

A Guide on  
Hazardous Waste Management  
for Florida's

# Pharmacies





## WHY SHOULD I CARE ABOUT HAZARDOUS WASTES?

Some of the materials produced in everyday pharmacy operations may be harmful to people or the environment.

**This booklet suggests a five-step management plan with tips on how to:**

- Comply with federal and state hazardous waste regulations.
- Avoid penalties by properly managing pharmaceuticals.
- Save money on disposal costs by reducing pharmaceutical wastes.

### Health and the Environment

**In absence of definitive knowledge about the effects of pharmaceuticals on the environment, disposing of all pharmaceutical waste as hazardous waste, although not required, would be the most protective of the environment. A reasonable alternative to this approach would be the incineration of non-hazardous pharmaceutical waste at a regulated medical waste incinerator or municipal incinerator permitted to burn non-hazardous pharmaceutical waste.**

Hazardous pharmaceutical wastes disposed of improperly may contaminate soil or seep into the groundwater and contaminate drinking water supplies.

Hazardous pharmaceutical wastes disposed of improperly may run off into the nearest body of water where they may poison or kill fish and other wildlife.

Hazardous pharmaceutical wastes pose a health risk to you, your employees and your community.

## Cost Savings

State and county environmental compliance inspectors may visit your pharmacy to ensure that pharmaceutical wastes are being managed properly. State penalties may involve fines up to \$50,000 **per day per violation**.

Implementing an effective pharmaceutical waste management plan can reduce the amount of waste generated, disposal costs, and your liability risk.

## Public Image

Your customers will appreciate your efforts to prevent pollution. Your community will recognize your pharmacy as a good neighbor.

# WHAT STEPS SHOULD I FOLLOW TO MANAGE MY PHARMACEUTICAL WASTES?

Some of the following practices may not be required for your pharmacy to remain in compliance with regulations. Even if they are not required, they are good waste management practices. Additional information is available from the Florida Department of Environmental Protection (DEP).

## Step 1

### ESTABLISH A PHARMACY MANAGEMENT PLAN

Make a **commitment to reducing waste** in every area of your pharmacy's operations.

**Evaluate** your pharmacy's wastes and identify areas where changes can be made.

Facilitate and encourage the participation of all pharmacy personnel through **education, training, and incentives**.



## General Pharmaceutical Management

- Conduct random expired pharmaceutical audits and remove outdated products from inventory.
- Be sure to inspect all medication storage areas for outdated products.
- Remember that **pharmaceuticals include** the **samples** provided by pharmaceutical representatives or your suppliers.
- **Send only legitimate and potentially creditable outdated pharmaceuticals through reverse distribution. Send waste-like items, such as partial vials, IVs, ointments, etc. through a universal waste handler** (see page 6).
- **Designate a clearly marked outdated pharmaceutical quarantine area to accumulate outdated pharmaceuticals or pharmaceutical products that cannot be sold.**
- All **pharmaceuticals discarded** by the facility **must be reviewed for hazardous waste status** and a determination must be made as to whether or not the discarded pharmaceuticals are hazardous waste.
- **Never discharge hazardous waste** to a drain that is connected to a publicly owned treatment works facility (POTW) without written permission from the POTW.
- **Never discharge hazardous waste** to a septic tank.
- **Never mix** hazardous pharmaceutical waste with biomedical waste for disposal.
- **Train all employees** according to your outdated product management program and ensure that employees can identify, reduce, and properly handle wastes.





## General Pharmaceutical Management (continued)




The Pharmacy has **two options** for managing outdated pharmaceuticals for credit through the return process:

1. Use a **Reverse Distributor**.
2. Process all returns and waste **internally**.

### Procedures for Managing Outdated Pharmaceuticals for Reverse Distribution

-  Implement the **outdated management procedures** provided by your reverse distributor or create a written outdated management program and initiate it as standard operating procedure. It is important to ensure that your reverse distributor is properly permitted and insured. Check with the Florida Department of Health at **(850) 245-4292** or **<http://ww2.doh.state.fl.us/irm00praes/praslist.asp>** and search the drop down list for Restricted Rx Drug Distributor-Reverse Distributor for a list of permitted reverse distributors in Florida. For a list of National Reverse Distributors, check with your Regional DEA Office (see page 24 for contact information).
-  Your outdated management plan should include container, storage, labeling, shipping, and recordkeeping guidelines.

