

Best Management Practice Recommendations for the Disposal of Unwanted Medications Not Controlled by the U.S. DEA, Generated at Consumer Collection Programs

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Advisory Committee of the Unwanted Medications Collection Pilot Project, Northeast Recycling Council, Inc., with funding from the U.S. EPA and USDAⁱ

Introduction

When deciding how best to dispose of collected unwanted medications, several factors should influence the decision making process. Naturally, cost will be one factor. But when making a decision about which strategy to use in your community, be sure to evaluate whether an incinerator or landfill is permitted to handle medications; and if so, under what conditions.

It is also important to be able to track the unwanted medications from the point of collection through disposal. Due to the increased value and attractiveness of diverting medications to other users and uses, there is a growing concern about theft. As a collected material, it may appear to be a particularly “attractive” waste to scavenge. Precautions should be taken.

The disposal hierarchy that follows is based on the following essential criteria:

1. Controlled substances are separated from the medications before being shipped for disposal, and there are no controlled substances knowingly included.
 - **A U.S. DEA controlled substance is a drug which because of its abuse potential is regulated by the federal Drug Enforcement Administration.** Because of this, controlled substances cannot be accepted by anyone other than a law enforcement official at a collection site, and are subject to specific federal disposal regulations; including witnessed destruction.
2. Under all circumstances, state and federal drug management and disposal regulations, as well as solid waste management and disposal laws and permits must be observed.

Recommended Best Management Practices for the Disposal of Non-Controlled Substancesⁱⁱ

BEST: Hazardous waste incineration

Second Best: Municipal solid waste incineration facility, as long as the facility has an operating permit that permits the incineration of waste pharmaceuticals. This option is based on the assumption that the State in which the medication was collected and will be disposed regards household generated hazardous waste as excluded from RCRA and state hazardous waste regulations.

Not a Best Management Practice, but if no other available option

Solid Waste Landfill: As long as the facility's operating permit allows for the disposal of pharmaceuticals. In order to prevent diversion or theft, the containers should be immediately made non-recoverable, such as buried upon receipt, or a like-procedure appropriate to the specific facility. Again, the assumption is made that the states of origin and disposal regard household generated hazardous waste as excluded from RCRA regulations, including Land Disposal Restriction Forms.

NEVER! Flush it down the drain or toilet.

ⁱ These recommendations are *not* those of these Agencies.

ⁱⁱ Other destruction options may be available, but due diligence would be required to assess the level of destruction and compliance with federal and state regulations.