
SUBJECT:	Pharmaceutical Waste	Number:	EHS-007
CATEGORY:	Medical Waste Management	Last Update:	05-31-2018
ISSUING OFFICE:	Environmental Health & Safety (EHS) Office	Revision Date:	05-31-2019

Guidelines for Managing Pharmaceutical Waste

DESCRIPTION

“**Pharmaceutical**” means a prescription or over-the-counter drugs. Pharmaceutical includes student medications brought to school sites, and medications available at/dispensed from the school site’s health office. Present District policy requires school sites to return student medications back to the students’ families at the end of the school year. Environmental regulations prohibit the disposal of medications into the sewer and trash. Any medication must be disposed of in accordance with federal, state and local regulatory requirements.

LEGAL BASIS

This guideline has been established and maintained within the District for all employees to comply with requirements set forth in Sections 117600-118360 of the California Health and Safety Code known and cited as the Medical Waste Management Act (MWMA), revised January 2017; Section 609 of the California Code of Regulations, Title 5 known as Education Code; the state of California Program Advisory on Medication Administration issued pursuant to Education Code; Section 173.6 of Title 49 of the Code of Federal Regulations, known and cited as Materials of Trade Exceptions, and Section 1201-1211 of the San Diego County Ordinance 9967.

GENERAL PROCEDURE

All student medications must be returned to the parent or guardian at the end of the school year. If parent or guardian does not arrange to pick up student medications on the last school day, student medications will be properly discarded. All unclaimed, discontinued, outdated, and unused medications should not be disposed of in school trash or flushed down the toilet. For the health and safety of all students, medications should not be sent home with students.

WASTE CATEGORIZATION

- To categorize the pharmaceutical wastes generated at the school site, health staff shall segregate and separate according to the following:
 - a. Pharmaceutical wastes classified by the federal Drug Enforcement Agency (DEA) as “**controlled substances**”, which shall be disposed of in compliance with DEA requirements coursed through the School Police Services. Complete the Controlled Substance Waste

Tracking Document (see Attachment A, Page 4) and follow the instructions at the bottom of the document.

- b. **Used epinephrine auto-injectors and glucagon kits**, which shall be placed in the sharps container in compliance with the District's Sharps Waste Management Program.
- c. **All other prescription or non-prescription and herbal pharmaceuticals in any form:** caplets, tablets, pills, suppositories, liquids, suspensions, drops, inhalers, ointments, gels, creams, unused epinephrine auto-injectors and glucagon kits, which shall be disposed of in compliance with MWMA requirements coursed through the EHS Office. Complete the Pharmaceutical Waste Tracking Document (see Attachment B, Page 5) and follow the instructions at the bottom of the document.
- d. Do not include mercury thermometers and other mercury containing devices that are not allowed at school sites, contact the EHS Office immediately.

CONTAINMENT & STORAGE

To containerize or store **all other prescription or non-prescription and herbal pharmaceutical wastes**, nurse or health staff should follow these instructions:

- Always keep medications in their original manufacturers containers
- Secure pharmaceutical wastes from access by unauthorized individuals (i.e. locked cupboard/cabinet)
- Contact EHS Office to provide pharmaceutical waste packaging material
- Place pharmaceutical wastes into a leak-proof, rigid container with tight-fitting lid/cover, which meets Food and Drug Administration (FDA) compliance like in Figure 1.
- Affix the label (see Attachment C, Page 6) on the lids and sides of the container so as to be visible from any lateral direction as described below:
 - Words "**PHARMACEUTICAL WASTE**" and "**HIGH HEAT**" or "**INCENERATION ONLY,**" and
 - School Name and Address, Phone Number and Accumulation Start Date
- Store no longer than 90 days when the container is ready for disposal.

DESIGNATED ACCUMULATION AREA

- Keep container in a secured room to deny access by unauthorized persons and posted with warning signs, on or adjacent to, the exterior of entry doors, gates, or lids.
- The wording of warning signs shall be in (see Attachment D, Page 7):
 - English: "**CAUTION-BIOHAZARDOUS WASTE STORAGE AREA-UNAUTHORIZED PERSONS KEEP OUT,**" and Spanish, "**CUIDADO-ZONA DE RESIDUOS-BIOLÓGICOS PRELIGROSOS-PROHIBIDA LA ENTRADA A PERSONAS NO AUTORIZADAS,**" or

- Another language, in addition to English, determined to be appropriate by the infection control staff or enforcement agency.