### Procedures for Managing Outdated Pharmaceuticals Internally

-  Separate and store outdated pharmaceuticals by manufacturer and by the manufacturer's return policy for possible return to the manufacturer.
-  Using the manufacturer's return policy, distinguish between products eligible for credit and products that are not returnable for credit. Store and segregate these products according to the container and storage guidelines on page 14.
-  Waste management procedures should include container, storage, labeling, shipping, and recordkeeping guidelines. Follow the hazardous waste and non-hazardous waste guidelines included in **Steps 2-5** of this brochure.



## ESTABLISH A PHARMACY MANAGEMENT PLAN (continued)

### Management Scenarios:

**Internal Management:** A pharmacy **separates** returnable from non-returnable pharmaceuticals and inventories all pharmaceuticals. The pharmacy **ships** only the returnable pharmaceuticals to a manufacturer, wholesaler, or reverse distributor and retains the non-returnable pharmaceuticals for disposal via a universal waste handler. The **pharmacy** is the hazardous waste generator upon determining that the non-returnable pharmaceuticals are hazardous waste.

**Reverse Distribution I:** A pharmacy **does not separate** returnable from non-returnable pharmaceuticals, **inventories** all pharmaceuticals, and **ships** the pharmaceuticals as a product to a manufacturer or a reverse distributor. The **manufacturer** or **reverse distributor** is the hazardous waste generator upon determining that the non-returnable pharmaceuticals are hazardous waste.



**Reverse Distribution II:** A pharmacy **contracts** with a reverse distributor to work onsite. The reverse distributor does not separate returnable from non-returnable pharmaceuticals onsite, but inventories all pharmaceuticals, and ships the product to the reverse distribution facility. The **reverse distribution facility** becomes the hazardous waste generator upon determining that the non-returnable pharmaceuticals are hazardous waste.

## Step 2





### IDENTIFY YOUR HAZARDOUS AND NON-HAZARDOUS WASTES

#### WHEN ARE PHARMACEUTICALS CONSIDERED WASTE?

Be aware of both **Federal and State** interpretation.

-  An outdated product is generally considered waste at the time and place the decision is made to discard it.
-  According to the EPA, unsorted and/or outdated pharmaceuticals may be shipped as a product (rather than as a waste) if the outdated pharmaceuticals are being shipped to a reverse distributor or a manufacturer with the intent to return the outdated pharmaceuticals to the manufacturer for credit.

Waste pharmaceuticals include all pharmaceuticals that have been **identified as:**

-  Outdated but not returnable for credit.
-  Used in compounding or IV preparation.\*
-  Spilled or broken product no longer useable for intended purpose, and\*
-  Any items used in cleaning up a spill (vermiculite, paper towels, etc).\*



*\* May not be managed as a universal waste, see Universal Waste Rule on page 6.*

## Universal Pharmaceutical Waste Rule

The Universal Pharmaceutical Waste rule (UPW) allows large and small quantity handlers of universal pharmaceutical waste to reduce their generator status by managing certain hazardous waste pharmaceuticals as universal wastes.

### The UPW applies to:

Pharmaceuticals that are no longer viable (pharmaceuticals that are returned without reasonable expectation of sale; returned or delivered without a reasonable expectation of credit to a manufacturer, wholesaler, reverse distributor, or any type of waste broker) are non-viable and are discarded. Once a decision has been made to discard a viable pharmaceutical, it becomes non-viable.

### The UPW rule does not apply to:

1. Pharmaceuticals returned with a reasonable expectation of credit through the pharmaceutical reverse distribution system to a manufacturer, wholesaler, or reverse distributor due to an oversupply, expiration of the recommended shelf life, a manufacturer recall, a shipping error, or damage to the exterior packaging.
2. Spill residues, cleanup materials, and media that are contaminated with pharmaceuticals as the result of a spill or discharge.
3. Raw materials or ingredients used in the manufacturing of pharmaceuticals.



### NOTE:

Hazardous waste pharmaceuticals not managed as universal waste shall be managed in accordance with Chapter 62-730, F.A.C., and shall be disposed of at a permitted hazardous waste treatment, storage, or disposal facility.





## Determining Your Handler Status

A large quantity handler of universal waste is a universal waste handler that, at any time:

- Accumulates 5,000 kilograms or more total of universal waste (batteries, pesticides, thermostats, lamps, or pharmaceuticals, calculated collectively).
- Accumulates universal pharmaceutical waste consisting of more than one kilogram total of pharmaceuticals listed in 40 CFR 261.33(e) as acutely hazardous waste (P-listed wastes). The designation as a large quantity handler of universal waste is retained through the end of the calendar year in which the universal waste is accumulated.

