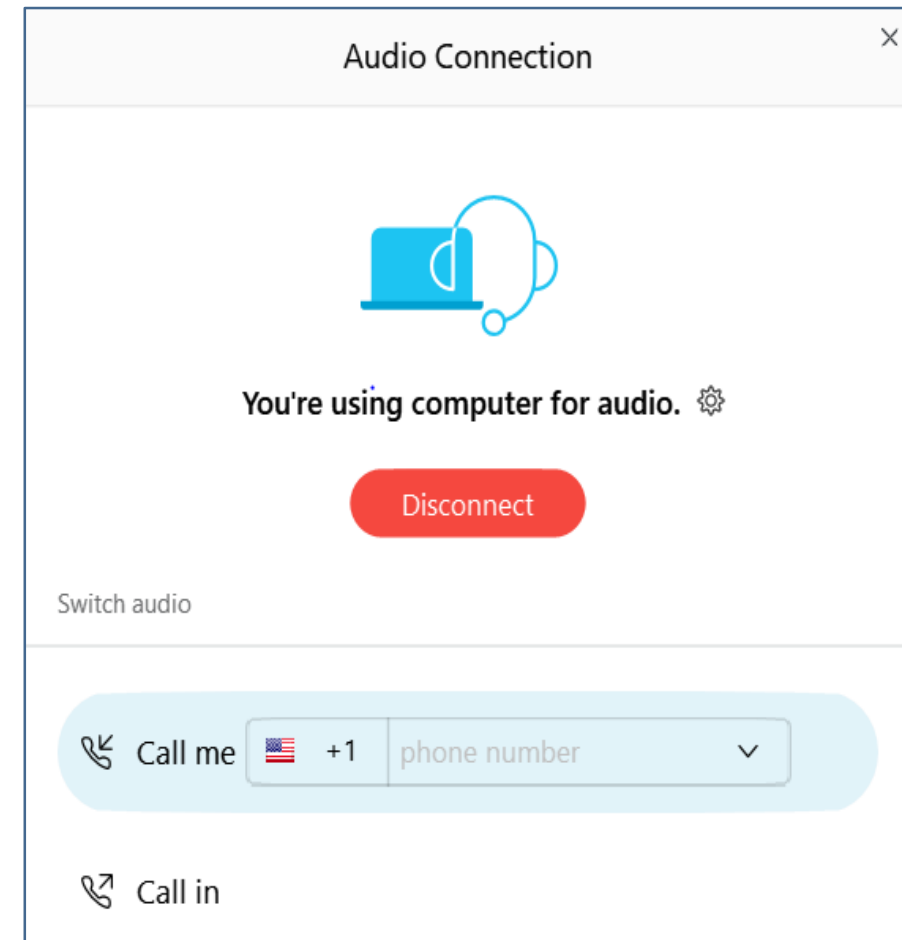


# Welcome to the WA Pharmaceutical Waste Regulations Webinar!

We will do sound checks every few minutes.

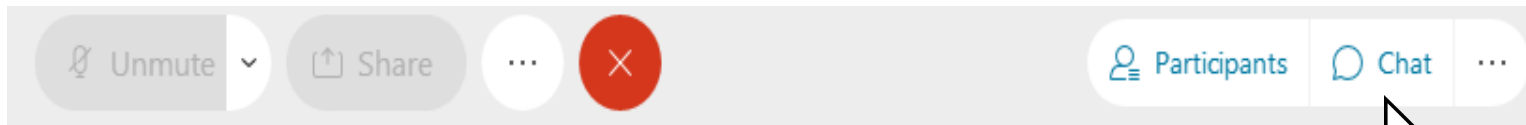
## How to connect to Audio

- Click on the three dots at the bottom of your screen.
- Click "Audio Connection" and a box will appear with options on how to connect.

