

Medicine Cabinet Clean-Out Days

Hosted by the Western Lake Superior
Sanitary District (WLSSD) in Duluth, MN



A Summary Guide



This project was funded in part by the Coastal Zone Management Act by the NOAA's Office of Ocean and Coastal Resource Management, in conjunction with Minnesota's Lake Superior Coastal Program.



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Written by Gina Temple-Rhodes,
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2008

Introduction

The Western Lake Superior Sanitary District (WLSSD) is a special governmental unit with responsibility to prevent pollution in the lower St. Louis River in Northeastern Minnesota. WLSSD operates a regional wastewater treatment facility that treats over 40 million gallons of municipal and industrial wastewater each day. WLSSD is dedicated to preventing pollution at its source whenever possible.

Over the past few years, pharmaceuticals and endocrine disruptors have been detected in surface and drinking water sources around the country. This issue has been increasingly covered in scientific literature and mainstream media. A series of Associated Press stories brought the issue to the national spotlight in early 2008. Residents, scientists, political leaders and health care professionals expressed concern proper disposal of pharmaceuticals; the old advice to flush was no longer acceptable. But no easy solution existed for disposal of unwanted pharmaceuticals. As early as 2006, some sanitary and wastewater districts began offering pharmaceutical collection events in other states around the country, including Maine, Washington and California.

However, no collection event had been offered in MN. As a leader in pollution prevention, WLSSD decided to approach the issue proactively and applied for grant funding through Minnesota's Lake Superior Coastal Program in December of 2006 to research and host the state's first collection events for unwanted medication. In its mission to protect and preserve the waters of the lower St. Louis River, WLSSD is concerned about the quality of the effluent that is sent every day into the St. Louis River as well as the makeup of the garbage that enters area landfills. While some pharmaceutical compounds are excreted by humans, others can be kept from the waste stream by educating the general public about safe ways to dispose of expired or unwanted medication; i.e. not flushing. WLSSD set out to offer an alternative to disposal down the drain or in the garbage.

The learning curve was steep, and WLSSD staff became familiar with a host of state and federal regulations regarding pharmaceutical collection. Unwanted medication can fall into 3 main categories; Over-the-counter, non-controlled and controlled prescriptions. The last category offers the most problematic management challenges, as they can ONLY be turned over to a law enforcement officer for safekeeping until destruction.). WLSSD confirmed with the U.S. Drug Enforcement Administration that having law enforcement officers present at a collection was the best way to legally approach this requirement.

However, in Minnesota, most of the controlled medication is considered hazardous waste, but there is no provision in the federal drug law to allow law enforcement officers to utilize the services of hazardous waste haulers to safely transport and destroy

medication. This is a major hurdle encountered when planning collection events in Minnesota, since there are no nearby hazardous waste incinerators. This became a major issue when wrapping up the collection events; more details can be found below.

WLSSD organized and held the first of 5 community drive-through collection events on October 6, 2007 at the WLSSD Household Hazardous Waste facility. These events were promoted as "Medicine Cabinet Clean-Out Days." Significant resources were spent to educate the public and promote the event. Advertisements were placed in the local newspaper and posters and flyers distributed at local pharmacies and medical establishments. In order to comply with federal regulations regarding the handling of controlled substances, two officers from the Duluth Drug and Gang Task force were hired to work at the event and take possession of the substances after the event. Licensed pharmacists were also hired to sort the medication into controlled and non-controlled categories and assist the law enforcement officers with identification and logging.

The first-ever Minnesota medication collection event, held in October 2007, went smoothly and attracted medication from 166 households; a total of 271 lbs of unwanted medication that filled over 3 fifty-five gallon drums. Residents expressed appreciation at having a safe option for disposing of unwanted medication. Surveys indicated that some residents had been holding onto medication for decades because they did not know what to do with it. Clearly, there was a need and desire in the local community for medication collection events.

