Waste Acceptance Policy

Stericycle policy requires compliance with all applicable regulations regarding the collection, transportation and treatment of regulated medical waste. Federal Department of Transportation (DOT) regulations require the generator of regulated medical waste to certify that the packaging and documentation of transported regulated medical waste complies with DOT regulations regarding waste classification, packaging, labeling and shipping documentation. To ensure that neither Stericycle nor the generator of regulated medical waste violates applicable regulations, it is imperative that all parties understand the rules regarding proper identification, classification, segregation and packaging of regulated medical waste. The purpose of this policy is to summarize the minimum requirements for preparing your medical waste for collection, transportation and treatment. Additional facility or state-specific waste acceptance policies may apply based on permit specifications. Please contact your local representative for further information or email [customerservice@stericycle.com](mailto:customerservice@stericycle.com).

**REGULATED MEDICAL WASTE**

Stericycle accepts medical waste generated in a broad range of medical, diagnostic, therapeutic and research activities. The term "medical waste" includes both sharps, biohazardous, infectious or regulated medical waste as defined under federal, state or local laws, rules, regulations and permits. Stericycle is defined by specific state regulations, this includes RCRA hazardous waste pharmaceuticals, all DEA scheduled drugs including controlled substances, both prescription and over-the-counter, waste containing mercury or other heavy metals, batteries of any type, containers, non-infectious dental waste, instruments such as scalpels, syringes, containers or spillable materials classified as infectious waste under federal and/or state specific EPA Regulations. In addition, Stericycle **accepts except** both liquids, radioactive materials, or complete human remains (including heads, full bodies and fetuses). Stericycle **accepts except** blood, deflated materials packaged as regulated medical waste. All lab wastes or materials which contain or have the potential to contain infectious substances, animal tissue, agents listed under 42 CFR Part 173.13 (b)(1), 42 CFR Part 173.13 (b)(2) (b) (3) (b)(4) (b)(5) (b)(6) (b)(7) (b)(8) (b)(9) (b)(10) (b)(11) (b)(12) (b)(13) (b)(14) (b)(15) (b)(16) (b)(17) (b)(18) (b)(19) (b)(20) (b)(21) (b)(22) (b)(23) (b)(24) (b)(25) (b)(26) (b)(27) (b)(28) (b)(29) (b)(30) (b)(31) (b)(32) (b)(33) (b)(34) (b)(35) (b)(36) (b)(37) (b)(38) (b)(39) (b)(40) (b)(41) (b)(42) (b)(43) (b)(44) (b)(45) (b)(46) (b)(47) (b)(48) (b)(49) (b)(50) (b)(51) (b)(52) (b)(53) (b)(54) (b)(55) (b)(56) (b)(57) (b)(58) (b)(59) (b)(60) (b)(61) (b)(62) (b)(63) (b)(64) (b)(65) (b)(66) (b)(67) (b)(68) (b)(69) (b)(70) (b)(71) (b)(72) (b)(73) (b)(74) (b)(75) (b)(76) (b)(77) (b)(78) (b)(79) (b)(80) (b)(81) (b)(82) (b)(83) (b)(84) (b)(85) (b)(86) (b)(87) (b)(88) (b)(89) (b)(90) (b)(91) (b)(92) (b)(93) (b)(94) (b)(95) (b)(96) (b)(97) (b)(98) (b)(99) (b)(100) (b)(101) (b)(102) (b)(103) (b)(104) 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**WASTE SEGREGATION AND PACKAGING**

The generator is solely responsible for properly segregating, packaging and labeling of regulated medical waste. Proper segregation and labeling is critical to ensure that the waste is properly identified and packaged and exposure to employees and the general public. DOT regulations (49 CFR 173.177) require that all packages of regulated medical waste be prepared for transport in accordance with all of the following requirements: rigid, leak resistant, impervious to moisture, of sufficient strength to prevent tearing or bursting under normal conditions of use and handling, sealed to prevent leakage during transport and puncture resistant for sharps. All regulated medical waste must be accompanied by a properly completed shipping document (49 CFR 172.203).

**MANAGEMENT OF NON-CONFORMING WASTE**

An incident by regulation and compliance. Stericycle employees may refuse containers that are non-compliant because of their contents or are improperly packaged, leaking, damaged or likely to create a risk of exposure to employees or the general public. Any waste found to be non-compliant to the Waste Acceptance Policy identified in this policy, or at a Stericycle location, may be returned to the generator for proper packaging and disposal, or may be returned for appropriate destruction. This may include improperly marked regulated medical waste which should have been identified for incineration (i.e., pathological, chemotherapy or non-radioactive pharmaceuticals). Proper segregation and packaging is essential to ensure compliant and safe handling, collection, transportation and treatment of regulated medical waste.

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We protect what matters.

# Waste Not Accepted for Disposal as Regulated Medical Waste

- X Untreated Category A Infectious Substances**
- X Complete Human Remains**  
(including heads, full torsos, and fetuses)
- X Chemicals**  
Formaldehyde, formalin, acids, alcohol, waste oil, solvents, reagents, fixer developer, fluorescein, cleaning products and disinfectants
- X RCRA Hazardous Waste or Universal Waste**  
Including but not limited to batteries, bulbs, hazardous waste pharmaceuticals, bulk chemotherapy
- X Compressed Gas Cylinders, Canisters, Inhalers and Aerosol Cans**
- X Mercury Containing Material, Devices, or Wastes**  
Mercury thermometers, sphygmomanometers, amalgam and related wastes
- X Radioactive Waste**  
Any container with a radioactivity level that exceeds regulatory or permitted limits; lead-containing materials

## The Red Bag Cannot Become A Catchall For Any And All Waste From A Covid-19 Patient

Hazardous waste, including hazardous waste pharmaceuticals, generated in a potential COVID-19 exposure situation should be managed per current waste protocols and disposed in the appropriate waste receptacles.

Solid waste, such as PPE and other items that are not contaminated with blood or other potentially infectious materials do not need to be disposed in the red bag.

