



EXP PHARMACEUTICAL
SERVICES
CORP.

Reverse Distribution and Pharmaceutical Waste Management

**Washington Department of Ecology
Hospital Seminar: Pharmaceutical Waste Management
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**Mark Harvey
Director of Operations
EXP Pharmaceutical Services Corp.**

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Role of Reverse Distributors in Managing Waste Pharmaceuticals

- What is a Reverse Distributor?
 - Returning Potentially Creditable Pharmaceuticals
 - Waste Determination and Management at Reverse Distributor's Facility
 - Assisting Current Customers in Waste Management and Education by:
 - Initial training of Pharmacy staff by Reverse Distributor personnel
 - Processing report data that includes reasons for credit ineligibility
 - Non-compliance incident reports

HEALTHCARE FACILITY (HCF) INVENTORY

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Dispensable Pharmaceuticals

Unwanted Pharmaceuticals

Non-Creditable Pharmaceuticals

EXAMPLES:

- Patient Owned Medications
- Repackaged Products
- Samples
- IV Preparations
- Compounded Pharmaceuticals
- Pharmaceuticals Acquired for Free
- Partial Creams and Ointments
- Partial Vials
- Inherently Waste-Like Materials
(such as: broken, spilled, or unidentifiable pharmaceuticals)

Potentially Creditable Pharmaceuticals

Solid Waste

EXP recommends disposing of Solid Waste pharmaceuticals via incineration.

Non-RCRA Hazardous Waste

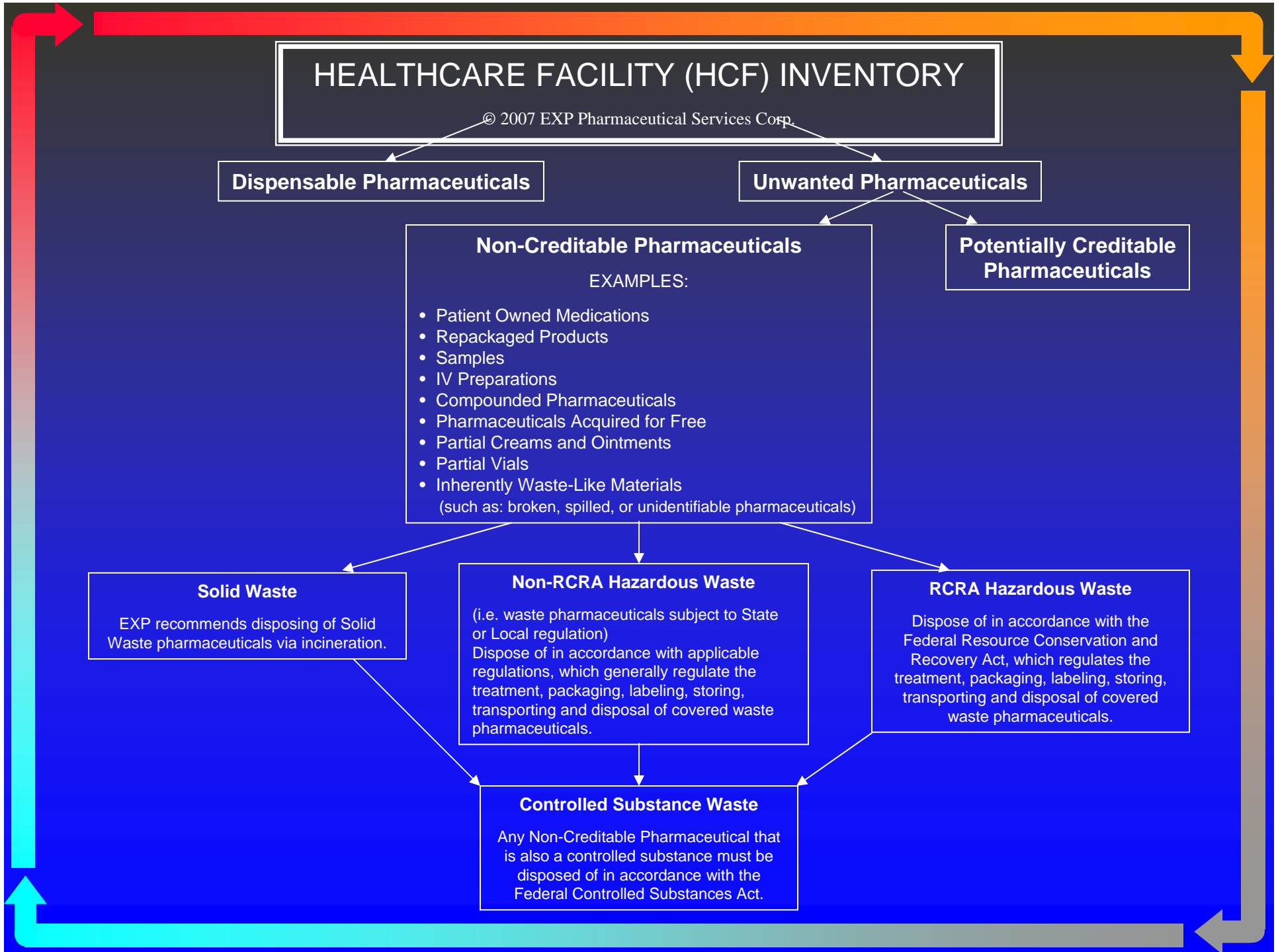
(i.e. waste pharmaceuticals subject to State or Local regulation)
Dispose of in accordance with applicable regulations, which generally regulate the treatment, packaging, labeling, storing, transporting and disposal of covered waste pharmaceuticals.

