

# **UNWANTED RESIDENTIAL MEDICINE COLLECTION EVENTS RECOMMENDED STANDARD OPERATING PROCEDURES**

## **INTRODUCTION AND OVERVIEW**

This standard operating procedure describes the New Hampshire Department of Environmental Services (DES) recommended approach for conducting a residential medicine collection event. These medicines include over-the-counter, prescription and veterinary medicines. Some of the medicines are regulated as “controlled substances” by the United States Drug Enforcement Agency (USDEA). At a collection event, USDEA laws and regulations require that controlled substances be transferred from the individual to a law enforcement officer. Additionally, both controlled substances and uncontrolled substances may be regulated by the NH Hazardous Waste Rules or Solid Waste Rules". This standard operating procedure recommends managing all uncontrolled medicine as hazardous waste. This SOP describes DES's recommended approach for conducting medicine collection events. Documents prepared by the New England Recycling Council (NERC) describe multiple approaches for conducting medicine collection events in various settings. These materials may be found online at [www.nerc.org](http://www.nerc.org) .

This document only describes procedures for collecting unwanted medicine from residential settings. Unwanted medicine that is considered a hazardous waste from clinics, institutions or commercial settings is subject to additional laws and cannot be disposed of at medicine collection events described by this SOP.

DES has developed this document because medicine collection events becoming more commonplace in New Hampshire. Often times, entities sponsoring or organizing the events unknowingly are not complying with various laws pertaining to controlled substances or hazardous waste. DES has also worked with a large advisory committee develop recommendations for the disposal of medicine in residential trash (see [www.xyz.com](http://www.xyz.com)-to be completed).

## **Pertinent Laws**

Federal agencies that regulate the handling and disposal of prescription medicines include the USDEA, the Environmental Protection Agency (USEPA), and the Department of Health & Human Services (USDHHS). The USDEA prohibits the transfer of dispensed controlled medicine from the patient to any entity other than a law enforcement official that is specifically authorized by the USDEA to take possession of the controlled medicine. Thus, it is an absolute necessity that a law enforcement official participate in any medicine collection event.

The New Hampshire Pharmacy Board regulates the dispensing and management of prescription medications. Only the licensed pharmacist, health care provider, patient, or a caregiver for a person may possess prescribed medicine. Therefore, it is absolutely necessary that a pharmacist licensed in New Hampshire participate in any medicine collection event.

The NH Department of Environmental Services regulates the handling, storage and disposal of hazardous waste. Federal hazardous waste laws exempt household generated hazardous waste from regulations that apply to other hazardous waste generators. However, in New Hampshire, once household hazardous waste is collected at a centralized location, it is no longer exempt from the regulations and must be handled, stored, transported, and disposed of in accordance with the New Hampshire Hazardous Waste Rules. DES recommends that all non controlled substances collected at collection events be managed and disposed of as hazardous waste.

## **Management of the Waste**

Controlled medicine collected during an unwanted medicine collection event will be destroyed according to USDEA destruction criteria. Uncontrolled medicine will be managed and disposed of by incineration by a licensed hazardous waste company.

*A very small subset of unused medicine is classified as both hazardous waste and controlled substances. These medicines should not be collected at an unwanted medicine collection event.* Rather, people that attend the event to dispose of this type of medicine should be given instructions on how to dispose of the unwanted medicine that is considered a controlled substance and hazardous waste in their household trash (cite residential disposal policy under development). Disposal of this type of medicine in household trash is exempted from hazardous waste and controlled substance laws and regulations.

**Organizers of unwanted medicine collection events should be aware that by conducting a collection event, they may be a “Hazardous Waste Generator” under New Hampshire state law.** Hazardous waste law and regulations in New Hampshire are different than the federal requirements and the requirements of other states, which may exempt entities conducting household hazardous waste collection events from being considered a hazardous waste generator.

## **STANDARD OPERATING PROCEDURES**

### **I. Planning and Publicity**

- A. Organize a core group for an unwanted medicine collection event that will consist of a supervisor, assistant, and publicity person. Prior to advertising the event, arrange to hire a licensed pharmacist and law enforcement officer. In some cases, pharmacists and law enforcement agencies may offer to volunteer their services.
- B. The supervisor assigns pre-event tasks, which include:
  - i. Selecting the site.
  - ii. Hiring the pharmacist.
  - iii. Contacting the NH Board of Pharmacy ((603) 271-2350) for available pharmacists in the area and ensuring that the pharmacist selected is licensed.

- iv. Contacting the local law enforcement agency to request that one or two officers staff the medicine collection event (see **Appendix A** for example letter to the law enforcement agency).
- v. Hiring a hazardous waste hauler: See **Appendix B**.
- vi. Advertising (see C below).
- vii. Budgeting (see Section II below).
- viii. Finding additional staff and volunteers (see Section III below).

