



# Interim Pharmaceutical Waste Policy (IPWP)

Pub #07-04-024, revised October, 2016

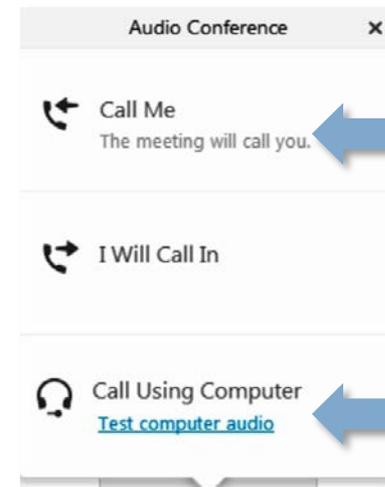
# Interim Pharmaceutical Waste Policy

The purpose of this webinar is to provide an overview on changes made to the Interim Pharmaceutical Waste Policy (IPWP). This policy will be in place until EPA releases their rule revisions and Ecology has responded and formalized any changes.

**Start time:** 9:00 a.m. PST

**Anticipated end time:** 11:00 a.m. PST

Please choose “Call Me” or “Call Using Computer”  
This helps us identify you during our Q&A sessions.  
*All lines are muted.*



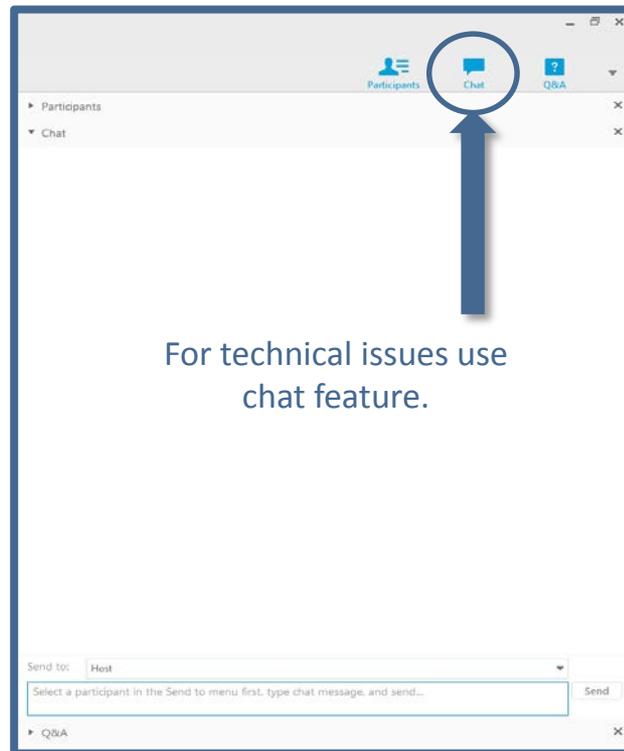
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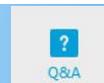
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# Technical Issues



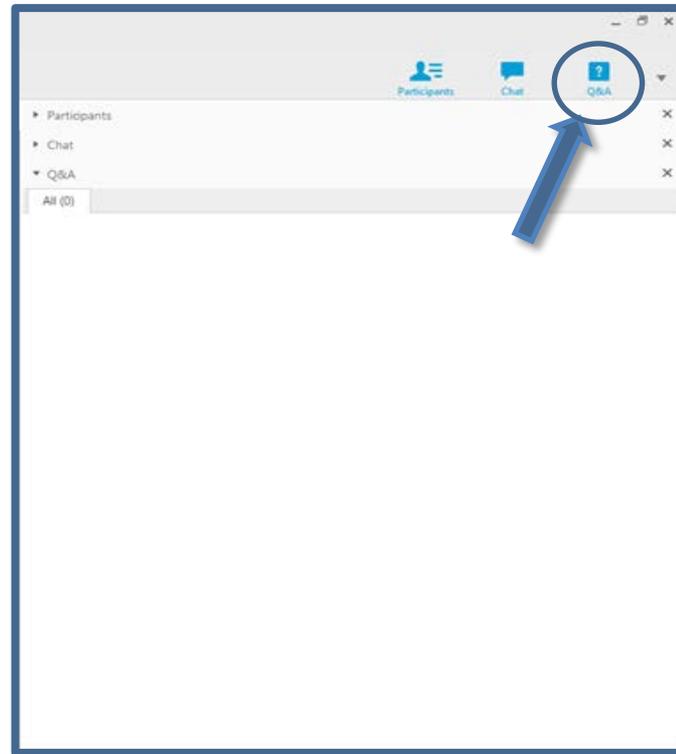
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# Asking Questions



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# Department of Ecology Regional Offices



[www.ecy.wa.gov](http://www.ecy.wa.gov)

Type into the search bar:  
**Managing  
Pharmaceutical Waste**

Southwest Region  
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Northwest Region  
425-649-7000

Central Region  
509-575-2490

Eastern Region  
509-329-3400



# IPWP: Who, What, Why



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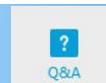
# EPA's rules are not here yet!

...and might not be for at least some time...so...

- Drafted section 173-303-**555** to prepare for EPA's Subpart P
  - Can't adopt ANY portions until EPA finalizes
  - Approximately a year out from final rule.....so.....