RCRA Hazardous Waste

Dispose of in accordance with the Federal Resource Conservation and Recovery Act, which regulates the treatment, packaging, labeling, storing, transporting and disposal of covered waste pharmaceuticals.

Controlled Substance Waste

Any Non-Creditable Pharmaceutical that is also a controlled substance must be disposed of in accordance with the Federal Controlled Substances Act.



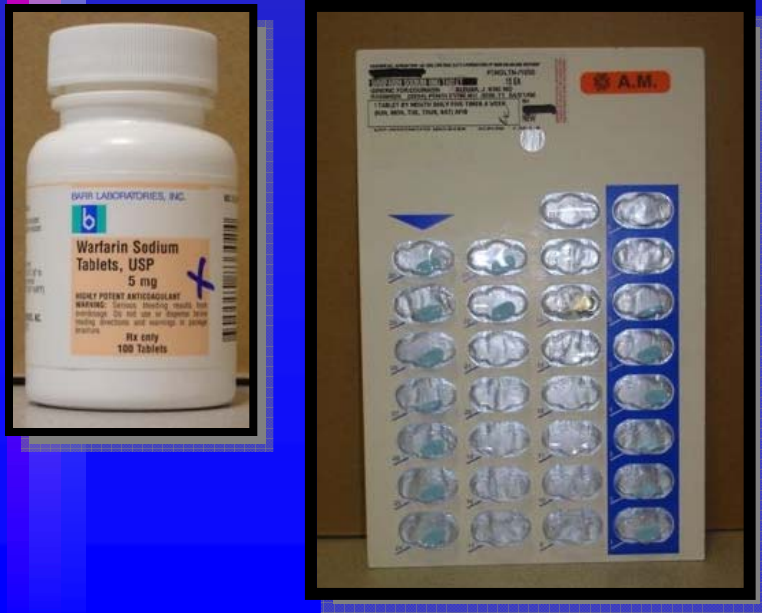
EXPIRED



SAMPLES

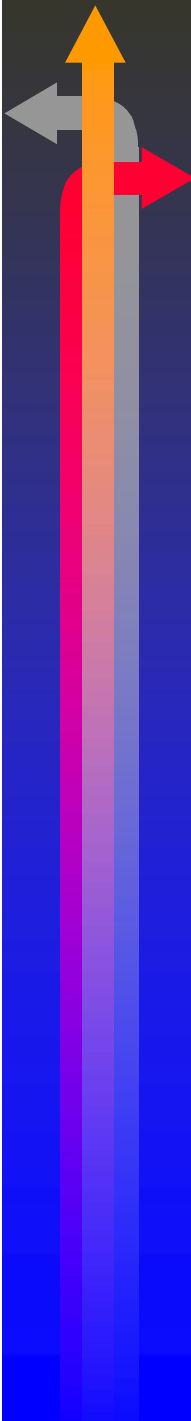


REPACKS



FREEBIES





“The larger hospitals and pharmacies use reverse distributors to manage some of their pharmaceutical discards. However, on the hospital floor and in small medical facilities and doctors’ offices, the staff is not in compliance with RCRA regulations – not because they don’t want to be but because they are overworked, stressed and it would be overly burdensome.”

Dave Galvin

2003 Alert; Pharmaceutical Disposal Comment Opportunity



The Future of Reverse Distributors in Managing Waste Pharmaceuticals

- Reverse Distributors are in a position to play a greater role in Managing Waste Pharmaceuticals.
- EXP filed a letter with the EPA in July of last year recommending the application of the Universal Waste Rules to waste pharmaceuticals that designate as RCRA hazardous waste.
- EPA is considering an amendment to the Universal Waste Rule to include pharmaceuticals
- A significant benefit of applying the UW Rules to waste pharmaceuticals is that it would allow for waste pharmaceuticals that designate as RCRA hazardous waste to be transported via common carriers at substantially less cost.
- This would encourage healthcare facilities to responsibly dispose of their waste pharmaceuticals.



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Questions?

Mark Harvey

Director of Operations

48021 Warm Springs Blvd

Fremont, CA 94539

Phone: 510-933-0936

Email: MarkRH@expworld.com