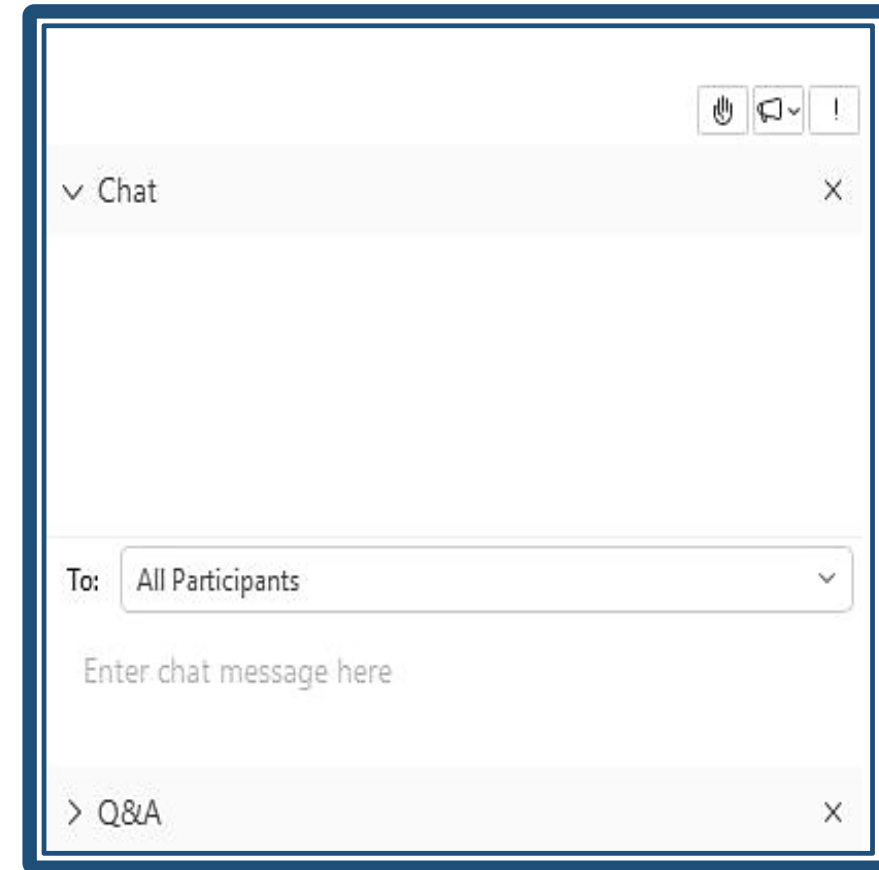


# How to Use WebEx

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- If you experience technical issues please send your message to the host using the Chat feature.
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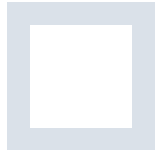


# Special Requirements for Management of Dangerous Waste Pharmaceuticals

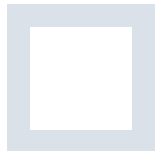
WAC 173-303-555

Presented by  
Lauren Smith and Eric McConnell

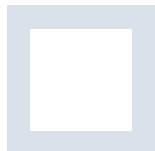




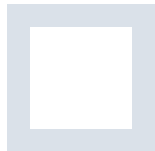
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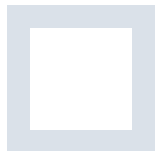
**Examples**



**Management Requirements**



**SQG Management Options**



**Questions**



# Special Requirements for Dangerous Waste Pharmaceuticals

## Effective October 31, 2020

- Incorporates the federal rule (Subpart P).
- Addition of WA state-only dangerous waste pharmaceuticals.
- Replaces the Interim Policy for Pharmaceutical Waste.
  - Only WA Law Enforcement can use the revised conditional exclusion for state-only dangerous waste pharmaceuticals.

# Conditional Exclusion

**Not an option for health care facilities**

Only for:

- Washington State law enforcement.
- State-only dangerous waste drugs held in custody.

Under exclusion, state-only dangerous waste drugs must be disposed of by incineration meeting certain conditions.



# Pharmaceutical Waste Terminology and Abbreviations

## Terminology:

- Dangerous waste pharmaceuticals
  - Noncreditable dangerous waste pharmaceuticals
  - Potentially creditable dangerous waste pharmaceuticals
- Nonpharmaceutical dangerous waste
- RCRA permitted facility (TSDF)
- Reverse distributor

## Abbreviations:

- Dangerous waste (DW)
- Acute hazardous waste (AHW)
- Extremely hazardous waste (EHW)
- Over-the-counter (OTC)

# Health Care Facility

The special requirements apply only if your facility meets the definition of a “health care facility” found in WAC 173-303-555(1).

To summarize the definition, a health care facility is any person lawfully authorized to:

- Provide care of a human or animal
- or**
- Distribute, sell, or dispense pharmaceuticals





# Health Care Facility Examples

- Hospitals
  - Including psychiatric hospitals
- Outpatient/ambulatory surgical centers
- Urgent care centers
- Oncology infusion
- Ambulance services
- Clinics and physician's offices
  - Includes dental, optical, chiropractic, dialysis



# Health Care Facility Examples

- Veterinary facilities
  - Hospitals
  - Clinics
  - Mobile vets
- Animal research facilities
- Zoos

