

# Managing Compliance Challenges Related to the Coronavirus Pandemic

### March 26, 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.

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# "We are not preparing for the world we live in - we are preparing for the world we find ourselves in."

~Michael Mabee\*

\*Reference does not represent endorsement by Stericycle



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### Agenda

Regulatory Climate and Relief

Compliance Challenges

Coronavirus / COVID-19 Waste Overview

Business Continuity / Contingency Planning

Communication and Resources



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# Regulatory Climate and Relief



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## Regulatory Climate – Key Points

- Compliance is still expected; State of Emergency does not provide blanket relief to environmental regulations



- Regulatory Agency offices are likely closed and staff are working at home if at all
- May experience delayed responses on permitting, licensing, fee invoices, interpretations, requests for enforcement discretion or guidance due to this being the first time Agency staff are working outside the office
- Written / formal responses will be delayed; likely email interaction or phone conversations necessary to obtain answers to questions

Reduced or eliminated onsite regulatory inspections; movement towards more desktop/paperwork/data audits and compliance reviews

- Regulatory Alerts / Updates coming from State and Local Agencies as mass emails to Generators or posting to websites
  - Announcing enforcement discretion
  - Creating resource websites
  - Hosting informational webinars
  - Posting instructions for submitting fees/permits electronically
- Will lead to significant delays of state-level legislative / regulatory activity
  - Adoption of Generator Improvement, Pharmaceutical, and Universal Waste Aerosol Rules will be affected



May delay enforcement actions



#### **CDC and State Agency Websites**

State Health and Environmental Departments and CDC are providing additional guidance – check frequently for updates on special provisions

### **OSHA Temporary Enforcement Guidance**

OSHA is communicating additional guidance and relief at <u>www.osha.gov</u>

- Temporary Enforcement Guidance Healthcare Respiratory Protection Annual Fit-Testing for N95 Filtering Facepieces During the COVID-19 Outbreak
- 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



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### **DOT PHMSA – Enforcement Policy on Training**

- PHMSA gives notice they are using enforcement discretion to not take enforcement action for offerors or carriers unable to meet recurrent training requirements
- Effective for 90 days from March 23, 2020
- Enforcement discretion will be in effect for:
  - Federal Aviation Administration
  - Federal Railroad Administration
  - PHMSA
  - FMCSA
  - Coast Guard
- Encouraging the use of web-based, self-paced computer instruction, remotely delivered classroom instruction and on-the-job training



### **State-Level Activity**

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

- 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
- Wisconsin DNR email alert:
  - Online method for requesting an extension to generator accumulation time limits
  - <u>https://www.surveymonkey.com/r/HWStorage</u>



MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY





### **State-Level Activity - Continued**

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









### **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
  - <u>https://www.tceq.texas.gov/response/covid-19</u>
- 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







### **Industry Association Activity**

National Waste & Recycling Association (NWRA)

- Letter to DOT FMSCA requesting temporary relief for DOT CDL Driver Physicals and Drug Screening requirements
  - Update: March 24, 2020 DOT FMSA issues waiver from certain regulations applicable to interstate and intrastate commercial driver's license (CDL)
- Letter to Vice President Pence requesting exemptions from some handling requirements for medical, residential, and commercial wastes
- Healthcare Waste Institute (HWI)
  - Sending letter to 50 states requesting regulatory relief for extended medical waste storage timelines





## Additional DOT Relief and Essential Services

Document	Level	Issuing Agency	Overview	Date	Web Link
Essential Critical	Federal	Cybersecurity &	Provides detail on which functions and types of businesses services are	3/19/2020	https://www.cisa.gov/ide
Infrastructure		Infrastructure	considered "essential".		ntifying-critical-
Workers		Security Agency			infrastructure-during-
Document					covid-19
FMCSA	Federal	Federal Motor	Main document identifying the regulatory relief from FMCSA regulations	3/18/2020	https://www.fmcsa.dot.g
Expanded		Carrier Safety	<ul> <li>HOS, record keeping, all sections 49 CFR 390-399</li> </ul>		ov/newsroom/us-
Emergency		Administration			department-
Declaration for					transportation-expands-
Relief from DOT					national-emergency-
Safety					declaration-commercial-
Regulations					vehicles
FMCSA	Federal	Federal Motor	Provides clarification of the applicability of the declaration.	3/19/2020	https://www.fmcsa.dot.g
Emergency		Carrier Safety			ov/newsroom/us-
Declaration FAQ		Administration			department-
					transportation-expands-
					national-emergency-
					declaration-commercial-
					vehicles
FMCSA Waiver in	Federal	Federal Motor	Provides waiver for certain aspects of Commercial Drivers License and	3/24/2020	https://www.fmcsa.dot.g
Response to the		Carrier Safety	Commercial Driver Learner Permits regarding medical certifications and		ov/sites/fmcsa.dot.gov/fil
COVID-19		Administration	physical exams		<u>es/2020-</u>
Emergency					03/FMCSA%20CDL%20Wa
					iver-3.24.20.pdf