# COVID-19 Waste Management Protocols\*

\*Proposed Protocols – Stericycle is obtaining agreement and confirmation from State Agencies

<b>COVID-19 Waste Management Protocols</b>			
<b>Process Generating Waste</b>	<b>Waste Contents</b>	<b>Normal (non-COVID-19) Disposal Method Protocols</b>	<b>COVID-19 Disposal Method Protocols</b>
<b>Healthcare related waste from treatment/testing/care of known or suspected COVID-19 infected individual (blood, bodily fluids, other potentially infectious material - OPIM, sharps)</b>	Used PPE, clean-up rags and wipes, other debris	Regulated Medical Waste	Regulated Medical Waste

# COVID-19 Waste Management Protocols\*

\*Proposed Protocols – Stericycle is obtaining agreement and confirmation from State Agencies

<b>COVID-19 Waste Management Protocols</b>			
<b>Process Generating Waste</b>	<b>Waste Contents</b>	<b>Normal (non-COVID-19) Disposal Method Protocols</b>	<b>COVID-19 Disposal Method Protocols</b>
<b>Decontamination of areas where known or suspected COVID-19 infected individual was present and contaminated area (clearly not RMW, not sharps, not lab related etc.)</b>	Used PPE, clean-up rags and wipes, other debris with a non-hazardous disinfectant chemical	Solid Waste	Solid Waste  *Some Generators are over-classifying all waste from decontamination activities and managing as RMW  **States may have specific requirements for managing this type of waste
		Hazardous Waste (when materials contaminated with disinfecting chemicals determined to be RCRA or State-Regulated hazardous waste)	Hazardous Waste (when materials contaminated with disinfecting chemicals determined to be RCRA or State-Regulated hazardous waste)

# COVID-19 Waste Management Protocols\*

\*Proposed Protocols – Stericycle is obtaining agreement and confirmation from State Agencies

<b>COVID-19 Waste Management Protocols</b>			
<b>Process Generating Waste</b>	<b>Waste Contents</b>	<b>Normal (non-COVID-19) Disposal Method Protocols</b>	<b>COVID-19 Disposal Method Protocols</b>
<b>General Decontamination of workplace, schools, public facilities, mass transit</b>	Used PPE, clean-up rags and wipes, other debris with a non-hazardous disinfectant chemical	Solid Waste	<p>Solid Waste (if no reasonable anticipation that COVID-19 infected individual was present and when materials contaminated with disinfecting chemicals determined to be non-RCRA and non-State regulated/non-hazardous)</p> <p>*Some Generators are over-classifying all waste from decontamination activities and managing as RMW</p> <p>**States may have specific requirements for managing this type of waste</p>

# COVID-19 Waste Management Protocols\*

\*Proposed Protocols – Stericycle is obtaining agreement and confirmation from State Agencies

<i>COVID-19 Waste Management Protocols</i>			
Process Generating Waste	Waste Contents	Normal (non-COVID-19) Disposal Method Protocols	COVID-19 Disposal Method Protocols
<b>General Decontamination of workplace, schools, public facilities, mass transit</b>	Used PPE, clean-up rags and wipes, other debris with a hazardous waste disinfectant chemical	Hazardous Waste (when materials contaminated with disinfecting chemicals determined to RCRA or State-Regulated hazardous waste)	Hazardous Waste (when materials contaminated with disinfecting chemicals determined to RCRA or State-Regulated hazardous waste)



# COVID-19 Waste Management Protocols\*

\*Proposed Protocols – Stericycle is obtaining agreement and confirmation from State Agencies

<b>COVID-19 Waste Management Protocols</b>			
<b>Process Generating Waste</b>	<b>Waste Contents</b>	<b>Normal (non-COVID-19) Disposal Method Protocols</b>	<b>COVID-19 Disposal Method Protocols</b>
<b>Concentrated Decontamination / Disinfecting Chemicals</b>	Empty containers that previously held concentrated chemicals	Solid Waste – if containers meet state and federal definition of empty.	Solid Waste – if containers meet state and federal definition of empty.
	Full or partially full unused or leftover containers of concentrated chemicals	Solid Waste or Hazardous Waste - Generators must evaluate the chemical to determine if they would be RCRA Hazardous waste or State Regulated Hazardous Waste for toxicity, corrosivity, or flammability	EPA has published a listing of chemicals that are effective for use against Human Coronavirus (provided under Supporting Documents). Generators must evaluate the chemical to determine if they would be RCRA Hazardous waste or State Regulated Hazardous Waste for toxicity, corrosivity, or flammability  <u><a href="#">EPA Disinfectants for Use Against CoV-2</a></u>

# How is the waste being managed?

- All properly permitted RMW facilities should be able to manage this waste; autoclave and incineration facilities can manage this waste
  - Incineration should only be required for wastes that may already require incineration (pathological/trace chemo/non-haz Rx)
- Post-treatment wastes can go to landfill (or other final disposal i.e. WTE) and do not require any special handling
- Waste generated in households can be managed as general solid waste and also go to landfill
- Hazardous wastes (including pharmaceuticals) should be managed per current standards
- Solid wastes can be managed by municipal solid waste landfill, industrial waste landfill, waste-to-energy incineration, municipal waste incineration



# Federal Enforcement Discretion

# EPA Enforcement Discretion

## COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program

Memo from Susan Parker Bodine, Assistant Administrator for Enforcement and Compliance Assurance

- Retroactive to March 13, 2020
- *"The EPA will exercise the enforcement discretion specified below for noncompliance covered by this temporary policy and resulting from the COVID-19 pandemic, if regulated entities take the steps applicable to their situations, as set forth in this policy."*
- Defines the scope and outlines several discretionary areas:
  - Routine compliance monitoring and reporting
  - Settlement agreement and consent decree reporting obligations and milestones
  - Facility operations
  - Public water systems
  - Critical infrastructure
- <https://www.epa.gov/enforcement/covid-19-implications-epas-enforcement-and-compliance-assurance-program>



# EPA Enforcement Discretion

## General Conditions

All enforcement discretion set forth in this temporary policy is conditioned on the following.

1. Entities should make every effort to comply with their environmental compliance obligations.
2. If compliance is not reasonably practicable, facilities with environmental compliance obligations should:
  - a. Act responsibly under the circumstances in order to minimize the effects and duration of any noncompliance caused by COVID-19
  - b. Identify the specific nature and dates of the noncompliance
  - c. Identify how COVID-19 was the cause of the noncompliance, and the decisions and actions taken in response, including best efforts to comply and steps taken to come into compliance at the earliest opportunity
  - d. Return to compliance as soon as possible
  - e. Document the information, action, or condition specified in a. through d.



