



# Hazardous Waste Self Audit

Section: Pharmaceuticals for Reverse Distribution

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### Self-Audit Tips, Action Steps & Resources

#### Hazardous, infectious and dual waste pharmaceuticals

This section covers pharmaceuticals from your emergency kits, pharmacy, clinic(s) and/or over-the-counter drugs. If you have a clinic, please note that infectious waste (biohazardous, sharps, red bag or regulated medical waste) is not the same as hazardous waste. Each have separate waste disposal requirements. If your clinic generates hazardous waste pharmaceuticals, you will need to keep them in separate containers from your infectious wastes.

However, there are times when a waste can be both. In Minnesota this waste is called Dual Hazardous/Infectious Waste. Dual waste must be placed in a container designed for dual waste and not a red infectious waste container.

#### Reverse distribution for controlled substances

Any expired or unused pharmaceuticals that are classified as DEA Controlled Substances can go back to reverse distribution for destruction. Your facility will be notified by the county if there are any changes to these guidelines.

#### For more information

See *Reverse Distribution of Non-Controlled Substance Pharmaceuticals* at [www.pca.state.mn.us/publications/w-hw3-36b.pdf](http://www.pca.state.mn.us/publications/w-hw3-36b.pdf).

← Refer to the tips, action steps and resources to help you complete the audit.

### 1. Does your business return unused and/or expired pharmaceuticals to manufacturers or reverse distributors?

- Yes. List the name, phone number and address of the reverse distributor(s):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Unused and/or expired pharmaceuticals in their original containers can be returned to manufacturers or reverse distributors.
- Leaking containers, partially used liquids or paste, or pharmaceuticals that are inherently waste-like or exhibit characteristics that preclude their beneficial reuse as products and are determined to be hazardous waste must be managed as hazardous waste by your business and must not be returned to the manufacturer or reverse distributor.
- Reverse distributors typically send an itemized return invoice that lists pharmaceuticals that were disposed of as hazardous waste. Keep these records on site and available for review for three years.

- No, this business does not return pharmaceuticals to a reverse distributor.

### 2. Pharmaceuticals that may not go to a reverse distributor.

- I understand that pharmaceuticals that meet the following descriptions are hazardous waste and must be disposed of through a permitted hazardous waste disposal company and not a reverse distributor.

Pharmaceuticals that:

- Are unlabeled, unidentifiable or are in a damaged/leaking container.
- Are contaminated or mixed inseparably with other pharmaceuticals or other product.
- Have been dispensed to a customer or released from the control of the pharmacy.
- Were repackaged by the pharmacy.
- Do not meet reverse distributor's return criteria.
- Are a sample.
- Are expired.

# Section: Pharmaceuticals for Reverse Distribution *(continued)*

## Instructions for filling out the Management Plan Form 2

**B. Four-digit hazardous waste code:** Some common waste codes for pharmaceuticals include:

- D001: Aerosols, pharmaceutical containing more than 24 percent alcohol
- D009: Thimerosal preserved pharmaceuticals such as flu vaccines
- D011: Silver-containing creams
- D024: Creosol preserved pharmaceuticals such as insulin
- MN01: All unevaluated waste pharmaceuticals

**C. Year waste first generated:** Estimate if unknown.

**D. Shipment or treatment frequency:** For example: 2 times per 1 year. Write “to be determined” if you are unsure how often the waste will be disposed.

**G. Type of waste storage container:** Storage containers must be:

- Compatible with the waste (will not react with, be affected by, or absorb contents)
- Sturdy and leak-proof (will not leak when overturned or bumped)

**I. Amount generated per year:** Estimate the amount generated annually if unknown..

**\*L./M./N./O. Transporter/ Disposer:** See *Hazardous Waste Disposal Companies* factsheet to find a transporter and disposer. Download at [www.hennepin.us/hazwastedisposalcompanies](http://www.hennepin.us/hazwastedisposalcompanies).

Contact your hazardous waste transporter/disposer for their EPA ID number.

## Management Plan Form 2 — Pharmaceuticals for Reverse Distribution

Report how you manage or will manage your wastes. Call 612-348-3777 for assistance.

← Refer to the instructions for more information.

**A. Waste name:** Expired or Unused Pharmaceuticals

**B. Four-digit hazardous waste code:**  D001  D009  D011  D024  MN01

**C. Year waste was first generated at the site under current ownership:** \_\_\_\_\_

**D. Frequency of shipment or treatment:** \_\_\_\_\_ times per \_\_\_\_\_ year

**E. Source or process of generation (check all that apply):**

- Expired  Partially used  Unusable medications  
 Other (specify): \_\_\_\_\_

**F. On-site management of waste (select one):**

- Stored for shipment (*You ship or will ship your waste to a disposal or recycling facility*)  
 Other (specify) \_\_\_\_\_

**G. Type of waste storage container(s):**

- Drum  Pail  Original container  
 Other (specify) \_\_\_\_\_

**H. On-site storage location of the waste:**  Indoors  Outdoors  N/A

**I. Amount generated per year:** \_\_\_\_\_ gallons or \_\_\_\_\_ pounds

**J. Check that you understand and follow the requirements for proper labeling and storage:**

- Labeled with a clear description of the waste (e.g., Pharmaceuticals for Reverse Distribution)

**K. Disposal facility management method** (*contact your disposal company if unknown*)

- Incinerate  
 Other (specify) \_\_\_\_\_  
 Have not identified a disposal company

**L. Transporter name\*:** \_\_\_\_\_

- or  Self  
 To be determined\*

**M. Transporter EPA ID number:** \_\_\_\_\_

**N. Disposer name\*:** \_\_\_\_\_

- or  To be determined\*

**O. Disposer EPA ID number:** \_\_\_\_\_

### Office use only

Phys. state:

Inv. ID:

Date entry & initials:

Storage container:

Billing code:

Disposal method:

Waste inactive: