



STATE OF WASHINGTON  
DEPARTMENT OF CORRECTIONS

APPLICABILITY  
**PRISON/WORK RELEASE**

REVISION DATE  
8/1/12

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**DOC 650.080**

**POLICY**

TITLE  
**PHARMACEUTICAL WASTE MANAGEMENT AND  
RETURNING VIABLE PRODUCTS**

**REVIEW/REVISION HISTORY:**

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**SUMMARY OF REVISION/REVIEW:**

Numerous changes, including policy title. Read carefully!

**APPROVED:**

Signature on file

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**G. STEVEN HAMMOND**, PhD, MD, MHA  
Chief Medical Officer

6/19/12

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Date Signed

Signature on file

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**SUSAN LUCAS**,  
Assistant Secretary for Health Services

6/26/12


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Date Signed

Signature on file

\_\_\_\_\_  
**BERNARD WARNER**, Secretary  
Department of Corrections

6/29/12

\_\_\_\_\_  
Date Signed

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## REFERENCES:


DOC 100.100 is hereby incorporated into this policy; [WAC 173-303-080](#); [WAC 173-303-090](#); [WAC 173-303-071](#); [WAC 173-303-100](#); [WAC 246-869-130](#); [ACA 4-4378](#); [DOC 650.020 Pharmaceutical Management](#); [DOC 890.030 Container and Hazardous Waste Material Management](#); [Department of Ecology Interim Enforcement Policy 07-04-024](#)

## POLICY:

- I. The Department has established procedures for pharmaceutical waste management to comply with Department of Ecology regulations. Pharmaceutical waste will not be disposed of through the sewer system or the solid waste stream as doing so is detrimental to the environment.
- II. A reverse distributor will only be authorized to take pharmaceutical products as designated in this policy.

## DIRECTIVE: [4-4378]

- I. Disposing of Pharmaceuticals That Have Left Pharmacy But Not Health Services Control
  - A. Pharmaceuticals that have left the pharmacy, but have not left the control of the health services staff, will be returned to the pharmacy. Pharmacy staff will determine if the items are suitable for re-distribution per WAC 246-869-130.
  - B. If unsuitable to be re-dispensed, the pharmaceuticals are considered waste.
    1. A portion of these wastes will be designated as Federal hazardous waste (i.e., Resource Conservation and Recovery Act (RCRA) waste) covered under WAC 173-303-080 and 090. Per federal law, these items must be segregated from other wastes.
      - a. These wastes will be stored in a black container labeled "Federal Hazardous Waste", which will remain in the pharmacy or a secured area with limited access until transferred.
        - 1) A list of RCRA waste will be placed immediately next to the container. A sample list of [Federal Hazardous Items](#) is available on InsideDOC in the Health Services section under "Pharmacy".
        - 2) Wastes will be logged on DOC 16-333 Federal Hazardous Waste Inventory Log or an equivalent generated from


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pharmacy software. The log will be placed on or adjacent to the container. Offender names must not appear on the log.

- b. Pharmacy accumulated RCRA waste must be transferred to a Satellite Accumulation Area within the timeframe designated by the facility Hazardous Waste Coordinator.
  - c. Each time RCRA waste is added to the black container, it must be logged on DOC 16-333 Federal Hazardous Waste Inventory Log, noting the RCRA waste code and estimating the quantity.
  - d. The facility Hazardous Waste Coordinator will prepare the container for the shipment to a Treatment, Storage, and Disposal facility per DOC 890.030 Container and Hazardous Waste Material Management.
2. The remainder of the wastes and any returned or expired medication that was previously dispensed to offenders by the Department pharmacy will be considered State Only Dangerous Waste covered under WAC 173-303-100.
- a. These wastes will be stored in a white container labeled “State Only Dangerous Waste”, which will remain in the pharmacy or a secured area with limited access until transferred.
  - b. DOC 16-334 State Only Dangerous Waste Inventory Log or an equivalent log generated from pharmacy software will be used to log wastes contained in each box. Copies of the log will be placed in the box, emailed as an attachment to the AHCC distribution list as directed, and retained by the sending facility. Offender names must not appear on the log.

## II. Disposing of Pharmaceuticals in Offender Possession

- A. Pharmaceuticals that have been in an offender’s possession are considered household hazardous waste.
  1. Examples of these wastes include:
    - a. Medications confiscated from offenders that came from outside the Department.
    - b. Unusable medication transported with the offender from a facility outside the Department (e.g., medications that were dispensed by other pharmacies or from jails, etc.).

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c. Loose pills refused by an offender at Pill Line, and pills dropped on the floor or contaminated in any way.

B. Pharmaceuticals that are considered household hazardous waste must be stored and disposed of in the same manner as State Only Dangerous Waste, except that they are not included on DOC 16-334 State Only Dangerous Waste Inventory Log.