A small quantity handler of universal waste is a universal waste handler that does **not**:

- Accumulate 5,000 kilograms or more total of universal waste (batteries, pesticides, thermostats, lamps or pharmaceuticals, calculated collectively); or
- Accumulate universal pharmaceutical waste consisting of more than one kilogram total of pharmaceuticals listed in 40 CFR 261.33(e) as acutely hazardous waste (P-listed wastes).

## Storage and Labels

A reverse distributor or wholesaler which makes determinations as to whether pharmaceuticals are viable shall:

1. Begin the process of distinguishing viable pharmaceuticals from universal pharmaceutical waste or hazardous waste within 14 days of receipt of a complete shipment of returns from a handler, and in no event more than 21 days from the receipt of the first installment of a partial shipment.
2. Complete the universal pharmaceutical waste or hazardous waste identification process within 21 days of receipt of the complete shipment, and in no event more than 30 days from receipt of the first installment of a partial shipment.
3. Keep a record of each shipment of returns by any method that clearly demonstrates the date on which the shipment was received and the date on which the reverse distributor or wholesaler determined the universal pharmaceutical waste or hazardous waste status of all items in the shipment.

**A small quantity handler** of universal waste may accumulate universal pharmaceutical waste for no longer than one year from the date the universal pharmaceutical wastes were generated.

**A large quantity handler** of universal waste may accumulate universal pharmaceutical waste for no longer than 6 months from the date the universal pharmaceutical wastes were generated.



A handler may accumulate universal pharmaceutical waste for a longer period of time than specified if such activity is solely for the purpose of accumulation of such quantities of universal pharmaceutical waste as are necessary to facilitate proper recovery, treatment, or disposal. However, the handler bears the burden of proving that the extended accumulation time is solely for these purposes.

The entire Universal Pharmaceutical Waste rule can be found at 62-730.186, F.A.C.

## WHAT IS A HAZARDOUS WASTE?

**A waste is defined as being HAZARDOUS if:**

-  It has any of the **characteristics** described on page 12.
-  It is **listed** as a hazardous waste in the Code of Federal Regulations (40 CFR Part 261).

## Characteristic Wastes

A characteristic hazardous waste is a solid waste that exhibits any of the properties included in the definitions of ignitability, corrosivity, reactivity, and toxicity according to 40 CFR Part 261.

## Listed Wastes

A waste is hazardous if it is identified as a **Listed Waste** in 40 CFR Part 261. There are numerous listed wastes-a partial list is provided on page 13. For details on listed wastes and waste code numbers, contact the DEP (see page 25 for DEP phone numbers). The Code of Federal Regulations is available online at <http://www.gpoaccess.gov/cfr/index.html>



### **Acutely Hazardous Wastes**

Acutely hazardous wastes are extremely dangerous wastes. Small amounts of these wastes, such as arsenic and cyanide compounds, are regulated in the same way as large amounts of other wastes. A pharmacy that generates 2.2 pounds (1 kilogram) or more of these acutely toxic wastes per month is subject to full regulation under the hazardous waste rules. Contact the DEP for more information on the proper management of acutely hazardous wastes.

### **Identifying Your Hazardous Wastes**

Once it has been determined that a pharmaceutical is a waste, it must be determined if the waste is hazardous. For example, an outdated pharmaceutical that cannot be returned to the manufacturer is classified as a waste, and a hazardous waste determination must be performed. There are several ways to identify hazardous wastes.

## Identifying Your Hazardous Wastes (continued)

- Obtain and read Material Safety Data Sheets (MSDS).
- Obtain a COA (Certificate of Analysis).
- Talk to product suppliers and manufacturers. Read product labels.
- Compare product to hazardous waste characteristics and to wastes listed in federal regulations.
- If product information is not available or is inconclusive, have a commercial lab sample and test the waste using the Toxicity Characteristic Leaching Procedure (TCLP) to determine if the item contains one of the 40 ingredients listed in 40 CFR 261.24.
- A non-hazardous material or product may become a hazardous waste due to contaminants added during use. Lab testing may be necessary to determine whether or not the waste is hazardous.

