

**FINAL REPORT
ALACHUA COUNTY ENHANCED SMALL QUANTITY GENERATOR GRANT
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION AGREEMENT NO. S0359
AMENDMENT No. 3**

1.0 INTRODUCTION

Pharmaceuticals and personal care products (PPCPs) are increasingly documented in surface water and groundwater in the U.S. and throughout the world. PPCPs have probably been present in water and the environment for as long as humans have been using them. However, with advances in technology that improves the ability to detect and quantify these chemicals, we can now begin to identify what effects, if any, these chemicals have on human and environmental health. Potential sources of PPCPs are wastewater from centralized domestic sewage treatment plants and onsite sewage treatment and disposal systems. PPCPs can make it to the domestic sewage waste stream either by the direct disposal of medications or as byproducts of drugs not entirely absorbed by our bodies, and excreted and passed into sanitary sewer system.

On December 14, 2009 the Alachua County Environmental Protection Department (ACEPD) entered into an agreement with the Florida Department of Environmental Protection (FDEP) to perform hazardous waste generator compliance assistance visits (CAV) of businesses in Alachua County as part of the FDEP Enhanced Small Quantity Generator program (ESQG). This is the 3rd year of this agreement; and the primary focus for this contract period was assessing the current management of PPCPs in the County. This report presents a summary of the work performed by ACEPD, selected statistics on the CAV inspections and conclusions based on the results of the project.

2.0 SCOPE OF WORK

1. ACEPD conducted 58 hazardous waste generator compliance assistance visits (CAV) of businesses in Alachua County. The inspections were conducted at assisted living facilities (12), hospitals (8), urgent care centers (6), police departments (5) pharmacies (13), and other facilities responsible for the proper management of pharmaceutical waste.
2. All CAV were documented using NED approved inspection forms and checklists in order to identify potential hazardous waste compliance violations. The following forms were used to document the CAV inspections: FDEP CESQG Checklist, FDEP SQG Checklist, FDEP Short Form Inspection, and ACEPD Hazardous Materials Management Inspection form and business closure notification memorandum. Appendix A contains samples of all the forms used for the CAV inspections. Additionally all inspections were documented with digital pictures. All the checklists, documentation, pictures and data were managed electronically using a Microsoft Sharepoint Site. Digital copies of all the completed inspection forms and pictures are included with this report.
3. ACEPD created a Best Management Practices (BMP) fact sheet, a Compliance Assistance poster, and a bookmark with information on the proper management and disposal of pharmaceuticals. The compliance assistance information was distributed as part of the CAV inspections. EPD staff also distributed the current edition of the FDEP brochure "A Guide on Hazardous Waste Management for

Florida's Pharmacies". Appendix B contains copies of the compliance assistance materials distributed as part of the inspections. Additionally, a copy of the "Notification of Regulated Activity Form 8700-12FL" was provided to all regulated non-notifiers that were identified as part of the CAV.

4. ACEPD developed an email list of approximately 150 medical facilities and emailed electronic copies of the compliance assistance material.

5. CAV information was also documented in the FDEP CHAZ_ SQG data management system.

3.0 RESULTS

3.1 General Information

ACEPD completed a total of 58 hazardous waste generator compliance assistance visits (CAV) of businesses in Alachua County. Table 1 list the number of inspections grouped by business type.

