

# **Establishing an Unwanted Medication Collection Program**

**Manual**  
**January 2007**



**Brought to you by the  
*Pharmacy Society of Wisconsin***

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## ***PURPOSE***

Currently, unused and expired medications are being legally destroyed by placing them in the trash or flushing them into the sanitary system. Destroying medications by these methods is highly discouraged because wastewater treatment plants do not remove medications. As a result, these pharmaceuticals are surfacing in our streams and ground water. Drug components can harm plants and animals that depend on these water resources. Current research has proven that there should be more concern expressed about the impact that these medications may have on the environment and the risks associated with exposure, including antibiotic resistance. In addition, disposing of medications in the trash increases access to medications by children and pets.

“Take back” programs have demonstrated success in prevention or reduction of unintentional ingestion and overdose of medicine among children, medication errors among the elderly, inappropriate use of medications, drug abuse, drug diversion from the home to the streets, and pollution of the environment.

PSW has compiled this reference material in order to provide you with the necessary tools to organize a “take back” program in your community or organization.

## ***RESTRICTIONS***

### ***Controlled Substance Act***

- 1) Law enforcement officials must be present at each point where narcotic drugs change possession (i.e. citizen to pharmacist, site to incinerator)
- 2) Controlled substances must be separated from non-controlled substances.
- 3) Controlled substances collected must be recorded in writing, and the container that houses them must be sealed.
- 4) Law enforcement must keep a log of medications collected.

### ***U.S. Resource Conservation and Recovery Act***

- 1) “Hazardous Materials are substances that are capable of posing an unreasonable risk to health, safety, and property when transported in commerce. This Act regulates the transportation, treatment, and disposal of hazardous waste, but exempts waste

generated by consumers (household waste) from regulation. Some prescribed and over-the-counter medications are known to require management as a hazardous waste when they come from an entity other than an individual.”

**Web site:** [hazmat.dot.gov](http://hazmat.dot.gov)

**Hazardous Materials Registration Company Search:**

<https://hazmatonline.phmsa.dot.gov/Services/companylookup.aspx>

**Contacts:** (608) 829-7530 (Madison) or (800) 467-4922

**NOTE:**

A June 12, 2006 DNR memo states the Agency’s intent to use discretion in enforcing solid and hazardous waste rules applicable to the management of collected household pharmaceutical waste during a one-year evaluation period, if the following conditions are met:

1. Controlled substances must be managed according to DEA requirements.
2. Reasonable precautions must be taken to prevent theft of, or accidental exposure to, collected household pharmaceuticals.
3. Collected household pharmaceuticals must be collected, stored, transported and managed in a safe and nuisance free manner and to prevent releases to the environment. Standards necessary to ensure this include, but are not limited to, the following:
  - a. Collected household pharmaceuticals may not be disposed in a publicly owned treatment works or other wastewater treatment facility.
  - b. To the extent possible, and with due consideration to the compatibility of the waste stream to a particular management method, pharmaceuticals should be incinerated or otherwise destroyed, so as to render them unrecoverable in the future and in order to minimize their potential impact upon the environment.
  - c. Collected household pharmaceuticals that are destined for disposal at a licensed solid waste landfill must be managed according to ch. NR 668, Land Disposal Restrictions.

d. Operators of household pharmaceutical collection facilities and events must ensure that the final disposition/destruction of all collected household pharmaceuticals can be ascertained.

## ***WHAT MATERIALS CAN BE COLLECTED***

- Unused or expired medications
  - Non-narcotics
  - Narcotics
  - OTCs
  - Herbals
  - Veterinary medications

## ***WHAT MATERIALS CANNOT BE COLLECTED***

- Illegal Drugs
- Biohazardous Material
- Needles/Sharps

## ***TASKS TO BE COMPLETED***

- Establish a planning committee.
  - Contact county health department to determine if they are interested in participating
  - Determine date and time of event.
  - Identify several potential collection sites.
  - Obtain authorization from Board of Pharmacy
  - Contact personnel/staff involved
    - *Law Enforcement*
      - Request for assistance should be in writing and a follow up memo sent to confirm the collection specificities and duties of the officer. See Appendix 1/2
    - *Pharmacists, pharmacy students, etc*
      - To assist with collection
    - *Waste haulers*
      - For disposal arrangements
- Web site:** [dnr.wi.gov/org/aw/wm/hazard](http://dnr.wi.gov/org/aw/wm/hazard)