# **Compliance Challenges**



### Compliance Challenges: Compliance is Expected



#### **Store Closures: Exceeding Accumulation Time Limits**

• Compliance date passes when store/operations are closed

#### Store Closures: Accumulating Waste in a Manner to Prevent Releases

- Weekly inspections of waste accumulation area not completed
- Accumulation containers left open
- Spills not contained / cleaned up
- Restricted / Limited Access or Operating Hours: Exceeding Waste Storage Capacity
  - Waste pickups minimized to accommodate limited hours or essential activities
  - Waste volumes exceed storage capacity and accumulated in boxes or pallets

#### Reduced Staffing Levels: Recordkeeping, Accumulation Container Labeling, Training

• Knowledgeable Program Management Staff are not working; critical compliance responsibilities now in the hands of untrained individuals

Environmental Regulators will expect compliance with all Generator requirements unless specifically relief is requested and granted, or enforcement discretion is announced.



### Compliance Challenges: Compliance is Expected

#### **Store Closures: Exceeding Accumulation Time Limits**

- Monitor accumulation dates
- Schedule services prior to close
  - Proactively contact regulatory agencies for guidance

#### Store Closures: Accumulating Waste in a Manner to Prevent Releases

- Assign Weekly Inspections to Critical Remaining Staff
- Ensure Critical Remaining Staff are trained on minimum accumulation requirement and spill cleanup

## Restricted / Limited Access or Operating Hours: Exceeding Waste Storage Capacity

- Communicate with vendors on restricted access or service limitations
- Use quick reference guides / alerts on proper packaging and storage

#### Reduced Staffing Levels: Recordkeeping, Accumulation Container Labeling, Training

- Develop simplified and targeted training for pandemic protocols
- Assign Program Management responsibilities to limited Critical Remaining Staff

Build Your Case
Document-Document-Document
Be Proactive – Get Ahead of the Crisis
Contact Regulators for Guidance



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# Coronavirus / COVID-19 Waste Overview



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### What Infection Control Measures are Recommended?

CDC and Health Departments are recommending standard precautions

- Use social distancing, limit contact and isolation
- Adherence to standard transmission-based, contact, and airborne precautions
- Recommend that only essential personnel (doctors/nursing) enter rooms
- Personnel entering room should use PPE, gloves, eye/face protection, gowns/covers, and respiratory protection

CDC and OSHA now have waste specific information available

- <u>https://www.cdc.gov/coronavirus/2019-ncov/hcp/faq.html</u>
- <u>https://www.osha.gov/SLTC/covid-19/controlprevention.html#solidwaste</u>
- Generally both recommend typical engineering and administrative controls, safe work practices and PPE for the handling of wastes



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## Additional Guidance on Infection Control

- Agencies issuing guidance on PPE use to optimize use of limited resources while protecting workers
- CDC has issued guidance on optimizing use of eye protection, isolation gowns, facemasks, and N95 respirators
  - <u>https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/index.html</u>
- OSHA has issued temporary enforcement guidance on use of N95 respirators
  - <u>https://www.osha.gov/memos/2020-03-14/temporary-enforcement-guidance-healthcare-respiratory-protection-annual-fit</u>
  - Relief from fit testing
  - Provide training on use, maintenance and care of respirators, including the importance of the seal check



## **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
- Healthcare waste companies are capable of managing regulated medical waste and sharps per normal means
- 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."
- 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.



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#### **Packaging Procedures**





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### Waste Not Accepted for Disposal as Regulated Medical Waste

#### **Untreated Category A Infectious Substances**

**Complete Human Remains** (including heads, full torsos, and fetuses)



#### Chemicals

Formaldehyde, formalin, acids, alcohol, waste oil, solvents, reagents, fixer developer, fluorescein, cleaning products and disinfectants

#### **RCRA Hazardous Waste or Universal Waste**

Including but not limited to batteries, bulbs, hazardous waste pharmaceuticals, bulk chemotherapy



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#### Compressed Gas Cylinders, Canisters, Inhalers and Aerosol Cans



#### Mercury Containing Material, Devices, or Wastes

Mercury thermometers, sphygmomanometers, amalgam and related wastes

#### **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, \*CDC guidance coming\*



## **COVID-19 Waste Regulations?**

Federal guidance on waste management is limited (no Federal Regulated Medical Waste regulations)

States agencies involved with waste management are publishing guidance

- Treatment, disposal, enforcement discretion
- Stericycle is consolidating these sites into a document that can be found on our site

Healthcare Waste Institute, Stericycle, and other healthcare waste companies have all put out guidance on management of waste:

