

Materials Management Division

Epinephrine Auto-Injector Disposal Guide

Background

[Public Act 186 and 187](#) of 2014 requires that each public school have epinephrine auto-injectors (EAI) available in case of a medical emergency. There are both public health and environmental regulations that govern how EAI must be handled. This guide outlines how used and unused EAI must be handled to meet the state and federal regulations that apply. For more information see:

- Drug Waste - www.michigan.gov/deghealthcare, Waste Health Care Resources
- Medical Waste - www.michigan.gov/eglemedwaste



For questions related to waste regulations, call 800-662-9278. For questions related to U.S. Department of Transportation (U.S. DOT) regulations, contact the Michigan State Police at 517-241-0506.

Unused Epinephrine Auto-Injectors – Universal Pharmaceutical Waste & Medical Waste

Unused, expired EAI contain both an injection needle and epinephrine waste. They are considered a mixed medical waste that must be managed to meet the regulations that apply to non-hazardous liquids and the medical waste regulations. The simplest approach for handling mixed medical waste is to manage it under streamlined hazardous waste regulations called the [universal waste](#) regulations and sending it for hazardous waste incineration at a facility that is also authorized to manage medical waste or unused sharps/needles. The following outlines how schools and intermediate school districts (ISDs) can manage this waste.



Universal Pharmaceutical & Medical Waste Container

Container and Labeling

Container must be:

- Compatible with the waste.
- Spill, leak, and puncture-proof.
- Labeled “Universal Pharmaceutical & Medical Waste.”
- Marked with the biohazard symbol.
- Dated with the date when wasted epinephrine or sharps is first added.
- Kept closed except to add or remove waste.
- Containing only compatible materials (no aerosols, nitroglycerine, etc.).
- Managed to meet U.S. DOT packaging regulations.
- Secured from weather, fire, physical damage, and vandals.

Biohazard Symbol



Transportation

Transportation to the disposal facility must be:

- Within 90 days of the date when wasted epinephrine or sharps was first added to container.
- In compliance with the U.S. DOT requirements.
- Offered by a school or school district system [registered as a medical waste producer](#).

- Accompanied by a [Uniform Manifest](#) unless the school self-transport. See [liquid industrial waste generator guidance](#).
- Performed by a permitted/registered liquid industrial waste transporter.

Disposal

Disposal must include treatment and/or destruction at a hazardous waste licensed facility, preferably an incinerator, also authorized to manage medical waste and/or unused sharps/needles.

Used Epinephrine Auto-Injectors – Medical Waste

Used EAI have an injection needle that has been exposed to blood and body fluids and are medical waste that must be managed to meet the medical waste regulations. The following outlines how schools and intermediate school districts (ISDs) can manage this waste.

Container and Labeling

Container must be:

- Compatible with the waste.
- Spill, leak, and puncture-proof.
- Marked with the biohazard symbol.
- Dated with date when medical waste is first added to container.
- Containing only medical waste.
- Managed to meet U.S. DOT packaging regulations.
- Secured from weather, fire, physical damage, and vandals.



Medical Waste Container

Transportation

Transportation to a medical waste vendor or approving landfill must be:

- Within 90 days of the date when medical waste was first added.
- In compliance with the U.S. DOT requirements.
- Offered by a school or school district system [registered as a medical waste producer](#).

Disposal

Disposal of used sharps must:

- Include treatment/destruction at a licensed [medical waste facility](#) or
- Include transport directly to a municipal solid waste [landfill](#) that has approved acceptance of this waste for burial in a separate disposal cell designed specifically for medical waste.

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