Results

The first collection event gathered 250 lbs of non-controlled substances that were easily handled and destroyed by WLSSD's Hazardous Waste Hauler, Veolia Environmental Services. However, the 21 lbs of controlled substances gathered by the Officers could not be accepted by Veolia due to DEA regulations and were sent to the evidence holding area of the Duluth Police Department pending disposal solutions. Unforeseen complications for safely disposing of these federally controlled substances were encountered and led to the acquisition of another grant from the Environmental Protection Agency to fund safe and legal disposal of that small portion of the pharmaceutical waste stream.

Those complications still exist, but WLSSD has engaged in the national and state dialogue about safe and legal disposal of pharmaceutical substances. Various legal and logistical hurdles will need to be overcome and are currently being addressed at the state level by the Minnesota Pollution Control Agency (MPCA). WLSSD staff is cautiously optimistic that changes in Minnesota regulations can reduce barriers to future collection events in Minnesota.

After the completion of these state and federally-funded grant projects, WLSSD has not scheduled collection events in 2009 or beyond, pending answers on the state and federal level. Currently, residents are advised to destroy and dispose of medications in the garbage, per MPCA guidance and fact sheet. In some areas of the state, garbage is incinerated in municipal waste incinerators, likely a proper channel for disposal of medications. However, in Duluth, garbage ultimately ends up in a landfill near Lake Superior. Leachate from this landfill is treated by local wastewater treatment facilities. Medications cannot be removed from wastewater or leachate with current technology. Hence, WLSSD still seeks better answers and opportunities for safe medication disposal.

WLSSD's Medicine Cabinet Clean-Out Days Events At A Glance

When were the events held?

4 events were held in Duluth (October 6, 2007, February 23, 2008, April 26, 2008 and August 22, 2008). One event was held in Grand Marais at the semi-annual Hazardous Waste Collection Day at the County Recycling Center on September 20, 2008.

Saturday events from 10 am to 4 pm worked well. One Duluth event was held on a Friday from 11-5; the audience seemed to attract older residents. More questions arose from businesses on the Friday event.

Who was unwanted medication accepted from?

Medication was only accepted from residents, not businesses due to business waste generator limits and other rules. Medication was accepted from residents in an anonymous, drive-through event.

Where?

The Duluth events were held at the WLSSD Household Hazardous Waste (HHW) Facility, with hazardous waste collection permits, etc. already in place. If events are to be held at other locations, the MPCA should be notified and additional permits may need to be issued.

What was accepted?

WLSSD accepted all medication (controlled and non-controlled, over-the-counter, veterinary, etc). WLSSD advised (but didn't require) residents to bring medication in the original container so that medication information was easily available. Not all participants did this, but most did. Markers were offered to residents to mark out their personal information if desired. Promotional material instructed residents to leave medications in the original bottles with medication information visible to assist with sorting. WLSSD also accepted sharps and mercury thermometers due to having an HHW facility available and ready to accept all those materials. Sharps were fairly common, but very few thermometers were brought in.

Who staffed the event?

WLSSD provided HHW technicians to accept waste from cars, licensed pharmacists to sort medications, pharmacy students to greet cars and conduct surveys, law enforcement officers to accept the controlled substances and environmental program coordinators to coordinate event logistics, refreshments for workers, media, photos, etc.

How was it publicized?

Newspaper ads, press releases and articles, flyers and posters at pharmacies and doctor's offices. Later events (with extra funding) were also publicized with television and radio ads. Local media interest in the events resulted in television and print stories before and after the events.

What happened to the medication?

WLSSD contracted with Veolia Environmental Services to transport and destroy the non-controlled medication. The controlled medication was stored in the evidence rooms of the Duluth Police Department until final transport and destruction in a hazardous waste incinerator in Sauget, IL. Safely and legally disposing of the medication in a hazardous waste incinerator turned out to be the most difficult and complex element of the entire project.

What was the response?

Collection	Households Participating	Lbs of Non-Controlled Meds	Lbs of Controlled Meds	Volume of medications/bottles disposed
October 6, 2007	166	250	21	160 gallons
February 23, 2008	225	333	25	180 gallons
April 26, 2008*	400	498	25	250 gallons
August 22, 2008* Friday event	305	473	14.5	220 gallons
Sept 20, 2008 * (Grand Marais)	67	61	2.75	45 gallons
TOTALS	1163	1615 lbs	88.25 lbs	855 gallons

*these events had additional publicity due to EPA funding (television and radio)

Residents who brought in medication were very positive about the opportunity and were grateful to finally have an answer to the question of how to safely dispose of medication. They often asked when the next collection event would be held.