# DOT Enforcement Discretion

## DOT Federal Motor Carrier Safety Administration (FMCSA)

- Notice of Enforcement Discretion
- Hours of Service National Emergency Declaration
- Cross Border Transportation
- Local Shelter in Place and Restrictions on Movement
- Commercial Driver's License Actions
- Drug and Alcohol Testing
- <https://www.fmcsa.dot.gov/COVID-19>





# DOT Enforcement Discretion

## DOT Pipelines and Hazardous Materials Safety Administration (PHMSA)

- Enforcement Policy on Training
- <https://www.phmsa.dot.gov/news/phmsa-enforcement-policy-notice-regarding-hazardous-materials-training>
- Temporary Relief to Companies Transporting Hand Sanitizer by Highway
- <https://www.phmsa.dot.gov/news/phmsa-issues-temporary-relief-companies-transporting-hand-sanitizer-highway>



# OSHA Enforcement Discretion

## OSHA Temporary Enforcement Guidance

- OSHA is communicating additional guidance and relief at <https://www.osha.gov/SLTC/covid-19/>
  - Temporary Enforcement Guidance - Healthcare Respiratory Protection Annual Fit-Testing for N95 Filtering Facepieces During the COVID-19 Outbreak
  - Initial fit testing is still required
  - Appropriate respiratory protection is required for all healthcare personnel providing direct care of these patients.
  - Relief on many of the conditions but asking that operations make good faith effort to comply and provide training as best as available.
  - Prevent Worker Exposure to Coronavirus (COVID-19) – posters available on OSHA site
  - Alternative PPE options



# Manifests and Shipping Papers

# Signing of Shipping Documents

- All hazardous materials shipping papers (Regulated Medical Waste, hazardous waste, hazardous waste pharmaceuticals, etc.) require a generator signature
- Stericycle has reached out to DOT/PHMSA for guidance
- Proposed Protocols for Persons Refusing to Sign Shipping Papers:
  - Driver will ask Generator's representative for spelling of full name.
  - Driver prints Generator's full name in "PRINTED NAME" section of shipping document
  - Driver prints "Generator refused to sign COVID-19" under "Signature" section of shipping document
  - Driver prints date in date section of shipping document
  - Driver prints and signs their name and prints date in the appropriate section as Transporter
  - Driver will leave behind paper work as required by the regulations



# What Regulatory Information and Relief is Available?

## New York Department of Environmental Conservation

Enforcement Discretion on Signature Procedures for Hazardous Waste Manifests, Non-Hazardous Waste Shipping Papers During COVID-19 Emergency

- DEC is agreeing not to pursue enforcement of regulations mandating signatures for waste shipping documents
- Effective during the entire State of Emergency (currently September 7, 2020)
- Outlines Protocols: Print Generator's Name; print "on behalf of" in Signature Box; Sign Driver's Name in Signature Box
- [http://www.dec.ny.gov/docs/materials\\_minerals\\_pdf/tempsigproccovid2.pdf](http://www.dec.ny.gov/docs/materials_minerals_pdf/tempsigproccovid2.pdf)



# State-Level Enforcement Discretion




# State-Level Enforcement Discretion – Key Points

- ✓ Compliance is still expected; State of Emergency does not provide blanket relief to environmental regulations
- ✓ Information is changing and added frequently – check State Health Department and State Environmental COVID-19 websites often
- ✓ BE CAREFUL – Each State is taking their own approach to:
  - Timeframe for relief
  - Programs that are subject to relief
  - Activities that are subject to relief
  - Procedures to request relief
  - If/how they will notify you of any relief
  - Specific documentation requirements



# What Regulatory Information and Resources are Available

## RILA Resources

- Retail Operations Page
- [https://www.rila.org/retail-compliance-center/retail-operations?utm\\_source=informz&utm\\_medium=email&utm\\_campaign=informz%20email&zs=3omfd1&zl=hxke6](https://www.rila.org/retail-compliance-center/retail-operations?utm_source=informz&utm_medium=email&utm_campaign=informz%20email&zs=3omfd1&zl=hxke6)
- COVID-19 Resources
- State-by-State Summary of Enforcement Discretion 

## COVID-19 Resources

- COVID-19 Emergency - Enforcement Status of State Bottle Redemption Regulations
- COVID-19 Emergency – State Changes to Consumer Bag Regulations
- COVID-19 Environmental Compliance FAQs for Retail Sanitation/Disinfectant Products
- COVID-19 Environmental Compliance FAQs for Retail Hazardous Waste
- COVID-19 Compliance & Enforcement Status of State Environmental Regulations
- List of EPA-approved disinfectants with UPCs and SDS



## RETAIL INDUSTRY LEADERS ASSOCIATION

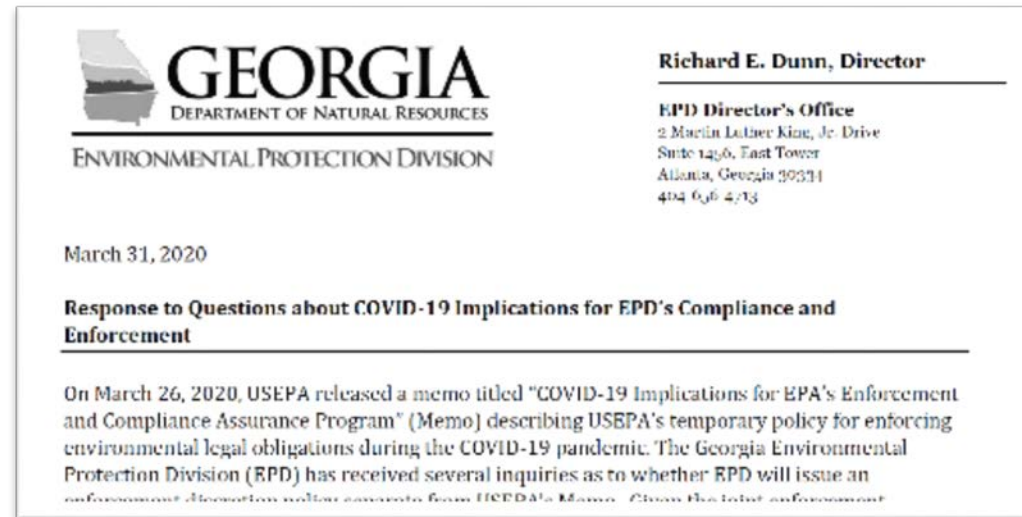
OH	Compliance and Enforcement	All regulated entities remain obligated to take all available actions necessary to ensure compliance with environmental regulations and permit requirements. In the instance where regulated entities will have an unavoidable noncompliance situation, directly due to impact from COVID-10, an email has been established to accept for requests for regulatory flexibility.	<a href="#">Ohio EPA COVID-19 Response</a>
OK	Compliance and Enforcement	Permit conditions and compliance schedules will continue to be met but the DEQ understand that closures and illness may limit this ability. DEQ will be flexible as needed and appropriate. Non-compliance issues should be communication with DEQ staff through email or program specific reporting telephone numbers.  In person payments are no longer being accepted but can be made by mail, phone or fax.	<a href="#">Oklahoma DEQ</a>
OR	Compliance and Enforcement	All applicable DEQ requirements remain in effect. However, DEQ will continue to exercise reasonable enforcement discretion within its authority when deciding whether to pursue potential violations caused by pandemic-related disruptions.	<a href="#">DEQ response to COVID-19 webpage</a>