## Additional Resources for Identifying Hazardous Wastes

American Hospital Formulary Service (AHFS Drug Information)  
Remington's Pharmaceutical Sciences  
Merck Manual  
The Pill Book – OTC Medications  
The Pill Book – Most Prescribed Drugs  
Red Book – Pharmacy Fundamental Reference  
CRC Handbook of Chemistry and Physics  
Drug Facts and Comparisons

## Information on the Internet

<http://www.rxlist.com>

Hospitals for a Healthy Environment - H2E - web site:  
<http://www.h2e-online.org>

Pharmaceutical guidance at:  
<http://www.h2e-online.org/hazmat/pharma.html>

[www.pharmecology.com](http://www.pharmecology.com)

## CHARACTERISTIC WASTES

### **Ignitable**

Many of the hazardous wastes that pharmacies handle are hazardous because they are ignitable. These wastes often pose the greatest management problems for pharmacies.

Ignitable wastes are easily combustible or flammable. If they are aqueous solutions and have a flashpoint of 140° F or less or an alcohol content of 24% or more, they are hazardous wastes. Examples include: alcohol (denatured ethyl, ethyl, isopropyl, etc.), ammonia inhalants, amyl nitrite, Anbesol<sup>®</sup>, flammable aerosol spray, benoxyl peroxide, Benzoin Tincture, collodion-based preparations, bronchial dilators (Tornalate), Compound W<sup>®</sup>, Cleocin T Topical Solution<sup>®</sup>, Erythromycin Topical Solution, Merthiolate Tincture, mouthwash (alcohol content >24%), Peppermint Spirit, Retin A Gel<sup>®</sup>, Right Guard<sup>®</sup> aerosol spray, Silver Nitrate (oxidizer), Solarcaine<sup>®</sup> aerosol spray, and some cough medicines (e.g. Nyquil<sup>®</sup>).

### **Corrosive**

Corrosive wastes corrode metals or other materials or burn the skin. These liquids have a pH of 2 or lower or 12.5 or higher. Examples of acids that exhibit a pH of 2 or lower include glacial acetic acid. Examples of bases that exhibit a pH of 12.5 or higher include Potassium Hydroxide and Sodium Hydroxide.

### **Reactive**

Reactive wastes are unstable and may explode or react rapidly or violently with water or other materials. Examples include Clinatest (a test tablet to determine sugar in urine). While nitroglycerin in its pure form is reactive, pharmaceuticals containing nitroglycerin are too weak to react and have been excluded from the reactive classification federally and in Florida. Some are ignitable, however.

### **Toxic**

Wastes are toxic if they contain toxic organic chemicals or certain heavy metals, such as chromium, lead, mercury, or cadmium. Examples of potential toxic pharmaceuticals include: Arsenic, Barium, Barium Enemas, Cadmium, Chloroform, Chromium, Fluogen, Fluzone, Insulin with Cresol, Lindane, Merbromin, Mercury, Mercurochrome, mixture of trace elements, Selenium, Silver, Silver Nitrate, Thimerosal (contains Mercury), and vaccines containing mercury as a preservative. Approximately 40 chemicals meet specific leaching concentrations which classify them as toxic.

## LISTED WASTES

There are two types of pharmaceutical commercial products that are listed hazardous wastes. These are known as acutely hazardous (**P-listed**) and toxic (**U-listed**).

P-listed Pharmaceutical Wastes—  
These wastes are known as **acutely hazardous for toxicity**.

### NAME HW#

Nicotine P075  
Physostigmine P204  
Physostigmine salicylate P188  
Sodium Azide P105  
Strychnine P108  
Warfarin >0.3% P001

U-listed Pharmaceutical Wastes – These wastes are hazardous for toxicity.

### NAME HW#

Acetone U002  
Chlorambucil U035  
Chloroform U044  
Cyclophosphamide U058  
Daunomycin U059  
Dichlorodifluoromethane U075  
Diethylstilbesterol U089  
Formaldehyde U122  
Hexachlorophene U132  
Lindane U129  
Melfhalan U150  
Mercury U151  
Mitomycin C U010  
Paraldehyde U182  
Phenacetin U187  
Phenol U188  
Reserpine U200  
Resorcinol U201  
Saccharin U202  
Selenium sulfide U205  
Streptozotocin U206  
Trichloromonofluoromethane U121  
Uracil mustard U237  
Warfarin ≤ 0.3% U248