DISPOSAL

- When all pharmaceutical wastes are ready for disposal, submit the:
 1. Controlled Substance Waste Tracking document to School Police Services. Only health staff are allowed to hand the controlled substances to the school police personnel.
 2. Pharmaceutical Waste Tracking document to EHS Office for removal processing.
- When a removal request is received, the Safety Compliance Technician reviews the pharmaceutical waste list for final waste determination. Only state Non-RCRA Pharmaceutical Waste can be managed as medical waste. Federal RCRA Pharmaceutical Wastes must be managed as hazardous waste in compliance with the District's Hazardous Waste Management Program.
- The Safety Compliance Technician picks up and transports state Non-RCRA pharmaceutical wastes to a designated consolidation facility (Warehouse and Distribution Center) for subsequent disposal and treatment. The Safety Compliance Technician shall have tracking document, signed by both site staff and transporter, in his/her possession while transporting the pharmaceutical waste and shall be shown upon demand to any enforcement agency personnel or officer of the Department of the California Highway Patrol. The facility receiving the pharmaceutical waste shall sign the tracking document and left with a copy.

RECORDKEEPING

- EHS Office will send the site a copy of the completed pharmaceutical waste tracking document. The site shall maintain records for not less than three (3) years. EHS Office shall have available electronically records.

ATTACHMENTS

- A-Controlled Substances Tracking Document
- B-Pharmaceutical Waste Tracking Document
- C-Pharmaceutical Waste Label
- D-Warning Sign



Figure 1

If you have questions or comments about these guidelines, please contact
Environmental Health & Safety (EHS) Office (858) 627-7174

San Diego Unified School District reserves the right to make exceptions to, modify or eliminate this guideline and or its content. This document supersedes all previous guidelines relative to this subject.

ATTACHMENT A- Controlled Substances Tracking Document

CONTROLLED SUBSTANCE WASTE TRACKING DOCUMENT

School Site / Generator: _____ Date: _____

Generator Site Address: _____

Site Contact / Staff List: _____ Contact Phone: _____

Emergency Response Telephone Number: (619) 291-7678 Permit Number: N/A

Receiving Facility Site Name and Address: School Police Services

Days at site (circle) M T W T F Hours _____ to _____

Number of Containers	CONTROLLED SUBSTANCES ONLY	Total Quantity

Generator's Certification: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. This site generates less than 20 pounds of medical waste per week and compliant with all the requirements of California Health & Safety Code Section 118030.

Site Staff Printed / Typed Name	Signature	Date

Transporter Printed / Typed Name	Signature	Date

Receiving Facility Printed / Typed Name	Signature	Date

Please send via email pdispatch@sandi.net or school mail Attn: School Police or by fax (619) 725-7169

ATTACHMENT B- Pharmaceutical Waste Tracking Document

PHARMACEUTICAL WASTE TRACKING DOCUMENT

School Site / Generator: _____ Date: _____

Generator Site Address: _____

Site Contact / Staff List: _____ Contact Phone: _____

Emergency Response Telephone Number: (619) 441-1818 UPF Permit Number: 114087

Consolidation / Receiving Facility Site Address: 2351 Cardinal Lane, San Diego, CA 92123

Days at site (circle) M T W T F Hours _____ to _____

Number of Containers	Type of Pharmaceutical Waste	Total Quantity

For additional types of pharmaceuticals, please provide an attached list.

Generator's Certification: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. This site generates less than 20 pounds of medical waste per week and compliant with all the requirements of California Health & Safety Code Section 118030.

Site Staff Printed / Typed Name	Signature	Date

Transporter Printed / Typed Name	Signature	Date

Receiving Facility Printed / Typed Name	Signature	Date

Please send via email safetyoffice@sandi.net or school mail Attn: Safety Office or by fax (858) 573-5710

ATTACHMENT C- Pharmaceutical Waste Label

Place this label on lids and side of the container

SAN DIEGO UNIFIED SCHOOL DISTRICT

**PHARMACEUTICAL
WASTE**



HIGH HEAT

SITE NAME: _____

ADDRESS: _____

PHONE NUMBER: _____

ACCUMULATION START DATE: _____

**IN CASE OF AN EMERGENCY, CONTACT THE
ENVIRONMENTAL HEALTH & SAFETY OFFICE AT (858) 627-7174**

HANDLE WITH CARE

ATTACHMENT D-Warning Sign

Place this warning sign on the exterior door of designated accumulation area

CAUTION

BIOHAZARDOUS WASTE
STORAGE AREA
UNAUTHORIZED
PERSONS KEEP OUT



CUIDADADO

ZONA DE RESIDUOS
BIOLOGICOS PELIGROSOS
PROHIBIDA LA ENTRADA
A PERSONAS
NO UTORIZADAS