### C. Advertisement and Press Releases

Advertise the event at least one month in advance.

- i. Advertise in local papers, community cable announcements, local radio stations, doctor offices, local pharmacies, transfer stations, community center bulletin boards, town hall bulletin boards, and church bulletin boards, etc. Consider issuing a press release to all of the above entities.
- ii. Involve local pharmacists and have them help advertise the event.

## II. Budgeting

Costs for collection events will vary by location, public participation in the collection event, reliance on volunteers versus paid staff and disposal costs. **Appendix D** provides estimates of disposal costs from a pilot study published by NERC. The following is a list of items associated with a medicine collection event that may incur costs.

- A. Event organization and assistant staff
- B. Licensed pharmacist
- C. Law enforcement officers for security and taking control of controlled substances
- D. Data entry personnel
- E. Hazardous waste hauler/disposal
- F. Controlled substance disposal
- G. Outreach/publicity costs
- H. Supplies (gloves, (see attachment to Appendix D) markers, ziplock bags, trash bags, water)

## III. Assembling the On-Site Team

The additional staff needed for the collection event, and each of their responsibilities should be addressed by the site supervisor and assistant.

- A. Staff Required
  - i. Supervisor
  - ii. Greeter

- iii. Pharmacist
- iv. Law enforcement officer(s)
- v. Data entry person
- vi. Hazardous waste hauler staff

## B. Staff Responsibilities

Any person conducting hazardous waste job functions (i.e., reviewing/signing hazardous waste manifests or sorting and identifying containers as hazardous) must verify they have adequate training in accordance with Env-Hw 509.02(a)(2) if more than 220 pounds of hazardous waste will be collected within a month. If the supervisor is hiring a hazardous waste hauling company, he/she would need to ensure the company and the individual hired are adequately trained. Questions regarding training and the hazardous waste handling rules can be directed to the DES Hazardous Waste Compliance Hotline at 1-866-HAZ-WAST (429-9278).

- i. Supervisor
  - a. Set up collection site
  - b. Assign other staff and instruct them in their responsibilities
  - c. Instruct law enforcement officers about site layout
  - d. Be on-site contact for hazardous waste hauler
  - e. Obtain an EPA ID # (or temporary #) by contacting the DES Reporting and Information Management Section at 271-2921
  - f. Maintain records, including copies of witnessed controlled substances inventory, hazardous waste manifests, custody form from law enforcement officer, worker sign-in sheets
  - g. Sign hazardous waste manifest
  - h. Provide supplies and equipment
  - i. Pay invoices
- ii. Greeter: The greeter is the first point of contact and is responsible for the following:
  - a. Ask people if they have needles (sharps) and instruct them that the only needles acceptable are unused EpiPens. Refer them to DES fact sheet WMD-SW-31 ( <http://des.nh.gov/organization/commissioner/pip/factsheets/sw/documents/sw-31.pdf> ) for information about how to dispose of other types of sharps.
  - b. Provide markers to obscure personal information (names, addresses, and phone numbers) on medicine containers. The drug name and dose must remain visible.
  - c. Direct people to the station for disposing of their medicine.
  - d. Distribute educational materials.
- iii. Pharmacist:
  - a. Determine if a medicine is a controlled substance.



#### IV. Equipment and Material

- A. Personal protective equipment:
  - i. Protective gloves for anyone handling unused medicine.
  - ii. Orange safety vests for traffic control people (if applicable).
  - iii. Safety glasses
  - iv. First aid kits
- B. Permanent black markers for obscuring personal information on containers.
- C. Garbage cans for incidental items mixed in with unused medicines. These may include items like sun block, skin creams, or rigid plastic housing around inhalers.

#### V. Setting Up the Site for the Collection Day

- A. Law Enforcement Officer – He/she should be positioned such that no one can come up behind him/her, and such that he/she has direct visual contact with the individuals dropping off their unused medicine.
- B. The pharmacist, data entry person, and law enforcement officer should be positioned closely enough to verbally communicate for data entry purposes.

The New Hampshire State Police, Bureau of Liquor Enforcement, has DUI Mobile Command Unit that it can make available for medicine collection events. State police requests when the DUI Mobile Command Unit is requested, that local law enforcement officials be involved with the medicine collection event. Contact Sgt. Hutchins at 271-1722 for more information.

#### VI. Packing Medicines for Disposal:

- A. Non-Controlled Substances: Non-controlled substances should be packed for destruction in their original containers. **Inhalers or other medicines in pressurized cans** can be placed in plastic buckets after removing the outer plastic housing, which is put in the garbage. Finally, place the bags and containers in the hazardous waste drum or container. If unidentified medicine is presented for disposal, place it in a sealable bag and mark the bag “unknown”. This medicine should be given to law enforcement officer for disposal with controlled substances
- B. Controlled Substances: Controlled substances should be packed for destruction in their original containers placed in zipper seal bags. The law enforcement agency can advise the staff on marking the bags if necessary. After sealing the bag, packing tape is place over the closure. The law enforcement officer then places a signature and date over the tape seal. From this time forward, the law enforcement officer maintains possession of the controlled substances.