**NOTE:** These are not comprehensive lists of “P” and “U” listed chemicals. For a complete list, refer to: 40CFR§261.33. The Code of Federal Regulations is available online at: <http://www.gpoaccess.gov/cfr/index.html>






## Step 3

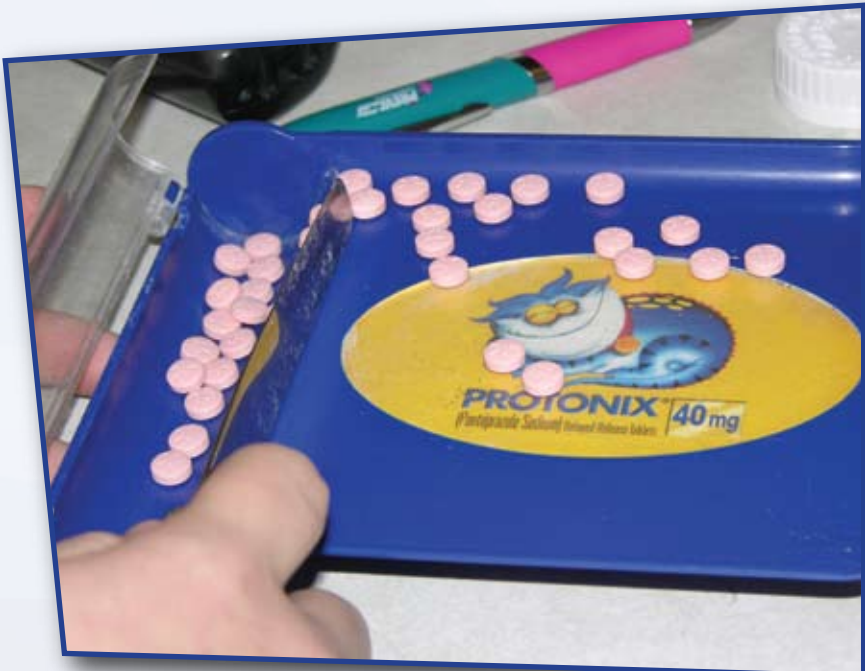
### IMPLEMENT BEST MANAGEMENT PRACTICES (BMPs) FOR:

#### Container Maintenance

-  Maintain containers in good condition.
-  Never place incompatible wastes, such as wastes that react with each other, in the same container (i.e. do not store acids and bases in the same container).
-  Wastes must be compatible with the container in which they are being stored (i.e. do not store strong acids or bases in metal containers).

#### Storage







-  Separate waste by hazardous waste classification: Toxicity (including P and U), Ignitability, Corrosivity, and Reactivity.
-  Don't combine hazardous waste with non-hazardous waste.
-  Maintain aisle space between containers to allow for inspection.
-  Inspect pharmaceutical waste storage areas weekly.
-  Be aware of allowable time limits for storage.





# IMPLEMENT BEST MANAGEMENT PRACTICES (BMPs) FOR: (continued)

## Labels

-  Label every container with the contents (**type of pharmaceutical or waste**).
-  Label every container with whether it is a **hazardous waste** or a **non-hazardous waste**.
-  Include any **federal waste code numbers** that apply.
-  Include the **accumulation start date** (the date when waste pharmaceuticals were first stored in the container).
-  Include your pharmacy **name** and **address**.
-  Use the following words on labels for **hazardous** wastes:

<p>HAZARDOUS WASTE FEDERAL LAW PROHIBITS IMPROPER DISPOSAL If found, please contact the nearest police or public safety authority or the U.S. EPA (Your business's name, address and manifest document number)</p>
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Use the following words on labels for non-hazardous wastes:

<p><b>NON-REGULATED WASTE</b></p> <p>Optional Information: _____</p> <p>Shipper: _____</p> <p>Address: _____</p> <p>City, State, Zip: _____</p> <p>Proper DOT Shipping Name: _____</p> <p>U.N. or N.A. No.: _____</p> <p>Contents: _____</p> <p>THIS WASTE IS NOT REGULATED BY THE U.S. EPA</p>
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## IMPLEMENT BEST MANAGEMENT PRACTICES (BMPs) FOR: (continued)

### Recordkeeping

- Inspect containers at least once a week and keep a written log of container inspections.
- Total weight of P-listed waste generated monthly must be documented on a monthly basis (weight of the container/solvent included) if the organization is not a large quantity generator.
- Total weights of U-listed and characteristic waste generated monthly must be documented on a monthly basis if the organization is not a large quantity generator.
- Keep training and inspection records for at least 3 years.
- Keep manifests and shipping receipts for at least 3 years.
- Keep records of completed inventories/audits regarding the distribution or shipment of prescription drugs for at least 3 years.
- Keep records of laboratory tests for at least 3 years.
- Keep completed land disposal restriction forms for at least 3 years.