- <u>https://cdn.ymaws.com/wasterecycling.org/resource/resmgr/hwiminutes/HWI\_COVID-2019\_FAQs.pd</u>
- <u>www.Stericycle.com/coronavirus</u>

The EPA has published a list of disinfecting chemicals that are effective against the Coronavirus/COVID-19:

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



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## COVID-19 Waste Management Protocols\*

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

COVID-19 Waste Management Protocols							
Process Generating Waste	Waste Contents	Normal (non-COVID-19) Disposal Method Protocols	COVID-19 Disposal Method Protocols				
Decontamination of areas where known or suspected COVID-19 infected individual was present and contaminated area	Used PPE, clean-up rags and wipes, other debris with a non- hazardous disinfectant chemical	Solid Waste	Regulated Medical Waste (when materials contaminated with disinfecting chemicals determined to be non-RCRA and non-State regulated/non-hazardous)				
Decontamination of areas where known or suspected COVID-19 infected individual was present and contaminated area	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 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

Process Generating Waste	Waste Contents	Normal (non-COVID-19) Disposal	COVID-19 Disposal Method
		Method Protocols	Protocols
General Decontamination of workplace, schools, public facilities, mass transit	Used PPE, clean-up rags and wipes, other debris with a non- hazardous disinfectant chemical	Solid Waste	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) *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
General Decontamination of workplace, schools, public facilities, mass transit	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\*

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COVID-19 Waste Management Protocols						
Process Generating Waste	Waste Contents	Normal (non-COVID-19) Disposal Method Protocols	COVID-19 Disposal Method Protocols			
Concentrated Decontamination / Disinfecting Chemicals	Empty containers that previously held concentrated chemicals Full or partially full unused or leftover containers of concentrated chemicals	Solid Waste – if containers meet state and federal definition of empty. 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	Solid Waste – if containers meet state and federal definition of empty. 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			

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# 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



# 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



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# Business Continuity / Contingency Planning



### Essential Businesses / Essential Activities

- State of Emergency, Executive Orders, Shelter-In-Place Orders, Stay at Home Advisory, Travel Restrictions, Border Closures, Business Closure Directives
  - Definition of Essential Business and Essential Activities
  - Waste related services included as Essential Businesses
  - Stericycle's Permitting and Compliance Team reaching out to each State for confirmation that waste related facilities, onsite services, field services, and transportation related activities are considered Essential Businesses

*From:* <u>BBBBB@epa.ohio.gov</u> [mailto:BBBBB@epa.ohio.gov] *Sent:* Tuesday, March 24, 2020 8:26 AM *To:* DDDDD < <u>DDDDD@STERICYCLE.com</u>>

*Subject:* Ohio Stay at Home Order DDDD,

Just wanted to reach out and make sure you were aware of Ohio's new Stay at Home Order and it's application to Stericycle. Stericycle, as a waste transporter and treatment facility operator, would be exempt under Order 12(V) Essential Businesses and Operations, manufacture, distribution, and supply chain for critical products and industries.





### Essential Businesses / Essential Activities

- United Nations Environment Programme Press Release March 24, 2020
  - "Waste management an essential public service in the fight to beat COVID-19"
- Is your retail business an Essential Business?
  - RILA organization working to support clarifications for retail
  - Letter to California Governor to include ports and distribution centers as Essential Businesses
- Resources:
  - RILA website: COVID-19 Resources for Retailers
    - <u>https://www.rila.org/coronavirus-resources-for-retailers</u>
  - MultiState Associates website: COVID-19 Policy Tracker
    - https://www.multistate.us/pages/covid-19-policy-tracker





### **Essential Businesses / Essential Activities**

- March 19 Memo from Department of Homeland Security Cybersecurity and Infrastructure Security Agency (CISA)
- Memorandum on Identification of Essential Critical Infrastructure Workers During COVID-19 Response
- The President Stated "If you work in a critical infrastructure industry, as defined by the Department of Homeland Security, such as healthcare services and pharmaceutical and food supply, you have a special responsibility to maintain your normal work schedule."
- Several Sections of the Memo Refer to Waste Related Businesses as Essential
  - Transportation and Logistics
    - Truck drivers who haul hazardous and waste materials to support critical infrastructure, capabilities, functions, and services
  - Public Works
    - Support to ensure the effective removal, storage, and disposal of residential and commercial solid waste and hazardous waste
  - Hazardous Materials
    - Workers at nuclear facilities, workers managing medical waste, workers managing waste from pharmaceuticals and medical material production, and workers at laboratories processing test kits
    - Workers who support hazardous materials response and cleanup
    - Workers who maintain digital systems infrastructure supporting hazardous materials management operations





## **Business Continuity / Contingency Planning**



Make sure Contingency or Emergency Response Plans are updated with current protocols, contacts, and contact info



If COVID-19 Contingency Plans are in place, ensure they are posted and staff are trained on current protocols

- Current staff working under closure or reduced staffing levels should be informed that waste services are essential to minimize refusal of services

Communicate with vendors on any local challenges with accessing stores/distribution centers



Communicate with vendors on any new protocols for limiting loading dock access – restricted or scheduled hours of service or high priority vendors have preferred access at certain times of the day



Use this time as opportunity to refresh the program

- Review compliance binder to ensure all copies of permits and licenses are present
- Complete a paperwork review to ensure manifest copies are present
- Change out broken totes, damaged drums, damaged shelving
- Complete a general clean-up and reset of waste accumulation area
- Ensure training materials and posters are present
- Restock spill-kits, baggies, labels, etc.



