Management of Dangerous Waste Controlled Substances

**Start Here:**
Dangerous Waste (DW) Controlled Substances

Are you managing your DW controlled substances under the **Policy**?

- Yes
- No

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

- Yes
- No

**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.
- Must manage at RCRA permitted incinerator.
- Must profile all DW pharmaceuticals treated.
- 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.

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

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

**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 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.

**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

**This is a Treatment by Generator (TBG) process**

Are you mixing controlled substances with other DW pharmaceuticals?

- Yes
- No

**Under the Policy:**
- 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.

**Under the DW regulations:**
- Must maintain TBG log.
- Count waste towards generator status.
- Must report on DWAR.
- Must prepare Uniform Hazardous Waste Manifest.
- Must manage at a 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.

**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?

- Yes
- No

**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 a 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 “Controlled Substances Only.”
- Container must be closed and in good condition.

**This is a Treatment by Generator (TBG) process**

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

- Yes
- No

**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.
- Must manage at RCRA permitted incinerator.
- Must profile all DW pharmaceuticals treated.
- 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.