### Spills




- Keep** spill cleanup materials readily accessible including: fire extinguishers; safety equipment such as rubber or latex gloves and safety glasses; spill cleanup products such as absorbents, rags, towels, brooms, shovels, and dust pans to pick up materials; and containers to hold spill waste.
- Observe** the safety precautions associated with the material spilled.
- Stop** the source of the spill immediately and clean up the spill right away.
- Recover** the spilled substance while observing safety precautions.
- Contain** the spilled material.
- Call** your local fire and/or police departments if fire or public safety hazards are created.



## **Step 4**

### **DETERMINE YOUR WASTE GENERATOR STATUS**

You must determine how much hazardous waste you generate each month. The set of rules you must follow depends on how much waste you generate, how much you store, and how long you store it.


-  If you generate **less than 220 pounds** of hazardous waste (100 kilograms or about half a drum) per month and you generate less than 1 kilogram of acutely hazardous waste per month: you are a **“Conditionally Exempt Small Quantity Generator.”**
-  If you generate **220 - 2,200 pounds** of hazardous waste (100 – 1,000 kilograms) per month and you generate less than 1 kilogram of acute hazardous waste per month: you are a **“Small Quantity Generator.”**
-  If you generate **more than 2,200 pounds** of hazardous waste (1000 kilograms or more than about 5 drums) per month or you generate 1 kilogram or more of acutely hazardous waste per month: you are a **“Large Quantity Generator.”**







## **Step 5**

### **COMPLY WITH GUIDELINES FOR TRANSPORT AND DISPOSAL**



#### **TRANSPORT GUIDELINES FOR MANAGING OUTDATED PHARMACEUTICALS INTERNALLY AND FOR SHIPPING OTHER PHARMACEUTICAL WASTE GENERATED AT YOUR FACILITY**

-  Conduct a complete inventory/audit of all pharmaceuticals or wastes being shipped offsite. Keep records of completed inventories/audits for at least 3 years.

#### **Shipping Guidelines for Hazardous Waste Transport & Disposal**

-  Make sure your transporter is properly permitted and has an EPA identification number.
-  Make sure that the treatment, storage, and disposal facility receiving your shipment has an EPA identification number and is properly permitted to dispose of the waste you are shipping.
-  Use manifests for all hazardous wastes shipped offsite.
-  Follow container, storage, and label guidelines described on pages 14-15.

#### **Federal Drug Enforcement Administration (DEA) Regulations**

-  If you are shipping Controlled Substances for disposal/destruction, be sure to follow DEA Regulations. For more information on shipping controlled substances for disposal/destruction, contact your Regional DEA office (see page 24).
-  If any of your controlled substances are hazardous wastes and are destined for disposal/destruction, contact the DEP (see page 25).

# TRANSPORT GUIDELINES FOR MANAGING OUTDATED PHARMACEUTICALS FOR REVERSE DISTRIBUTION

## Shipping Guidelines for Waste Transport & Disposal

- Wrap glass/vials/ampules carefully.
- Segregate controlled substances in tamper-proof pouches with no external indication of what is being shipped, including the appropriate inventory forms.
- Apply DOT Hazardous Materials Label: ORM-D Consumer Commodity, and up arrows if over 1 liter.

## Federal Drug Enforcement

### Administration (DEA) Regulations

(For contact information see page 24.)

- If you are shipping controlled substances, be sure that all DEA regulations are followed.
- Be sure your reverse distributor is registered to accept the products being shipped. The DEA requires that all transfers be made between registrants.
- Inventory all controlled substances in Schedules III - V.
- Include one copy of the inventory in the shipment.
- Retain one copy of the inventory for your records at the pharmacy.
- If you are shipping Schedule II products, the reverse distributor must provide you with a Form 222 for the products being shipped prior to the shipment. Follow the procedures of your reverse distributor.
- DO NOT indicate that the contents of the shipment contain controlled substances.
- DO NOT request or accept a Form 41 (Registrants Inventory of Drugs Surrendered).