**Contact information for permanent household hazardous waste collection programs & contractors:**  
[www.uwex.edu/erc/pdf/HHW/PermAddress.pdf](http://www.uwex.edu/erc/pdf/HHW/PermAddress.pdf)

**Contact information for one-day household hazardous waste collection programs & contractors:**  
[www.uwex.edu/erc/pdf/HHW/1DayAddress.pdf](http://www.uwex.edu/erc/pdf/HHW/1DayAddress.pdf)

Licensed hazardous waste transporters lists:  
[dnr.wi.gov/org/aw/wm/faclists](http://dnr.wi.gov/org/aw/wm/faclists)

- *Greeters*
- *Persons to enter data into computer*
- *Local Water treatment representatives*
- *Local poison prevention group*

**UNIVERSITY OF WISCONSIN HOSPITAL & CLINICS**  
Poison Prevention and Education Center  
600 Highland Avenue, F6/133-1530  
Madison, WI 53792

**Administrative Phone:** (608) 265-8160

**CHILDREN'S HOSPITAL OF WISCONSIN POISON CENTER**  
PO Box 1997, Mail Stop 677A  
Milwaukee, WI 53201-1997

**Administrative Phone:** (414) 266-2952

- *DEA agent-in-charge*
  - Inform agent about the planned collection and the safeguards that will be taken to ensure that there will be compliance with Federal controlled substance laws See Appendix 3

Controlled substances need to be managed according to the applicable regulations in 21 CFR Parts 1300 to 1316.

**Web site:** [www.deadiversion.usdoj.gov](http://www.deadiversion.usdoj.gov)

**Controlled substances list:**  
[www.deadiversion.usdoj.gov/schedules/alpha/alphabetical.htm](http://www.deadiversion.usdoj.gov/schedules/alpha/alphabetical.htm)

**Contact (Milwaukee):** (414) 297-3395, extension 6400

- Contact Wisconsin DHFS-Cancer and chronic disease drug repository sites, if applicable.

Manage according to the applicable rules in ch. HFS 148, Wis. Adm. Code.

**Web site:**  
[dhfs.wi.gov/bqaconsumer/cancerdrugreposy.htm](http://dhfs.wi.gov/bqaconsumer/cancerdrugreposy.htm)

**Rules:** [www.legis.state.wi.us/rsb/code/hfs/hfs148.pdf](http://www.legis.state.wi.us/rsb/code/hfs/hfs148.pdf)

**Participating Pharmacies:**  
<http://dhfs.wi.gov/bqaconsumer/CDRparticips.pdf>  
See Appendix 4

- Initiate a public awareness campaign one to two months prior to the event.
  - Flyers; see sample flyer Appendix 5
  - Posters
  - TV (local news?)
  - Newspaper; see sample press release Appendix 6

Critical Information for the Event:

- Medications must stay in original containers.
- Personal information can be crossed out, but medication information must remain legible.

- Labels may not be removed.
  - No sharps.
  - No thermometers.
  - No medical waste.
  - All medications will be destroyed.
  - No refunds will be issued in retail settings; medications will not be resold or reused.
  - Details of the event: where, when, hours of operation, and who to contact for more information.
  - No cost to participate.
- Investigate potential funding sources for advertising, disposal and employee wages
    - Corporate sponsors
    - Local pharmacies
    - DNR grants
    - Office supply stores (copying, signage)
    - Local individuals
  - Map out traffic control and site set-up; a site visit is beneficial
  - Prepare survey for traffic control greeters; see sample survey in Appendix 6
  - Collect supplies for the event
    - 5-gallon pail for "items under pressure" -such as inhalers, which must be disposed of separately
    - Recycling bin
    - Trash bin
    - Chairs
    - Tables
    - Hazardous waste containers (supplied by certified waste hauler)
    - Gloves
    - Ziploc bags
    - Laptop
    - Printer
    - Pens
    - Paper
    - Survey forms
    - Clipboards
    - Safety vests
    - Packing tape
  - Other supplies; although these items should not be collected, some citizens will turn them in without the greeters knowing so being prepared to dispose of them is necessary

