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PROPER DISPOSAL OF OLD MEDICATIONS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 28 1990

Marilynne Wilson, RN
Quality Assurance Coordinator
Family Home Care
P.O. Box 2145
Spokane, Washington 99210-2145

Dear Ms. Wilson:

Thank you for your letter dated October 12, 1990 regarding the proper disposal of old medications.

Expired medications from households may fall into the category of household hazardous waste. Household hazardous waste (HHW) is appropriately identified by applying two criteria. First, the waste must be generated by individuals on the premises of a temporary or permanent residence for individuals. Second, the waste stream must be composed primarily of materials found in the waste generated by consumers in their homes. Other items that may fall into this category may include excess household cleaners, lawn and garden products, and paint thinners, among others, when intended for disposal.

Based on the information in your letter, it is not clear whether the medication you manage qualifies as HHW. However, you should be able to determine the regulatory status of the material based on the aforementioned criteria. At the Federal regulatory level, HHW is excluded from hazardous waste regulations under Subtitle C of the Resource Conservation and Recovery Act (RCRA). Please note that state or local regulations may be more stringent than Federal regulations.

Although household hazardous waste is excluded from Subtitle C regulations, the Environmental Protection Agency (EPA) shares concerns such as yours regarding household hazardous waste. In fact, EPA attempts to address some of these concerns in the enclosed publication entitled A Survey of Household Hazardous Wastes and Related Collection Programs. This report contains the results of a comprehensive nationwide survey of HHW. In this publication the Agency identifies: existing information on the types and quantities of HHW; the impacts of HHW on homeowners, solid waste collection and disposal personnel,

and the environment; and existing collection programs at the state and local levels. You may also be interested in the enclosed publication Household Hazardous Waste: Bibliography of Useful References and List of State Experts which lists resources and contacts for HHW programs.

With regard to disposal of old medications, rinsing the bottles and flushing this type of waste down a toilet may be the most appropriate method of disposal. Additionally, most pharmacists recommend flushing expired tablets and capsules down the toilet. By disposing of these normally minute quantities of household waste in this fashion, the possibility of exposing children that might be attracted to the potentially harmful materials while in the trash is removed. Federally, any mixture of domestic sewage and other wastes that pass through a sewer system to a publicly owned treatment works (POTW) for treatment is not regulated under Subtitle C.

I suggest you consult your local publicly owned treatment works (POTW) to determine if local limits or general/specific prohibitions are applicable when disposing of expired medications in this manner. I also suggest you contact your state solid waste program office to determine if they can provide additional HHW disposal guidance. The address in Washington is:

Solid And Hazardous Waste Management Division
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504
(206) 459-6316

Thank you for your interest in proper waste management. I hope this information is useful when determining the appropriate disposal options for expired medications.

Sincerely,

Mike Petruska, Chief
Waste Characterization Branch

Enclosures