III. Shipping State Only Dangerous Waste and Household Hazardous Waste to AHCC for Disposal

A. When preparing for shipment to AHCC, State Only Dangerous Wastes and Household Hazardous Wastes will be collected in plastic bags and packaged in boxes.

1. Liquid medications must be packaged in a way to avoid breakage and leaks.
2. Prior to sealing each box, the sending facility will ensure its weight does not exceed 20 pounds.
3. Box labels will only include the following address and the quantity of sent boxes (e.g., 1/1, 1/2 and 2/2, etc.):

Airway Heights Corrections Center  
Bay #2, Bldg. A-1, AHCC Warehouse  
Attn: Conex  
W. 11919 Sprague Ave.  
Airway Heights, WA 99001


B. Boxes will be shipped by UPS or FedEx only. Shipment will not be made through the U.S. Postal Service.

C. The sending facility will submit DOC 16-334 State Only Dangerous Waste Inventory Log or the log generated from pharmacy software to the AHCC Pharmacy via email to [DOC DL AHCC HS Dangerous Waste](#).


D. Upon receipt of the shipment, the AHCC Warehouse will email a confirmation to the sending facility.

IV. Disposal Procedure at AHCC

A. AHCC warehouse receiving staff will accept delivery and notify the AHCC pharmacy to arrange for the transfer of the delivered boxes to the Conex container.

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1. Authorized pharmacy staff must be present for the transfer.
  2. Documentation of each delivery will be signed by both warehouse and pharmacy staff.
- B. Pharmacy staff at AHCC will do random checks of at least 2 boxes per month to ensure the contents and quantities are listed properly.
1. The AHCC Pharmacist Supervisor/designee will report any unresolved or repeated discrepancies to the Health Care Administrators, Director of Pharmacy and the Health Care Managers of AHCC and the sending facility.
- C. As necessary, AHCC Pharmacy staff will notify personnel at the Waste-to-Energy Plant to arrange for disposal at the incinerator. At the time of disposal, a complete list of State Only Dangerous Waste items will be submitted to Spokane Regional Solid Waste-to-Energy Plant.
1. Two representatives from AHCC, including at least one pharmacy staff, will accompany the waste and witness the disposal.
  2. Both representatives will sign the receipt from the plant indicating the date, time, and number of boxes or weight of the disposed medications.
- V. Returning Pharmaceuticals that Have Not Left the Pharmacy
- A. Return of pharmaceuticals that are part of the pharmacy stock will be managed using an authorized Department reverse distributor (i.e., vendor that may accept viable pharmaceuticals in exchange for credit).
1. Viable pharmaceuticals are products prior to or past their expiration dates for which a credit might be obtained.
  2. The AHCC pharmacy is not a reverse distributor.
- B. Pharmaceuticals identified in this policy as waste will not be disposed of through a reverse distributor, including loose pills and offender medication with no potential for credit.
- C. The reverse distributor will provide the facility pharmacy with documentation of credit and/or a Disposal Manifest and Certificate of Destruction within 20 days of receiving the pharmaceutical products.
- VI. Disposing of Controlled Substances

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- A. Unusable pharmaceuticals from any source may include Drug Enforcement Administration (DEA) controlled substances. When disposing of DEA regulated controlled substances, pharmacy staff will:
1. Follow this policy and DEA regulations, using [DEA Form 41 Registrants Inventory of Drug Surrendered](#) to document proper destruction per DEA requirements, or
  2. If disposing through reverse distribution, use a DEA licensed reverse distributor which uses a RCRA permitted incinerator for final disposal of unmarketable substances.
  3. Dispose of expired or discontinued patient specific controlled substances in the patient's possession as State Only Dangerous Waste in the white secure containers provided for that purpose.

#### VII. Recordkeeping

- A. The following records related to pharmaceutical waste will be maintained on-site for at least 5 years per Department of Ecology regulations, or longer if requested by the Department of Ecology:
1. DOC 16-333 Federal Hazardous Waste Inventory Log,
  2. DOC 16-334 State Only Dangerous Waste Inventory Log,
  3. Reverse distributor receipts/invoices/credits,
  4. Disposal Manifests and Certificates of Destruction,
  5. Audit reports on boxes delivered to AHCC for disposal, and
  6. Waste disposal receipts from the Spokane Regional Solid Waste-to-Energy Plant.

#### DEFINITIONS:

Words/terms appearing in this policy may be defined in the glossary section of the Policy Manual.

#### ATTACHMENTS:

None

#### DOC FORMS:

[DOC 16-333 Federal Hazardous Waste Inventory Log](#)  
[DOC 16-334 State Only Dangerous Waste Inventory Log](#)