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# Interim Pharmaceutical

So, in the mean time we are using an interim pharmaceutical policy the “IPWP” or “revised policy”

We Revised the old “IEP” Policy to:

- Fix some mistakes
- Changes with the times
- Get a jump start on Subpart P



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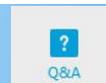


# The revised Policy

- Optional to all healthcare facilities (HCF) and retail pharmacies
- Not an option for:
  - Research facilities
  - Wholesale pharmacies
  - Reverse distributors
  - Drug manufacturers



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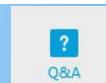
# Non-pharmaceutical DW:

Some non-pharmaceutical DW examples at healthcare facilities include:

- Formalin – tissue fixative
- OPA or glutaraldehyde – High-level disinfectants
- Xylene and alcohol waste – tissue staining
- CO2-scrubber canisters
- Paint waste from facilities



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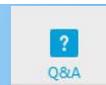


# Benefits for using the Revised Policy

- No QELs (regardless of amount)
- No counting (Pharm. waste)
- No reporting (Pharm waste)



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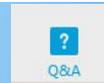


# Benefits...continued

- Waste profile
- Accumulate – 180 days



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# Management Details



Jenny Yoo | [jenny.yoo@ecy.wa.gov](mailto:jenny.yoo@ecy.wa.gov) | 425.649.7166

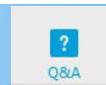


# Revised Policy Management Standards

- Generic profile
- Notification
- Creditable pharmaceuticals to a Reverse Distributor
  - Can still send waste controlled substances
- Uniform Hazardous Waste Manifest



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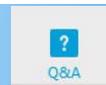


# Revised Policy Management Standards

- Compatibility
- Commingle
- Secondary containment
- Closed
- Accumulate up to 180 days
  - No SAA



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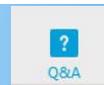
# Revised Policy: Major Changes

## Disposal requirements

- No Sewering
- Send to RCRA permitted facility
  - Follow all Land Disposal Restrictions (LDRs)



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# Revised Policy: Major Changes

- New Labeling requirements:  
*"Hazardous Waste Pharmaceuticals"*  
or  
*"Dangerous Waste Pharmaceuticals"*

**Hazardous Waste Pharmaceuticals**

**Accumulation Start**  
**Date:** \_\_\_\_\_  
**Location:** \_\_\_\_\_

**Handle with Care!**  
**TOXIC**



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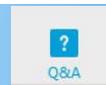


# Revised Policy: Major Changes DEA Controlled Substances

- No sewerage – even partials
- Manage per DEA
  - Allows on-site DEA destruction
  - Allow municipal incineration
- No allowance under the Dangerous Waste Regulations



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# Revised Policy: Major Changes Treatment by Generator

- Allowable under the revised Policy
- Profile Pharmaceuticals & Residue
- Must manage residue and/or canisters per the Policy
- Containers must be closed
- **No Count – No Log – No Report**



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# Revised Policy: Major Changes Containers and Syringes



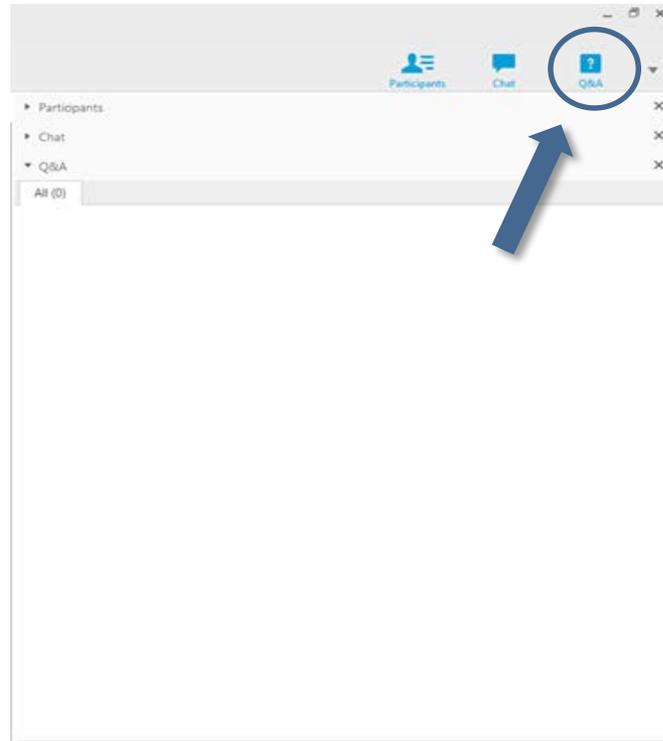
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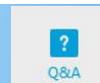
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# Asking Questions



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# More Information

Visit our website:

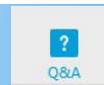
[www.ecy.wa.gov/programs/hwtr/pharmaceuticals/index.html](http://www.ecy.wa.gov/programs/hwtr/pharmaceuticals/index.html)

## Contact

- Implementation Questions:
  - Jenny Yoo | [jenny.yoo@ecy.wa.gov](mailto:jenny.yoo@ecy.wa.gov) | 425.649.7166
  - Tom Cusack | [thomas.cusack@ecy.wa.gov](mailto:thomas.cusack@ecy.wa.gov) | 360.407.7613
- Rule revision questions:
  - Rob Rieck | [robert.rieck@ecy.wa.gov](mailto:robert.rieck@ecy.wa.gov) | 360.407.6751
- Stakeholder concerns:
  - Kimberly Goetz | [kimberly.goetz@ecy.wa.gov](mailto:kimberly.goetz@ecy.wa.gov) | 360.407.6754



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