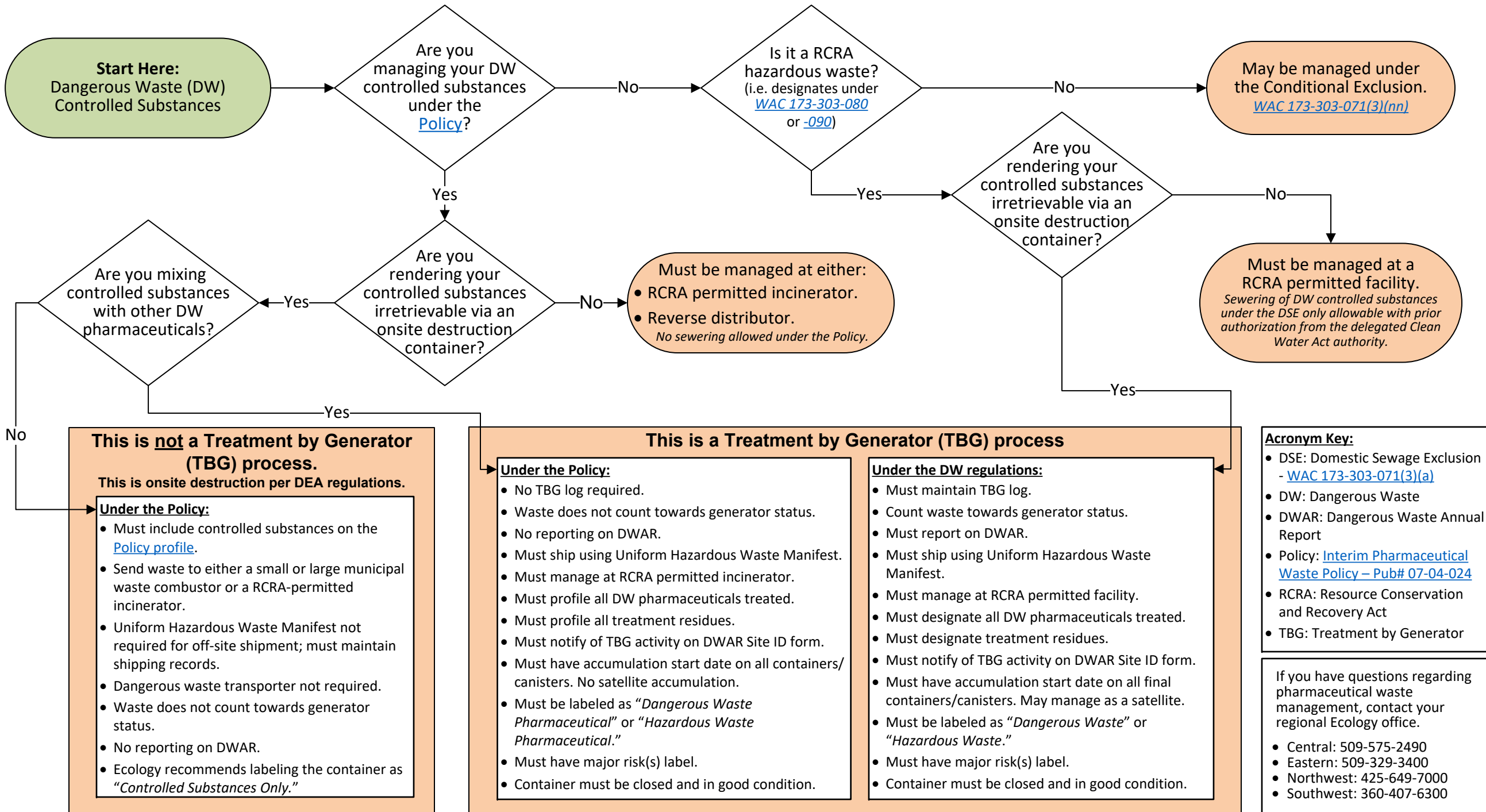


Management of Dangerous Waste Controlled Substances



Start Here:
Dangerous Waste (DW)
Controlled Substances

Are you managing your DW controlled substances under the [Policy](#)?

Is it a RCRA hazardous waste? (i.e. designates under [WAC 173-303-080](#) or [-090](#))

May be managed under the Conditional Exclusion. [WAC 173-303-071\(3\)\(nn\)](#)

Are you rendering your controlled substances irretrievable via an onsite destruction container?

Must be managed at either:
• RCRA permitted incinerator.
• Reverse distributor.
No sewerage allowed under the Policy.

Must be managed at a RCRA permitted facility.
Sewering of DW controlled substances under the DSE only allowable with prior authorization from the delegated Clean Water Act authority.

Are you mixing controlled substances with other DW pharmaceuticals?

This is not a Treatment by Generator (TBG) process.
This is onsite destruction per DEA regulations.

- Under the Policy:**
- Must include controlled substances on the [Policy profile](#).
 - Send waste to either a small or large municipal waste combustor or a RCRA-permitted incinerator.
 - Uniform Hazardous Waste Manifest not required for off-site shipment; must maintain shipping records.
 - Dangerous waste transporter not required.
 - Waste does not count towards generator status.
 - No reporting on DWAR.
 - Ecology recommends labeling the container as "Controlled Substances Only."

This is a Treatment by Generator (TBG) process

- Under the Policy:**
- No TBG log required.
 - Waste does not count towards generator status.
 - No reporting on DWAR.
 - Must ship using Uniform Hazardous Waste Manifest.
 - Must manage at RCRA permitted incinerator.
 - Must profile all DW pharmaceuticals treated.
 - Must profile all treatment residues.
 - Must notify of TBG activity on DWAR Site ID form.
 - Must have accumulation start date on all containers/canisters. No satellite accumulation.
 - Must be labeled as "Dangerous Waste Pharmaceutical" or "Hazardous Waste Pharmaceutical."
 - Must have major risk(s) label.
 - Container must be closed and in good condition.

- Under the DW regulations:**
- Must maintain TBG log.
 - Count waste towards generator status.
 - Must report on DWAR.
 - Must ship using Uniform Hazardous Waste Manifest.
 - Must manage at RCRA permitted facility.
 - Must designate all DW pharmaceuticals treated.
 - Must designate treatment residues.
 - Must notify of TBG activity on DWAR Site ID form.
 - Must have accumulation start date on all final containers/canisters. May manage as a satellite.
 - Must be labeled as "Dangerous Waste" or "Hazardous Waste."
 - Must have major risk(s) label.
 - Container must be closed and in good condition.

Acronym Key:

- DSE: Domestic Sewage Exclusion - [WAC 173-303-071\(3\)\(a\)](#)
- DW: Dangerous Waste
- DWAR: Dangerous Waste Annual Report
- Policy: [Interim Pharmaceutical Waste Policy – Pub# 07-04-024](#)
- RCRA: Resource Conservation and Recovery Act
- TBG: Treatment by Generator

If you have questions regarding pharmaceutical waste management, contact your regional Ecology office.

- Central: 509-575-2490
- Eastern: 509-329-3400
- Northwest: 425-649-7000
- Southwest: 360-407-6300