

# RCRA Hazardous Pharmaceutical Waste

If it appears on one of the EPA Lists or exhibits one of four characteristics (ignitability, corrosivity, reactivity, and toxicity) it's RCRA Hazardous Waste. These definitions are determined by the US EPA but may vary based on additional State requirements.\*

*\*as a note Subpart P will not impact whether something is a hazardous waste or not, it will only impact labeling, generator status, etc.*



USN241207

## Waste resulting from Diagnosis and Treatment



▶ Chemotherapy Research, Testing and Facilities



▶ Compounding Pharmacies



▶ Patient Care facilities including Hospitals, Rehabilitation Centers and Oncology Centers



▶ Sealed Rx Destroyer and Secure a Drug containers that contain hazardous controlled substances

*\* Controlled substances require witness documented destruction.*

*\* This may require a separate disposal container. Cannot be mixed with other pharmaceuticals.*

## Items that are RCRA Hazardous Pharmaceuticals



▶ Partial and unused medications that are considered to be a RCRA hazardous waste

*i.e.: insulins, coumadin, sore throat sprays, topical creams such as Silvadene or Selenium*



▶ Non-empty containers or IV bags containing Chemotherapy medicine (over 3% of residual substance)



▶ Unused or partial syringes and ampoules that still contain RCRA Hazardous Medication



▶ Containers, IV bags, or tubing that is empty but contained a P-listed pharmaceutical i.e. Arsenic Trioxide, Coumadin, Physostigmine\*

*\*Subpart P may impact this requirement, check state regulations*

## HAZ vs NON-HAZ PHARMACEUTICAL WASTE



**HAZ** | RCRA pharmaceuticals, bulk chemotherapy and listed waste as described on this poster can be combined in a black hazardous waste container. This does not include acutely hazardous P-Listed Waste.



**NON-HAZ** | Includes all pharmaceuticals that are not a listed or characteristic RCRA waste, not a NIOSH hazardous drug, and not an investigative chemotherapy agent.

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\* **Guidance only.** Each facility should check with their local and state regulations to verify specific policy and procedures