# Health Care Facility Examples

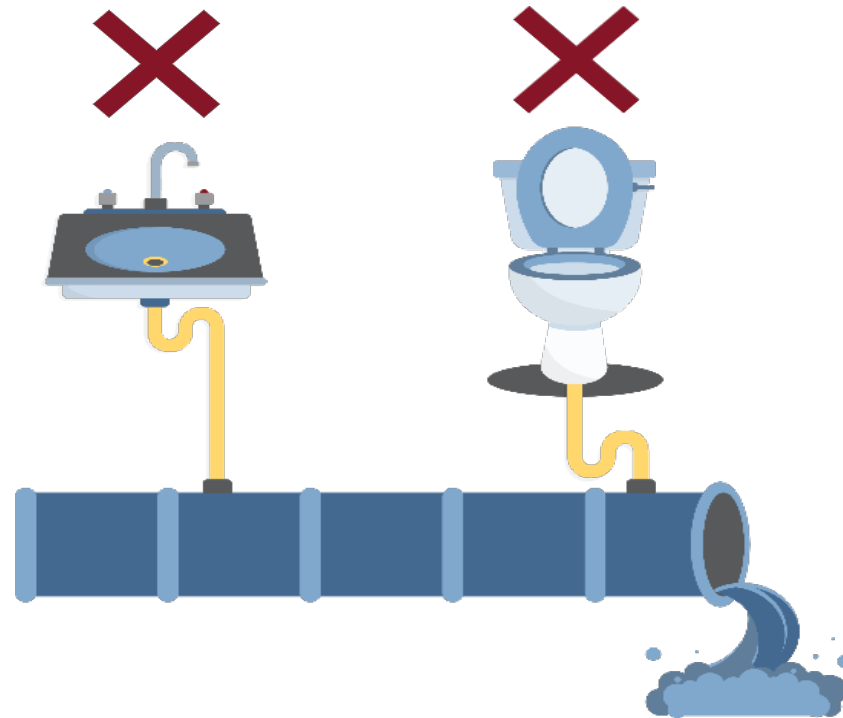
- Long-term care facilities
- Correctional facilities
- Military installations
  - Hospitals, clinics, mobile units, logistics facilities
- Colleges and universities
- K-12 schools

# Health Care Facility Examples

- Retail pharmacy
- Mail-order pharmacy
- Retail stores with OTC and/or prescription medications
- Forward distributors and wholesale 3<sup>rd</sup> party logistics
- Manufacturing or industrial facilities with an on-site medical clinic

# No disposal to sewer

This applies to all health care facilities





# Steps to determine management requirements

To determine the rules for managing your dangerous waste use the steps below:

Step 1 – Designation

Step 2 – Count all dangerous waste

Step 3 – Applicability of section -555

Step 4 – Generator category



# Step 1 – Designation

Determine if waste is a dangerous waste and which waste code(s) apply:

- Listed wastes (P-, U-, and F- waste codes).
- Characteristic wastes (D- waste code).
- State criteria waste (W- waste code).

It is your responsibility to designate **all** your waste.

Learn more about designation at [ecology.wa.gov/Designation](https://ecology.wa.gov/Designation).

# Step 1 – Designation Examples

- P001 – Warfarin
- P012 – Arsenic trioxide
- P042 – Epinephrine
- P075 – Nicotine
- U010 – Mitomycin C
- U058 – Cyclophosphamide
- U059 – Daunomycin
- D001 – Ignitable (e.g. in alcohol)
  - Fentanyl sublingual spray (CII)
- D009 – Toxicity for mercury
  - Any medication with thimerosal as a preservative
- D011 – Silver nitrate sticks
- D024 – Insulin with cresol
- WT02 – State Toxic
  - Lidocaine
  - Tylenol and Ibuprofen
  - Antibiotics
- WP01 – State Persistent
  - Isoflurane, Desflurane, Sevoflurane





# Nicotine Waste

Nicotine replacement therapies approved by Food and Drug Administration are not listed as P075 dangerous waste. However, they may still designate as a dangerous waste.

**Nicotine e-cigarette and vape wastes are still P075 dangerous waste.**



# Step 2 – Count All Dangerous Waste

Count all dangerous waste generated in a month within each quantity exclusion limit (QEL) category:

- 2.2 pounds (e.g. P-listed, WT01 state-only toxic waste).
- 220 pounds (e.g. U-listed, D-code waste, W-code state-only waste).

# Step 3 – Applicability of Section -555

Must manage dangerous waste pharmaceuticals under section -555 if you generate greater than:

- 2.2 pounds of P-listed or WT01 waste
- **or**
- 220 pounds of other dangerous waste.

You have management options if you generate less than the limits above.

# Step 4 – Determine Generator Category

If you're managing dangerous waste pharmaceutical under section -555:

- Count all nonpharmaceutical dangerous waste generated in calendar month.

If you're not managing dangerous waste pharmaceuticals under section -555:

- Count all dangerous waste generated in a calendar month.