- 5-gallon pail with kitty litter for mercury-containing medications/thermometers
  - Sharps container
- Determine site cleanup plan

# **DAY OF EVENT**

## Brief Overview

1. Individuals come in with their medications – ideally in the original containers, but they may bring them in cardboard boxes and plastic grocery bags.
2. They drop off their medications and leave. An individual's on-site time is very brief. You may have a few survey questions for them to complete before they leave.
3. The pharmacist(s) sort(s) and categorize(s) the medications as controlled and non-controlled substances. The non-controlled medications are put into hazardous waste containers. The controlled substances are inventoried and turned over to law enforcement.
4. At the end of the event, the controlled substance inventory is printed out and signed by the law enforcement official as well as the pharmacist.
5. At the end of the event, the hazardous waste hauler removes all of the non-controlled and controlled substances (if allowed by DEA), creates manifests to document the materials per US Environmental Protection Agency guidelines and US Department of Transportation Regulations, and transports waste to a hazardous waste incinerator.
6. After the hazardous waste hauler leaves, the law enforcement official takes the controlled substances (if the hazardous waste hauler is not allowed to remove these substances) to the local police station and puts them in the evidence storage locker, prior to destruction.

## Roles

- **Traffic control personnel ("greeters")** will be needed at the entrance of the collection point. Use a "drive-thru" process; participants do not get out of the car
  - Screen patients to determine that they did not bring hazardous materials/waste or sharps
    - *Epi-Pens* are acceptable
  - Collect medications and turn them over to pharmacists
  - Complete a short survey (see Appendix 6)
    - These sheets can be mailed to UEMR (Unused & Expired Medication Registry) the survey was

developed by the Community Medical Foundation for Patient Safety, an organization that collects information on unwanted medications to increase understanding for health care providers related to pharmacy policy, patient safety and health education  
Community Medical Foundation for Patient Safety  
6800 West Loop South, Suite 190  
Bellaire, Texas 77401

Telephone: 832-778-7777

Fax: 281-920-1118

Email: [info@comofcom.com](mailto:info@comofcom.com)

Website: [www.communityofcompetence.com](http://www.communityofcompetence.com)

- Distribute informational materials for educational purposes
- Attire: safety vests

- **Pharmacists** will assist in sorting controlled substances from non-controlled substances, approximately 3-4 pharmacists at each table is sufficient
  - Internet connection is ideal for drug identification capabilities
  - Keep medications in their labeled containers so that identity of the medication can be established at all phases of the process
  - There should be no loose pills in the waste container so if pills are not in their original container, plastic bags may be used to package medications once reconciled for. Label bag with type of medication and dosage
  - Controlled substances must be logged (see appendix 7), and the container that houses them must be sealed when completely filled
  - Identification of non-controlled substances usually not feasible due to quantity and time limit
  - Law enforcement must keep the log of controlled substances collected
  - All collected medications will be treated as hazardous waste for incineration
  - Attire: White lab coat, gloves
  - Tools: counting trays, reference materials for identification of unknown tablets

□ **Data Entry**

- Individual enters controlled substance inventory into computer
- Print out inventory of controlled substances for law enforcement
- Tools: laptop, printer

□ **Law Enforcement-local police**

- Law enforcement should be positioned so that they can see the collection and movement of the medications from the public to the workstation (may require more than one law enforcement agent)
- Provide security throughout event
- Controlled substances must stay in the sole physical possession of law enforcement throughout the collection and until placed in the evidence storage locker or taken for destruction. At no time may the container of controlled substances leave the physical possession of law enforcement.
- For security sake, law enforcement should stay on site until the container(s) of non-controlled substances are closed, labeled, and placed in the hazardous waste hauler's truck; effectively removing them from the site and public access.
- # of law enforcement agents depends on potential size and traffic load at event
- Attire: uniform

□ **Hazardous waste hauler**

- Drop off containers at least one day prior to event
- Schedule company to pick-up non-controlled medications one hour after the event
- Incineration must occur within 24 hours after event
- All non-controlled drugs are weighed and marked for disposal via incineration
- All controlled drugs are weighed and placed into a special container(s)
- Some waste haulers are licensed as reverse distributors by DEA, yet the DEA often requires law enforcement to dispose of controlled substances

Veolia Environmental Services  
 W124 N9451 Boundary Road  
 Menomonee Falls, WI 53051  
 (262)-255-6655

□ **Hazardous waste incineration**

- The waste processor shreds all materials into micro-particles that are microwave treated and heat/steam disinfected/incinerated.
- After observation of the above process, law enforcement can sign off on the disposal transcripts acknowledging delivery/receipt of sealed drums.