Table 1. Inspections by Business Type

Facility	FDEP#	Category	Inspection Date
Atrium		Assisted Living	04/14/2010
Clare Bridges		Assisted Living	4/16/2010
Emeritus at Gainesville		Assisted Living	04/19/2010
HarborChase Assisted Living		Assisted Living	04.21.2010
Mayflower Assisted Living		Assisted Living	4/28/2010
Misty Meadows Assisted Living		Assisted Living	4/28/2010
North Florida Retirement Village		Assisted Living	04/16/2010
Oak Hammock @ UF		Assisted Living	04/22/2010
Palm Gardens of Gainesville		Assisted Living	4/23/2010
Signature HealthCare		Assisted Living	04/13/2010
Sterling House		Assisted Living	4/16/2010
Summerville		Assisted Living	04/15/2010
Cardiology associates		Cardiologist	03/16/2010
Interventional Cardiologists		Cardiologist	4/7/2010
Meridian Behavioral Methodone Clinic		Clinic	5/4/2010
Graper Facial Institute		Cosmetic Surgeon	5/21/2010
Alachua County Department of Public Safety		Fire Rescue	01/05/2010
Gainesville Fire Rescue		Fire Rescue	01/05/2010
Haven Hospice		Hospice	3/2/2010
North Florida Day Surgery		Hospital	5/19/2010
North Florida Regional Medical Center	FLD982129926	Hospital	02/02/2010
Shands @ AGH	FLR000099838	Hospital	11/24/2009
Shands @ UF	FLD982140170	Hospital	12/14/2009
Shands Cancer Hospital	FLR000085795	Hospital	04/29/2010

Shands Dialysis Center		Hospital	04/29/2010
Shands South Tower	FLR000161265	Hospital	10/09/2009
VA Hospital	FL1360015449	Hospital	5/27/2010
Family Practice Associates		General Practice	5/14/2010
Rogers & Davidson P. A.		General Practice	3/16/2010
North Florida Neurosurgery		Neurologist	3/16/2010
Ramadan Institute		Orthopedics	4/7/2010
Gainesville Pediatrics		Pediatric	5/21/2010
Kids Health Team		Pediatric	5/20/2010
Albertsons		Pharmacies	4/7/2010
CVS		Pharmacies	04/06/2010
CVS # 1815		Pharmacies	04/06/2010
Hitchcocks		Pharmacies	3/18/2010
Publix		Pharmacies	03/19/2010
Southeastern Community Pharmacy		Pharmacies	04/19/2010
Target		Pharmacies	4/5/2010
Walgreens		Pharmacies	3/19/2010
Walmart	FLR000073866	Pharmacies	03/22/2010
Westlab Pharmacy		Pharmacies	3/30/2010
Winn Dixie		Pharmacies	4/7/2010
Wise Pharmacy		Pharmacies	03/30/2010
Best Drugs		Pharmacies	5/19/2010
APD		Police	3/1/2010
ASO		Police	01/15/2010
GPD		Police	01/15/2010
HSPD		Police	3/1/2010
UPD		Police	5/20/2010
Southeast Urology		Renal	05/20/10
Children's Medical Center		Urgent Care	3/10/2010
Emergency Medical Center		Urgent Care	02/15/2010
Emergency Physicians Medical center		Urgent Care	02/03/2010
Immediate Care Center		Urgent Care	04/12/2010
Solantic 720 Bldg		Urgent Care	02/16/2010
Solantic West		Urgent Care	02/22/2010

3.2 Compliance Information

As part of the CAV inspections, ACEPD staff verified compliance with federal, state and local Hazardous Waste management requirements. ACEPD staff observed very few documented violations of the Hazardous Waste Rules (62-730 F.A.C) or the Universal Pharmaceutical Waste Rule (62-730.186 F.A.C). Only three facilities had documented Hazardous Waste violations, two of them were violations of the

manifest requirements (262.40, 262.44 C.F.R) and the third one was improper disposal of regulated waste (265.31 C.F.R). All violations have been corrected and the facilities are back in compliance. Table 2 has summary information on the compliance information collected as part of this project.

