

Pharmaceutical Waste: The Difficult Dilemma of Discarding Drugs

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Main Points

- Background on why Pharmaceutical Waste needs to be managed
- The difficulties in putting together a Pharmaceutical Waste Program
- How Northern Michigan Regional Hospital took on the challenge of putting together a Pharmaceutical Waste Program and its evolution

Objectives

- Explain why Pharmaceutical Waste Management is Important
- Describe where to look for pharmaceuticals that are considered hazardous
- Distinguish between treating pharmaceutical waste as Hazardous or Universal Waste

Resources

www.michigan.gov/documents/deq/deq-whm-hwp-Part111Rules_248146_7.pdf - 2008-11-06

- Characteristic codes: R 299.9212
- D list: R 299.9217 Table 201 a
- EPA P list: R 299.9224 Table 205 a
- EPA U list: R 299.9225 Table 205 b
- MI U list R 299.9226 Table 205 c

Resources

- Definition of Hazardous Waste:
<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=7d28aafa3582ff5ffb8793bf39a4503e&rgn=div8&view=text&node=40:25.0.1.1.2.1.1.3&idno=40#>

- P & U listed Waste:
<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=c6be28903a7c02f5ab9998e09e3118e3&rgn=div8&view=txt&node=40:25.0.1.1.2.4.1.4&idno=40#>

- Universal Waste Guidance:
<http://www.deq.state.mi.us/documents/deq-ead-tas-uvivwaste.pdf>

- Environmental Assistance Bulletin:
http://www.michigan.gov/documents/deq/dnre-oppca-bulletin-February2010_310601_7.pdf

- Waste Characterization Guidance:
<http://www.deq.state.mi.us/documents/deq-ess-p2tas-wastecharacterization.pdf>

Sources

- **NIOSH**
<http://www.cdc.gov/niosh/docs/2004-165/2004-165d.html>

- **Health & Human Services 11th report on Carcinogens:**
ntp.niehs.nih.gov/ntp/roc/toc11.html

- **Article on David Norris study:**
http://trib.com/news/state-and-regional/article_09833221-f96f-5d85-a628-edb4662db9e9.html

Where to go for help

- **Managing Pharmaceutical Waste: A 10-step Blueprint for Healthcare Facilities In the United States**

- <http://www.h2e-online.org/docs/h2epharmablueprint41506.pdf>

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- **MDNRE compliance assistance specialist**

- Christine Grossman

- Environmental Assistance Program

- Office of Pollution Prevention and Compliance and Environment

- Direct Phone: 517-373-0590

- Environmental Assistance Center: 1-800-662-9278

- Fax: 517-241-0858

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