## **VII. Disposal – Transporting and Destruction**

- A. The uncontrolled medicine collected will be transported by the hazardous waste contractor hired for the event for disposal by incineration. **Hazardous Waste Transporters** are listed in Appendix B. For additional information about registered hazardous waste transporters, contact DES at (603) 559-1506.
  
- B. The controlled medicine collected will be transported by the law enforcement officer and managed and destroyed utilizing methods approved by USDEA as described in Section III, B, IV of this document.

**APPENDIX A:  
SAMPLE LETTER TO LAW ENFORCEMENT AGENCY REQUESTING  
PARTICIPATION**

Date

Chief \_\_\_\_\_  
\_\_\_\_\_ Police Department

Address

Town, State, Zip

Subject: Request for Police Participation in an Unwanted Medicine Collection Event  
Location, Town, Date

Dear Chief \_\_\_\_\_:

As we discussed on the phone today, the [*Town, organization or other*] hopes to hold an Unwanted Medicine Collection event in cooperation with [*XYZ Pharmacy*] at [*Location*] on [*Date*] from 9 a.m. to 5 p.m. We will be accepting both controlled and non-controlled medicines for incineration. In order to comply with federal and state laws, a law enforcement officer must be present and take possession of the controlled substances that may be collected. We are asking for the services of [one, two] of your officers to assist us with the collection event. The overall flow of the event will be as follows:

- Individuals will bring in unwanted medicines and hand them to the licensed pharmacist.
- The pharmacist will inventory the medicines (type, dosage, and amount) and make a determination if they are controlled substances.
- If the medicine is a controlled substance, it will be handed to the law enforcement officer to be placed in a designated container.
- At the end of the day, the law enforcement officer will be presented with an inventory of the controlled substances and be asked to sign copies of the document certifying to having received the medicines. It will be witnessed by the pharmacist.
- The law enforcement officer will then take the controlled substances back to the police station and place them, along with the inventory, in a locked storage area.
- The medicines should then be destroyed in accordance with USDEA requirements.

Due to the nature of the event, and wanting to be sure that everything runs as smoothly as possible, we ask that the law enforcement officer(s) be on-site one-half hour before the official opening of the event, and that they stay one-half hour after the close of the event. We propose to compensate for the outside overtime from 8:30 a.m. to 5:30 p.m. If extra time is incurred due to unforeseen circumstances, we will pay for that time as well. We understand the hourly outside overtime rate is \$\_\_\_\_\_ per hour.

I look forward to hearing back from you on this matter. If you have any questions, I can be reached at (phone number and/or email). I look forward to working together on this important project.

Sincerely,

Name,  
Title



## Hazardous Waste Contractors

<p><b><u>Enpro Services, Inc.</u></b>            12 Mulliken Way            Newburyport, MA 01950            (800) 966-1102            Danny Rogers</p>	<p><b><u>Clean Harbors</u></b>            20 Dunklee Road            Bow, NH 03304            (800) 640-6478            Bill Moar</p>	<p><b><u>Clean Venture, Inc.</u></b>            378 Page St, Unit 6            Stoughton, MA 02072            (508) 344-8880            Ed Price</p>
<p><b><u>Care Environmental</u></b>            10 Orben Drive            Landing, NJ 07850            (800) 494-2273            Mark Kodrowski</p>	<p><b><u>CYN Environmental</u></b>            8 Progress Drive            Dover, NH 03820-5450            (800) 417-7455            Jim Bell</p>	<p><b><u>General Chemical Corp</u></b>            133 Leland Street            Framingham, MA 01702            (508) 872-5000 x109            John McDonald</p>
<p><b><u>Heritage Environmental Services</u></b>            2 Avenue D            Williston, VT 05495            (802) 860-1200            Andy Johnson</p>	<p><b><u>Veridium</u></b>            461 Cooke Street            Farmington, CT 06032            (800) 585-7916            Jim Green</p>	<p><b><u>Safety-Kleen</u></b>            28A Brigham Street            Marlborough, MA 01752            (508) 481-3116            221 Sutton Street            North Andover, MA 01845            (978) 683-1002</p>
<p><b><u>United Industrial Services</u></b>            410 Shattuck Way            Newington, NH 03801            (888) 276-0887</p>	<p><b><u>Triumvirate Environmental</u></b>            P.O. Box 136            Somerville, MA 02143            (800) 966-9282            Wayne Griffith</p>	<p><b><u>Veolia Environmental Services</u></b>            749 Spruce Pond Drive            Strafford, NH 03884            (603) 664-5218            (800) 354-2382 x4808            Paul Cless</p>

This is not necessarily a complete list of all facilities or vendors available, nor does it imply endorsement from the New Hampshire Department of Environmental Services. This list is merely offered as a reference to people in search of hazardous waste disposal options.

