

# STATE OF COLORADO

John W. Hickenlooper, Governor  
Christopher E. Urbina, MD, MPH  
Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.      Laboratory Services Division  
Denver, Colorado 80246-1530      8100 Lowry Blvd.  
Phone (303) 692-2000      Denver, Colorado 80230-6928  
Located in Glendale, Colorado      (303) 692-3090

<http://www.cdphe.state.co.us>



Colorado Department  
of Public Health  
and Environment

March 6, 2013

Attn: «Administrator»  
«Nursing\_Home\_Name»  
«Mailing\_address\_number» «Mailing\_Street»  
«Mailing\_City», «Mailing\_State» «Mailing\_Zip»

RE: Drug Waste Needs Proper Disposal

«GreetingLine»

The Colorado Department of Public Health and Environment (CDPHE) is launching an initiative to ensure proper disposal of pharmaceuticals at Long Term Care Facilities (LTCFs) in Colorado. This packet contains information that LTCFs can use to help to set up a pharmaceutical waste disposal program that is in compliance with solid and hazardous waste regulations and protective of the environment.

## Why is CDPHE working on pharmaceutical waste disposal at nursing homes?

In recent years there has been a lot of concern about pharmaceuticals in the environment. Multiple studies have shown very low levels of hormones, antibiotics, antidepressants, blood pressure medications, pain killers and other medications in surface water and, in some cases, drinking water. While we know of no definitive evidence of adverse effects in humans from these low levels of pharmaceuticals in water, researchers have linked some pharmaceuticals to adverse effects in aquatic life. Since improper disposal of pharmaceuticals is one potential source of pharmaceuticals in the environment, CDPHE is working with health care facilities to ensure proper disposal of medications.

## I already have a drug disposal routine, how do I know if it meets the requirements?

If your facility disposes of drugs (other than controlled substances) either down the drain, in the regular trash, in the red sharps containers, or the red biohazard bins, **your process is not in compliance**. If you have contracted with an RCRA hazardous waste company to take your waste medications to an out-of-state to an incinerator, there is a good chance that you are in compliance.

## Is proper disposal of waste medications required or is it just a good idea?

Both! Colorado's solid and hazardous waste statutes and regulations require proper disposal of waste medications. Colorado's hazardous waste regulations carry enforcement penalties of up to \$25,000 per day per violation.

## What do I do with controlled substances?

Please manage your controlled substances as required by the Drug Enforcement Administration, **even if it conflicts with this guidance**. Because diversion of narcotics is such an important public health issue, CDPHE defers to DEA rules when it comes to disposal of controlled substances.

What is the goal of CDPHE's pharmaceutical waste disposal initiative?

The goal of CDPHE's pharmaceutical waste initiative for nursing homes is to have all nursing homes in Colorado in compliance with solid and hazardous waste regulations regarding pharmaceutical waste disposal by September 1, 2013.

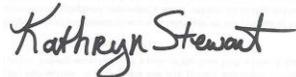
There is so much information here, where do I start?

You can start by reading the *Drug Waste Needs Proper Disposal* flier included in this packet.

Then, using the *List of Colorado Onsite Medical Waste Service Providers* or another source, interview two or more waste disposal companies and evaluate their recommendations for putting a disposal program in place at your facility. Although different disposal companies may have different approaches, if your disposal company's approach appears to conflict with the information in the *Drugs Need Proper Disposal* flier then please ask for clarification. Contract with the disposal company that can best meet the hazardous waste needs of your facility.

If you have further questions please contact me at [kathryn.stewart@state.co.us](mailto:kathryn.stewart@state.co.us) ; Lillian Gonzalez at [lillian.gonzalez@state.co.us](mailto:lillian.gonzalez@state.co.us); or Dan Goetz at [daniel.goetz@state.co.us](mailto:daniel.goetz@state.co.us)

Sincerely,



Kathryn Stewart, Unit Leader  
Hazardous Waste Compliance Assurance Unit  
Hazardous Materials and Waste Management Division  
Enclosures:

*Drugs Need Proper Disposal* flier  
*Approved Pharmaceutical Waste Only* container labels  
*No Pharmaceuticals* container labels  
*List of Colorado Onsite Medical Waste Service Providers*