

Universal Pharmaceutical Waste (UPW)

Guidance/Training Module
Environmental Health & Safety

Pharmaceutical Waste Technical Advisory Group

The Pharmaceutical Technical Advisory Group (PharmTAG) is comprised of technical experts from both government and private industry whose purpose is to help develop compliance assistance educational materials for the generation, segregation, packaging, transport, and disposal of biomedical and Universal Pharmaceutical Wastes (UPW) that are regulated by three Florida agencies: DEP for waste management, DOH for infectious waste, drug distribution and diversion and DOT for transportation.

Objective

This Guidance Module is being developed to assist healthcare Environmental Health and Safety department personnel in carrying out their duties related to the design, development and deployment of their UPW program.

NOTE: This module does NOT satisfy the training requirements spelled out in 62-730.186, Florida Administrative Code

Selecting Vendors

- Selected by committee
- By an assigned department (EVS, Pharmacy, etc.).
- Choose a single or multiple vendors to meet their needs.
- Internalize some services for synergy or efficiency.

Selecting Vendors

- Formulary Characterization/Waste Determination
- Handler Facility / Destination Facility
- Waste Transporter
- Container Supplier
- Training and in-servicing
- Labor

Formulary Characterization/Waste Determination

- Vendor Selection
 - Qualify that the database being used is accurate
 - Monthly, quarterly, or annual updates to formulary
 - Method/Procedure(s) to identify UPW at the Pharmacy (black dot, barcode)
- Formulary database. How do you determine if the database is accurate? Different vendors have different databases. Add steps to qualify database.
- Visual ID (i.e.: color coded stickers)
- Software tracking (i.e.: Pyxis)
- Software such as Pyxis may not be a cost effective solution for smaller offices or clinics

Handler Facility / Destination Facility

Know where the waste is going

- UPW Notification (FDEP)
- Rx Restricted Distributor (FDOH)
- Controlled Substances Registration (DEA)
- TSDF Permit (EPA) (RCRA Incinerator)

Waste Transporter

- Waste Transporter
 - HW/UW Transporter Notification (FDEP)
 - Hazardous Materials Registration (USDOT)
 - Employee Training
 - Drug Testing and Background Check
- DEP insurance liability requirements
 - \$1 Million Pollution Liability endorsement
 - Must provide evidence to DEP annually

Training

- Training and in-servicing required annually
- Most hospitals have education departments internally. These departments will need to be equipped with training materials and knowledge of UPW and related activities.
- Smaller hospitals may wish to contract with one of their vendors to assist in training and refreshers.
- Outside sources such as Universities, Community Colleges, etc.

Training

- Elements of the Training Requirements:
 - Proper waste management relevant to duties
 - Spill response and cleanup
 - Containers
 - Labeling
 - Storage
 - Transportation
 - Documentation
 - Recordkeeping
- Additional topics as necessary depending on individual facility

Container Management

Selecting Containers

- Size
- Color(s)
- Packing Group (PGII) (DOT)
- Single-use or Re-usable
- Ease of use (top or lid must be able to close (62-730.186(7)(a)(1)))
- Pre-Labeled (“UPW”, Waste Codes)

SAMPLE UPW LABEL

SCOTT
CONTAINERS

Distributed By:
Clean Fuels of Florida, Inc.
2635 NE 4th Avenue
Pompano Beach, Florida 33064
Tel: (954) 791-9588 | Toll Free: 800-725-8711
Email: info@clean-fuels.net
www.clean-fuels.net

Reorder #
SC-18UPW-P
(18 gal - 60L)

Do Not Fill Above This Line

WASTE MEDICINE, LIQUID, FLAMMABLE, TOXIC, N.O.S.
3, UN3248, PGII



DO NOT FORCE OR OVERFILL CONTAINER
FOR INCINERATION ONLY



SINGLE
USE

UPW



LATEX
FREE

(Universal Pharmaceutical Waste)

Accumulation

START DATE

 4H2/Y28/S/09

CAN/ABMC 2-2860

MAX WT 62 Lbs

Waste Codes:

D001 D005 D007 D009 D010 D011
D018 D024 D026 P001 P042 P075
P188 U010 U035 U058 U129 U150
U188 U200 U205 U206

Container Management

- Location
 - Unit Accumulation
 - Soiled Utility Room
 - Med Room
 - Central Storage Area
 - HW Storage Area
 - At or near loading area
 - Secure Location – No public access
 - Supply Containers
 - New container storage and access
 - Date (start date) upon placement

Container Management

- Logistics – Internally managed or outsourced?
 - Pickup routine or “rounds”
 - Trained personnel
 - Response to releases
 - Spill kits
 - PPE
 - ER Contact & Procedures (safety, environment, disposal, etc.)
 - Container storage (upright, closed, labeled, dated, not leaking, etc.)
 - Replacement (empty) supply containers

Off Site Shipment

- Containers must be prepared for shipment in accordance with DOT regulations.
- Transporters, receiving handlers, and/or destination facilities may have additional requirements for palletizing, weight restrictions, load distribution and material compatibility. Check with your vendor(s) to avoid costly demurrage or rejection charges.

Off Site Shipment

- Shipping container
 - Must be UN rated and compatible with the material being shipped
 - Must be closed and leak free
 - Must be labeled for shipment (varies according to destination)

Off Site Shipment

- Shipping Document
 - Hazardous Waste Manifest if being shipped out of state
 - Bill of Lading (BOL) if shipping within Florida
- Record Keeping
 - Certificate of Destruction (COD) when disposed. Keep all COD's for 2 years (DOH Requirement)
 - Keep all manifests or BOL's for 3 years
 - Keep all training records for 3 years
 - All records must be kept on site of originating shipment

Links and Resources

- Florida Department of Environmental Protection
 - UPW Regulation (62-730.186) - <http://pharmtag.org/62730186.pdf>
 - DEP Notification Form (EPAID Application) - <http://www.dep.state.fl.us/waste/categories/hwRegulation/pages/NotificationRegulatedWaste.htm>
 - DEP EPAID Lookup - http://approd.dep.state.fl.us/www_rcra/reports/handler_sel.asp
 - DEP Hazardous Waste Transporters List - http://approd.dep.state.fl.us/www_rcra/reports/CommHWTransport.asp
- Florida Department of Health, Drugs Devices & Cosmetics (DDC)
 - Regulations for Drugs Devices & Cosmetics (64F-12, FAC) - <https://www.flrules.org/gateway/chapterhome.asp?chapter=64F-12>
 - DOH License Lookup - <https://ww2.doh.state.fl.us/IRM00PRAES/PRASLIST.ASP>
- US DOT HazMat Registration
 - <http://www.phmsa.dot.gov/hazmat/registration>
 - Anyone who offers a single shipment containing 1,000 lbs. or more of one or more classes of hazardous materials or hazardous wastes that require placarding to register with the US DOT.
 - Registration Lookup - <https://hazmatonline.phmsa.dot.gov/Services/companylookup.aspx>
- US Drug Enforcement Agency (DEA) - <http://www.deadiversion.usdoj.gov>