

University of South Florida

Universal Pharmaceutical Waste Program

Purpose

The purpose of this program is to ensure that all regulatory requirements applicable to the management and disposal of universal pharmaceutical wastes are met and that pharmaceuticals are properly disposed.

Background

Many pharmaceuticals, when discarded, can be hazardous to the environment and are regulated as universal pharmaceutical waste (UPW) by the Florida Department of Environmental Protection (FDEP). Therefore, these pharmaceutical wastes cannot legally be discarded into the garbage, the sanitary sewer, or biohazardous waste containers.

For the sake of simplicity, all pharmaceutical waste and pharmaceutical-contaminated delivery equipment generated at USF facilities will be handled as UPW.

The statutory requirement for management of UPW can be found in F.A.C. 62-730.186, *Universal Pharmaceutical Waste*, which is the primary resource for the following program.

Roles and Responsibilities

To ensure compliance with the regulatory requirements, various responsibilities are assigned to the following entities:

Environmental Health and Safety

- Serves as the administrator of the university's contract with the UPW disposal vendor.
 - Acts as the contact between the university and the vendor for program-related issues including site setup, container delivery, and pickup scheduling.
 - Ensures excellent service is maintained by vendor.
 - Receives and files copies of all shipping manifests and invoices from the vendor and makes them available for audit by regulatory agencies.
- Maintains information about the current UPW disposal vendor and general program information on the USF EH&S website (<http://www.usf.edu/eh&s>).
- Acts as a resource to colleges/departments/units to assist in the development of their individual programs and to answer technical questions regarding regulatory requirements. Assists colleges/departments/units in maintaining compliance with UPW regulations.
- Assists in the event of a pharmaceutical release that is beyond the ability of the College/Department/Unit to contain and remediate.
- Collects all waste resulting from the release of universal pharmaceutical waste and assists colleges/departments/units with spill cleanup as necessary.

Colleges/Departments/Units

- Compile and implement a written program for the management of UPW specific to the area. This written program will include:
 - General program information received from vendor
 - Site-specific procedures for handling UPW in the facility
 - Plans for training personnel and maintenance of training records
 - Site-specific procedures for managing emergency releases of UPW in the facility

- Delineation of roles and responsibilities for developing, implementing, and maintaining an on-site program.
- Work with the EH&S and UPW disposal vendor to identify wastes that are to be disposed as UPW.
- Manage containers in accordance with regulatory requirements.
- Work with EH&S and UPW disposal vendor to identify locations within their facilities in which to accumulate UPW waste.
- Work with EH&S to determine appropriate schedule for waste pickups by UPW disposal vendor. Notify EH&S if more frequent or out-of-cycle pickups are required based on the accumulation of waste at the facility.
- Appoint a representative from the college/department/unit who will sign and collect a copy of shipping manifests from the UPW disposal vendor during waste shipments.
- Maintain copies of UPW shipping manifests in the college/department/unit for at least three years for audit by regulatory agencies.
- Purchase containers for collection of UPW from UPW disposal vendor.
- Set up a college/department/unit account with the UPW disposal vendor for receipt of invoices and payment for services.
- Contain and remediate releases of pharmaceuticals immediately. Contact EH&S at (813) 974-4036 for assistance if a release exceeds the ability of the college/department/unit. Dispose of waste from the release of pharmaceuticals as hazardous waste. Contact EH&S for collection of hazardous waste.
- Maintain compliance with the UPW regulations and written UPW program documents within the college/department/unit.

UPW Disposal Vendor

- Assists colleges/departments/units with setup and implementation of UPW disposal programs including
 - Identification of storage locations for UPW containers
 - Determination of wastes that can be disposed as UPW
 - Initial training of employees or providing a “train-the-trainer” course to designated individuals
- Advises colleges/departments/units on disposal procedures for new pharmaceutical wastes.
- Provides collection, transportation, and disposal of UPW from designated areas in colleges/departments/units at intervals agreed-upon with colleges/departments/units or on an as-needed basis.
- Completes and provides copies of waste manifests to designated college/department/unit representatives and EH&S at the completion of UPW pickups.
- Invoices colleges/departments/units individually and sends copies of invoices to EH&S.

Any questions about this program should be directed to the Environmental Health and Safety at (813) 974-4036.

Attachment
Florida Department of Environmental Protection Requirements for
Management of Universal Pharmaceutical Waste
(Summarized from F.A.C. 62-730.186)

Training

- Employees shall successfully complete a program of classroom instruction or on-the-job training familiarizing them with proper waste management procedures relevant to their responsibilities during normal facility operations and emergencies.
- Training shall include the appropriate response to releases of pharmaceuticals.
- Training shall be completed within three months of date of employment or assignment.
- Untrained employees shall not manage UPWs unsupervised until they have completed training.
- Annual refresher training is required.
- Training shall be documented and include name, signature, date of hire or assignment, training date, and training type.
- Documentation shall be maintained for 3 years.

Container Management

- All UPW containers shall remain closed except when adding waste.
- Containers must be structurally sound and compatible with the waste contained therein.
- Containers must be clearly labeled with the words “Universal Pharmaceutical Waste” or “Universal Waste Pharmaceuticals.”
- Containers must be managed in such a way that prevents releases to the environment. Any container that shows evidence of leakage, spillage, or damage must be placed into a larger container that will prevent release of contents to the environment and any spilled materials must be immediately cleaned up.
- All releases of UPW must be immediately contained. If the UPW is a hazardous waste, the resulting cleanup materials must be managed as hazardous waste and may not be disposed as UPW. (For more information about the management of hazardous wastes, please refer to the [USF Hazardous Waste Management Guide](#).)

Accumulation Time

- UPW can be accumulated on site for no longer than six months from the date that the first UPW was added to an accumulation container.
- Accumulation time must be demonstrated by marking the UPW accumulation container with the earliest date that any UPW was added to the container.

Collection

- The collection interval will not exceed six months from the accumulation start date.

Disposal Records

- Records of disposal must be maintained for at least three years from the date of UPW shipment and must include:
 - Name and address of handler, reverse distributor, or destination facility to which the wastes were sent
 - Quantity of UPW sent
 - Date the shipment of UPW was shipped.