Frequently Asked Questions 
Regarding Disposal of 
Hazardous Waste Pharmaceuticals


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What does the new rule do?

- Establishes cost-saving, streamlined standards for handling hazardous waste pharmaceuticals at healthcare facilities,
- Prohibits regulated facilities from discharging hazardous waste pharmaceuticals to sewers, thereby making drinking and surface waters safer and healthier, and
- Removes FDA-approved, over-the-counter nicotine replacement therapies (i.e., nicotine patches, gums and lozenges) from regulation as hazardous wastes when discarded.
  - Note: This does not include “vaping” products like e-liquids/e-juices in e-cigarettes, cartridges, or vials.

What about Florida’s Universal Pharmaceutical Waste Rule?

Florida repealed its Universal Pharmaceutical Waste Rule, 62-730.186 F.A.C., on August 15, 2019, so Pharmaceutical Waste is now regulated under the new Federal rule.

What are “regulated facilities?”

This rule specifically regulates healthcare facilities and reverse distributors.
What is considered a “healthcare facility?”

EPA defines a healthcare facility as:

- Any person that is lawfully authorized to—
  (1) Provide preventative, diagnostic, therapeutic, rehabilitative, maintenance or palliative care, and counseling, service, assessment or procedure with respect to the physical or mental condition, or functional status, of a human or animal or that affects the structure or function of the human or animal body; or
  (2) Distribute, sell, or dispense pharmaceuticals, including over-the-counter pharmaceuticals, dietary supplements, homeopathic drugs, or prescription pharmaceuticals.

- This definition includes, but is not limited to, wholesale distributors, third-party logistics providers that serve as forward distributors, military medical logistics facilities, hospitals, psychiatric hospitals, ambulatory surgical centers, health clinics, physicians' offices, optical and dental providers, chiropractors, long-term care facilities, ambulance services, pharmacies, long-term care pharmacies, mail-order pharmacies, retailers of pharmaceuticals, veterinary clinics, and veterinary hospitals.

- This definition does not include pharmaceutical manufacturers, reverse distributors, or reverse logistics centers.

What is a “hazardous waste pharmaceutical?”

To understand what a hazardous waste pharmaceutical is one must first understand what a “pharmaceutical” is. EPA defines a pharmaceutical as:

- Any drug or dietary supplement for use by humans or other animals
- Any electronic nicotine delivery system (ENDS)
  - e.g., electronic cigarette or vaping pen
- Any liquid nicotine/e-liquid packages for retail sale for use in electronic nicotine delivery systems
  - e.g., pre-filled cartridges or vials

EPA further defines a hazardous waste pharmaceutical as:

- A pharmaceutical that is a solid waste, as defined in § 261.2, and exhibits one or more characteristics identified in part 261 subpart C or is listed in part 261 subpart D.
- A pharmaceutical is not a solid waste, as defined in § 261.2, and therefore not a hazardous waste pharmaceutical, if it is legitimately used/reused (e.g., lawfully donated for its intended purpose) or reclaimed.
- An over-the-counter pharmaceutical, dietary supplement, or homeopathic drug is not a solid waste, as defined in § 261.2, and therefore not a hazardous waste pharmaceutical, if it has a reasonable expectation of being legitimately used/reused (e.g., lawfully redistributed for its intended purpose) or reclaimed.
Is training available?

Yes, EH&S provides in-person and on-line Hazardous Waste Pharmaceuticals training, see the [EH&S training page](#).

Those who generate pharmaceutical wastes must complete initial training and annual refresher training.

What must I do with my waste pharmaceuticals?

**Pharmaceutical wastes must not be discharged to the sanitary sewer or disposed in the regular trash unless a waste determination has indicated they are non-hazardous.**

If a hazardous waste determination has not been performed, pharmaceutical wastes must be managed and disposed as hazardous waste pharmaceuticals.

See the flow chart below.
How do I get my Pharmaceutical Waste picked up?

Complete the online Request HWP Pickup form or contact EH&S (see below).

Where can I get more information?

- Contact EH&S (813) 974-4036 or ehs@usf.edu.
- USF Disposal of Hazardous Waste Pharmaceuticals
- EPA Final Rule Site
- EPA Final Rule Webinar Slides