Stericycle’s HDDS Pharmaceutical Identification Checklist

The U.S. Environmental Protection Agency (EPA) requires all businesses to evaluate waste materials prior to disposal in order to determine whether they are regulated as hazardous under the Resource Conservation and Recovery Act (RCRA). This requirement extends to waste pharmaceuticals being disposed of by healthcare facilities, and this process of evaluation and analysis is often referred to as "waste characterization." Stericycle has developed this checklist to assist generators with waste characterization and to ensure that hazardous pharmaceutical waste is accumulated, transported and disposed of properly.

SECTION 1: Identifying Compatible Hazardous Pharmaceutical Waste

Compatible hazardous pharmaceutical waste denotes Rx items that can be placed together in the same container for disposal without risk of a chemical reaction.

CHECK ANY OF THE FOLLOWING THAT YOU CARRY:

1. Chemotherapy:
   - Mitomycin, Mitomycin C, Mutamycin
   - Chlorambucil, Leukeran
   - Cyclophosphamide, Cytoxan, Neosar
   - Daunomycin, Daunorubicin, Cebidim, DaunXome, Rubidomycin
   - Melphalan, Alkeran, L-PAM
   - Streptozotocin, Zanosar
   - Azaserine
   - Diethylstilbestrol, DES, stilbestrol
   - Uramustine, Uracil Mustard, Mustargen

2. Flammables:
   - Mouthwashes
   - Formo Cresol, Cresol Solution
   - Unused/Expired Alcohol Pads, Alcohol Swabs

3. Anesthesia:
   - Sevoflurane, Isoflurane
   - Silvadene, Silver Sulphadiazine
   - Phisohex
   - Chloroform

4. Vitamins:
   - Glucerna, Boost, Jeivity, Nepro, Osmoite, Multigen, POLY-VI-SOL
   - Multivitamins
   - Multigen
   - Protegra
   - Selenium
   - Chromium

5. Vaccines:
   - Do you vaccinate your patients?
     - Yes
     - No

6. Cardiology:
   - Reserpine
   - Epinephrine*, EpiPen, Epi-Foam, Twinject, Primatene, S2, Adrenaline
   - Nitroglycerine*, Nitrostat, Nitroquick, Nitro-Dur, Nitro-Bid

7. Dermatology:
   - Resorcinol
   - Cough Sprays
   - Afrin
   - Lindane Shampoo or Lotion
   - T-gel, Inisol-T, Polytar, Zetar, Coal Tar
   - Selenium Sulfide, Dandex, Oxel, Selson Blue, Selseb, Selenos, Tersi Foam
   - Fluocinonide Topical, Lidex
   - Fluorescein Sodium
   - Lice Treatment Shampoos, Nix

8. Ophthalmology:
   - Neo-Synephrine
   - Vision Blue, Trypan Blue
   - FML, S.O.P, Fluomethalone
   - Neomycin/Polyoxymycin, dexamethazone
   - Vioptic, Trifluridine
   - Beophamidine

9. Diabetes Treatment:
   - Humalog, Humulin
   - Novolog, Novolin
   - Symlin
   - Levebin
   - Iletin
   - Byetta
   - Insulin

SECTION 2: Identifying P-Listed Hazardous Pharmaceutical Waste

P-listed hazardous waste, also known as "acutely hazardous waste," is subject to a special set of EPA regulatory requirements due to its high toxicity to human health and the environment. P-listed Rx waste must be collected separately from other Rx waste and monitored so that the total amount on-site does not exceed 2.2 pounds.

CHECK ANY OF THE FOLLOWING THAT YOU CARRY:

- Coumadin/Plavix/Lexem/Pentasaccharide
- Phystostigmine, Phystostigmine Salicylate
- Arsenic trioxide/Triplenox

* In the vast majority of states, medical-grade nitroglycerine and epinephrine are exempted from P-listed status.

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SECTION 3: Identifying Incompatible Hazardous Pharmaceutical Waste

A small number of medications, known as “incompatible” pharmaceutical waste, must be collected and transported in their own containers, separate from compatible waste and from one another, to prevent a chemical reaction from occurring. Following is a list of incompatible pharmaceuticals. Please note that each underlined category listed below requires its own container, separate from all other Rx waste.

CHECK ANY OF THE FOLLOWING THAT YOU CARRY:
- Aerosols (includes asthma inhalers, Hurricane)
- Botox/Myobloc
- Colloidal/nitrocellulose (includes New Skin, wart removers)
- Corrosive Acids (includes aluminum chloride injections, Tri-Chlor, ammonia inhalants, cupric/copper/chromium chloride, hydroxyzine hydrochloride, L-Cysteine, lactic acid, Pyritoxine HCl injection, Sporanox)
- Oxidizers (includes Silver Nitrate sticks/applicators, Arxol Silver, Amyl Nitrate, Cyanide Antidote kits)

SECTION 4: Estimating Pharmaceutical Waste Volume

Thinking of a typical office/desk-side trash can (approximately 8 gallons and roughly 12” diameter x 18” high), how often would it take you to fill with pharmaceutical waste (excluding controlled substances)?
- One Week or less
- One Month
- Three Months
- Six Months
- Twelve Months

SECTION 5: Definition of Acceptable Pharmaceutical Waste

I certify that these containers will be used only for collection of RCRA hazardous and non-hazardous pharmaceutical waste. I certify that no DEA controlled substances, infectious or regulated medical wastes (RMW) or non-pharmaceutical wastes of any kind will be included in these containers. I certify that I will collect my incompatible pharmaceutical waste separately from my compatible pharmaceutical waste. I agree to place only wastes conforming to these descriptions into these containers.

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