



Drug Waste Needs Proper Disposal...

** For DEA controlled substances, follow DEA rules for disposal*



NOT DOWN THE DRAIN

Do not flush pharmaceutical waste down the toilet or drain.



NOT WITH YOUR BIOHAZARDOUS WASTE

Most waste in sharps containers and red bags is treated with a water-based steam disinfection process, which may not prevent pharmaceuticals from reaching Colorado water ways.



NOT IN THE TRASH

Most Colorado landfills do not have approval to accept pharmaceutical waste from businesses. Also, risk for diversion is present in regular trash collection.

YES! IN THE PHARMACEUTICAL WASTE CONTAINER



The waste in this container will be incinerated or treated by another method approved for pharmaceutical waste.

See reverse side for more details. →

Violations of Colorado hazardous waste disposal regulations may be subject to penalties of up to \$25,000 per day per violation.

Questions? Contact the Colorado Department of Public Health & Environment's Hazardous Materials and Waste Management Division's Customer Technical Assistance Line at **303-692-3320** or toll free at **888-569-1831 ext. 3320** or visit us at www.colorado.gov/cdphe/medicalwaste



Colorado Department
of Public Health
and Environment

This compliance poster is intended to provide guidance on the appropriate management of drug wastes for Conditionally Exempt Small Quantity Generators (CESQGs) based on Colorado solid and hazardous waste statutes and regulations. Other regulations may apply.



Colorado's solid and hazardous waste regulations require proper management of pharmaceutical waste in a way that is protective of public health and the environment.

This guidance describes best management practices for small health care facilities that are Conditionally Exempt Small Quantity Generators ("CESQGs") of RCRA hazardous waste. RCRA hazardous wastes are wastes that meet the definition of "hazardous" under the Resource Conservation and Recovery Act. By conservatively managing *all* pharmaceutical waste as RCRA hazardous waste, this guidance minimizes the need for health care facilities to sort RCRA hazardous from non-RCRA hazardous pharmaceutical waste. However, there may also be other methods of managing pharmaceutical waste that are in compliance. Ensuring compliance with disposal regulations is the responsibility of each health care facility. This guidance is not intended for households.

What is "Pharmaceutical Waste?"

In this guidance, "pharmaceutical waste" refers to prescription medications, over-the-counter medications, vaccines, and vitamins that need to be discarded.

Waste pharmaceuticals include, but are not limited to:

- Medicines in capsule or tablet form;
- Medicinal gums or lozenges;
- Medicinal liquids, ointments, lotions, or gels;
- Vaccines;
- Vitamins;
- Allergenic;
- Medicinal shampoos;
- Aerosol inhalers;
- Antiseptics and;
- Medicinal dermal patches.

Pharmaceutical waste also includes materials (such as IV bags, tubing, and vials) if they contain excess drugs. Also included are containers, such as blister packs or pill bottles, if they came in direct contact with **acutely** hazardous waste drugs such as Coumadin, nicotine, and physostigmine.

For the purpose of this guidance, pharmaceutical waste **does not include** radioactive waste or potentially infectious waste such as sharps, bloody bandages, body fluids, or human tissue.

IMPORTANT: Waste pharmaceuticals that contain controlled substances are regulated by the Drug Enforcement Administration (DEA). These wastes have specified management and disposal requirements under the Controlled Substances Act (Title 21, Chapter 13, Subchapter I Part B (USC)). For DEA controlled substances, health care facilities must follow DEA requirements, even if those requirements differ from this guidance.

Am I a Conditionally Exempt Small Quantity Generator (CESQG)?

If your health care facility is a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste, this guidance applies to you.

Generally, health care facilities that meet the following criteria can be considered CESQGs:

- Generate less than 220 lbs of pharmaceutical waste per month, AND

Generate less than 2.2 lbs of acutely hazardous waste such as Warfarin (Coumadin), nicotine patches and physostigmine per month, AND

- Generate **no** laboratory waste, AND
- Generate **no** other hazardous waste other than the following recycled materials: used oil, used batteries, used fluorescent bulbs, and used electronics.

Health care facilities that are CESQGs must identify, collect, and properly dispose of pharmaceutical hazardous waste. Many nursing homes, community clinics, physicians' offices, and dental offices can meet these CESQG criteria.

This guidance is NOT intended for large health care facilities that generate other hazardous wastes.

How do I Manage Pharmaceutical Waste?

- Create a comprehensive list of pharmaceuticals in your inventory (update annually at a minimum).
- Contract with a waste disposal company to create (a) hazardous waste profile(s) and to arrange proper destruction of waste at a RCRA permitted hazardous waste facility.
- Collect waste in dedicated containers labeled and constructed for pharmaceuticals. Liquids and semi-liquids should be in their original, leak-proof containers.
- Some pharmaceutical wastes **MUST** be collected separately. This includes, but is not limited to:
 - Controlled substances,
 - Silver nitrate applicator sticks,
 - Aerosol inhalers.

If you generate these pharmaceutical wastes, please contact CDPHE, your hazardous waste disposal company, or a hazardous waste consultant for more information. For controlled substances visit the DEA website.

- Keep pharmaceutical waste in a secure area until it is ready for disposal.
- Contact your hazardous waste company to pick-up and properly dispose of your pharmaceutical waste.

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