



We protect what matters.

January 21, 2026

Via Email: DNRECHearingComments@delaware.gov

Theresa Smith, Hearing Officer
DNREC – Office of the Secretary
89 Kings Highway
Dover, DE 19901

Re: Proposed Amendments to 7 DE Admin. Code: 1301, "Regulations Governing Solid Waste" (Docket #2025-R-WHS-0016

To Whom it May Concern:

Stericycle, Inc. (Stericycle) is a leading provider of compliance-based solutions that protect people, promote health and safeguard the environment. Stericycle specializes in the collection, transportation, treatment and disposal of medical waste. To our customers, team members and the communities we serve, Stericycle is a company that protects what matters. Stericycle operates dozens of medical waste facilities across the United States. Though we do not currently operate locations in Delaware, because we provide essential services to healthcare facilities across the State that generate medical waste, including public and private hospitals, clinics, nursing homes and laboratories, we have interest in commenting on portions of the proposed amendments as related to infectious waste.

Stericycle appreciates the opportunity to provide these comments to the Delaware Department of Natural Resources' (DNREC's) proposed amendments to 7 DE Admin Code: 1301, "Regulations Governing Solid waste" waste rules at Division 335-17 (Proposed Amendments). Stericycle agrees with DNREC's goal of clarifying and improving existing regulatory language, however, we would suggest that DNREC consider additional changes, particularly to the regulations for infectious waste found in 7 DE Admin. Code 1301 (11).

Lack of Allowance for Electronic Recordkeeping and Manifests

The current and proposed verbiage in 7 DE Admin. Code 1301 (11.16) outlines requirements for manifests for shipments of infectious waste. Stericycle is working towards a fully electronic manifest process that would bring many benefits to both our Delaware customers and the environment. For example, waste associated with printing, storing, and disposing paper would be reduced as would compliance costs and clerical demands on healthcare providers. Critical information used in reporting would continue to be maintained and likely enhanced. However, despite there being multiple benefits to electronic manifests, no allowance for such is given in the current rules. Stericycle recommends aligning language with federal hazardous materials shipping paper requirements and allowing for electronic recordkeeping. We would be happy to discuss such language as well as the U.S. Department of Transportation's DOT's pre-emptive authority on this matter with DNREC.

Mail Back Programs for Infectious Waste

Infectious waste is most commonly generated at hospitals and other large healthcare facilities; such facilities typically utilize the transport, treatment, and disposal services of permitted infectious waste haulers and processors. Smaller generators of infectious waste may utilize these services too, though



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simpler solutions such as mail back programs for infectious waste can be more appealing as they may be more cost-effective than traditional route-based services. However, the current and proposed rules limit the use of mail back services, allowing only sharps to be shipped through such a program and only by small quantity generators that fill out a form to ask for approval. The restriction on other infectious waste types and requirement to fill out a form creates a barrier to healthcare generators that may have interest in utilizing such a program. Furthermore, it is not clear if households are able to utilize mail back programs; though their infectious waste is exempted, ensuring that infectious wastes are not discarded with municipal solid waste is key to protecting waste workers and the environment. As more infectious waste may be generated in household settings due to the increase of healthcare services provided in the home as well as use of injectable medications, the option for infectious waste mail back programs to be used in households is becoming more pronounced. Mail back programs for infectious waste are allowed in most of the country, provided that United States Postal Service (USPS) requirements are followed. Thus, we recommend that DNREC consider clarifying that the exemption in 7 DE Admin. Code 1301 (11.14) can be used by any generator that utilizes an infectious mail back program with the USPS, provided that USPS requirements are followed. USPS requirements already restrict large volumes of waste to be shipped in this manner, require use of approved containers, require a manifest, and require the destination facility to be approved, thus protecting human health and the environment while providing a convenient means for the transport, treatment, and disposal of small volumes of infectious waste.

Thank you for your consideration of these comments. Stericycle welcomes the opportunity to collaborate with DNREC and would be happy to discuss these matters further. Please feel free to reach out to me at csimaga@stericycle.com or 312-720-6213 with any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Cara Simaga".

Cara Simaga, CHMM
Sr. Director – Regulatory Affairs
Stericycle, Inc.