# What Regulatory Information and Resources are Available?

## Industry Association Activity

### National Waste & Recycling Association (NWRA)

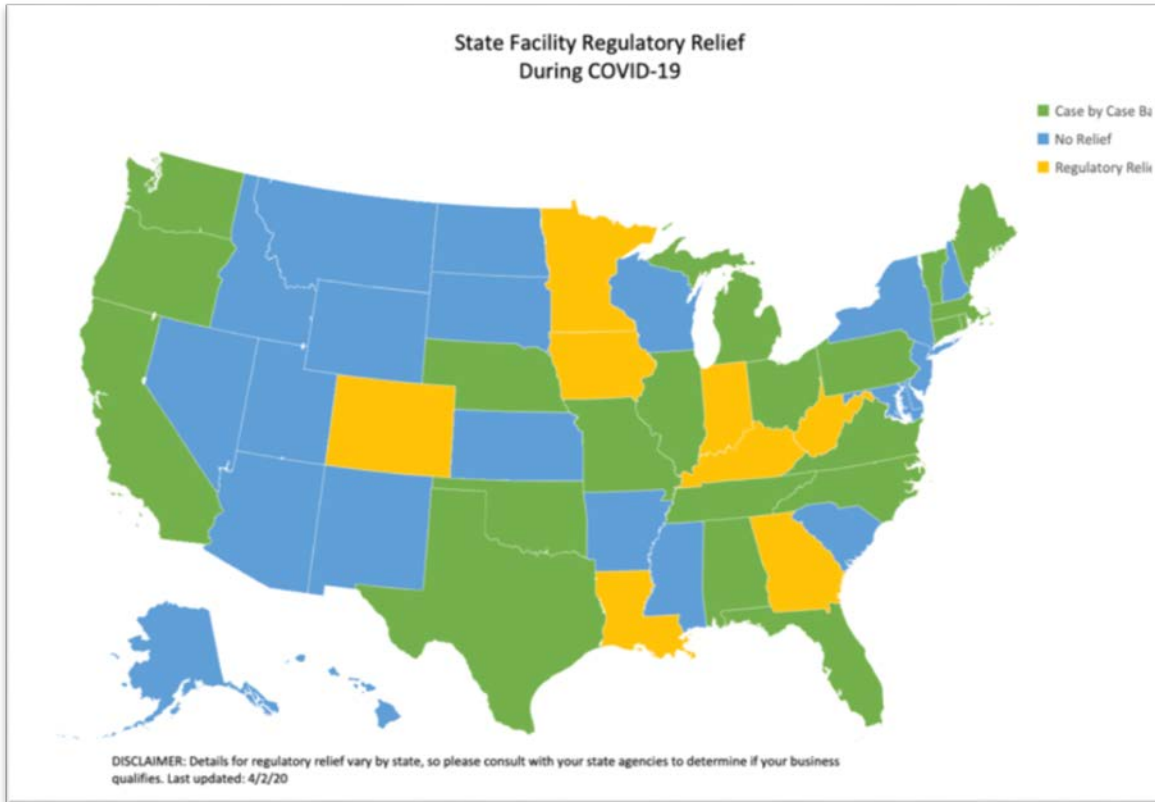
- COVID-19 Regulatory Flexibility Summary by State
- Document summarizes state regulatory flexibility related to COVID-19 granted to elements of the waste and recycling industry
- Results from a letter sent by NWRA to every State Agency requesting regulatory relief during the COVID-19 pandemic
- Provides copies of memo/letter/email response to letter as well as info on other regulatory relief and enforcement discretion
- Summary document is not yet publicly posted
- Website does have map of response results



# What Regulatory Information and Resources are Available?

## NWRA State Response Maps

<https://wasterecycling.org/page/covidstatemap>



# What Regulatory Information and Resources are Available?

## Industry and Vendor Activity

### Trinity Consultants

- COVID-19: EHS REGULATORY UPDATES
- State by State Summary of Regulatory Relief
- Provides a brief explanation of the relief or positions on enforcement discretion with emails and links to state resources
- <https://www.trinityconsultants.com/news/federal/covid-19-ehs-regulatory-updates#id>



### New York

- > Contact the permit engineer and region if you are missing due dates and provide an explanation
- > Submit extension requests to [Air.Inventory@dec.ny.gov](mailto:Air.Inventory@dec.ny.gov).
- > The NY State Department of Environmental Conservation (NYSDEC) is handling requests and
- > Emission statement deadlines extended on a case-by-case basis.
- > NYSDEC has issued a [Waste and Recyclables Essential Services Statement](#).
- > Public hearing meetings regarding proposed regulations, in-person meetings, and other sir



# What Regulatory Information and Relief is Available?

## State-Level Activity

State Environmental Agency Alerts/Notices/Guidance on enforcement protocols sent via email to generators or posted on Agency websites

- Wisconsin DNR – website:
  - COVID-19: Environmental Compliance Process
  - Online survey form to request enforcement discretion
  - <https://dnr.wi.gov/emergency/COVID19Compliance.html>
- Minnesota Pollution Control Agency - website
  - COVID-19 regulatory guidance
  - Instructions with email address for requesting regulatory flexibility
  - <https://www.pca.state.mn.us/covid-19/covid-19-and-regulatory-flexibility>





# What Regulatory Information and Relief is Available?

## State-Level Activity - Continued

- Michigan Dept. of Environment, Great Lakes and Energy (MIEGLE) – email guidance:
  - Manage to eliminate the possibility of release
  - Will not be conducting unannounced compliance audits
  - If non-compliance is unavoidable, contact MIEGLE to request regulatory relief
    - o The specific regulatory requirement in question, including identification of any permit, order, or agreement that applies to the entity's obligations
    - o A concise statement describing the circumstances preventing compliance and how the compliance issue is impacted by the COVID-19 response - regulatory flexibility is only for COVID-19 prompted non-compliance
    - o The steps taken to avoid the compliance issue, including whether you contacted EGLE for assistance and why the compliance issue was not reasonably avoidable
    - o The anticipated duration of the compliance issue and whether it may create an acute risk or imminent threat to human health or the environment, if this is the case, please call 800-292-4706
    - o A description of measures planned to protect public health and environment during period the requirement(s) cannot be met
    - o A central point of contact for the site be provided, including an email address and phone number.



