

# Guidelines for Household Pharmaceutical Waste Collection Programs



Department for Environmental Protection

## Collecting and Disposing of Household Pharmaceutical Waste

The Kentucky Department for Environmental Protection (DEP) offers the following guidance regarding the proper collection and disposal of household pharmaceutical waste. Household pharmaceutical waste must always be managed in a manner that prevents a release into the environment.

### Household Pharmaceutical Waste Collection Centers

Collection centers of household pharmaceutical waste are not required to register with the Division of Waste Management as a hazardous waste generator, solid waste transfer station or a convenience center provided the following management practices are met:

1. Only pharmaceuticals from households may be accepted at the collection center. This includes pharmaceuticals collected from residents of long-term care facilities.
2. Pharmaceuticals from commercial or industrial locations or institutions such as pharmacies, hospitals, clinics and doctor's offices may not be accepted at the collection center.
3. Collected household pharmaceutical waste may not be mixed with any other hazardous waste. To prevent the possibility of becoming subject to additional environmental requirements, it is recommended that you do not mix collected household pharmaceuticals with any other waste stream, including confiscated pharmaceuticals, contraband or evidence.



### Disposal Options for Collected Household Pharmaceutical Waste

#### Contained Landfills

DEP strongly encourages household pharmaceutical collection programs to dispose of household pharmaceutical waste in a solid waste-contained landfill. Because most solid waste-contained landfills are not permitted to accept bulk liquid waste, you should solidify any liquids over one quart in volume before disposal. To solidify waste, mix 1 part liquid to 2 parts kitty litter, sawdust, sand or any other inert material in a large container prior to transport and disposal in the landfill.

#### Flushing

DEP strongly discourages the disposal of household pharmaceutical waste via flushing. Wastewater treatment plants are not designed to remove pharmaceutical contaminants. These contaminants pass through to Kentucky's water resources and have the potential to impact human health and the environment.

#### Open Burning

Open burning of collected household pharmaceutical waste is prohibited. While open burning of confiscated marijuana is allowed under state open burning regulations, this does not apply to confiscated drugs that are nonvegetative, such as pills, liquids, etc.

#### Incineration Via a Permitted Incinerator

It is illegal to burn or incinerate collected household pharmaceutical waste in an unpermitted incinerator. Collected household pharmaceutical waste can be disposed of in a permitted hazardous waste incinerator or in a permitted solid waste incinerator, provided that the incinerator has permission to accept household pharmaceutical waste. Human and animal crematoriums are classified as incinerators.

The Department for Environmental Protection (DEP) encourages entities to contact their solid waste coordinator when establishing and operating a household pharmaceutical waste collection program. A list of all solid waste coordinators can be found on the [Division of Waste Management website](#).

For a list of DEP-permitted, contained landfills, visit the [Division of Waste Management website](#).

## DEP Agency Contacts

Division for Air Quality  
Attn: Kevin Flowers  
200 Fair Oaks Lane  
First Floor  
Frankfort, KY 40601  
502-564-3999 (Telephone)  
502-564-4666 (Fax)  
[www.air.ky.gov](http://www.air.ky.gov)

Division of Compliance Assistance  
300 Fair Oaks Lane  
Frankfort, KY 40601  
502-564-0323 (Telephone)  
502-564-9720 (Fax)  
Email: [envhelp@ky.gov](mailto:envhelp@ky.gov)  
[www.dca.ky.gov](http://www.dca.ky.gov)

Division of Waste Management  
Solid Waste Program  
Attn: Ron Gruzesky  
200 Fair Oaks Lane  
Second Floor  
Frankfort, KY 40601  
502-564-6716 (Telephone)  
502-564-4049 (Fax)  
Email: [waste@ky.gov](mailto:waste@ky.gov)  
[www.waste.ky.gov](http://www.waste.ky.gov)

Division of Waste Management  
Recycling and Local Assistance  
(Household Hazardous Waste  
Collection Grants)  
Attn: Cathy Guess  
200 Fair Oaks Lane  
Second Floor  
Frankfort, KY 40601  
502-564-6716 (Telephone)  
502-564-3492 (Fax)  
Email: [waste@ky.gov](mailto:waste@ky.gov)  
[www.waste.ky.gov](http://www.waste.ky.gov)

Division of Water  
200 Fair Oaks Lane  
Fourth Floor  
Frankfort, KY 40601  
502-564-3410 (Telephone)  
502-564-0111 (Fax)  
[www.water.ky.gov](http://www.water.ky.gov)



## DEA Contacts

### [DEA Office Locations](#)

#### DEA Field Offices

Lexington, Ky. 859-977-6100  
London, Ky. 606-862-4500  
Louisville, Ky. 502-582-5908  
Madisonville, Ky. 270-821-6899

# BEST MANAGEMENT PRACTICES

The following are best management practices guidelines for the proper operation of a household pharmaceutical collection program. These are in addition to the regulatory requirements of the Department for Environmental Protection.