Table 2 Compliance Information

Facility	FDEP#	Category	Violations	Violations Detail	Corrected
Signature HealthCare	NA	Assisted Living	Yes	Manifest errors	4/20/2010
North Florida Regional Medical Center	FLD982129926	Hospital	Yes	HW disposal	4/20/2010
Shands @ UF	FLD982140170	Hospital	Yes	Manifest errors	01/22/2010

In addition to compliance with the Federal, State and local rules, ACEPD staff also documented adherence to the recommended Best management Practices for the management of waste pharmaceuticals. ACEPD observed 14 facilities that were routinely disposing of all or part of their pharmaceutical waste through the sanitary sewer, as a solid waste or as part of their bio-hazardous waste. Disposal through the sanitary sewer was the standard practice at most of the assisted living facilities inspected. It is important to note that the type of disposal documentation maintained by the different facilities varies widely, so it is reasonable to assume that in some cases Hazardous Waste could have been disposed through the sanitary sewer, as a solid waste or as part of their bio-hazardous waste. Table 3 has summary information on the BMP information collected as part of this project.

Table 3 BMP Information

Facility	FDEP#	Category	BMP	Violations Detail
Clare Bridges		Assisted Living	Yes	Pharmaceutical waste disposal (sewer)
Emeritus at Gainesville		Assisted Living	Yes	Pharmaceutical waste disposal (sewer)
HarborChase Assisted Living		Assisted Living	Yes	Pharmaceutical waste disposal (sewer)
Mayflower Assisted Living		Assisted Living	Yes	Pharmaceutical waste disposal (sewer)
North Florida Retirement Village		Assisted Living	Yes	Pharmaceutical waste disposal (sewer)
Palm Gardens of Gainesville		Assisted Living	Yes	Pharmaceutical waste disposal (sewer)
Signature HealthCare		Assisted Living	Yes	Pharmaceutical waste disposal (sewer)
Sterling House		Assisted Living	Yes	Pharmaceutical waste disposal (sewer)
Cardiology associates		Cardiologist	Yes	Pharmaceutical waste disposal (solid waste)
Family Practice Associates		MD/GP	Yes	Pharmaceutical waste disposal (sewer and Biohazard)
Winn Dixie		Pharmacies	Yes	Pharmaceutical waste disposal (solid waste)
Best Drugs		Pharmacies	Yes	Pharmaceutical waste disposal (solid waste)
Children's Medical Center		Urgent Care	Yes	Pharmaceutical waste disposal (sewer and Biohazard)
Solantic 720 Bldg		Urgent Care	Yes	Pharmaceutical waste disposal (Biohazard)

Since 2004, Alachua County has operated a residential pharmaceutical waste collection program in Alachua County. County residents can safely dispose of their unwanted pharmaceuticals by taking them to the County's Hazardous Waste Collection Center or to three satellite collection facilities. An unexpected benefit of the CAV was the addition of more satellite pharmaceutical waste collection sites for the existing waste collection program. As a direct result of this program we have added three more locations (Southeastern Community Pharmacy, North Florida Retirement Village, Target Pharmacy) and there is the possibility of adding a couple more. The additional collection points will facilitate the proper disposal of the unwanted pharmaceuticals and will keep them out of the domestic water stream. For additional information on the County's Hazardous Waste program please visit: www.alachuacountyhazwaste.us

3.3 Pharmaceutical / Medical Drug Waste Questionnaire Results

As part of the CAV inspections, ACEPD conducted a survey of the inspected facilities in order to obtain general data regarding their pharmaceutical / drug waste management practices. A copy of the form can be found in Appendix A. Summary information for selected questions is presented in this section.

Question 1: Are the services of a Reverse Distributor available to this facility?

76% of the facilities inspected indicated that reverse distribution of medication was available to them and was currently in use at their facilities (calculated percentage does not include police and fire departments).

Question 2: Do you know what a RCRA waste is?

86% of the facilities surveyed did not know what a RCRA waste was. Only the operators of hospitals and some of the pharmacies responded yes to this question.

Question 3: Are patients asking questions on how to dispose of unwanted medications?

49% of the facilities reported that they receive questions from their customers regarding the proper disposal of pharmaceutical waste (calculated percentage does not include police and fire departments).

Question 4: Are you aware of FDEP/ACEPD suggested disposal options?