**APPENDIX C  
ADVERTISING FLIERS**

**Do you have unwanted medicines around your home?**

**Help protect your family, community and the environment by  
properly disposing of them.**

**FREE UNWANTED/EXPIRED MEDICINE COLLECTION**

**DAY of Week, Month, day, year  
Time**

**LOCATION**

**WHAT TO BRING TO THE COLLECTION:**

**Expired or unwanted medicine  
Over-the-counter medicines  
Unknown tablets or capsules**

**For more information call  
(XXX – XXX – XXXX)**

## APPENDIX D – COSTS

Excerpted from Northeast Recycling Council (November 2008) *Best Management Practices for Holding Unwanted Medication Collections*

**Hazardous Waste Disposal:** Overview of pilot collections (2005 – 2008)

Pilot Location	Number of Participants	Average volume in gallons per participant	Average cost per gallon destruction on non-controlled substance	Hazardous Waste Transportation Fee
CVS Pharmacy-Portland, ME (2/2005)	51	0.77	\$24	\$250
CVS Pharmacy-Simsbury, CT (9/2006)	49	1.20	\$11	\$100
Big Y Pharmacy-Tolland, Ct (9/2007)	15	1.67	\$19	\$200
Ukrop's Pharmacy-Richmond, VA (9/2007)	17	0.97	\$41	\$220
CVS Pharmacy-Windsor, CT (4/2008)	122	1.48	\$14	\$210
Eaton Apothecary-Wellesley, NA (6/2008)	41	0.84	\$16	\$250
Eaton Apothecary-Wellesley, MA (10/2008)	80	0.9	\$12	\$250
<b>AVERAGE</b>	<b>54</b>	<b>1.1</b>	<b>\$20</b>	<b>\$211</b>

**Law Enforcement:** The hourly rate paid for law enforcement varied by jurisdiction, but the average cost is estimated at \$46 per hour. In addition to the on-site hours, charges may include travel time, and the activity of putting the medications in evidence storage.

**Pharmacist:** The average salary for pharmacists in New Hampshire in 2008 is \$65 per hour (cited by the NH Board of Pharmacy).

**Controlled Substance Destruction:** Law enforcement agencies did not charge for the cost of destroying the controlled substances. The volumes were low and in many cases, another agency was responsible for the actual destruction of controlled substances.

**Advertising:** The amount and type of advertising is event-specific, but in general, the costs are low.

**Staff Time:** Planning for and implementing an unwanted medicine collection is time-consuming. The key factors are securing law enforcement and a pharmacist. Once this is accomplished, the rest of the event is easy to plan, organize, and implement. Much of the work may be carried out by volunteers, but the supervisor role should be considered a paid position. The cost will be activity specific.

**Supplies:** Assuming that the majority of supplies are materials that are already on hand or can be readily borrowed, such as tables, chairs, laptop computer, printer and office supplies, the cost of supplies should be minimal. Providing water and disposable gloves will likely be the major costs (see following pages).

Developing partnerships with pharmacies, police departments, hospitals, and other agencies may help to defray costs.

## APPENDIX E

### EXAMPLE INVENTORY SPREADSHEET FOR UNWANTED MEDICINE COLLECTION

Federally Controlled Substance Received		
Date		
Received by: Name & Signature of Law Enforcement Officer		
Witnessed by: Name and Signature of Pharmacist		
MEDICINE	DOSAGE	AMOUNT
Acetaminophen/codeine	#3	62 Tablets
Alprazolam	0.25 mg	30 Tablets
Ambien	10 mg	198 Tablets
Clonazepam	0.5 mg	177 Tablets
Codeine sulphate	30 mg	49 Tablets
Concerta	27 mg	6 Tablets
Darvocet	100 mg	6 Tablets
Diazepam	5 mg	2 Tablets
Duragesic	75 mcg	1 Tablet
Endodan	4.88/325	42 Tablets

Non-Controlled Substance Received		
Date		
Witnessed by: Name and Signature of Pharmacist		
MEDICINE	DOSAGE	AMOUNT
Acetaminophen	325 mg	3 Tablets
Asiphex	20 mg	9 Tablets
Advil	200 mg	39 Tablets
Advil children's liquid	1 oz	0.5 fluid oz
Alfrin spray		5 ml
Antibiotic ointment		½ oz
Clobetasol	0.05%	30 g
Flonase	50 mcg	9 g
Imodium ad	2 mg	21 Tablets
Tiotropium Bromide Inhalation Powder		2 blisters