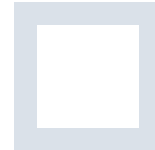


| <b>Small Quantity Generator (SQG)</b><br>(waste per calendar month) | <b>Medium Quantity Generator (MQG)</b><br>(waste per calendar month) | <b>Large Quantity Generator (LQG)</b><br>(waste per calendar month) |
|---------------------------------------------------------------------|----------------------------------------------------------------------|---------------------------------------------------------------------|
| 2.2 pounds or less of AHW or WT01 EHW                               | 2.2 pounds or less of AHW or WT01 EHW                                | More than 2.2 pounds AHW or WT01 EHW                                |
| and                                                                 | and                                                                  | or                                                                  |
| 220 pounds or less of DW                                            | 2,200 pounds or less of DW                                           | More than 2,200 pounds DW                                           |
| and                                                                 | and                                                                  | or                                                                  |
| 220 pounds or less of residue from clean-up of AHW or WT01 EHW      | 220 pounds or less of residue from clean-up of AHW or WT01 EHW       | More than 220 pounds of residue from clean-up of AHW or WT01 EHW    |

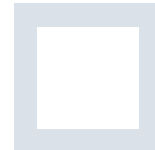




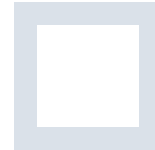
**Applicability**



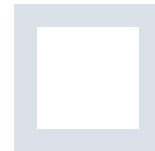
**Examples**



**Management Requirements**



**SQG Management Options**



**Questions**

# Beta Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- Step 3 - Applicability of Section -555
- Step 4 - Generator Category



Generated the following waste in a month:

- 800 pounds of dangerous waste pharmaceuticals.
- 200 pounds of spent solvent from laboratories.
- 15 pounds of glutaraldehyde from sterilizing equipment.
- 10 pounds of paint waste from building maintenance.

# Beta Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ☐ Step 4 - Generator Category



- 800 pounds of dangerous waste pharmaceuticals:
  - 15 pounds of P042 epinephrine waste (AHW).
  - 5 pounds DW controlled substances.
  - 200 pounds chemotherapy.
  - 80 pounds federal hazardous waste pharmaceuticals.
  - 500 pounds state-only dangerous waste pharmaceuticals.
- 200 pounds of spent solvent.
- 15 pounds of glutaraldehyde.
- 10 pounds of paint waste.



# Beta Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ☐ Step 4 - Generator Category



- 800 pounds of dangerous waste pharmaceuticals:
  - + 15 pounds of P042 epinephrine waste (AHW).
    - 5 pounds DW controlled substances.
    - 200 pounds chemotherapy.
    - 80 pounds federal hazardous waste pharmaceuticals.
    - 500 pounds state-only dangerous waste pharmaceuticals.
  - 200 pounds of spent solvent.
  - 15 pounds of glutaraldehyde.
  - 10 pounds of paint waste.

---

= 15 pounds P-listed AHW in a month.

# Beta Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ☐ Step 4 - Generator Category



+ 800 pounds of dangerous waste pharmaceuticals.

- 15 pounds of P042 epinephrine waste (AHW).
- 5 pounds DW controlled substances.
- 200 pounds chemotherapy.
- 80 pounds federal hazardous waste pharmaceuticals.
- 500 pounds state-only dangerous waste pharmaceuticals.

+ 200 pounds of spent solvent.

+ 15 pounds of glutaraldehyde.

+ 10 pounds of paint waste.

---

= 15 pounds P-listed AHW in a month.

= 1,010 pounds of DW in a month.

# Beta Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- Step 4 - Generator Category



Beta Hospital **must** manage their dangerous waste pharmaceuticals under section -555 since their monthly dangerous waste total is greater than:

- 2.2 pounds of P-listed AHW.
- and
- 220 pounds of dangerous waste.

# Beta Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ✓ Step 4 - Generator Category



- 800 pounds of dangerous waste pharmaceuticals.
- 200 pounds of spent solvent from laboratories.
- 15 pounds of glutaraldehyde from sterilizing equipment.
- 10 pounds of paint waste from building maintenance.

# Beta Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ✓ Step 4 - Generator Category



~~800 pounds of dangerous waste pharmaceuticals (not counted).~~

- + 200 pounds of spent solvent from laboratories.
  - + 15 pounds of glutaraldehyde from sterilizing equipment.
  - + 10 pounds of paint waste from building maintenance.
- 
- = 225 pounds of dangerous waste in a month.

# Beta Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ✓ Step 4 - Generator Category



Beta Hospital is a **medium quantity generator (MQG)** since they generated:

- Less than 2.2 pounds of P-listed AHW
- and**
- Greater than 220 pounds of dangerous waste in a month.

Beta Hospital **must** manage their nonpharmaceutical dangerous waste under WAC 173-303-170.



# Alpha Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- Step 3 - Applicability of Section -555
- Step 4 - Generator Category



Generated the following waste in a month:

- 40 pounds of dangerous waste pharmaceuticals.
- 70 pounds of spent solvent from laboratories.
- 15 pounds of glutaraldehyde from sterilizing equipment.
- 10 pounds of paint waste from building maintenance.