## HOW CAN I REDUCE PHARMACEUTICAL WASTE GENERATION?

Make a **commitment to reducing waste** in every area of your pharmacy's operations.

**Evaluate** your pharmacy's waste and identify areas where changes can be made.

Manage hazardous pharmaceutical waste as Universal Waste.

Facilitate and encourage the participation of all pharmacy personnel through **education, training, and incentives**.

### Apply Inventory Management Techniques

- Dispense older pharmaceuticals first.
- Create an effective inventory system to reduce outdated accumulation.
- After inventory is reduced, prevent the accumulation of new inventory.
- Save money by ordering smaller quantities of pharmaceuticals and reducing the need to dispose of outdated pharmaceuticals.
- Purchase pharmaceuticals from suppliers who will accept returns of unopened pharmaceuticals.
- Purchase pharmaceuticals from vendors who promote small quantity purchases and who will accept returns of unopened bottles.
- If a constant stock is required, perform an inventory review at least once a year to evaluate ordering trends and pharmacy inventory needs.



## Reverse Distribution

- If you inventory and ship all unsorted, outdated pharmaceuticals as products to a qualified and properly permitted reverse distributor;  
OR  
If you contract a reverse distributor to inventory and ship all unsorted, outdated pharmaceuticals as products to the reverse distribution facility, THEN:  
The reverse distribution facility becomes the Hazardous Waste Generator upon determining that the non-returnable pharmaceuticals are hazardous waste.
- Your reverse distributor should:
  - Inventory and review all items for return eligibility at the reverse distribution facility.
  - Properly manage all non-returnable items as hazardous, non-hazardous, or universal waste.
- It is YOUR RESPONSIBILITY to ensure that the reverse distributor is properly handling your outdated pharmaceuticals.

## WHAT ARE THE END RESULTS?

**These steps** will help to ensure that your pharmacy is able to effectively:

- Develop a consistent outdated pharmaceutical reduction and management program.
- Develop and implement a waste reduction program.
- Understand and apply RCRA federal and state environmental regulations.
- Assure compliance in all departments to successfully avoid regulatory fines.

## Reducing wastes in your pharmacy **makes sense.**

Benefits include:

- Maximizing **profits.**
- **Saving money** on waste management costs.
- **Earning** a greater return on investments.
- Reducing concerns about penalties and liability.
- Creating a safer and healthier workplace.
- Promoting positive public relations with clients, customers, and the local community.

## CHECKLIST

**This checklist will help you to prevent the most common hazardous waste violations.** For more detailed information on hazardous waste management requirements, contact the DEP.

- Identify types and quantities of hazardous wastes.
- Notify the DEP of your monthly hazardous waste generation and obtain an EPA identification number from the DEP.
- Use proper containers to collect and store wastes.
- Separate waste by classification: Toxicity, Ignitability, Corrosivity, and Reactivity.
- Don't combine hazardous waste with non-hazardous waste.
- Label all containers as hazardous or non-hazardous waste.
- Include the accumulation start dates on labels.
- Maintain aisle space between containers for inspection.
- Inspect containers weekly for rust, leaks, or damage and keep inspection records for at least three years.
- Total weight of P-Listed waste must be documented monthly (unless an LQG).
- Total weight of U-Listed and characteristic waste must be documented monthly (unless an LQG).
- Never discharge hazardous waste to a drain or a septic tank unless you have a permit that allows you to do so.
- Train employees to properly handle hazardous wastes.
- Make sure your transporter and disposal facility are registered and have EPA identification numbers.
- Make sure your reverse distributor is properly licensed and registered.
- Use manifests for all waste transported for disposal.
- Keep all records for at least three years.







## WHERE CAN I GET MORE INFORMATION?

Additional information on hazardous waste reduction and regulations is available from many sources.

### Florida Department of Environmental Protection

District offices and the Tallahassee office offer technical assistance, fact sheets, and other publications on hazardous waste regulations.