## ***TIPS***

Begin planning early—the time needed to plan the event is dependent upon the responsiveness of the key contacts. Some events may require up to 1 year to plan. This time frame could potentially be reduced for repeat programs.

Discuss event with people who have completed a unwanted medication disposal day.

Conduct program on a Saturday for greatest traffic flow. Length of event dependent on expected turnout; 4 hours has been sufficient for most events.

All volunteers and workers should have nametags so that identification is easy.

Holding events in town will most likely prove successful because senior citizens do not like to travel.

## ***REFERENCES***

Operating Unwanted Medication Collections - A Legal & Safe Approach  
Northeast Recycling Council, Inc. © September 2006

[www.nerc.org](http://www.nerc.org)

[\*\*\*www.deadiversion.usdoj.gov\*\*\*](http://www.deadiversion.usdoj.gov)

## APPENDIX 1: Sample Letter to Police Requesting Participation

Date

Address

Dear Chief \_\_\_\_\_,

As we discussed on the phone today, the **(group)** hopes to hold an unwanted medication event in cooperation with **(pharmacy)** at its **(location)** on **(day,date)**, from **(time)**.

We will be accepting both controlled and non-controlled medications for incineration. In order to comply with Federal and State controlled substance requirements, a law enforcement official must be present and take physical possession of the controlled substances. We are asking for the services of a **(local law enforcement official)** to assist us with the collection.

The overall flow of the event will be as follows:

1. An individual will bring in unwanted medications and hand them to the greeter.
2. The pharmacist will inventory the medications (type, dosage, and amount) and make a determination if it is a controlled substance.
3. If it is a controlled substance, it will be handed to the Law Enforcement Officer to be placed in a designated container (most likely a 5-gallon bucket with a locking lid).
4. At the end of the day, the Law Enforcement Officer will be presented with an inventory of the controlled substances and be asked to sign copies of the document certifying receipt of the drugs. It will be witnessed by the pharmacist.
5. Then the Law Enforcement Officer will take the controlled substances back to the police station and place them, along with the inventory, in a locked storage area. We anticipate that this will involve, at the most three 5-gallon pails.

Due to the nature of the event, and wanting to be sure that everything runs as smoothly as possible, we ask that the Law Enforcement Officer be on site at **(time)**. We propose to compensate the officer for overtime from **(time range)**. If extra time is involved due to currently unforeseen circumstances, we will pay for that time as well. We understand that the hourly outside overtime rate is **(wage)**.

I look forward to hearing back from you on this matter. Naturally, if you have any questions, I will be happy to answer them. I look forward to working with you and your staff on this exciting new project.

Sincerely,

**APPENDIX 2: Follow-up Memo to Police Confirming Collection Details**  
**MEMO**

Date: xxx

To:

From:

RE: Collection of Unwanted/Expired Medication

This is to confirm the information that we discussed over the phone about the unwanted medications collection on **(day, date)** at the **(location)**. The officer staffing the event should be onsite by **(time)**. I am not sure yet what time we will be done, but definitely by **(time)**. The officer should be in full uniform. We will have registered pharmacist(s) onsite, along with volunteers to help with traffic flow.

The pharmacist(s) will do the sorting of the controlled from the non-controlled substances. The pharmacist(s) will also do a count of all controlled substances and a data entry person will keep a record on a laptop; an inventory will be printed for your officer at the end of the collection. During the collection event, the controlled substances will be handed directly from the pharmacist to the police officer for placement in an appropriate container. The container is to remain with the officer at all times.

At the end of the collection we will put the controlled substances into a sealed container, and secure it. A copy of the inventory will be placed inside the container and another copy taped to the outside. A large label identifying the collected medications as “non-evidence and non-confiscated” will also be placed on the envelope. This collection method meets the criteria for both the Drug Enforcement Agency (DEA) and the **(state regulation agency)**.