# Alpha Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- Step 4 - Generator Category



- 40 pounds of dangerous waste pharmaceuticals:
  - 3 pounds of P042 epinephrine waste (AHW).
  - 5 pounds DW controlled substances.
  - 32 pounds dangerous waste pharmaceuticals.
- 70 pounds of spent solvent.
- 15 pounds of glutaraldehyde.
- 10 pounds of paint waste.



# Alpha Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ☐ Step 4 - Generator Category



- 40 pounds of dangerous waste pharmaceuticals:
    - + 3 pounds P042 epinephrine waste (AHW).
      - 5 pounds DW controlled substances.
      - 32 pounds dangerous waste pharmaceuticals.
  - 70 pounds of spent solvent.
  - 15 pounds of glutaraldehyde.
  - 10 pounds of paint waste.
- 
- = 3 pounds of P-listed AHW in a month.

# Alpha Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- Step 4 - Generator Category



- + 40 pounds of dangerous waste pharmaceuticals:
  - 3 pounds of P042 epinephrine waste (AHW).
  - 5 pounds DW controlled substances.
  - 32 pounds dangerous waste pharmaceuticals.
- + 70 pounds of spent solvent.
- + 15 pounds of glutaraldehyde.
- + 10 pounds of paint waste.

---

- = 3 pounds of P-listed AHW in a month.
- = 132 pounds of DW in a month.

# Alpha Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- Step 4 - Generator Category



Alpha Hospital **must** manage their dangerous waste pharmaceuticals under section -555 since they generated:

- Greater than 2.2 lbs of P-listed AHW waste.

# Alpha Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ✓ Step 4 - Generator Category



- 40 pounds of dangerous waste pharmaceuticals.
- 70 pounds of spent solvent.
- 15 pounds of glutaraldehyde.
- 10 pounds of paint waste.

# Alpha Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ✓ Step 4 - Generator Category



~~40 pounds of dangerous waste pharmaceuticals (not counted).~~

+ 70 pounds of spent solvent.  
+ 15 pounds of glutaraldehyde.  
+ 10 pounds of paint waste.

---

= 95 pounds of dangerous waste in a month.

# Alpha Hospital

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ✓ Step 4 - Generator Category



Alpha Hospital is a **small quantity generator (SQG)** since their monthly nonpharmaceutical waste generation is less than:

- 2.2 pounds of other AHW or WT01 EHW

**and**

- 220 pounds of other DW.

Alpha Hospital **must** manage their nonpharmaceutical dangerous waste under WAC 173-303-170.

# Review

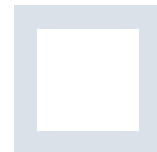
- Health care facilities must count all their dangerous waste to determine if section -555 applies, including:
  - RCRA hazardous waste pharmaceuticals.
  - State-only dangerous waste pharmaceuticals.
  - Nonpharmaceutical dangerous waste.
- If section -555 applies, **only** count nonpharmaceutical dangerous waste to determine generator category.



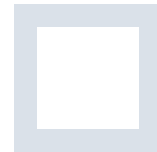
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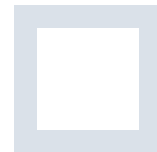
**Examples**



**Management Requirements**



**SQG Management Options**



**Questions**



# Management Requirements Under Section -555

- Designate all waste including pharmaceutical waste.
- Determine applicability of section -555.
- Notification.
- Dangerous Waste Annual Report.
- Types of dangerous waste pharmaceuticals.
- Special on-site pharmaceutical waste management requirements.

# Management Requirements under -555

## NOTIFICATION

- EPA/state ID number.
  - Obtain or update within 60 days if your facility is subject to section -555.
- Check box 18 on the Site ID form to notify Ecology you are a health care facility managing dangerous waste pharmaceuticals under section -555.

# Management Requirements under -555

## REPORTING

- Must file Dangerous Waste Annual Reports.
  - Due March 1 for previous calendar year.
- Check box 18 in the Site ID form for pharmaceutical management under the special requirements in section -555.
- No reporting dangerous waste pharmaceuticals.



# Management Requirements under -555

## TYPES OF DANGEROUS WASTE PHARMACEUTICALS

Two primary categories of waste pharmaceuticals:

- Noncreditable Dangerous Waste Pharmaceuticals.
- Potentially Creditable Dangerous Waste Pharmaceuticals.





# Noncreditable Dangerous Waste Pharmaceuticals

## DEFINITION

- A prescription dangerous waste pharmaceutical that does not have a reasonable expectation to be eligible for manufacturer credit
- or
- A nonprescription dangerous waste pharmaceutical that does not have a reasonable expectation to be legitimately used/reused or reclaimed.