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To avoid additional regulatory requirements

- Only the following items should be accepted at collection centers:
  - Prescription Medications (consumer should black out contact information)
  - Over-the-Counter Medications
  - Pet Medications
  - Medicated Ointments, Lotions and Creams
  - Liquid Medication in Plastic Containers
  - Vitamins
  - Inhalers
- The following items should not be accepted at collection centers:
  - Sharps: Needles and Syringes (may have separate collection location on-site)
  - Thermometers
  - Aerosol Cans
  - Medication Waste Items, such as IV Bags, Used Bandages, Empty Containers
  - Chemicals or Disinfectants
  - Personal Care Products
  - Pharmaceuticals from commercial or industrial locations or institutions, such as pharmacies and hospitals

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To prevent leachate (wastewater) contamination in the landfill, the collected pharmaceuticals should immediately be made nonrecoverable. Take the following precautions:

- Dissolve all pharmaceuticals in water,
- Solidify (kitty litter or sawdust),
- Place solidified contents in a sealed container prior to transport and disposal in the landfill.

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Collection centers should work closely with the Drug Enforcement Administration (DEA) to ensure compliance with DEA regulations. A brief overview is given below:

- Law enforcement agencies are the only allowed locations for collection containers.
- Law enforcement agencies must reapply annually with DEA for collection approval prior to establishing a permanent collection program.
- The collection center should use a secure collection container to prevent theft and any release of collected household pharmaceutical waste to the environment.
- The collection center should provide proper oversight of collection containers (may include electronic surveillance) to prevent theft and ensure proper use of containers.

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Collected household pharmaceutical waste should not be mixed with any other hazardous waste or solid waste stream, such as confiscated pharmaceuticals or evidence.

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The collection centers should provide clear signage at drop-off locations to ensure that only household pharmaceuticals are accepted.

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The collection container should be lined with a plastic liner in order to prevent release to the environment and ensure easier transport to main accumulation container.

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Collection centers should work with the Department of Transportation (DOT) to ensure compliance with DOT regulations when transporting collected household pharmaceutical waste.

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Collection centers should dispose of household pharmaceutical waste in a DEP/EPA-permitted disposal facility.

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Collection centers should maintain records to show compliance with state and federal requirements. This may include:

- Amounts of pharmaceuticals collected
- Date of disposal
- Location of disposal
- Witness of disposal

# INCINERATORS

## Guidance on Obtaining DEP Permits for a Household Pharmaceutical Waste Incinerator

### **Incineration is not the preferred method of disposal for household pharmaceutical waste.**

Prior to construction and operation of an incinerator for the purpose of disposing of household pharmaceutical waste, the owner/operator must obtain permits from the Division for Air Quality and the Division of Waste Management's Solid Waste program.

#### Division for Air Quality

1. The owner/operator of the incinerator must submit an air permit application to the Kentucky Division for Air Quality using the DEP 7007 series of air permit application forms, per 401 KAR 52:040.
2. The owner/operator must comply with 401 KAR 59:021 New Municipal Waste Incinerators when operating a solid waste incinerator.
3. The owner/operator must comply with 401 KAR 63:020 Potentially Hazardous Matter or Toxic Substances when selecting and operating a unit.
4. The owner/operator must comply with 401 KAR 59:010 New Process Operations for Particulate Matter Emissions when operating a

unit.

5. The owner/operator of the incinerator must meet the standard of 40 CFR 60 Subpart EEEE for Other Solid Waste Incinerator Units:
  - Preconstruction siting analysis
  - Waste management plan
  - Operator training and qualification
  - Emission limitations and operating limits
  - Performance testing
  - Initial compliance requirements
  - Continuous compliance requirements
  - Monitoring
  - Recordkeeping and reporting

#### Division of Waste Management

1. The owner/operator of solid waste incinerators must obtain a solid waste permit from the Kentucky Division of Waste Management.
2. Before the owner/operator submits a permit application to the Division of Waste Management, the proposed incinerator must receive a local determination from the local solid waste governing body of the county or counties in which the incinerator will be operated.
3. The ash resulting from the incineration of household pharmaceutical waste can be disposed of in a landfill providing it is not mixed with any hazardous waste.

## ENFORCEMENT OF EXISTING INCINERATORS

In the course of preparing this guidance, DEP became aware that there may be a small number of portable incinerators operating in the Commonwealth that are not adequately permitted.

While the department does not have any data that indicates these units are posing any harm to either human health or the environment, it is necessary for them to be properly authorized in compliance with environmental law. To provide a reasonable amount of time to allow these units to become properly permitted, DEP will apply its enforcement discretion and allow any incineration units used to dispose of household pharmaceuticals that were in operation on March 1, 2012 to continue operation until March 1, 2013. After March 1, 2013, these units may continue to be operated only if they have been permitted by the department. This interim period will enable facilities to work with the department to bring these incineration units into compliance or find alternative disposal options. During the interim period, owners of these units will be expected to operate the units in a manner that does not pose a threat to either human health or to Kentucky's environment.