

Household Pharmaceutical Collection

Regulatory Requirements, Current Issues and Opportunities

Jennifer Volkman

Minnesota Pollution Control Agency
Household Hazardous Waste
Program Coordinator

What is happening in MN?

- New collection sites being established by law enforcement weekly!
- Estimate 50 total collection sites at law enforcement locations in MN within a year.
- Events at pharmacies and HHW facilities
- Sharps, Inc. mailers at some pharmacies—may not be legal

September 25, 2010

DEA Events

All Estimated:

- 11 sites in Anoka, Dakota, Hennepin, Ramsey, Sherburne and Washington counties
- 2,000 to 2,200 participants 4,000 lbs of non-controlled pharms
- 400 lbs of controlled substances
- Built excellent partnerships—YAY HHW PROGRAMS!
- Spring event?
- <http://www.justice.gov/dea/index.htm> Pictures!

WHO CAN COLLECT HH PHARMS?

- Law enforcement is the only entity that can collect all pharms 24/7
- Pharmacies and HHW Programs:
 - Events only
 - No on-site storage of controlled substances

Legislation in MN 2009

Modification to Board of Pharmacy Statutes to allow possession of “legend” pharms by different entities for the purpose of collection for proper disposal.

- Law enforcement and other county programs
- Approved waste management transporters and facilities
- People!

Regulatory Requirements

--Notification--

- Contact Jennifer.volkman@state.mn.us or Teresa.gilbertson@state.mn.us
- Complete Notification Form
- One page:
 - Contact info
 - General operational info
 - Disposal info
 - Sign, date, submit

Regulatory Requirements

--HW ID Number--

- ★ Needed if you plan to ship pharm waste with a Hazardous Waste hauler.
- ★ Haz Waste ID numbers are site specific
- ★ “Notification of Regulated Waste Activity”
Forms available at:
<http://www.pca.state.mn.us/waste/pubs/business.html#forms>
- ★ Complete all contact info on page 1
- ★ On Page 2:,
 - ★ Check: VIII B. 4
 - ★ Sign and submit

Regulatory Requirements

- No license fee for collectors
- Review guidance document for collectors—basics on notification, storage, PPE...
- MPCA will notify Board of Pharmacy
- Collectors should notify DEA if collecting controlled substances

Regulatory Requirements

--Waste Management--

2 Options:

- 1) Contract with HW hauler for all collected pharms.
- 2) Seek approval to bring collected pharms to a Waste-To-Energy facility in MN.

All controlled substance pharms must be destroyed via “witnessed burn”

Collection Options

Events benefits:

- Limited investment of staff
- Cost control
- Raise awareness of environmental and abuse issues

Permanent collection via secured kiosk

- Convenience to public; increase in amount collected
- More staff investment; esp from law enforcement
- Storage space needed

Reporting

Annual to MPCA, Metro County

- Total pounds collected
- Number of participants, if tracked
- Share additional data—pharmacy students are willing to sort to generate more detailed information.

Also report to:

www.communityofcompetence.com

Why Report?

- To show benefits of your community service
- To help focus pollution prevention and abuse prevention efforts.
- To support legislation
- To support Product Stewardship efforts

S.3397 -- Secure and Responsible Drug Disposal Act of 2010

<http://thomas.loc.gov/cgi-bin/query/D?c111:6:./temp/~c111zOKO8N::>

On President's desk for signature:

- Directs AG to establish collection scenarios that are “secure, convenient and responsible”
- Allows delivery of CS to a collection program by individuals or by long-term care facilities
- Increases penalties for bad guys—look out!
- Main purpose is to reduce abuse, “also” to help the environment.

State Legislation

- Several states will pursue product stewardship legislation: WA, Maine, FL, CA, VT...
- Most are waiting until after elections to finalize plans

VSQG Pharm Generators

- Only non-Controlled Substances may be accepted by VSQG Consolidation Sites
- MPCA/Metro counties are educating small clinics and pharmacies, which may generate calls
- Protocol for county run VSQG consolidation sites is to immediately mix with used oil or oil based paint in a paint can and labpack for direct charge.

THANK YOU!

Questions?

Jennifer.volkman@state.mn.us

651-757-2801

Pharmaceuticals in Homes

Childhood Accidental Poisoning and Overdoses



- Almost 40% of accidental poisoning occurs in grandparents' homes
- Half of all poisonings involve children under 6 years of age

Source: Minnesota Poison Control, 2004

- 13% percent of all poison exposure calls received in 2008 were related to analgesics or painkillers.
- 9% Cosmetics or personal care products,
- 8.6% household cleaning products
- Of the 1,756 deaths reported to poison centers in 2008, most fatalities involved exposure to drugs by adults between the ages of 20 and 59