# Noncreditable Dangerous Waste Pharmaceuticals

## CONTAINER MANAGEMENT

- Closed when not in use.
- Structurally sound and non-leaking container.
- Compatible with the contents.
- Labeled or marked “**Hazardous Waste Pharmaceuticals**” or “**Dangerous Waste Pharmaceuticals.**”
- 1-year accumulation time limit.
- Labeled or marked with the date the contents first became waste.
  - Records can also be used to document waste has been on site less than one year.



# Noncreditable Dangerous Waste Pharmaceuticals

## CONTAINER LABEL EXAMPLE

**Hazardous Waste  
Pharmaceuticals**

**Accumulation start date:** \_\_\_\_\_



# Noncreditable Dangerous Waste Pharmaceuticals

## EMPTY CONTAINERS

- Stock, dispensing, and unit dose containers:
  - Considered empty and solid waste when contents are removed using common practices.
  - No destruction or triple rinsing required.
- Syringes:
  - Empty when fully depressed.



# Noncreditable Dangerous Waste Pharmaceuticals

## EMPTY CONTAINERS

- IV bags:
  - Empty when fully administered to patient.
  - May also use “RCRA empty” under 173-303-160(2) if not P-listed AHW or WT01 EHW.
  
- What is “RCRA empty”?

# Noncreditable Dangerous Waste Pharmaceuticals

## EMPTY CONTAINERS

- Other containers:
  - Manage as noncreditable dangerous waste pharmaceuticals.
  - May also use “RCRA empty” requirements under 173-303-160(2) if not P-listed AHW or WT01 EHW.
- Examples of other containers:
  - Aerosol inhaler.
  - Tubes of creams or ointment.

# Noncreditable Dangerous Waste Pharmaceuticals

## DISPOSAL

- Send to designated facility:
  - RCRA permitted treatment, storage, or disposal facility.
- Ship on Uniform Hazardous Waste Manifest.
  - Use “**PHRM**” on item 13.
- Use licensed Hazardous Waste Transporter.
- May accept dangerous waste pharmaceuticals from an off-site “true” SQG health care facilities that are affiliated.

# Noncreditable Dangerous Waste Pharmaceuticals

## CONTROLLED SUBSTANCES CONDITIONAL EXEMPTION

- No sewer disposal.
- Follow Drug Enforcement Administration (DEA) regulations.
- Destroy by either:
  - Combustion at one of five types of incinerators listed in -555(7)**or**
  - A method DEA has publicly deemed (in writing) to meet their non-retrievable standard.

# Noncreditable Dangerous Waste Pharmaceuticals

## CONTROLLED SUBSTANCE SEQUESTRATION SYSTEM

- Provides more secure handling prior to destruction.
- Exempted from many section -555 requirements if only accumulating waste controlled substances.
- Cannot be managed as solid waste.
- Not considered treatment.

# Noncreditable Dangerous Waste Pharmaceuticals

## STATE-ONLY DANGEROUS WASTE ALTERNATE DISPOSAL

### **Counts toward WAC 173-303-555 applicability**

Only for health care facilities managing under section -555:

- Alternative off-site disposal as dangerous waste.
- Have copy of permit or authorization that receiving incinerator can accept this type of waste.
- Manifest not required, but shipments must be documented.
- Not available to SQGs managing dangerous waste pharmaceuticals under WAC 173-303-170.

# Potentially Creditable Dangerous Waste Pharmaceuticals

**A prescription dangerous waste pharmaceutical that has a reasonable expectation to receive manufacturer credit.**

Pharmaceutical must be:

- In original manufacturer packaging (except pharmaceuticals that were subject to a recall)  
**and**
- Undispensed  
**and**
- Unexpired, or less than one year past expiration date.

# Potentially Creditable Dangerous Waste Pharmaceuticals

This does **not** include:

- Evaluated dangerous waste pharmaceuticals.
- Nonprescription pharmaceuticals including, but not limited to:
  - Over-the-counter drugs.
  - Homeopathic drugs.
  - Dietary supplements.



# Potentially Creditable Dangerous Waste Pharmaceuticals

Determine if pharmaceutical is potentially creditable:

- May be sent to reverse distributor.
  - Cannot send any other dangerous wastes.
- May accept potentially creditable from an off-site true SQG health care facilities that are affiliated.

# Reverse Distributor

- Facilitates or verifies manufacturer credit.
- May include:
  - Forward distributors.
  - 3<sup>rd</sup> party logistics providers.
  - Pharmaceutical manufacturer.
- May be different from a DEA reverse distributor.

# Sending to a Reverse Distributor

Health care facility must verify their reverse distributor:

- Has an active EPA/State ID Number.
- Is regulated under:
  - WAC 173-303-555 in Washington state
  - RCRA subpart P, or
  - Equivalent out-of-state dangerous waste pharmaceuticals regulations.

