



Changes in Pharmaceutical Waste Management

Fall 2020
Joshua Burman

MPCA #w-hw3-33; Changes in pharmaceutical waste management

<https://www.pca.state.mn.us/sites/default/files/w-hw3-33.pdf>



CAUTION!
This presentation is only a summary of *changes* in pharmaceutical waste management in Minnesota and ***does not*** detail all final applicable requirements.

MPCA #w-hw1-00; Basic Hazardous Waste for Business

<https://www.pca.state.mn.us/sites/default/files/w-hw1-00.pdf>

(Review) What must be assumed?

- Every regulated pharmaceutical waste must be:

- assumed to be hazardous

OR

- evaluated as non-hazardous*

(documented as non-hazardous)

- documented knowledge

and/or

- testing



MPCA #w-hw4-45a; Evaluating Pharmaceutical Wastes

<https://www.pca.state.mn.us/sites/default/files/w-hw4-45a.pdf>

What is regulated?

- Commercially-generated

- Pharmacies
- Hospitals/clinics
- Veterinary hospitals/clinics
- Dentists
- Nursing homes, hospices (LTCFs)*



- Household-generated *only if collected*

- Home-based care facilities*
- Schools
- Shelters



MPCA #w-hw3-35; Regulatory Consensus on Healthcare

<https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf>

Controlled Substances?

- Exempt *(from hazardous waste requirements)* if:

- Evaluated as non-hazardous

or

- Not sewerred

AND

- Managed under DEA/Board requirements

AND

- Destroyed by incineration at permitted solid waste facility

or by other method approved by DEA in writing



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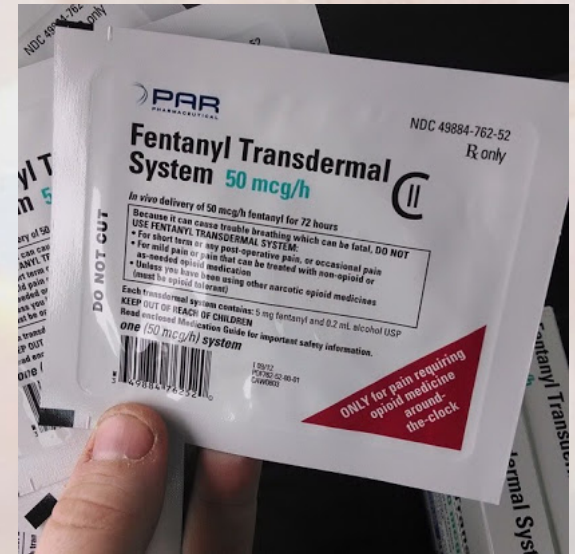
Fentanyl Patches?

- Exempt *(from HW requirements)*
 - MPCA has determined non-hazardous

- Sewerable?

- **Yes:** Metro Counties (sites served by MCES)

- **Maybe:** Outstate city-by-city



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Generator Size & Reporting?

■ Pharmaceutical wastes:

- report manifested waste
 - ☒ do *NOT* report Reverse Distribution
- count for fees
- do *NOT* count towards standard generator 'size'



- ☒ except...
 - any acute pharmaceutical waste (including RD'd)
 - render site ineligible for MiniQG

 so most sites will be VSQGs

MPCA #w-hw1-02; Determine generator size

<https://www.pca.state.mn.us/sites/default/files/w-hw1-02.pdf>

Acute pharmaceuticals?

- Nicotine, warfarin, arsenic trioxide, physostigmine
 - Report only 'Yes'/'No' acute pharmaceutical generation
 - Accumulate & count same as other HW pharmaceutical



MPCA #w-hw2-02; Plist of acute hazardous waste

<https://www.pca.state.mn.us/sites/default/files/w-hw2-02.pdf>

Empty pharmaceutical containers?



■ Exempt *(from hazardous waste requirements)* if:

Meet hazardous waste empty container standard
or

Stock/dispensing container $\leq 10,000$ tablets or $\leq 1L$
AND

All product removed by normal means

Then...

No rinsing or measurement necessary (including acute)

Includes packaging

MPCA #w-hw4-16; Containers that held hazardous waste or product

<https://www.pca.state.mn.us/sites/default/files/w-hw4-16.pdf>

Nicotine?

■ Exempt:

- FDA-approved, OTC nicotine replacement therapies (NRTs) {gum, lozenges, patches}

□ Not exempt:

- Prescription NRTs {sprays, inhalers}
- E-cigarettes
- Vaping liquids



MPCA #w-hw2-02; Plist of acute hazardous waste

<https://www.pca.state.mn.us/sites/default/files/w-hw2-02.pdf>

Disposal Options?

(for regulated pharmaceutical hazardous waste at non-LTCFs)

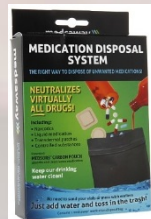
- Ship for Reverse Distribution



- Manifest with Hazardous Waste Transporter

- use waste code 'PHRM'

- Destroy on-site *then Manifest*



MPCA #w-hw3-35; Regulatory Consensus on Healthcare

<https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf>

Sewering? *(by businesses)*

- Pharmaceuticals prohibited from sewerage, if:
 - Unevaluated
 - or*
 - Evaluated as 'federally-regulated'



MPCA #w-hw4-45a; Evaluating Pharmaceutical Wastes

<https://www.pca.state.mn.us/sites/default/files/w-hw4-45a.pdf>

Sewering? *(by businesses)*

- May only be sewered if:
 - Evaluated as non-hazardous
 - or*
 - Evaluated as only Lethal pharmaceutical

-
- Then, only to Publicly Owned Treatment Works (POTW), **NOT** septic system;
 - and*
 - POTW has been notified prior to discharge
 - and*
 - POTW conditions are complied with



MPCA #w-hw4-45a; Evaluating Pharmaceutical Wastes

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Disposal Options? *(for household waste)*

- Transport to household collection receptacle
 - at pharmacies & law enforcement
- *Sewer (strongly discouraged)*
- Treat on-site *(optional)* then solid waste



MPCA; Managing unwanted medications

<https://www.pca.state.mn.us/living-green/managing-unwanted-medications>

Expected ~2022

THE FOLLOWING **PREVIEW** HAS BEEN APPROVED FOR
ALL AUDIENCES
BY THE MINNESOTA POLLUTION CONTROL AGENCY

- Rulemaking to complete adoption of 'Subpart P'
 - Lethal pharmaceutical wastes sewerage ban
 - Pharmaceutical wastes containers secured
 - 1-year limit for pharmaceutical waste accumulation

MPCA #mm-rule1-00; Public Rulemaking Docket

<https://www.pca.state.mn.us/sites/default/files/mm-rule1-00.pdf> 17

Compliance Resources

- MPCA Small Business Environmental Assistance Program (SBEAP)
 - Free
 - Confidential

651-282-6143

800-657-3938

smallbizhelp.pca@state.mn.us



MPCA Small Business Environmental Assistance Program

<https://www.pca.state.mn.us/smallbizhelp>

Questions/More Information



Joshua Burman

(507) 344-5243

Joshua.Burman@state.mn.us

Any MPCA staff

(651) 296-6300

Info.pca@state.mn.us

Metro Counties

<https://www.pca.state.mn.us/waste/hazardous-waste-documents-and-forms>

(scroll to the bottom of the page)

MPCA; Assistance

<https://www.pca.state.mn.us/about-mpca/assistance>