

PLISTED PHARMACEUTICALS

Healthcare facilities that generate over one kilogram or 2.2 pounds per month of P-listed wastes are full quantity generators of hazardous waste and must adhere to stringent hazardous waste regulations.

Containers and inner liners that have held acutely hazardous wastes (P-listed) are deemed empty if the containers or inner liners have been triple rinsed with appropriate rinse-ate and no residue can be removed from the container. The rinse-ate is considered a hazardous waste mixture and must be managed accordingly. If the container is **not** rinsed out prior to disposal, then the container and the contents must be managed as a hazardous waste. Facilities cannot dispose of empty P-listed chemical containers that have not been properly rinsed in the medical “red bag” waste or in the solid waste “trash.”

Examples of P-Listed Pharmaceutical Waste (The complete list of P-listed chemicals can be found at Env-Hw 402.04.):

- Arsenic trioxide (P012)
- Epinephrine (P042)
 - Nicotine (P075)
- Phentermine (CIV) (P046)
 - Physostigmine (P204)
- Physostigmine Salicylate (P188)
- Warfarin >0.3% (P001)

Epinephrine Salts

Any chemical or formulation where epinephrine salt is the sole active ingredient is not a P042 listed hazardous waste when discarded. Please be aware that a chemical or formulation containing epinephrine salt can still be regulated as a hazardous waste if it exhibits a waste characteristic.

Management Example: Products with expired shelf lives

Occasionally, some products' shelf lives expire. Facilities should:

1. Return the product to a distribution company or manufacturer through a “take-back” program. Review the facility’s group purchasing organization contract for further information. Some of these services are included in the contract.
2. Create an inventory control program to limit the amount of products that expire before use. Resources spent on the management of expired products are resources lost.
3. Example: When unused physostigmine is the sole-active ingredient, it must be managed as a hazardous waste. The waste code on the manifest should be P204. This amount will also count towards the hazardous waste generation status.

Management Example: Nitroglycerin Formulations

The Department of Environmental Services adopted a nitroglycerine formulation exemption. The exemption reads:

Nitroglycerine, listed as P081 [is exempt], provided that it:

- a. Was to be used for medicinal purposes; and
- b. Does not exhibit a hazardous waste characteristic.