# Consolidation of Pharmaceutical Waste

A health care facility may receive waste pharmaceuticals from off-site a true SQG health care facility for consolidation.

- All health care facilities involved must either be:
  - Under the control of the same person
  - or**
  - Have a contractual or business relationship where the receiving facility supplies pharmaceuticals to the SQG.

# Consolidation of Pharmaceutical Waste

## Receiving facility:

- May consolidate **both**:
  - Noncreditable dangerous waste pharmaceuticals.
  - Potentially creditable dangerous waste pharmaceuticals.
- Must operate under WAC 173-303-555(3)(o) and (4)(b).

# Recordkeeping

RETAIN ALL RECORDS FOR AT LEAST 5 YEARS

- Notification (for as long as subject to section -555).
- Waste determination results.
- Waste shipping records:
  - Uniform Hazardous Waste Manifest.
  - Other shipping paperwork.



# Recordkeeping

RETAIN ALL RECORDS FOR AT LEAST 5 YEARS

- Records of consolidated pharmaceuticals received from off-site a true SQG.
- Reverse distribution records:
  - Shipment records or receipts.
  - Confirmation of delivery within 35 calendar days from the shipment date.





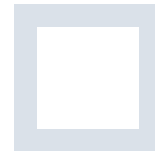
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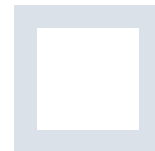
**Examples**



**Management Requirements**



**SQG Management Options**



**Questions**



# True SQG Management Options

Facilities that are below SQG levels after counting all their waste are true SQGs.

- Two management options.
- Examples of the management options.
- Consolidation options for dangerous waste pharmaceuticals.
- Examples of consolidation.



# True SQG Management Options

## QUESTIONS TO CONSIDER

- Are you able to maintain true SQG waste levels?
- Are you part of a larger system with universal company policies?
- Do you want to consolidate your pharmaceutical waste at an affiliated health care facility?



# Gamma Clinic

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ☐ Step 3 - Applicability of Section -555
- ☐ Step 4 - Generator Category



Generated the following waste in a month:

- 115 pounds of dangerous waste pharmaceuticals.
- 10 pounds of aerosol cans.
- 15 pounds of glutaraldehyde.
- 70 pounds of cleaning waste.



# Gamma Clinic

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ☐ Step 4 - Generator Category



- 115 pounds of dangerous waste pharmaceuticals:
  - 1 pound of P042 epinephrine waste (AHW).
  - 4 pounds DW controlled substances.
  - 110 pounds dangerous waste pharmaceuticals including chemo.
- 10 pounds of aerosol cans.
- 15 pounds of glutaraldehyde.
- 70 pounds of cleaning waste.

# Gamma Clinic

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ☐ Step 4 - Generator Category



- 115 pounds of dangerous waste pharmaceuticals:
  - + 1 pound of P042 epinephrine waste (AHW).
    - 4 pounds DW controlled substances.
    - 110 pounds dangerous waste pharmaceuticals including chemo.
  - 10 pounds of aerosol cans.
  - 15 pounds of glutaraldehyde.
  - 70 pounds of cleaning waste.

---

= 1 pound of P-listed AHW in a month.

# Gamma Clinic

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ☐ Step 4 - Generator Category



- + 115 pounds of dangerous waste pharmaceuticals:
  - 1 pound of P042 epinephrine waste (AHW)
  - 4 pounds DW controlled substances.
  - 110 pounds dangerous waste pharmaceuticals including chemo.
- + 10 pounds of aerosol cans
- + 15 pounds of glutaraldehyde
- + 70 pounds of cleaning waste

---

- = 1 pound of P-listed AHW in a month.
- = 209 pounds of DW in a month.

# Gamma Clinic

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- Step 4 - Generator Category



Gamma Clinic is a true SQG since they generated less than:

- 2.2 pounds of P-listed AHW in a month
- and**
- 220 pounds of dangerous waste in a month.

Gamma Clinic can choose either **Option 1** or **Option 2** to manage their dangerous waste pharmaceuticals.

# True SQG Option 1

## Dangerous Waste Pharmaceuticals:

- Manage under the special requirements detailed earlier: WAC 173-303-555.

## Nonpharmaceutical Dangerous Waste:

- Manage all other dangerous waste under the SQG regulations: WAC 173-303-170(2)(a)(i) and -171.





# True SQG Option 1

Health care facilities managing under section -555 cannot send dangerous waste pharmaceuticals to an affiliated health care facility for consolidation.

Dangerous waste pharmaceuticals received and consolidated are required to be counted in your monthly dangerous waste determination.