MICHIGAN DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY

# What Regulatory Information and Relief is Available?

## State-Level Activity - Continued

- Ohio Environmental Protection Agency - website
  - Coronavirus (COVID-19) Response, Questions, and Guidance
  - <https://www.epa.state.oh.us/covid19>
  - Online form to request enforcement discretion
  - The following information is needed to complete the form:
    - The specific regulatory or permit requirement which cannot be complied with
    - A concise statement describing the circumstances preventing compliance
    - The anticipated duration of time that the noncompliance will persist
    - The mitigative measures that will be taken to protect public health and the environment during the need for enforcement discretion
    - A central point of contact for the regulated entity, including an email address and phone number
    - Where alternative compliance options are authorized by Ohio EPA, regulated entities must maintain records adequate to document activities related to the noncompliance and details of the regulated entity's best efforts to comply.



# What Regulatory Information and Relief is Available?

## State-Level Activity - Continued

- California Department of Toxic Substances Control (DTSC)
  - Form to request extension for 90-day storage limit
  - <https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/Storage-Extension-Application-for-Generators.pdf>



## California CUPAs

- Sacramento County Environmental Management
  - Form to request Non-RCRA and/or RCRA exempt storage extension
  - <https://emd.saccounty.net/EH/Documents/Exempt%20Hazardous%20Waste%20Storage%20Extension%20Notification%202003%202020.pdf>



# What Regulatory Information and Relief is Available?

## State-Level Activity - Continued

- California Department of Public Health
  - Website on Medical Waste Management Interim Guidelines
  - <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/MedicalWasteManagementInterimGuidelines.aspx>
- Oregon Dept. of Environmental Quality
  - Guidance Document: Managing COVID-19 Solid Waste
  - <https://www.oregon.gov/deq/FilterDocs/SW-covid19.pdf>
- South Carolina Department of Health and Env. Control
  - Website with waste management guidelines
  - <https://scdhec.gov/infectious-diseases/viruses/coronavirus-disease-2019-covid-19/waste-management-covid-19>



# What Regulatory Information and Relief is Available?

## State-Level Activity - Continued

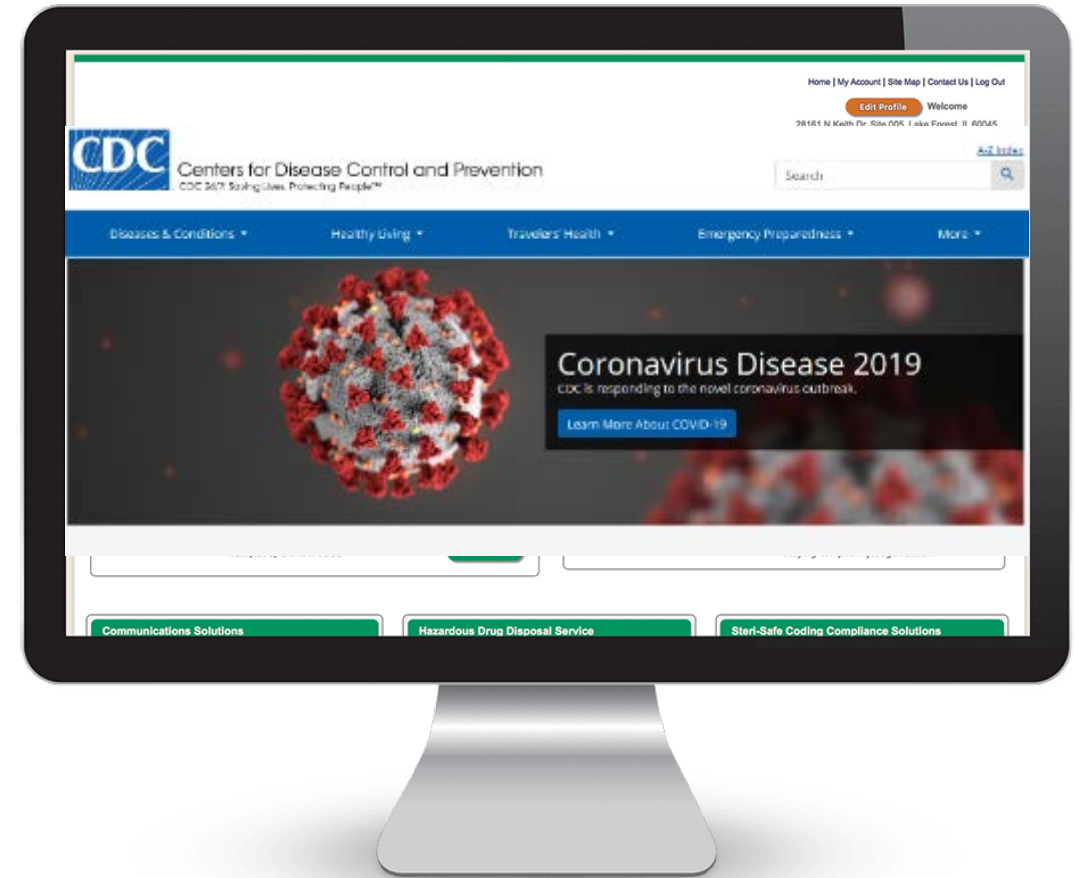
- Texas Commission on Environmental Quality
  - Email to Generators with instructions and email to accept requests for potential enforcement discretion
  - Website with disposal guidance
  - <https://www.tceq.texas.gov/response/covid-19>
- Pennsylvania Dept. of Environmental Protection
  - Website alert announcing office closings
  - Email address to inquire about waiver eligibility
  - <https://www.dep.pa.gov/Pages/AlertDetails.aspx>



# Communication and Resources

# Communication and Resources

- CDC: <https://www.cdc.gov/coronavirus/2019-nCoV/index.html>
- OSHA: [https://www.osha.gov/SLTC/novel\\_coronavirus/](https://www.osha.gov/SLTC/novel_coronavirus/)
- World Health Organization (WHO):  
<https://www.who.int/emergencies/diseases/novel-coronavirus-2019>
- EPA List N: Disinfectants for Use Against SARS-CoV-2:  
<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>
- NWRA – HWI Press Release and Guidance Document:  
[https://cdn.ymaws.com/wasterecycling.org/resource/resmgr/hwi\\_minutes/HWI\\_COVID-2019\\_FAQs.pdf](https://cdn.ymaws.com/wasterecycling.org/resource/resmgr/hwi_minutes/HWI_COVID-2019_FAQs.pdf)