Only 4% (2 facilities) were aware of the FDEP/ACEPD recommended disposal option. This is clearly an area that needs significant improvement.

Question 5: Do you keep records to track drug wastes, quantities and where it goes?

69% of the facilities surveyed stated that they maintained records regarding their waste management disposal practices.

3.4 Time Management Data

Table 4 shows a breakdown by activity type. Report writing includes the time spent writing the inspections reports. The inspection time includes only the time spent on the field conducting the inspections. Table 5 shows an estimated breakdown by business type.

Table 4. Hours by Project Activity

Activity	Total Hours
Report Writing	262
Inspections	243
Technical Research or Review	80
Materials Development	77
Administrative	27
Total	689

Table 5. Hours by business type

Category	Inspections	Hours
Pharmacies	13	154
Assisted Living	12	143
Hospital	8	95
Urgent Care	6	71
Police	5	59
Cardiologist	2	24
Fire Rescue	2	24
General Practice	2	24
Pediatric	2	24
Clinic	1	12
Cosmetic Surgeon	1	12
Hospice	1	12
Neurologist	1	12
Orthopedics	1	12
Renal	1	12
Totals	58	689

4.0 CONCLUSIONS

- 1. Compliance with existing regulations:** The CAV identified only three out of compliance facilities; however that small number may be misleading because of the uneven recordkeeping practices at the facilities inspected.
- 2. Compliance with recommended Best Management Practices:** This is an area that needs improvement, especially for the assisted living facilities in the County. Disposal of waste pharmaceutical through the sanitary sewer is a common and established practice and may take a significant effort to change.

- 3. Hazardous Waste Collection Program:** An unexpected benefit of this initiative was the addition of satellite collection points to our existing pharmaceutical waste collection program. The increase in the number of drop off collection should correlate with an increase in than amount of pharmaceutical collected. ACEPD plans to monitor these numbers and If appropriate work in adding additional satellite collection sites.
- 4. Outreach Campaign:** As stated in section 3.3, only a very small number of the facilities inspected were aware of the existing regulation and Best Management Practices. As part of this program we conducted only 58 CAV; a very small sample of the number of facilities involved in the management of waste pharmaceuticals. The generation of an email database proved to be a lot more difficult than anticipated, and the small number of facilities in the email database reflects that. An available option to reach a much larger number of facilities would be to purchase an existing commercial database.

APPENDIX A

NOTICE OF POTENTIAL HAZARDOUS WASTE / UPW NON-COMPLIANCE - Page 1 of 2

FACILITY NAME HarborChase Assisted Living		TYPE OF INSPECTION: X CAV CEI CI OTHER:	
CONTACT PERSON Kavin Paul - Director of Resident Care		PHONE NUMBER (352) 332-4505	
ADDRESS 1415 Fort Clarke Blvd		CITY Gainesville	STATE FL ZIP CODE 32606
COUNTY Alachua	EPA ID NUMBER	DATE OF INSPECTION 04/21/10	TIME OF INSPECTION 12:30 p.m.
GENERATOR STATUS? Non-Handler		Latitude	Longitude
FOLLOW UP CEI INSPECTION WITHIN 120 DAYS NEEDED? X YES NO		N 29 ° 39 ' 59.508 "	W 82 ° 26 ' 2.579 "
INSPECTION PARTICIPANTS Chris Gilbert, Kavin Paul		SIC CODE 8051 Skilled Nursing Care Facilities	

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance existing at the time of inspection.