# Gamma Clinic

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ✓ Step 4 - Generator Category



## Option 1

~~115 pounds of dangerous waste pharmaceuticals (not counted).~~

- + 10 pounds of aerosol cans.
- + 15 pounds of glutaraldehyde.
- + 70 pounds of cleaning waste.

---

- = 95 pounds of DW in a month.

# True SQG Option 2

## Dangerous Waste:

- Manage **ALL** of your dangerous waste under the SQG regulations: WAC 173-303-170(2)(a)(i) and -171.

## Must still follow:

- Sewer prohibition: WAC 173-303-555(6).
- Empty containers: WAC 173-303-555(8).

# True SQG Option 2

## May use optional sections:

- Reverse distribution of potentially creditable dangerous waste pharmaceuticals: WAC 173-303-555(5)(a).
- Conditional exemption for controlled substances: WAC 173-303-555(7).

# True SQG Option 2

## May consolidate pharmaceutical waste at:

- Affiliated health care facilities operating under WAC 173-303-555(3)(o) and (4)(b).
- LQG under control of the same person: WAC 173-303-171(1)(e)(ix).
- Alternate off-site disposal options for state-only dangerous waste pharmaceuticals is not allowed.

# Gamma Clinic

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ✓ Step 4 - Generator Category



## Option 2

- 115 pounds of dangerous waste pharmaceuticals.
    - + 1 pound of P042 epinephrine waste (AHW).
      - 4 pounds DW controlled substances.
      - 110 pounds dangerous waste pharmaceuticals including chemo.
  - 10 pounds of aerosol cans.
  - 15 pounds of glutaraldehyde.
  - 70 pounds of cleaning waste.
- 
- = 1 pound of P-listed AHW in a month.

# Gamma Clinic

- ✓ Step 1 - Designation
- ✓ Step 2 - Count Dangerous Waste
- ✓ Step 3 - Applicability of Section -555
- ✓ Step 4 - Generator Category



## Option 2

- + 115 pounds of dangerous waste pharmaceuticals
  - 1 pound of P042 epinephrine waste (AHW).
  - 4 pounds DW controlled substances.
  - 110 pounds dangerous waste pharmaceuticals including chemo.
- + 10 pounds of aerosol cans.
- + 15 pounds of glutaraldehyde.
- + 70 pounds of cleaning waste.

---

- = 1 pound of P-listed AHW in a month.
- = 209 pounds of DW in a month.

# Consolidation Example: Omega Pharmacy



Omega Pharmacy is the contract pharmacy for the following true SQG clients:

- Speedy Ambulance .
- City's community college (nursing program and health clinic).
- County jail.

## Omega Pharmacy:

- Managing dangerous waste pharmaceuticals under section -555.

## True SQG Clients:

- Managing all dangerous waste under section -170 (Option 2).

WAC 173-303-555(3)(o), (4)(b), and (5)

Image courtesy of freepik. Design created June 4, 2019.

[https://www.freepik.com/free-vector/online-pharmacy-landing-page-template\\_4936620.htm](https://www.freepik.com/free-vector/online-pharmacy-landing-page-template_4936620.htm)





# Consolidation Example: Omega Pharmacy



Omega Pharmacy can only receive pharmaceutical waste for consolidation from their true SQG clients under Option 2:

- Noncreditable dangerous waste pharmaceuticals.
- Potentially creditable pharmaceuticals.
- Omega Pharmacy must manage the consolidated pharmaceuticals under section -555.
- The true SQG facilities **can't** ship dangerous waste to each other.

WAC 173-303-555(3)(o), (4)(b), and (5)

Image courtesy of freepik. Design created June 4, 2019.

[https://www.freepik.com/free-vector/online-pharmacy-landing-page-template\\_4936620.htm](https://www.freepik.com/free-vector/online-pharmacy-landing-page-template_4936620.htm)





**Applicability**



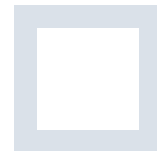
**Examples**



**Management Requirements**



**SQG Management Options**



**Questions**

# Additional Resources

## Ecology Websites

- Dangerous Waste Basics
  - Learn more about designation, counting, and determining generator category
  - <https://ecology.wa.gov/DWBasics>
- Managing pharmaceutical waste
  - Includes link to our Dangerous Waste Pharmaceutical Guide publication
  - <https://ecology.wa.gov/PharmaWaste>

# Additional Resources

## EPA Guidance

- Webinars and FAQs
  - <https://www.epa.gov/hwgenerators/frequent-questions-about-management-standards-hazardous-waste-pharmaceuticals-and#landdisposal>
- Which states have adopted subpart P
  - <https://www.epa.gov/hwgenerators/where-are-management-standards-hazardous-waste-pharmaceuticals-and-amendment-p075#tab-1b>

# Pharmaceutical Dangerous Waste Contact Information

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