# Communication and Resources

- RILA Coronavirus Resources for Retailers:  
<https://www.rila.org/coronavirus-resources-for-retailers>
- DOT website: <https://www.transportation.gov/coronavirus>
- MultiState Associates COVID-19 Policy Tracker:  
<https://www.multistate.us/pages/covid-19-policy-tracker>
- Stericycle Coronavirus (COVID-19) Knowledge Center:  
<https://www.stericycle.com/landing-pages/novel-coronavirus>



# Questions

## Stericycle Regulatory Team

[Ask-Regulatory@Stericycle.com](mailto:Ask-Regulatory@Stericycle.com)



### **Wade Scheel**

*Director, Government Affairs*

[WScheel@Stericycle.com](mailto:WScheel@Stericycle.com)

# Thank you

### COVID-19 Waste Management Protocols

Stericycle developed these proposed waste management protocols to outline our intentions for managing waste compliantly during the COVID-19 pandemic, absent regulatory or customer specification. Stericycle is continuously monitoring announcements from State Agencies on guidance and instructions on state-specific protocols and will revise these protocols accordingly.

<b>Process Generating Waste</b>	<b>Waste Contents</b>	<b>Normal (non-COVID-19) Disposal Method Protocols</b>	<b>COVID-19 Disposal Method Protocols</b>
<b>Laboratory Wastes</b>	Standard regulated medical waste associated with clinical testing of laboratory specimens	Regulated Medical Waste	Regulated Medical Waste
	Hazardous waste chemicals, reagents, compounding chemicals	Hazardous Waste	Hazardous Waste
<b>Quarantine Sites</b>	General trash from normal activities	Solid Waste	Solid Waste
	Healthcare related waste from treatment/care of known or suspected COVID-19 infected individual	Regulated Medical Waste	Regulated Medical Waste  *Some Generators are over-classifying all waste from quarantine sites and managing as RMW
<b>Healthcare related waste from treatment/testing/care of known or suspected COVID-19 infected individual (blood, bodily fluids, OPIM, sharps)</b>	Used PPE, clean-up rags and wipes, other debris	Regulated Medical Waste	Regulated Medical Waste

<p><b>Decontamination of areas where known or suspected COVID-19 infected individual was present and contaminated area (not clearly RMW, not sharps, not lab related etc.)</b></p>	<p>Used PPE, clean-up rags and wipes, other debris with a non-hazardous disinfectant chemical</p>	<p>Solid Waste</p>	<p>Solid Waste</p> <p>*Some Generators are over-classifying all waste from decontamination activities and managing as RMW</p> <p>**States may have specific requirements for managing this type of waste</p>
		<p>Hazardous Waste (when materials contaminated with disinfecting chemicals determined to be RCRA or State-Regulated hazardous waste)</p>	<p>Hazardous Waste (when materials contaminated with disinfecting chemicals determined to be RCRA or State-Regulated hazardous waste)</p>
<p><b>General Decontamination of workplace, schools, public facilities, mass transit</b></p>	<p>Used PPE, clean-up rags and wipes, other debris with a non-hazardous disinfectant chemical</p>	<p>Solid Waste</p>	<p>Solid Waste (if no reasonable anticipation that COVID-19 infected individual was present and when materials contaminated with disinfecting chemicals determined to be non-RCRA and non-State regulated/non-hazardous)</p> <p>*Some Generators are over-classifying</p>

			<p>all waste from decontamination activities and managing as RMW</p> <p>**States may have specific requirements for managing this type of waste</p>
<b>General Decontamination of workplace, schools, public facilities, mass transit</b>	Used PPE, clean-up rags and wipes, other debris with a hazardous waste disinfectant chemical	Hazardous Waste (when materials contaminated with disinfecting chemicals determined to RCRA or State-Regulated hazardous waste)	Hazardous Waste (when materials contaminated with disinfecting chemicals determined to RCRA or State-Regulated hazardous waste)
<b>Community/Company-Based COVID-19 public testing sites</b>	Used PPE from healthcare workers and volunteer, COVID-19 test-kit wastes	Solid Waste	Regulated Medical Waste
	Non-healthcare related wastes and wastes that were generated from interaction with the potentially COVID-19 infected public participants	Solid Waste	Solid Waste
<b>Concentrated Decontamination / Disinfecting Chemicals</b>	Empty containers that previously held concentrated chemicals	Solid Waste – if containers meet state and federal definition of empty.	Solid Waste – if containers meet state and federal definition of empty.
	Full or partially full unused or leftover containers of	Solid Waste or Hazardous Waste - Generators must	EPA has published a listing of chemicals that are effective for

	concentrated chemicals	evaluate the chemical to determine if they would be RCRA Hazardous waste or State Regulated Hazardous Waste for toxicity, corrosivity, or flammability	use against Human Coronavirus (provided under Supporting Documents). Generators must evaluate the chemical to determine if they would be RCRA Hazardous waste or State Regulated Hazardous Waste for toxicity, corrosivity, or flammability  <a href="#">EPA Disinfectants for Use Against CoV-2</a>
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For questions regarding this document, please contact your Stericycle Account Representative.



Better data. Better decisions. Greener planet.



# Can't fight what you don't know

## Disinfecting the world through shared data

April 7, 2020

# EPA's "List N"



List N was last updated on April 2, 2020.

