



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Meeting Minutes

Subject:	PharmTAG Meeting #8
Date:	November 18, 2009
Time:	9:00 AM
Location:	BMC Room 176, Tallahassee; Room 501A, Pensacola; Room 213A, Jacksonville; Room F Orlando; Room 111, Temple Terrace; Room (No #), West Palm Beach
Meeting Manager:	Mike Redig, FDEP Environmental Manager
Attendees:	Yvonne Peters, Claire Arnold, Christine Bailey, Michelle Chambers, Dennis Dansby, Barry Fernandez, Phil Hinkle, Tiffaney Holmes, Michael Jackson, Gregg Jones, Ismael Jusino, Jim Kendig, Janine Kraemer, Sharlene Lau, Michelle Leavis, Mark Matthews, Chuck McClellan, Michael McGann, Ron McGrier, Mike McQuone, Kathy Mihalek, John Pcolka, Glen Perrigan, Denise Roach-Rodney, Rhonda Rogers-Bardsley, Larry Sellers, Dan Skalecki, Joan Spencer, Barry Stewart, Simon Tanner, Laurie Tenace, Gina Vallone-Hood, Jack Whitley, Kathy Winston

Meeting Discussion:

- ☞ Mike opened with introductions of all present and via teleconference.
- ☞ Mike asked if everyone was able to get signed on to GoTo Meeting.
- ☞ Mike introduced the three presenters and turned it over to Michael Jackson from Florida Pharmacists Association.
 - The presentation was presented at FPA's annual meeting and was available prior to today's meeting on the PharmTAG website.
 - Improper UPW disposal can cause environmental issues. Some pharmaceuticals can survive the filtration process at wastewater treatment plants and there are concerns for runoff.
 - FPA recognizes there are no federal guidelines for handling unwanted medications. Once a medication is dispensed they are the property of the patients and it would be improper for pharmacies to take these medications back. The Office of National Drug Control Policy and the Federal Drug Administration released guidelines on the proper disposal

- of medications which advises not to flush medications down the drain unless the label instructs one to do so. This is in direct conflict with some state agencies and environmentalists.
- Pharmacies should conduct audits for expired pharmaceuticals and remove from inventory.
 - Only legitimate and potentially creditable outdated pharmaceuticals can be handled by reverse distribution.
 - Pharmacies must designate a clearly-marked area for outdated quarantined pharmaceuticals.
 - Several bills from 2009 were discussed:
 - HR 1191, The Safe Drug Disposal Act of 2009 which would amend the Controlled Substances Act to provide for disposal of controlled substances through a take-back program. Last action was March 16, 2009 (US House of Representatives).
 - HR 1359, Secure and Responsible Drug Disposal Act of 2009 which would also amend the Controlled Substances Act to provide for a take-back program. Last action was March 5, 2009 (US House of Representatives).
 - SB 2650, Pharmaceutical Take-back Programs which would require manufacturers to establish a take-back program. Died in Committee on Health Regulation on May 7, 2009 (Florida Senate).
 - HB 1357, Pharmaceutical Take-Back Program Pilot Project which would provide that manufacturer of drug may not sell drug or allow drug to be sold in pilot project area unless manufacturer operates pharmaceutical take-back program approved by DOH. Died in Health Care Regulation Policy Committee on May 2, 2009 (Florida House of Representatives).
 - There is a possible upcoming rule change to Rule 64B16-28.301, Florida Administrative Code, regarding how to address the needs in nursing homes for destruction of controlled substances.
- ☞ Ron McGrier presented for Health First. This presentation was available prior to today's meeting on the PharmTAG website. This was geared toward nurses.
- Several studies have been conducted on the effects of pharmaceuticals in watershed, in the drinking water and in bodies of water such as rivers.
 - Motivation for properly handling UPW is personal and corporate liability, fines, and time away from employment.
 - Barry Stewart suggested adding "partially" in the 4th bullet on slide 15 U-Listed Pharmaceuticals.
 - Although very few vaccines still contain Thimerosal, several flu vaccines are preserved with it.
 - Laurie Tenace asked whether the vaccines with Thimerosal may be cheaper than those without it.
 - Ignitables should be kept in a yellow safety cabinet.

- Florida does not have permits for any hazardous waste landfills. All landfills are lined.
- Health First utilizes black dots for UPW. Laurie Tenace asked how long they have been doing this and how well it was received. Ron McGrier stated they are rolling this out this month and the nurses have received it well.
- The Controlled Substance Management Policy PH9.01 referenced on slide 28 is a Health First policy.
- ☞ Michelle Leavis presented for Baptist Health South Florida. For proprietary reasons, this presentation was not available prior to today's meeting and will not be available on the PharmTAG website. This was geared toward nurses.
 - Although certain contaminants are filtered out at waste water treatment plants, pharmaceuticals are often not and can lead to various environmental issues.
 - Baptist Health South Florida also utilizes a black dot method for UPW.
 - Baptist Health South Florida utilizes a small red container for pressurized aerosols.
 - One slide utilized a visual cost comparison of disposal as hazardous waste vs UPW. The difference for this example was almost \$100. This is a great eye-opener.
 - Barry Stewart pointed out that the UPW label in a picture on one of the slides was missing the waste codes. Mike reminded the group those are required.
- ☞ Mike stated we have gotten great overview in today's presentations.
- ☞ Mike stated we were trying to get the next meeting in January to coincide with the annual RCRA workshop, but that has been placed on hold at this time. He asked the group to pencil in January 28th as a potential tentative date for the next meeting.
- ☞ Mike suggested the next overview should be for EHS staff who might be in charge of soliciting vendor contracts, making sure vendor gets appropriate materials for pre-transport, etc. Mike mentioned we would probably need help from PHMSA to help focus on the DOT aspects.
 - Michelle Leavis stated she is in the process of creating a training module for her EHS staff and is willing to share that with the group.
 - Jim Kendig made a suggestion that the EHS training module be more of a checklist. However, some facilities have more EHS staff than others and they will still need to have training as well.
 - Michele Leavis asked if EHS staff has any technical training requirements. Mike mentioned the possibility of an OSHA 24-hour HAZWOPR class as opposed to the 40-hour for spill responses. All training has to be documented.
- ☞ Ron McGrier asked a question referencing a letter being circulated by a vendor. According to Ron the letter states that if a reverse distributor determines something hazardous and un-returnable the reverse distributor is then asking vendors to dispose of the waste properly. Barry Fernandez

asked for clarification. If the reverse distributor is unable to dispose of waste, are they asking vendors to dispose of the waste themselves?

- Mike stated after the reverse distributor receives credit for material for their clients they have to dispose of that material. Once the manufacturers grant credit, the reverse distributor then becomes a generator and has to properly dispose of waste. If they have properly notified FDEP as UPW management and reverse distributor they can manage both streams and have to notify DOH. They can manage all manners of drugs as long as they keep proper records.
 - Barry Stewart requested Gregg Jones to speak at a future meeting about his agency and what his agency requires from inventories from hospitals shipping out UPW.
- ☞ Mike adjourned the meeting.

Follow-up:

- ☞ Mike Redig, Barry Fernandez and Michelle Leavis volunteered to work together to create the next draft presentation that will be geared toward EHS staff.
- ☞ Mike will check on the feasibility of a face-to-face meeting in January.
- ☞ Mike will request Gregg Jones speak to the group at a future meeting.