Residents were asked to complete a short survey when they dropped off medication. 917 surveys were completed at Duluth events and 66 at the Grand Marais events.

The results show that residents are often confused about what they should do with medication that they did not want; the most common answer when asked what they would do with unwanted medication if they did not have access to a collection event as that they would save it. Indeed, this tendency showed at the collection event; many prescriptions were years old, including some from the 1980's.

The results also showed that residents often had medications to dispose of because their prescriptions/needs had changed, not because a patient had passed away, etc. This may have been the nature of the event: they were one-day only events with publicity only a few weeks in advance. Residents were not encouraged to save medications from relatives who may have passed away, etc. Different populations or collection models may indeed find more medication being rendered unwanted through the death of patients.

<u>Why Disposing (more than one answer OK)?</u>			<u>Over 60?</u>		(out of 768)
Old/beyond exp date	622	68%	Yes	344	45%
Discontinued use	440	48%	No	325	42%
Patient died/moved	100	11%	No answer	99	13%

During the last 3 events, residents were asked what they used to do with medications, and what they will do in the future if there are no more events held.

<u>Disposal Before Events</u>			<u>Disposal If No Events</u>		
	<u>Number</u>	<u>Percent</u>		<u>Number</u>	<u>Percent</u>
Save it	117	37%	Throw in garbage	107	38%
Throw in garbage	97	31%	Don't Know	72	25%
Flush down drain/toilet	58	19%	Save it	70	25%
Don't Know	26	8%	Flush down drain/toilet	23	8%
This Event	7	2%	Contact WLSSD	8	3%
Other	6	2%	Bring to pharmacy	4	1%

How much did it cost?

Each event cost nearly \$4,000, with supporting staff time from WLSSD and volunteers totaling over \$5,000. The staff time was used to lay groundwork and plan the events; it could likely be reduced for future events. The disposal of controlled substances was the most costly element of the project; medication from all 5 events was stored and disposed of at one time to save money. One trip by law enforcement officers to a hazardous waste incinerator for witnessed destruction cost \$5183 for transport and burning fees.

Basic Cost Summary for EACH ONE DAY Event with the WLSSD Model (not counting advance planning/support time)

Staffing Required:

Pharmacists (2 for 7 hrs at \$48/hr)	\$744
Police Officers (2 for 10 hours at \$33/hr)	\$660
HHW Technicians (2 for 10 hours @23/hr)	\$460
Coordinator/Site Manager (1 for 10 hours @23/hr)	\$460
Greeters (6 Volunteers, 2 hrs each total valued at \$15/hr)	\$180
Refreshments/Thank Yous for Volunteers	\$181
Advertising in Local Newspapers	\$1930
Printing Brochures and Posters	\$320
Hauling/Destruction of 498 lbs of Non-controlled substances only (Veolia Environmental Services)	\$635

Total: \$3770

Controlled Substance Transport/Later Destruction Per event proportion of single trip	\$1036
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Future Issues

A note about controlled substance destruction:

Controlled substances were securely stored after each event by the Duluth Police Department. At the start of the project, it was believed that a hazardous waste hauler could accept the medication, but this proved not to be the case. Hauling companies can only accept medication from DEA Registrants, and police departments cannot become registrants. It became a frustrating catch-22. Inquiries to various programs around the country found that not all program coordinators knew the ultimate fate of the controlled substances collected at their events beyond the police possession. Indeed, some dubious methods for destroying medication are known to exist, including flushing or burning medication in backyard burn barrels.

WLSSD believed that since the medication was considered hazardous waste, it must be disposed of in the most correct, safe and appropriate manner. The Duluth Police Department was able to store the medication for a limited time due to space constraints, but was also interested in disposing of it in the most environmentally and legally correct manner. However, the Police Department also was very careful to maintain correct custody of the medication until witnessed destruction, per DEA regulations.

