

## Universal Waste Rule for Pharmaceuticals 62-730.186 F.A.C.



## What Is 'Universal Waste'?

- Generated in large quantities
- Found in variety of industries
- 40 CFR Part 273

## Examples

- Fluorescent lamps
- Mercury thermostats
- Batteries
- Recalled pesticides



## Why Drugs?

- Wide variety of generators:
  - Fire stations
  - Small drugstores
  - Warehouses
  - Large hospitals



## How does it work?

- Alternative set of standards
- Regulatory flexibility vs. 40 CFR Parts 260-272...

## Reduces barriers to collection

- Small quantity handler: 5000 kg
- SQG: 1000 kg
- Longer accumulation time



## Reduces complexities

- Waste Management
- Accumulation time
- Off-site shipments
- Tracking



## Reduces cost of compliance

- Increased accumulation times
- Relaxed standards



## A look at the Rule...



- Applies to H/W drugs (*"viable"*)
- Requires *documented* credit
  - Mfg
  - RD
  - Charities

## Handler requirements

- Small quantity:  $\leq 5000$  kg/mth
  - Accumulate 1 year
- Large quantity:  $> 5000$  kg/mth
  - Accumulate 6 mos
- Amounts are cumulative
- EPA ID number
- Proper container mgmt. (label, compatible)
- Training

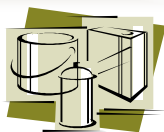
## Reverse Distributors

- H/W Generators
- Begin waste determination w/in 24 hrs
- Complete process in 10 days
- Keep record
  - Date of receipt
  - Date determined hazardous waste

## Documentation is key!



## Labpacks



- Handler may:
  - Sort/mix compatible drugs
  - Consolidate
  - Remove drugs from consumer packaging
- Manage any resulting wastes

## Employee Training



- Waste mgmt. relevant to position
- Contingency Plan
- 3-month window
- Annual review
- Document (3 years)!

## Off-site shipments



- Destination facility (40 CFR 273.9)
- RD: permitted HW disposal facility
- Self-transport
- DOT requirements
- Documentation (3 years)

## Acceptance of shipments

- Written agreement w/ destination facility
- Rejected shipments:
  - Receive waste back, or
  - Alternate facility
- Receipt of non-UW haz waste:
  - Notify DEP
  - Manage pursuant to Ch 62-730 F.A.C.



## Comments...

problems identified

## "Viable"

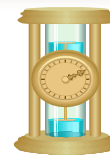
- No prior knowledge of final disposition
- Mfg. policies vary widely
  - Don't always cover returns
  - Deduct from invoice vs credit return
- Current wording increases waste

## Definitions



- “Container”
  - Not intended for ingestion, absorption, etc.
- “Consumer packaging”
  - Intended for retail/household environment

## Waste determination



- 24 hrs/10 days
  - Allow for business fluctuation
  - 20 days; no start time

## What's next?



- Workshop in early February
  - Public notice in January
- Final Rule in April
- Effective in July

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