HW GENERAL REQUIREMENTS:

- Failure to ensure delivery of HW to proper HW facility § 261.5
- Failure to perform hazardous waste determination § 262.11
- Failure to notify as hazardous waste generator § 262.12
- Failure to use a manifest or reclamation agreement § 262.20
- Failure to provide personnel training § 262.34, 265.16
- Evidence of releases of hazardous waste § 265.31
- Facility exceeds 90/180 day time limit § 262.34
- _____

UPW REQUIREMENTS:

- Failure to label containers
- Failure to respond to releases
- Failure to document RD/RTM disposals
- Improper disposal of universal Pharmaceutical Wastes
- Failure to label UPW container
- Improper storage of UPW
- _____

HW CONTAINER MANAGEMENT:

- Unlabeled containers § 262.34
- Undated containers § 262.34
- Leaking or rusting containers § 265.171
- Bulging containers § 265.172
- Open containers § 265.173
- Inadequate aisle space § 265.35
- _____

HW RECORDKEEPING REQUIREMENTS:

- Manifests § 262.40, § 262.44
- Modified contingency plan § 262.34
- Weekly container inspection records § 265.174
- Authorities not notified § 265.37
- Test results, waste analyses, and determinations § 262.40(c)
- _____

MATERIALS PROVIDED to assist in accomplishing corrective actions

- FDEP Guide for Florida Pharmacies
- ACEPD Pharmaceutical Poster
- FDEP List of Pharmaceuticals
- List of Fl. Reg. Reverse Distributors
- FDEP Pharmaceutical Waste Guide
- ACHWCC Resident Med Disposal
- ACEPD Pharmaceutical BMP
- Other _____

FLORIDA FACT SHEETS:

- Summary of Hazardous Waste Regulations
- Container Inspection Log
- ER / Contingency Plan Example
-
-

COMMENTS:

HarborChase Assisted Living is an Assisted Living Care Facility. HarborChase purchased and took over facility in 2010. Previous to this the facility was Eden Garden Assisted Living from construction of facility in 2001 - 2010. This inspection was unannounced by the Alachua County Environmental Protection Department Inspector.

Facility is on COG POTW Water & Sewer.

Facility has (2) MDs. (0) RNs. (7) LPNs. (1) ARPN. (1) Pharmacist. Facility operates (3) shifts, 7 days a week.

Facility utilizes reverse distribution for expired pharmaceuticals via Senior Meds. Switching to Guardian as of 05/2010 for reverse distribution.

Controlled Medications separated and currently flushed down POTW.

Dispensary cabinet double locked.

Provided FDEP Pharmacy Handbook, FDEP List of Pharmaceuticals, FDEP Pharmaceutical Waste Guide, ACEPD Pharmaceutical BMP & Poster.

Please send your response to the person signing as "INSPECTOR."
Alachua County Environmental Protection Department
201 S.E 2nd Avnue. Suite 201, Gainesville, FL 32601

The actions taken within 30 days of this notice will be considered in determining whether enforcement, including the assessment of penalties, should be initiated.

If you have any questions, contact Chris Gilbert (352) 264-6842

INSPECTOR (signature): 

DATE: 4-21-10

CESQG CHECKLIST

Facility Name: HarborChase Assisted Living

Date: 04/21/10

Facility Representative: Kevin Paul

Facility ID #: _____

SIC Codes: 8051

Inspector: Chris Gilbert

40 CFR 261.5

1. Describe the facility's hazardous and potentially hazardous waste streams 40 CFR 262.11:

Waste	EPA Waste Codes	Generation Rate	Disposal facility?	Proper Waste ID?

(describe discrepancies in waste identification in narrative)

Standards for Conditionally Exempt Small Quantity Generators - 40 CFR 261.5

- 2. Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? Y N _____
 And less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes? Y N _____
- 3. Has the facility obtained an EPA ID Number? (not required for CESQGs) Y _____ N
- RF 4. Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? (40 CFR 261.5) Describe discrepancies in narrative. Y N _____
- 5. Is the facility disposing of hazardous waste by mixing with used oil? Y _____ N _____ NA
- 6. Can the facility document proper disposal of all hazardous wastes? Y N _____ Violation
- 7. Are any hazardous wastes treated or disposed of on site? Describe in narrative: Y _____ N
- 8. Are there any unpermitted discharges of other wastes to the environment? Y _____ N

HARBORCHASE ASSISTED LIVING

1415 FORT CLARKE BOULEVARD, GAINESVILLE, FL 32606

ACEPD: H1241 Class: E

Employees: 35 Vehicles: 0 Billable Tanks: 0

Contact: KAVIN PAUL - DIRECTOR OF RESIDENT CARE

Inspection Results

4/21/2010 CLG

INITIAL E-SQG FACILITY INSPECTION INDICATES FACILITY CLASS "E" EXEMPT ASSISTED LIVING CENTER WITH LP GAS GENSET.

