

**New Hampshire Department of Environmental Services
NEWMOA Training Call - July 25, 2011
Pharmaceutical Waste Management**

1) Is any state considering adding pharmaceutical waste as a universal waste?
NH is not currently considering adding pharmaceutical wastes to the list of universal wastes.

2) What are your state's policies (if any) regarding the management of residential unwanted or unusable pharmaceuticals?

Message: Don't keep unneeded medications in the home.

Option 1: Dispose of medicines in the garbage, using the following procedure:

- 1) Pour medicine into a sealable plastic bag.
- 2) If the medicine is a solid, add a small amount of water to dissolve it.
- 3) Add coffee grounds, kitty litter or something similar to the liquid medicine in the plastic bag.
- 4) Seal the bag and immediately dispose of it in the trash.
- 5) Use a marker to black out any personal contact information on the empty medicine container prior to disposing of it in the trash.

Option 2: If readily available dispose of unwanted medicine at a collection event.

State Website: www.nh.gov/medsafety

Drain Disposal: Do NOT flush medicine down the toilet unless accompanying product information instructs otherwise.

- 3) What are your state's policies (if any) regarding the management of non-residential unwanted or unusable pharmaceuticals?
 - **If the pharmaceuticals are "solid waste" we expect a hazardous waste determination to be made on those wastes.**
- 4) If non-residential pharmaceuticals conform to a hazardous waste characteristic or listing, do you require that they are managed as hazardous waste?
 - **Yes**
- 5) What do you consider to be the point of generation? At the pharmacy or health care facility at which it is determined that the pharmaceutical is no longer usable or needed, or somewhere further down the line?
 - **If they are solid wastes (i.e., no reasonable expectation of use) we require them to be managed as hazardous waste.**
- 6) Do you have any specific policies relating to the management of unusable/unwanted pharmaceuticals at retail pharmacies (e.g., CVS, Walgreens, Rite Aid, etc.)?
 - **No**
- 7) Do your policies differentiate in any way between different types of health care facilities (i.e., hospitals vs. long-term health care facilities vs. retail pharmacies)?
 - **No, except for at some hospice or long-term care facilities the pharmaceuticals may be considered household waste if they originated from the patient.**
- 8) Have any of you had enforcement of any kind with any retail chain pharmacies in your state? (If so, please briefly summarize the nature of the violations and the resolution of the case.)
 - **No**

Reverse Distribution:

9) How do states implement EPA's allowance for reverse distribution systems for un-needed pharmaceuticals?

- **We have a written policy (January 22, 1999) on the reverse distribution of pharmaceuticals; the policy does not consider pharmaceuticals destined for a reverse distribution facility to be solid wastes provided there is a reasonable expectation that the pharmaceuticals will be used (similar to RO 11606)**
- **Our inspector interactions on reverse distribution have only been in hospital pharmacies. Provided the pharmaceuticals were being managed as a product and a qualified individual (pharmacist) was distinguishing between products for reverse distribution and waste pharmaceuticals we have not pushed for documentation on future use.**

Reverse Distribution (continued):

9a) Do you have any specific policies relating to the use of pharmaceutical return centers?

- **There must be a reasonable expectation that the pharmaceuticals will be used.**

9b) Has anyone asked for documentation to find a pattern of disposal fees being assessed in addition to or instead of a "credit" every time a generator is sending drug "x" through reverse distribution?

- **No**

10) Warfarin (P001)- how to do other states regulate or interpret "packaging" that once held a Coumadin pill? Can the container can be managed as solid waste? Containers include foil/blister packs, and paper/plastic cups to administer individual doses.

- **"Blister" packs and cups that contain individual doses of a medicine are not subject to the empty container criteria. These blister packs are viewed as dispensing devices.**

How about if the tablet is still in the container?

If the tablet is still in the dispensing device, the tablet is hazardous waste.