

Administrative Policy
POLICY NO.: 200.02.106A

POLICY TITLE: Pharmaceutical Waste Disposal

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Approved by: Quality Improvement Patient Safety Committee (QIPSC)

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SUMMARY & PURPOSE: The purpose of this policy is to outline the requirements to discard or dispose of pharmaceutical waste in compliance with law and regulations and in accordance with Florida Department of Environmental Protection (FDEP), Environmental Protection Agency (EPA), and US Department of Transportation (DOT).

SCOPE/APPLICABILITY: This policy applies to all the HWCOC Clinical Locations where faculty, students and /or staff provide care to patients. The HWCOC clinical locations include FIU Health Modesto Maidique, ("MMC"), FIU Health Broward and Green Family Foundation NeighborhoodHELP Mobile Health Centers. For the faculty, students and staff that are providing patient care in the *affiliated* hospitals, outpatient and diagnostic centers the policies and procedures of those institutions will govern their reporting responsibilities.

POLICY: To provide a pharmaceutical waste program that ensures proper and safe management of pharmaceutical waste that is safe and environmentally appropriate.

DEFINITIONS:

Hazardous Waste:

A waste with properties that make it dangerous or capable of having a harmful effect on human health or environment.

RCRA (Resource Conservation Recover Act):

The principle law in the US governing the disposal of solid waste and hazardous waste.

PROCEDURE:

1. All pharmaceutical (medication) waste items are to be discarded as follows:
 - a. All pharmaceutical waste, regardless of form or strength must be captured into the black pharmaceutical waste bins according to the Resource Conservation Recovery Act (RCRA). Medication forms include, but are not limited to vials, pills, capsules, tablets, creams, gels, ointments, paste, sprays, and patches. The pharmaceutical waste bins are not intended for sharps, infectious waste, or bodily fluids.
 - b. For Mobile Health Centers: The FIU Environmental Health & Safety department (EHS) is responsible for bin placement, removal, and replacement.
 - i. Clinical support staff will remove the bin from patient care areas when it is deemed half full and store in designated area.
 - ii. Clinical support staff will place the date the container is full on the label affixed to the container.
 - iii. Clinical support staff will contact EHS for proper pick-up.
 - iv. EHS disposes pharmaceutical waste through the pharmaceutical return management program "Guaranteed Returns". Guaranteed Returns collects the waste and disposes of it as required by state law.
 - v. EHS will provide the facility with a copy of the manifest in order to track disposal. In accordance with FDEP guidelines, the manifest is to be kept on file at the facility for 3 years.
 - c. For the FIU Modesto Maidique campus and FIU Health Broward: The approved vendor is responsible for bin placement, removal, and replacement.
 - i. Clinical support staff will remove the bin from patient care areas when it is deemed half full. Bin will be stored in the designated area until it is picked up by the vendor.
 - ii. The vendor will provide the facility with a copy of the manifest in order to track disposal. In accordance with FDEP guidelines, the manifest is to be kept on file at the facility for 3 years.
2. Preparation and responding to a pharmaceutical waste spill.
 - a. Spill kits are located in each patient care area.
 - b. In case of a spill, proper cleanup procedures should be followed in accordance with the Emergency Spill Control section of FIU Environmental Health & Safety Department's Hazardous Waste Awareness and Handling Training.
 - c. If a staff member has questions about spill cleanup, the University Police should be contacted at (7-5911) for assistance.
3. Staff training.
 - a. Upon hire and at least annually, all staff receive hazardous waste awareness and handling training. This training includes how to handle and dispose of pharmaceutical waste.
 - b. Training is provided by FIU Environmental Health & Safety department.
 - c. Department leadership keeps records of training and education in the employee's file.

SUPPORTING/REFERENCE DOCUMENTATION:

- Florida Department of Environmental Protection. Pharmaceutical Waste Management. <https://floridadep.gov/waste/permitting-compliance-assistance/content/pharmaceutical-waste-management-businesses-and>
- The Joint Commission 2019 Ambulatory Health Care National Patient Safety Goals. https://www.jointcommission.org/assets/1/6/NPSG_Chapter_AHC_Jan2019.pdf
- FIU Hazardous Waste Management Plan.

RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:

- HWCOP Administrative Policy: *Incident Reporting No.:* **200.03.100A**
- HWCOP Administrative Policy: *Hand Hygiene No.:* **200.02.103P**
- FIU Environmental Management Policy 150.405