Under the guidelines established by **(state regulation agency)**, the collected controlled substances are to be stored “in a readily separable and distinguishable manner from the evidence/confiscated medications.” They must be kept in identified separate containers and isolated in some manner from the evidence/confiscated medications. They can be kept in the storage locker, but law enforcement needs to have a non-criminal incident report associated with the collected medications. As per **(state regulation agency)** requirements, we will arrange for destruction of the collected controlled substances at a DEA approved incinerator.

Our collection site will have a covered area in case of rain. We will have coffee and other beverages. Restroom facilities will be available on site.

We will reimburse the department for the officer’s time. Please call me at **(phone #)** if you have any concerns or comments about the collection.

Thank you for your assistance.

### **APPENDIX 3: DEA Communication**

**(date)**

**(NAME)**

Drug Enforcement Agency  
Washington D.C. Division  
Washington, D.C. 20537

**Re: Residential drug disposal program**

Dear **(NAME)**,

To help protect local surface and ground water, prevent accidental poisonings, and reduce substance abuse, the (GROUP) and its partners are planning a pharmaceutical collection and education campaign for proper drug disposal.

Before we get started, we want to inform you of our plans and make sure that we are in full compliance with all Drug Enforcement Agency (DEA) regulations for collecting and destroying unused and expired medications.

Our collection will be available to **(WHO)** residents only. **(CERTIFIED WASTE HAULER)**, a DEA licensed \_\_\_\_\_, will coordinate the collection with assistance from volunteer pharmacists and officers from the **(POLICE DEPARTMENT)**.

A pharmacist will staff every drop off lane. The pharmacist will segregate controlled substances and immediately deliver them to on-site members of law enforcement. The **(POLICE DEPARTMENT)** will maintain possession of the controlled substances at all times and follow its normal operating procedures for the destruction of controlled substances.

If you require further information, please contact me at any time. My email address and phone number are listed below.

Regards,

## **APPENDIX 6: Sample Survey**

### **Unwanted Medications Collection**

**DATE**

**Zip code/Town you live in:** \_\_\_\_\_

#### **Why is the medicine being disposed of?**

- Didn't like the medicine (made me ill, etc.)
- Expired/out-of-date medicine
- Taken off medicine/no longer needed
- Death (family member/friend)
- Cleaning house
- Never used the prescription
- Drug was pulled off the market
- Other \_\_\_\_\_

#### **Whose medication was it?**

- Mine
- Family or household member
- Friend
- Pet

**How did you find out about this event?**

**Comments/Recommendations:**

## APPENDIX 7: Sample Press Release

### LETTERHEAD TIME SENSITIVE PRESS RELEASE - FOR IMMEDIATE USE

#### Date

For more information, contact:

#### Free Collection & Disposal of Unwanted Medication

**Do you have unwanted medicine in your home? Help protect your family, community and the environment by properly disposing of them.**

On DATE, TIME [Host] is offering a free medicine disposal opportunity. The collection will take place at LOCATION. This is a free event for environmentally safe disposal of all medications. NO REFUNDS OR EXCHANGES WILL BE PERMITTED.

#### WHAT TO BRING TO THE COLLECTION SITE:

- Expired or unwanted prescriptions and medicine
- Vitamins and herbals
- Veterinary medications
- Over the counter medicines.

***Do NOT bring thermometers, needles, or medical waste of any type.***

**WHAT TO DO:** This is an opportunity to clean out your medicine cabinets and bring all unwanted medications, including pet medications, to the event for proper disposal.

**WHAT WILL HAPPEN:** There will be a police officer present to supervise the collection. All medicine will be sent to a hazardous waste facility for secure incineration. ***NO MEDICINE WILL BE RE-USED OR RE-SOLD.***

**WHAT ABOUT PERSONAL INFORMATION ON BOTTLE LABELS?** Please use a black marker to cross off your name. Be sure to leave the name of the medication visible.

**WHAT INFORMATION WILL BE ASKED OF YOU?** You will be asked a few general questions, such as town of residence, why the medicine is being discarded, and how you heard about this event. *No personal information will be requested.*

You have the opportunity to safely dispose of your unwanted prescription medications at no cost. Spread the word to your friends and family. This is an important new program that will help to protect your health, your children's and grandchildren's health, our community and the environment.

For more information, call \_\_\_\_\_