INSPECTION INDICATES PROPER MANAGEMENT OF REGULATED MATERIALS WITH THE FOLLOWING EXCEPTIONS:

20 - OBTAIN & RETAIN DOCUMENTATION FOR ALL REVERSE DISTRIBUTION / DESTRUCTION OF EXPIRED PHARMACEUTICALS.

FACILITY ON COG POTW WATER & SEWER.

FACILITY HAS (2) MDS. (0) RNS. (7) LPNS. (1) ARPN. (1) PHARMACIST. FACILITY HAS (3) SHIFTS, 7 DAYS A WEEK.

FACILITY HAS 79 ASSISTED LIVING CARE BEDS.

(1) OLYMPIAN LP GAS GENSET.

REVERSE DISTRIBUTION UTILIZED FOR EXPIRED PHARMACEUTICALS VIA SENIOR MEDS. SWITCHING TO GUARDIAN AS (05/2010 FOR REVERSE DISTRIBUTION. CONTROLLED MEDS SEPARATED AND FLUSHED DOWN POTW.

DISPENSARY CABINET DOUBLE LOCKED.

CONTACT GRU WASTE WATER FRED WILLIAMS 334-3400 x 1698 FOR INSPECTION. PROVIDE COPY TO ACEPD.

PROVIDED FDEP PHARMACY HANDBOOK, FDEP LIST OF PHARMACEUTICALS, FDEP PHARMACEUTICAL WASTE GUIDE, ACEPD PHARMACEUTICAL BMP & POSTER.

FOLLOW UP - 30 DAYS.

Inspection Violations:

Violation Date	Violation	Date Corrected
4/21/2010	20 - HMMC - RECORD KEEPING REQUIREMENTS	



 EFD Inspector



 Facility Representative



Pharmaceutical / Medical Drug Waste

Questionnaire

Facility Name: HarborChase Assisted Living Inspector: Chris Gilbert SIC: 8051
 Address: 1415 Fort Clarke Blvd. Gainesville Date of Survey: 04/21/2010
 Phone: (352) 332-4505 Site Rep: Kavin Paul - Director of Resident Care
 No. of RNs: 0 No. of Physicians: 2 No. of Shifts: 3 No. of Pharmacists: 1
 Number of Beds or PTs served: 79 M Y

Are the services of a Reverse Distributor available to this facility? N
 If yes, are the services utilized? N

If available, but not used, why not? _____

Who is or should be responsible for the following: Gathering/Collecting drug wastes: Pharmacist
 Storing and Securing drug wastes: Pharmacist Disposing of drug wastes: Pharmacist

Do you know what a R.C.R.A waste is? Y

What types of drug waste disposal services would work best for your facility?:
 Drop off drug waste at a pharmacy Other drop off site Reverse Distributor
 Vendor pick up at my site Mail away service Associated hospital's disposal service
 Other idea: Describe - _____

How do you distinguish between Controlled substances and other drugs? Segregated

How are Controlled substances disposed? Disposed down POTW

Are Patients asking questions on how to dispose of unwanted medications? Y

Are you aware of the FDEP / ACEPD suggested disposal options?