Search:

Export to PDF

Show 25 entries

**Source:**  
<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>

**357 EPA IDs as of April 6.**

List N: Products with Emerging Viral Pathogens AND Human Coronavirus claims for use against SARS-CoV-2

<a href="#">EPA Registration Number</a>	<a href="#">Active Ingredient(s)</a>	<a href="#">Product Name</a>	<a href="#">Company</a>	<a href="#">Follow the disinfection directions and preparation for the following virus</a>	<a href="#">Contact Time (in minutes)</a>	<a href="#">Formulation Type</a>	<a href="#">Surface Types for Use</a>	<a href="#">Use Site</a>	<a href="#">Emerging Viral Pathogen Claim?</a>	<a href="#">Date Added to List N</a>
84683-3	Thymol	Benefact Botanical Daily Cleaner Disinfectant Spray	Cleanwell LLC	Rhinovirus	10	RTU	Hard nonporous	Healthcare; Institutional; Residential	Yes	04/02/2020
88897-2	Quaternary ammonium; Isopropanol; Ethanol	Panther Disinfectant	Maxill Inc	Adenovirus; Feline calicivirus	3	RTU	Hard nonporous	Healthcare; Institutional	Yes	04/02/2020
42048-4	L-Lactic Acid	Sani-Cide EX3 (10X) RTU	Celeste Industries Corp	Feline calicivirus	10	RTU	Hard nonporous	Institutional	Yes	04/02/2020
66171-7	Quaternary ammonium; Glutaraldehyde	Synergize	Preserve International	Feline calicivirus	10	Dilutable	Hard nonporous	Institutional	Yes	04/02/2020
85837-4	Hydrogen peroxide	Proxi Home General Disinfectant Cleaner Spray	Innovasource LLC	Rhinovirus	10	RTU	Hard nonporous	Healthcare; Institutional; Residential	Yes	04/02/2020
498-179	Quaternary ammonium; Ethanol	Champion Sprayon Spray Disinfectant Formula 3	Chase Products Co	Rhinovirus	10	RTU	Hard nonporous	Healthcare; Institutional; Residential	Yes	04/02/2020
1839-236	Quaternary	SC-5:128N	Stepan	Rotavirus	5	Dilutable	Hard	Healthcare; Institutional;	Yes	04/02/2020

# Unpacking EPA's Data



List N was last updated on April 2, 2020.

Search:

Export to PDF

Show 25 entries

List N: Products with Emerging Viral Pathogens AND Human Coronavirus claims for use against SARS-CoV-2

<a href="#">EPA Registration Number</a>	<a href="#">Active Ingredient(s)</a>	<a href="#">Product Name</a>	<a href="#">Company</a>	<a href="#">Follow the disinfection directions and preparation for the following virus</a>	<a href="#">Contact Time (in minutes)</a>	<a href="#">Formulation Type</a>	<a href="#">Surface Types for Use</a>	<a href="#">Use Site</a>	<a href="#">Emerging Viral Pathogen Claim?</a>	<a href="#">Date Added to List N</a>
84683-3	Thymol	Benefact Botanical Daily Cleaner Disinfectant Spray	Cleanwell LLC	Rhinovirus	10	RTU	Hard nonporous	Healthcare; Institutional; Residential	Yes	04/02/2020
		anther disinfectant	Maxi				Hard nonporous			
		ani-Cide EX3 (10X) RTU	Cele Indu Corp				Hard nonporous			
		ynnergize	Pres Inter			table	Hard nonporous			
85837-4	Hydrogen peroxide	Proxi Home General Disinfectant Cleaner Spray	Innovasource LLC	Rhinovirus	10	RTU	Hard nonporous	Healthcare; Institutional; Residential	Yes	04/02/2020
498-179	Quaternary ammonium; Ethanol	Champion Sprayon Spray Disinfectant Formula 3	Chase Products Co	Rhinovirus	10	RTU	Hard nonporous	Healthcare; Institutional; Residential	Yes	04/02/2020
1839-236	Quaternary	SC-5:128N	Stepan	Rotavirus	5	Dilutable	Hard	Healthcare; Institutional;	Yes	04/02/2020

**EPA Registration Number**  
Pesticide Registration Number. 123-45-678  
taxonomy = brand-chemical-distributor

**Contact Time**  
“The amount of time the surface should be treated for [in minutes]. The surface should be visibly wet for the duration of the contact time.”

**Surface Types for Use**  
“... the types of surfaces on which the disinfectant can be used (e.g., non-porous surfaces like doorknobs or stainless steel counters, or porous surfaces such as fabric).”

# Unpacking EPA's Data



List N was last updated on April 2, 2020.

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Export to PDF

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List N: Products with Emerging Viral Pathogens AND Human Coronavirus claims for use against SARS-CoV-2

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		anther disinfectant	Maxi				Hard nonporous			
		ani-Cide EX3 (10X) TU	Cele Indu Corp				Hard nonporous			
		ynnergize	Pres Inter			table	Hard nonporous			
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498-179	Quaternary ammonium; Ethanol	Champion Sprayon Spray Disinfectant Formula 3	Chase Products Co	Rhinovirus	10	RTU	Hard nonporous	Healthcare; Institutional; Residential	Yes	04/02/2020
1839-236	Quaternary	SC-5:128N	Stepan	Rotavirus	5	Dilutable	Hard	Healthcare; Institutional;	Yes	04/02/2020

**Use Site**

**Healthcare:** Hospital, dental or other healthcare facilities  
**Institutional:** Schools, office buildings, and restaurants  
**Residential:** Homes

**Emerging Viral Pathogen Claim?**

“If a product qualified for the emerging viral pathogen claim, it is effective against a harder-to-kill virus than human coronavirus. All products on this list meet EPA’s criteria for use against SARS-CoV-2, including those marked as “No” in this column.”

**Date Added to List N**

“... Submit your application via the CDX portal. Once you submit or if you have already submitted your application, please email disinfectantslist@epa.gov with your CDX tracking number (CDX\_2020\_XXXXXX) so that your submission can be expedited.”

But how can we improve efficiency for retailers and consumers to find these products?

## Finding a Product

The easiest way to find a product on this list is to enter **the first two sets** of its **EPA registration number** into the search bar below.

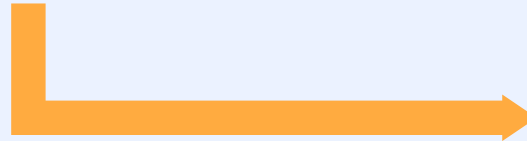
For example, if EPA Reg. No. 12345-12 is on List N, you can buy EPA Reg. No. 12345-12-2567 and know you're getting an equivalent product. **You can find this number by looking for the EPA Reg. No. on the product label.**

# What's an EPA ID to a consumer?

## Finding a Product

The easiest way to find a product on this list is to enter **the first two sets** of its **EPA registration number** into the search bar below.

For example, if EPA Reg. No. 12345-12 is on List N, you can buy EPA Reg. No. 12345-12-2567 and know you're getting an equivalent product. **You can find this number by looking for the EPA Reg. No. on the product label.**



Wait ... where is it?



# Potential unintended consequences of extra time spent searching for EPA ID on labels ...



- Touching labels
- More time spent in store
- More time consumer engaging store associates



# We connected EPA ID to UPC to SDS ...



data.world

Our dataset is 1,369 UPCs – and growing (April 7).

