

Guidance for



Medical and Pharmaceutical Waste

State of Hawaii, Department of Health



December 2018 update

General Questions

Container residue

For containers that once held p-listed hazardous waste, the entire container or inner liner must be managed and disposed as a p-listed hazardous waste unless the container meets the definition of "RCRA empty" in 40 CFR §261.7(b)(3), as incorporated and amended in chapter 11-261.1, HAR. Triple rinsing is one way to make such containers "RCRA empty". If containers are triple rinsed, the rinsate must be managed as a hazardous waste and may not be disposed of down the drain! Waste single-dose containers that once held p-listed pharmaceuticals must also be managed as p-listed waste. Only the weight of the residue counts toward generator status. Please see our guidance on p-listed hazardous waste residue located here: <http://health.hawaii.gov/shwb/hazfaq/>

Pre-filled syringes with P- or U-listed hazardous waste pharmaceuticals

If the needle can be safely separated, then disconnect it and dispose of the needle in the sharps bin and the syringe as hazardous waste. If the unit cannot be safely separated, dispose of the entire unit in the sharps container.

Transdermal patches with P- or U-listed hazardous waste

Unused patches are hazardous waste. If the patch has been used, it is no longer a listed hazardous waste. However, we encourage you to continue to manage used patches as hazardous waste because used transdermal patches may still contain about 95% of the original drug dispensed by the patch.

Mixing D-, U-, and P-listed pharmaceutical wastes for storage and disposal

Our concerns in terms of mixing different pharmaceutical hazardous wastes are that you (1) ensure the compatibility of the wastes for safe storage and transport, (2) maintain correct and compliant labeling and manifesting, and (3) contact the disposal facility to make sure they are able to receive and treat the waste properly if it is mixed together. By mixing P-listed waste with U- and D-listed waste, your records (manifests, biennial reports, etc.) will reflect a higher amount of acute waste generated, but as long as you are already a Large Quantity Generator (LQG) and you do not mind this, we don't see this as a problem. It is your business decision to take this step to simplify hazardous waste management for nursing staff. *Caution:* If you are a Very Small Quantity Generator or Small Quantity Generator of hazardous waste, mixing P-listed waste with your other wastes could make you an LQG.

Pharmaceuticals with multiple active ingredients

Waste pharmaceuticals containing more than one active ingredient are not P- or U-listed wastes, even if both or all active ingredients are P- or U-listed chemicals. (Note: These wastes could still be characteristic hazardous waste, for example, if they contain metals or are ignitable.) However, we strongly encourage managing drugs containing P- and U-listed chemicals and any other pharmaceutical products you judge to be acutely toxic as hazardous waste. Managing these wastes as hazardous waste will help to reduce the concentration of potentially toxic chemicals in the environment, including drinking water sources.

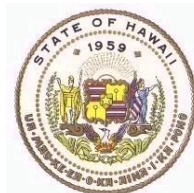
For questions please contact: State of Hawaii, Department of Health, Solid & Hazardous Waste Branch (808) 586-4226



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Questions on Specific Items

Epinephrine injection products **NEW**

Epinephrine salts are not included in the listing for epinephrine (P042). If the product is in the form of an epinephrine salt, it is not a listed hazardous waste. Many common brands of epinephrine injection products are prepared in this manner and therefore are not hazardous waste. Please be advised that safety data sheets (SDS) for these products may indicate the chemical abstracts service (CAS) number for epinephrine. It is the generator's responsibility to determine whether the particular product contains epinephrine or an epinephrine salt and manage the waste appropriately.

Medical nitroglycerin

Medical nitroglycerin that is not reactive is not a hazardous waste. Nitroglycerin is listed (P081) only for the reactivity characteristic, and under 40 CFR section 261.3(g)(1), as incorporated and amended in chapter 11-261.1, HAR, wastes listed only for reactivity are not hazardous wastes if they do not exhibit any characteristic of hazardous waste.

Phenol throat spray (low concentration)

If phenol is the sole active ingredient, the spray is a listed hazardous waste. The phenol listing (U188) is not concentration-based. Please note: Items like this may also be hazardous for ignitability and carry the EPA waste code D001, if the flash point is less than 140° F (see 40 CFR §261.21, as incorporated and amended in chapter 11-261.1, HAR).

Chromic catgut sutures

If the sutures are characteristic hazardous waste due to chromium (waste code D007; see 40 CFR §261.24, as incorporated and amended in chapter 11-261.1, HAR), then unused sutures should be managed as hazardous waste and used sutures should be managed as biomedical waste. "Used" sutures that do not need to be managed as biomedical waste should be managed as hazardous waste.

Leeches in ethanol

Due to the ignitability of ethanol, jars of pure ethanol with leeches must be managed as hazardous waste (EPA waste code D001).

Need More Help?

The Hawaii Administrative Rules (HAR) chapters on Hazardous Waste Management can be found here: <http://health.hawaii.gov/shwb/hwrules/> **NEW**

The Hazardous Waste Section's homepage is: <http://health.hawaii.gov/shwb/hazwaste/>

If you have questions, contact the Hazardous Waste Section at (808) 586-4226