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Protecting People. Reducing Risk.™



# Pharmaceutical Waste Compliance Program



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# Process Overview

- Assessment
- Logistics & Resource Analysis
- Formulary Characterization
- Training
- Implementation
- Segregation & Transport
  - RCRA Hazardous
  - RCRA Non-hazardous
  - RMW
- Disposal
- On-going Support



## Hospital Rx Formulary Breakdown \*

<u># NDC's</u>	<u>% NDC's</u>		<u>Range</u>
• 3,904	100%	Total Characterized	
• 3,630	93%	Total Identified Hazardous & Non-Hazardous	91% to 100%
• 274	7%	Not Characterized/Not on File	0% to 9%
<u>RCRA Hazardous vs. RCRA Non-Hazardous</u>			
• 3,630	100%	Total Identified Hazardous & Non-Hazardous	
• <b>203</b>	<b>6%</b>	<b>RCRA Hazardous</b>	<b>5% to 8%</b>
• <b>3,427</b>	<b>94%</b>	<b>Non-Hazardous</b>	<b>92% to 95%</b>
<u>P&amp;U Listed vs Characteristic RCRA Hazardous</u>			
• 203	100.0%	Total RCRA Hazardous	
• <b>49</b>	<b>24%</b>	<b>P &amp; U Listed Hazardous</b>	9% to 30%
• <b>132</b>	<b>65%</b>	<b>Characteristic Hazardous</b>	60% to 76%
<u>Compatibility</u>			
• 3630	100%	Total Identified Hazardous & Non-hazardous	
• <b>3619</b>	<b>99.7%</b>	<b>Compatible</b>	<b>99.4% to 99.9%</b>
• <b>11</b>	<b>0.3%</b>	<b>Non-Compatible</b>	<b>.1% to .6%</b>

\* Average based on analysis of 10 hospital RX formularies



# Findings

## RX Formulary Analysis RCRA Hazardous

	# NDC's	RCRA Hazardous	RCRA Listed Hazardous	RCRA Characteristic Hazardous	Dual Wast	Total	Non-compatible Hazardous
<b>AVG</b>	<b>4439</b>	<b>6.0%</b>	<b>23.2%</b>	<b>69.8%</b>	<b>4.7%</b>	<b>97.8%</b>	<b>13</b>
<b>High</b>	<b>15782</b>	<b>8.0%</b>	<b>27.9%</b>	<b>73.9%</b>	<b>7.0%</b>	<b>99.3%</b>	<b>44</b>
<b>Low</b>	<b>1877</b>	<b>4.3%</b>	<b>20.2%</b>	<b>60.8%</b>	<b>0.0%</b>	<b>93.7%</b>	<b>5</b>

## Waste Class Analysis Percent of Total Formulary NDC's

WASTE CLASSES	AVG	High	Low
Waste medicine liquid toxic	2.9%	3.9%	2.1%
Waste flammable liquids	1.2%	1.7%	0.7%
Waste flammable aerosols	0.8%	1.0%	0.7%
Waste corrosive liquid	0.2%	0.4%	0.1%
Waste oxidizing liquid	0.1%	0.2%	0.1%
Waste medicine liquid flammable toxic	0.2%	0.4%	0.1%
Waste organic peroxide	0.1%	0.5%	0.0%
RMW/toxic	0.4%	0.6%	0.1%

Baptist Hospital Miami  
Children's National Medical Center  
Geisinger Medical Center  
New England Medical Center

Sibley Memorial Hospital  
U Mass Medical Center  
Waterbury Hospital



# Hospital RX Waste Sort Errors

269 Containers Sorted  
70 (26%) Sort Errors

## Common Sort Errors

45% Blood in container  
35% Sharps  
14% Free Liquids  
4% Controlled Substances  
2% Human Waste



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