

Hazardous Waste Management

Management of Hazardous Waste Pharmaceuticals at Healthcare Facilities

Information presented in this fact sheet is intended to provide a general understanding of the regulatory requirements governing the management of hazardous waste pharmaceuticals. This information is not intended to replace, limit, or expand upon the complete regulatory requirements found in Division 14 of the Alabama Department of Environmental Management Administrative Code.

BACKGROUND

Healthcare facilities—including pharmacies, hospitals, clinics, and doctors' offices for both humans and animals—often generate small amounts of hazardous waste, generally in the form of unused medications and other pharmaceutical wastes. Many waste pharmaceuticals are hazardous (i.e., they exhibit a characteristic identified in 335-14-2-.03 or are listed in 335-14-2-.04). Managed improperly, these materials can cause great harm to the public. The hazardous waste pharmaceutical rules were developed to simplify the handling and disposal of these wastes, while keeping them out of solid waste landfills and sanitary sewers.

WHAT IS A NON-CREDITABLE HAZARDOUS WASTE PHARMACEUTICAL?

A "non-creditable hazardous waste pharmaceutical" is either a prescription hazardous waste pharmaceutical that does not have a reasonable expectation to be eligible for manufacturer credit, or a nonprescription hazardous waste pharmaceutical that does not have a reasonable expectation to be legitimately used, reused, or reclaimed. These items must be sent to a designated facility for disposal.

HOW SHOULD I MANAGE MY NON-CREDITABLE HAZARDOUS WASTE PHARMACEUTICALS?

- You must have an EPA ID number and notify the Department annually, using ADEM Form 8700-12.
- You must determine if your pharmaceutical waste is a hazardous waste.
- You must provide training to your employees that handle your non-creditable hazardous waste pharmaceuticals.
- Non-creditable hazardous waste pharmaceuticals must be placed in containers that are sound, managed to avoid leaks or releases, kept closed, and labeled or marked "HW Pharmaceuticals".
- All containers must be managed in accordance with all applicable DOT requirements.
- You may accumulate non-creditable hazardous waste pharmaceuticals for up to one year.
- Pharmaceuticals prohibited from combustion must be marked with hazardous waste codes.
- Incompatible wastes must be handled appropriately.
- You must ship your non-creditable hazardous waste pharmaceuticals to a designated facility using a hazardous waste manifest.
- Keep copies of manifests for at least 3 years.

WHAT IS A POTENTIALLY CREDITABLE HAZARDOUS WASTE PHARMACEUTICAL?

A "potentially creditable hazardous waste pharmaceutical" is an unopened, undispensed, and unexpired prescription hazardous waste pharmaceutical that has a reasonable expectation to receive manufacturer credit. These items can be sent to a reverse distributor to be evaluated.

HOW SHOULD I MANAGE MY POTENTIALLY CREDITABLE HAZARDOUS WASTE PHARMACEUTICALS?

- You must maintain shipping papers and delivery confirmations for each shipment to a reverse distributor for at least 3 years.
- If a delivery confirmation is not received within 35 days, contact the transporter and the reverse distributor to determine the status of your shipment.

WHAT ELSE MUST I KNOW?

- ✓ Washing hazardous waste pharmaceuticals into the sewer system is prohibited.
- ✓ Clean up spills or releases promptly; these materials must be managed as non-creditable hazardous waste pharmaceuticals.
- ✓ If you are a VSQG for all of your hazardous waste (pharmaceutical and non-pharmaceutical), you may continue to manage your hazardous waste pharmaceuticals under the VSQG exemptions found in Division 14, chapter 3, or you may manage it under these rules.
- ✓ Controlled substances and household waste pharmaceuticals may not be managed under these rules.

WHERE CAN I GET ADDITIONAL INFORMATION?

On-line Resources:

U. S. Environmental Protection Agency: <http://www.epa.gov>

Alabama Department of Environmental Management: <http://www.adem.alabama.gov>

ADEM Administrative Code Division 14 -

<http://www.adem.alabama.gov/alEnviroRegLaws/files/Division14.pdf>

ADEM Guidance - <http://www.adem.state.al.us/programs/land/guidanceReports.cnt>:

Hazardous Waste Determination

Notification of Regulated Waste Activity



Telephone Resources:

Hazardous Waste Compliance Inspectors • • • 334-271-7730