Do you keep records to track drug wastes, quantities and where it goes? N

Do you have containers for drug wastes? N

Where are they kept? Return Meds How are they Labeled? Original Containers

What are your recommendations, if any, regarding the proper management of unwanted medications?
None

APPENDIX B

**A Guide on
Hazardous Waste Management
for Florida's**

Pharmacies





Smart **Rx** Disposal



A Prescription for an Environmentally Healthy Florida



**Never dispose of pharmaceuticals
in a biohazard bag**





**Never flush pharmaceuticals
down the toilet**



**Never throw pharmaceuticals
in the trash**

Proper Disposal Includes:

-  Buy back programs
-  Universal pharmaceutical waste disposal

Questions concerning proper disposal of pharmaceuticals?

Call the Alachua County Environmental Protection Department

(352) 264-6800

alachuacountyhazmat.org



Checklist

This checklist will help you prevent the most common hazardous waste violations.

For more detailed information on hazardous waste management requirements, contact the Alachua County Environmental Protection Department at (352) 264-6800.

- 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
- Don't combine hazardous waste with non-hazardous waste.
- Label all containers as universal pharmaceutical waste 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.
- Keep all records for at least three years.
- Never discharge universal pharmaceutical waste to a drain or 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 facilities are registered and have EPA identification numbers.
- Make sure your reverse distributor is properly licensed and registered.
- Use manifests for all universal pharmaceutical waste transported for disposal.

2. Implement Best Management Practices (BMPs). (Continued)

Recordkeeping

Inspect containers at least once a week and keep a written log of container inspections.

Keep the following records for at least three years:

Training and inspection records, records of completed inventories / audits regarding the distribution or shipment of prescription drugs, records of laboratory tests, completed land disposal restriction forms

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.

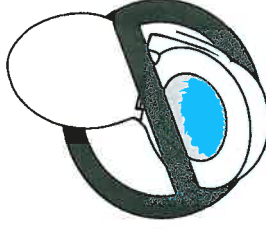
3. Comply with guidelines for transport.

4. Comply with guidelines for managing outdated pharmaceuticals internally and for shipping other pharmaceutical waste generated at your facility.

5. Conduct a complete audit of all pharmaceuticals or wastes being shipped offsite. Keep records of completed audits for at least three years.



for Management of Pharmaceutical Wastes



Alachua County Environmental Protection Department

(352) 264-6800

alachuacountyhazmat.org

How do I manage my pharmaceutical wastes?



1. Establish a pharmacy management plan.



General Pharmaceutical Management

Conduct 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. Manage only legitimate and potentially creditable outdated pharmaceuticals through reverse distribution. Manage waste-like items, such as partial vials, IVs, ointments, etc. through a universal waste handler. 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.

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

Universal Pharmaceutical Waste Rule

This 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.

UPW applies to:

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

UPW does not apply to:

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. Spill residues, cleanup materials, and media that are contaminated with pharmaceuticals as the result of a spill or discharge. 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.

2. Implement Best Management Practices (BMPs).



Container Maintenance

Maintain containers in good condition. Never place incompatible wastes, such as wastes that react with each other, in the same container. For instance, do not store acids and bases in the same container. Wastes must be compatible with the container in which they are being stored. For instance, strong acids or bases should **NOT** be stored in metal containers.

Storage

Separate waste by hazardous waste classification:

- Toxicity (including P and U)
- Ignitability
- Corrosivity
- Reactivity

Inspect pharmaceutical waste storage areas weekly. Be aware of allowable time limits for storage.

Labels

- Label every container with the contents (type of pharmaceutical or waste)
- Label every container as hazardous or 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

Continued on back



Front Side



Alachua County Environmental Protection Department

Proper Disposal of Unwanted / Expired Medications

Do your part to protect the environment and your drinking water.

For current list of drop off locations: www.alachuacountyhazwaste.us

Back Side



Alachua County Environmental Protection Department

Proper Disposal of Unwanted / Expired Medications



Do not flush your medications down the drain.

Do not throw your medications in the trash.

Do your part to protect the environment and your drinking water.

For current list of drop off locations: www.alachuacountyhazwaste.us