<http://www.dep.state.fl.us/>

#### Hazardous Waste Compliance Assistance Program

**Phone:** (800) 741-4337

**Fax:** (850) 245-8810

#### Publications available:

Summary of Hazardous Waste Regulations

Requirements for Conditionally Exempt Small Quantity Generators

Requirements for Small Quantity Generators

Handbook for Small Quantity Generators of Hazardous Waste

### Florida Board of Pharmacy

<http://www.doh.state.fl.us/mqa/pharmacy>

**Address:** Board of Pharmacy  
2020 Capital Circle SE, Bin #C04  
Tallahassee, FL 32399-3254

**Phone:** (850) 414-2969

**Email:** [daisy\\_king@doh.state.fl.us](mailto:daisy_king@doh.state.fl.us)

### Florida Small Business Environmental Assistance Program

The Small Business Assistance Program helps businesses with environmental concerns. Assistance is confidential and staff experts have business experience.

**Phone:** (800) 722-7457

## DEA CONTACTS IN FLORIDA

### MIAMI DIVISION

8400 NW 53rd Street  
Miami, Florida 33166  
(305) 994-4880

### TAMPA DIVISION

4950 W Kennedy Boulevard  
Suite 400  
Tampa, Florida 33609  
(813) 287-4765

### ORLANDO DIVISION

300 International Parkway  
Suite 424  
Heathrow, Florida 32746  
(407) 333-7046

## YOUR TRADE & PROFESSIONAL ASSOCIATIONS

Many trade and professional associations have published guides to help you find solutions to your hazardous waste management problems.

### AMERICAN PHARMACEUTICAL ASSOCIATION

2215 Constitution Avenue NW  
Washington, DC 20037-2985  
(202) 628-4410

### AMERICAN ASSOCIATION OF PHARMACEUTICAL SCIENTISTS

2107 Wilson Boulevard  
Suite 700  
Arlington, VA 22201-3042  
Main Telephone:  
(703) 243-2800  
Main Fax: (703) 243-9650

### FLORIDA PHARMACY ASSOCIATION

610 N Adams Street  
Tallahassee, Florida 32301  
(850) 222-2400

### AMERICAN SOCIETY OF CONSULTANT PHARMACISTS AT <http://www.ascp.com/>

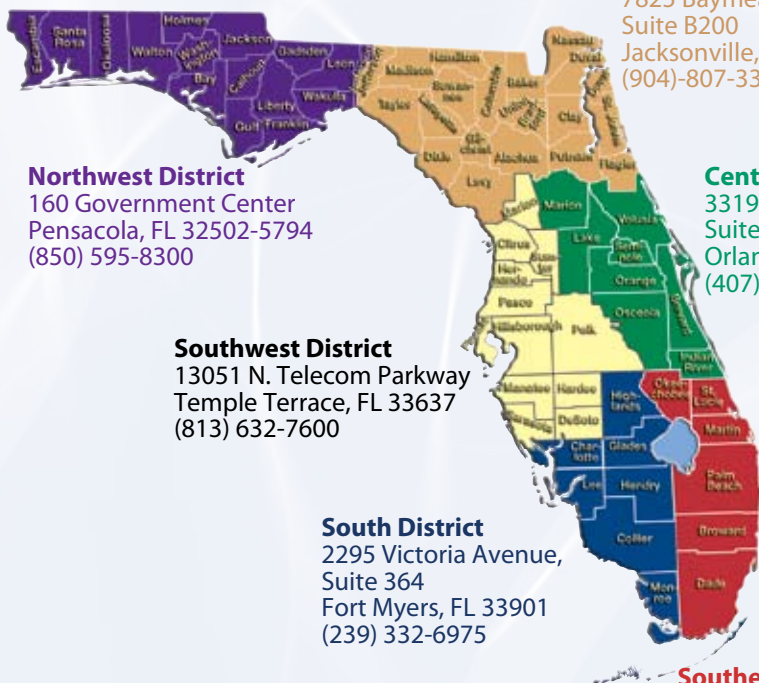
### AMERICAN ASSOCIATION OF PHARMACEUTICAL PHYSICIANS

500 Montgomery Street  
Suite 800  
Alexandria, VA 22314  
1-866-225-2779

# Florida Department of Environmental Protection

## Hazardous Waste Compliance Assistance Program

2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
Phone: (850) 245-8789  
Fax: (850) 245-8810



**Northwest District**  
160 Government Center  
Pensacola, FL 32502-5794  
(850) 595-8300

**Southwest District**  
13051 N. Telecom Parkway  
Temple Terrace, FL 33637  
(813) 632-7600

**South District**  
2295 Victoria Avenue,  
Suite 364  
Fort Myers, FL 33901  
(239) 332-6975

**Northeast District**  
7825 Baymeadows Way,  
Suite B200  
Jacksonville, FL 32256  
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