

New Washington Interim Policy On Handling Pharmaceutical Wastes

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Washington Department of Ecology has developed an interim policy for generators of pharmaceutical wastes which could be classified as “dangerous waste” under State rules. The State has enacted this policy pending US EPA finalizing federal rules to streamline handling and disposal of these wastes. Once the EPA rule is finalized, Ecology expects to adopt the federal rule.

What are the generator requirements under the interim Ecology policy?

All generators of pharmaceutical wastes which could be classified as “dangerous waste” under State rules are required to manage wastes as follows:

Profile Your Waste.

You are required to complete a pharmaceutical waste profile by determining the waste codes that apply to pharmaceutical waste at your facility and representative percentage range by weight for each waste pharmaceutical.

Notify Ecology.

All generators of pharmaceutical waste need to send notification to Ecology indicating that your facility is managing pharmaceutical waste under this policy, include a copy of completed profile(s). The notification must be signed by the pharmacy manager and the environmental manager.

Staff Training.

All staff involved in pharmaceutical waste management must be trained. Training must cover appropriate safety and emergency procedures, proper waste management, and recordkeeping.

***Certain
Pharmaceutical
Wastes Can Be
Regulated as
“Dangerous Wastes”
By The State Of
Washington***



Accumulate Waste.

You must accumulate pharmaceutical waste in a manner that reduces accidental releases and provides reasonable protection for safety, security, and the environment. You must:

- Place absorbent material in the bottom of containers storing liquid waste.
- Use containers compatible with their contents.
- Do not mix or store incompatible wastes in the same container.
- Keep accumulation containers closed unless adding or removing waste.
- Keep spill cleanup materials and personal protective equipment on-site.
- Label containers with the words "Non-Viable Hazardous Pharmaceutical Waste."
- Label containers with all appropriate risk labels such as "Ignitable", "Corrosive", or "Toxic."
- Label containers with an accumulation start date. The start date begins when the first item is placed in the container.
- Limit accumulation to 180 days.

Shipping.

You are required to segregate and package pharmaceutical waste according to the U.S. Department of Transportation (DOT) regulations for shipment of hazardous materials (HazMat). As per DOT regulation, persons preparing shipments and signing shipping papers must be [DOT HazMat trained](#).

Disposal of Waste.

You must manage all pharmaceutical waste according to the policy or the Dangerous Waste Regulations. Pharmaceutical waste managed under the policy must be incinerated at a RCRA permitted incinerator, or state-only pharmaceutical waste may be incinerated according to the policy or the conditional exclusion. Under the Dangerous Waste Regulations, pharmaceutical waste must be sent to a RCRA permitted incinerator on a Hazardous Waste Uniform Manifest, except Small Quantity Generators are not required to use a manifest and have additional disposal options.

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