## EPA INPUTS

## UPC INDEX

List N: Products with

EPA Registration Number	Active Ingredient/s	Product I
84198-1	Hydrogen peroxide	Peroxy HD
45745-11	Hydrogen peroxide	HP202
65402-9	Peroxyacetic acid;	VigorOx 15



	bar_code	epa_reg_no	product_name	sds	com
1	044600353005	67619-10	409 CLEANER/DEGREASE/1GAL	<a href="https://s3.amazonaws.com/new-prod-ss-">https://s3.amazonaws.com/new-prod-ss-</a>	Clorox Profession
2	044600353067	67619-10	409 CLEANER/DEGREASE/32OZ	<a href="https://s3.amazonaws.com/new-prod-ss-">https://s3.amazonaws.com/new-prod-ss-</a>	Clorox Profession
3	10044600353002	67619-10	Formula 409 Degreaser and All Purpose	<a href="https://s3.amazonaws.com/new-prod-ss-">https://s3.amazonaws.com/new-prod-ss-</a>	Clorox Profession
4	10044600353064	67619-10	Formula 409 Degreaser and All Purpose	<a href="https://s3.amazonaws.com/new-prod-ss-">https://s3.amazonaws.com/new-prod-ss-</a>	Clorox Profession
5	044600024899	67619-32	CLOROX GERM BLCH 3/1820Z	<a href="https://s3.amazonaws.com/new-prod-ss-">https://s3.amazonaws.com/new-prod-ss-</a>	Clorox Profession
6	040008156217	67619-8	CLOROX GERMICIDE BLCH 96Z	<a href="https://s3.amazonaws.com/new-prod-ss-">https://s3.amazonaws.com/new-prod-ss-</a>	Clorox Profession
7	046500039638	70627-15	Triad III Disinfectant Cleaner (US)	<a href="https://s3.amazonaws.com/new-prod-ss-">https://s3.amazonaws.com/new-prod-ss-</a>	Diversey Inc
8	10807174491934	70627-15	Triad III Disinfectant Cleaner (US)	<a href="https://s3.amazonaws.com/new-prod-ss-">https://s3.amazonaws.com/new-prod-ss-</a>	Diversey Inc
9	10807174492191	70627-15	Triad III Disinfectant Cleaner (US)	<a href="https://s3.amazonaws.com/new-prod-ss-">https://s3.amazonaws.com/new-prod-ss-</a>	Diversey Inc
10	046500043321	70627-24	Diversey Virex II 256 Broad Spectrum	<a href="https://s3.amazonaws.com/new-prod-ss-">https://s3.amazonaws.com/new-prod-ss-</a>	Diversey Inc
11	076335203669	70627-24	Dimension 256 Neutral Disinfectant Cl	<a href="https://s3.amazonaws.com/new-prod-ss-">https://s3.amazonaws.com/new-prod-ss-</a>	Diversey Inc

# UPCs → Findable. SDSs → Safety.



## SAFETY DATA SHEET

Issuing Date January 5, 2015 Revision Date New Revision Number 0

**1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING**

**Product Identifier**  
 Product Name Clorox Commercial Solutions® Formula 409® Cleaner Degreaser Disinfectant

**Other means of identification**  
 EPA Registration Number 67619-10

**Recommended use of the chemical and restrictions on use**  
 Recommended Use General purpose cleaner, degreaser, and disinfectant

**Uses advised against**  
 Uses advised against No information available

**Details of the supplier of the safety data sheet**  
 Supplier Address  
 Clorox Professional Products Company  
 1221 Broadway  
 Oakland, CA 94612  
 Phone: 1-510-271-7000

**Emergency telephone number**  
 Emergency Phone Numbers  
 For Medical Emergencies call: 1-800-446-1014  
 For Transportation Emergencies, call Chemtrec: 1-800-424-9300

### EPA INPUTS

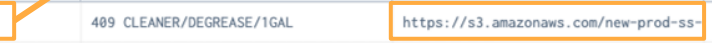
### UPC INDEX

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	bar_code	epa_reg_no	product_name		
1	044600353005	67619-10	409 CLEANER/DEGREASE/1GAL	https://s3.amazonaws.com/new-prod-ss-	Clorox Profession
2	044600353067	67619-10	409 CLEANER/DEGREASE/32OZ	https://s3.amazonaws.com/new-prod-ss-	Clorox Profession
3	10044600353002	67619-10	Formula 409 Degreaser and All Purpose	https://s3.amazonaws.com/new-prod-ss-	Clorox Profession
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9	108807174492191	70627-15	Triad III Disinfectant Cleaner (US)	https://s3.amazonaws.com/new-prod-ss-	Diversey Inc
10	046500043321	70627-24	Diversey Virex II 256 Broad Spectrum	https://s3.amazonaws.com/new-prod-ss-	Diversey Inc
11	076335203669	70627-24	Dimension 256 Neutral Disinfectant Cl	https://s3.amazonaws.com/new-prod-ss-	Diversey Inc



# How do we make this data available and improve efficiency for retailers/consumers?



## EPA INPUTS

List N: Products with

<a href="#">EPA Registration Number</a>	Active Ingredient/s	Product I
84198-1	Hydrogen peroxide	Peroxy HD
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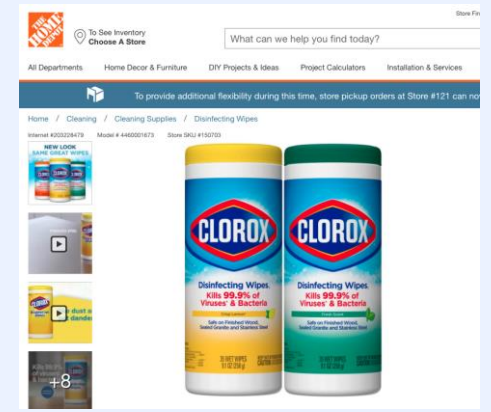


## UPC INDEX

	bar_code	epa_reg_id	pro
1	044600353005	67619-10	409 CLEANER/DEG
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3	10044600353002	67619-10	Formula 409 Deg
4	10044600353064	67619-10	Formula 409 Deg
5	044600024899	67619-32	CLOROX GERM BLC



## RETAILER SITES & STORES?



**Let's work together to keep the world safe and healthy through shared data.**

- Partnerships
- Joining retail, brand, third-party data sets
- Consumer visibility

## Questions?

**Charlie Vallely**, Smarter Sorting  
Co-Founder, Chief Product Officer  
[charlie@smartersorting.com](mailto:charlie@smartersorting.com)