

## **MIOSHA PERSPECTIVE ON JUNE 2002 FEDERAL OSHA INTERPRETATION REGARDING BLOOD TUBE COLLECTION HOLDERS**

**RE: Federal OSHA Standard Interpretations 06/12/2002 - Re-use of blood tube holders.**

The following excerpt was taken from the Federal OSHA letter of interpretation related to the reuse of blood collection tube holders.

**Question:** What is OSHA's position regarding the use of blood tube holders specifically removing a needle in order to re-use a tube holder? Must each blood tube collection device be disposed of with the needle attached each time they are used?

OSHA's Bloodborne Pathogens Standard (29 CFR 1910.1030, paragraph (d)(2)(vii)(A)) provides:

**Contaminated needles and other contaminated sharps shall not be bent, recapped, or removed, unless the employer can demonstrate that no alternative is feasible or that such action is required by a specific medical or dental procedure.** More specifically, our new compliance directive, CPL 2-2.69 at XIII.D.5 states, **removing the needle from a used blood-drawing/phlebotomy device is rarely, if ever, required by a medical procedure. Because such devices involve the use of a double-ended needle, such removal clearly exposes employees to additional risk, as does the increased manipulation of a contaminated device.**

In order to prevent potential worker exposure to the contaminated hollow bore needle at both the front and back ends, blood tube holders, with needles attached, must be immediately discarded into an accessible sharps container after the safety feature has been activated.

In Michigan, the MIOSHA Part 554 Bloodborne Infectious Diseases Standard R 325.70007 Work Practices Rule 7. (2) (e) states, **Used needles and other contaminated sharps shall not be sheared, bent, or broken and shall not be recapped or resheathed where other disposal methods are practical. Used needles and other sharps shall not be recapped, resheathed, or removed unless the employer can demonstrate that no alternative is feasible or that such action is required by a specific medical procedure.** Removal of a blood collection needle from a blood collection tube holder would be a violation of this rule unless the employer can demonstrate that no alternative is feasible or that such action is required by a specific medical procedure.

The MIOSHA compliance directive for Bloodborne Infectious Diseases is currently under revision. When completed, copies may be requested in accordance with the Freedom of Information Act (FOIA) through the Michigan Department of Consumer and Industry Services, Bureau of Safety and Regulation, Occupational Health Division, 7150 Harris Drive P.O. Box 30649 Lansing, MI 48909-8149.

Sincerely,

Jenelle K. Thelen  
Industrial Hygienist  
MIOSHA Consultation Education and Training  
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