



# TREATMENT BY GENERATOR

Treatment-Specific Guidance

## Pharmaceutical Waste

Fact Sheet 14-04-009

March 2014

This document is for generators interested in treating their dangerous waste pharmaceuticals on site in accumulation containers. Following the standards in this fact sheet and the Technical Information Memorandum (TIM) #96-412, [Treatment by Generator](#), meets the requirement of the [Dangerous Waste Regulations, Chapter 173-303 WAC](#) (Ecology publication #92-91) without a permit or other written approval necessary.

Pharmaceutical waste treated under treatment by generator (TBG) guidance cannot be managed under the [Interim Enforcement Policy for Pharmaceutical Waste in Healthcare](#) (Ecology pub. #07-04-024).

### Description and Definition

**Dangerous waste pharmaceuticals:** A pharmaceutical that can no longer be used for its intended purpose, sold, or returned to the manufacturer, wholesaler, or reverse distributor for credit. This may include, but is not limited to:

- Expired pharmaceuticals
- Outdated items repackaged at the pharmacy
- Dropped pills
- Partial IVs
- Ampoules ointments
- Creams
- Lotions and inhalers
- Patient medications left at the hospital
- Samples

Each pharmaceutical has its own inherent chemical and/or physical properties. Treatment is processing dangerous waste pharmaceuticals to make them:

- Non-dangerous or less dangerous
- Safer to transport
- Reduced in volume
- More amenable to store

This includes treatment that satisfies the Drug Enforcement Administration's (DEA) requirements for controlled substances.

### Treatment Methods

Treatment methods for dangerous waste pharmaceuticals could include, but are not limited to:

- Chemical digestion
- Solidification

## Treatment Requirements

Generators must meet all requirements of the TBG guidance unless otherwise specified below.

1. Secure containers of dangerous waste pharmaceuticals and use only for waste pharmaceuticals.
2. Pharmaceuticals can't be accessed or retrieved by unauthorized personnel while being accumulated in a container.
3. Count dangerous waste pharmaceuticals toward generator status *prior* to treatment. Any dangerous waste residues from treatment must also be counted toward generator status. For counting purposes, weigh the container prior to use and again after it is full. The difference is the weight of the waste.
4. A generic profile to determine the designation of the contents of the container may be used to obtain applicable waste code(s). For more information about profiling your waste see [Pharmaceutical Waste Profiling and Notification](#), publication 07-04-026.
5. Containers must be closed at all times, except when adding waste pharmaceuticals. This reduces the potential for employee exposure, spills, and mismanagement. Containers must have lids attached and in place. They do not need to be sealed if:
  - a. The container is mounted to the wall or other permanent, non-mobile structure to prevent spills and;
  - b. No volatiles are emitted from the container to present an inhalation or ignition hazard.
6. All containers must be labeled or marked with:
  - a. The words "Dangerous Waste" or "Hazardous Waste," and;
  - b. The primary risk of the wastes in the container (e.g., Toxic, Ignitable).
7. Don't place incompatible dangerous waste pharmaceuticals in the same container.
8. Treatment by solidification must comply with the guidance in the Treatment-Specific Guidance: [Solidification](#) (Pub. #96-416).

## Ecology Assistance

For assistance, please contact a hazardous waste specialist at your regional Ecology office:

### **Southwest Regional Office, 360-407-6300**

Serving counties: Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, and Wahkiakum

### **Central Regional Office, 509-575-2490**

Serving counties: Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, and Yakima

### **Northwest Regional Office, 425-649-7000**

Serving counties: Island, King, Kitsap, San Juan, Skagit, Snohomish, and Whatcom

### **Eastern Regional Office, 509-329-3400**

Serving counties: Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, and Whitman

Or visit Ecology's website at

[www.ecy.wa.gov/programs/hwtr/manage\\_waste/treatment\\_by\\_generator.html](http://www.ecy.wa.gov/programs/hwtr/manage_waste/treatment_by_generator.html)

*To request this document in a format for the visually impaired, call the Hazardous Waste and Toxics Reduction Program at 360-407-6700. Persons with hearing loss, call 711 for Washington Relay Service. Persons with a speech disability, call 877-833-6341.*