#### Help Us Help You

- Provide letter to vendors announcing that we are an Essential Business to your operation
- Communicate with vendors on any local alerts that will impact services
- Communicate with vendors on store closures or internal policy changes that will impact services



# Business Continuity / Contingency Planning

Be Proactive – Get Ahead of the Crisis

- Stock up on supplies
- Redistribute supplies from other locations
- Arrange for waste shipments prior to store closures

#### Is Non-Compliance Unavoidable?

- Proactively contact State or Local Regulators with request for enforcement discretion
- Clearly explain the circumstances leading to noncompliance
- Clearly explain any preventative actions you took to potentially avoid the non-compliance
- Outline your plans to manage the circumstances to minimize any potential negative environmental effects and maintain compliance
- Outline your plans to correct the situation and anticipated timelines for returning to full compliance



Compliance Uncertainty?

- Use the same approach to proactively contact Regulators to explain the circumstances and plans to maintain compliance
- Consider Other Options
  - Alternative packaging options bulk packaging vs. totes or drums
  - Alternative accumulation options secondary accumulation areas
  - Accommodate extraordinary circumstances now; return to normal protocols ASAP

### Build Your Case For Future Regulatory Scrutiny Document-Document-Document

- Written documentation of the what/how you did what you did to manage the risk
- SOPs, Work Instructions, Training Guides, Position Statements, Communication Chains





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- CDC: <u>https://www.cdc.gov/coronavirus/2019-nCoV/index.html</u>
- OSHA: <u>https://www.osha.gov/SLTC/novel\_coronavirus/</u>
- World Health Organization (WHO): <u>https://www.who.int/emergencies/diseases/novel-coronavirus-</u> 2019
- EPA List N: Disinfectants for Use Against SARS-CoV-2: <u>https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2</u>
- Department of Homeland Security Cyber and Infrastructure Security Agency (CISA): <u>https://www.cisa.gov/publication/guidance-essential-critical-infrastructure-workforce</u>
- NWRA HWI Press Release and Guidance Document: <u>https://cdn.ymaws.com/wasterecycling.org/resource/resmgr/hwi</u> <u>minutes/HWI COVID-2019 FAQs.pdf</u>





- RILA Coronavirus Resources for Retailers: <u>https://www.rila.org/coronavirus-resources-for-retailers</u>
- DOT website: <u>https://www.transportation.gov/coronavirus</u>
- DOT FMCSA: <u>https://www.fmcsa.dot.gov/newsroom/us-department-transportation-</u> <u>issues-national-emergency-declaration-commercial-vehicles</u>
- MultiState Associates COVID-19 Policy Tracker: <u>https://www.multistate.us/pages/covid-19-policy-tracker</u>





#### **COVID-19** healthcare waste generators want to reference:

Strategies for Optimizing PPEs, CDC

Strategies for Optimizing the Supply of N95 Respirators, CDC

<u>Personal Protective Equipment (PPE) Supply Equivalents,</u> ECRI's COVID-19 Resource Center

Resources for Supply Chain, ECRI

Novel Coronavirus EVS Advisory, AHE

Interim Infection Prevention and Control Recommendations for Patients with Suspected or Confirmed Coronavirus Disease, CDC

Print resources on COVID-19, CDC



- Stericycle Coronavirus (COVID-19) Knowledge Center: <u>https://www.stericycle.com/landing-pages/novel-coronavirus</u>
- This presentation was primarily focused on compliance challenges related to handling and managing solid waste, universal waste, and hazardous waste from retail operations involving consumer products and standard retail business practices.
- Information on compliance challenges related to handling and managing solid waste and regulated medical waste from retail healthcare operations or pop-up testing sites or cooperative hospitals involving COVID-19 may be obtained from the Stericycle Coronavirus (COVID-19) Knowledge Center link above.
- Specifically, the Stericycle Regulatory Compliance Team hosted a webinar on Wednesday, March 25 on Coronavirus Waste Management. The link to the recording from this webinar can be found at the link above.



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# Questions

### Stericycle Regulatory Team

<u>Ask-Regulatory@Stericycle.com</u>



### Wade Scheel

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Thank you



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