<http://www.aapcc.org/>

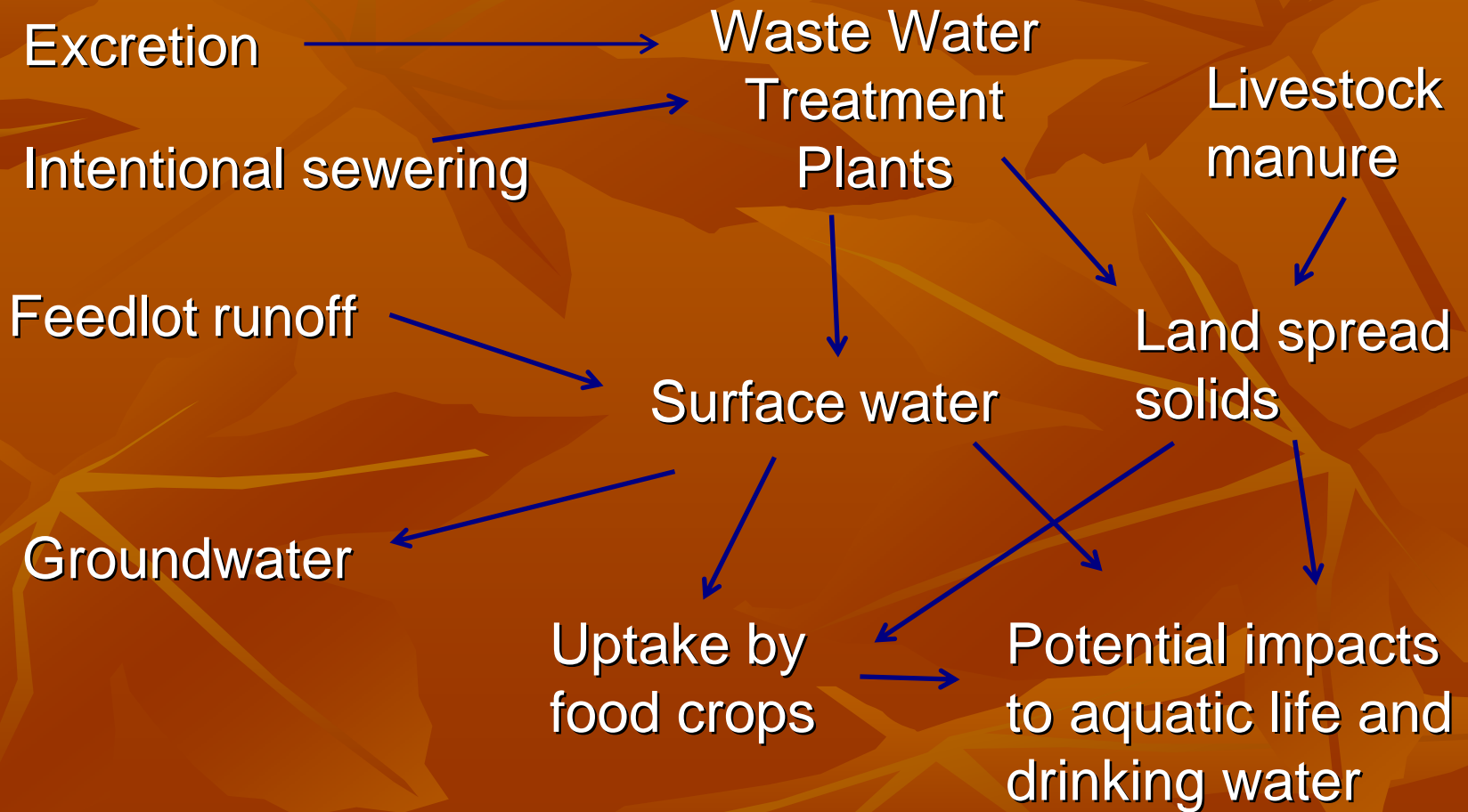
Current MPCA Efforts

- Review and approve incineration of pharms at WTE facilities in MN
- Provide guidance for collectors of HH pharms
- Pharmaceuticals in lake sediments – 2008 Statewide EDC study with USGS and SCSU
<http://www.pca.state.mn.us/water/sediments/studies-statewide.html>
- 2009 Personal Care products and SSRI (Antidepressant) monitoring at 50 locations in Minnesota
<http://www.pca.state.mn.us/water/edc.html>
- Compliance Guidance tools for pharmacies
<http://www.mntap.umn.edu/healthcarehw/index.html>

Prescription Drug Abuse

- Second only to marijuana use
- ~70% of people who have abused opioids got them from friends and relatives
- Between 1993 and 2005, there was a 93.3 percent increase in those abusing prescription stimulants like Ritalin and Adderall.
- Among teens who have abused painkillers, nearly one-fifth (18%) used them at least weekly in the past year.
- 32% of teens say they abuse prescription painkillers because they believe there are fewer side effects than street drugs.
- Between 1995 and 2005, treatment admissions for abuse of prescription pain relievers grew more than 300 percent.
- Above stats are from <http://www.awarerx.org/> sponsored by MN Pharmacists Association

Pathways to the Environment



“The toilet is not a garbage can.”