The best solution for destruction of medication is hazardous waste incineration. The nearest hazardous waste incinerator is located in Sauget, IL. A solution was found only with the addition of some additional grant money from the U.S. Environmental Protection Agency.

WLSSD contracted with two members of the Duluth Police Department to transport the medication to the nearest hazardous waste incinerator, and then paid the special witnessed destruction burn fee. The Police Officers observed the medication being destroyed, which satisfied the department's commitment to seeing the medication through to destruction. However, the financial cost of this solution was very high and is not a sustainable solution.

However, the cost of this event helped to highlight the need for future in-state solutions for law enforcement to safely dispose of unwanted medication. Federal regulations also limit the feasibility of collecting medication. Comment periods are now open on some of the waste and medication handling rules and WLSSD remains optimistic that a more sustainable and feasible solution may be found.

The question of controlled substance disposal is currently the largest roadblock to cost effective, efficient medication collection events.

Photos:



Event Location: WLSSD HHW Facility with drive through capacity. Greeters wearing safety gear greeted vehicles.



Material from just one resident.



Medication was sorted by licensed pharmacists and logged for proper tracking.



Both very old AND very costly, recently expired medication was brought in by residents.





Uncontrolled medication was packaged up and transported to a hazardous waste incinerator by Veolia Environmental Services.

RESOURCES

Other Agency Toolkits

The publications regarding Collection Events for Unwanted Medication available from the Northeast Recycling Council were invaluable when planning the WLSSD collection events.

The NERC Guides can be found at: <http://www.nerc.org/documents/> (scroll to Unwanted Medications)

The Illinois/Indiana Sea Grant has also produced a useful toolkit for groups wishing to coordinate collection events. It can be found at:

<http://www.iisgcp.org/unwantedmeds/>

Collection organizers should also be familiar with DEA and Office of Drug Control Policy information and fact sheets. They are available at:

http://www.whitehousedrugpolicy.gov/drugfact/factsht/proper_disposal.html

The Minnesota Pollution Control Agency currently suggests disposal in the garbage if no community collection events are available. The fact sheet can be found at:

<http://www.pca.state.mn.us/oea/hhw/pharmaceuticals.cfm>



EXAMPLE News Release

For Immediate Release: 10:00 a.m. Thursday, February 7, 2008
Contact: Karen L. Anderson, Community Relations Director
218-740-4776
Gina Temple-Rhodes, Environmental Program Coordinator
218-740-4784

WLSSD to Host Collection Event for Unwanted Medication

Duluth, MN: The Western Lake Superior Sanitary District will host a free collection event for unwanted or expired medications at its regional Household Hazardous Waste Facility on Saturday, February 23rd from 10:00 am to 4:00 pm. The “*Medicine Cabinet Clean-Out Day*” is a one-day event offering residents free disposal of unwanted medications in a manner that’s safe, convenient and environmentally sound.

At Minnesota’s first-ever medication collection event held last October at WLSSD, residents brought in over 250 pounds of unwanted pills and other medication, filling two large barrels. This medication was disposed of through a hazardous waste handler, preventing the release of these compounds into the environment.

“The first collection event really showed us that there is a lot of unwanted medication lingering in medicine cabinets all over the WLSSD area,” said Gina Temple-Rhodes, WLSSD Environmental Program Coordinator. “Residents told us they had been storing the medications for years because they didn’t know what else to do with them. This collection event offers an easy, safe answer to the disposal question.”

Residents may bring their own or a family member’s unwanted or expired medication to the event for disposal. Drop-off is free and confidential. Residents will use the drive-through area at the Household Hazardous Waste facility during this special event. The facility is located at 2626 Courtland Street in Duluth.

“Unwanted medication should not be flushed or poured down the drain,” said WLSSD Executive Director Kurt N.W. Soderberg. “Although many of us were taught to dispose of medicines this way, we now know that flushing them is not a good idea.”

“Wastewater treatment plants were not designed to remove pharmaceutical substances from wastewater,” Soderberg continued. “Proper disposal of medication helps protect water quality in our region.”

Studies around the United States have found hormones and other pharmaceutical substances in rivers and streams. When medication is flushed, it travels to wastewater treatment plants. Although some medicines break down in treatment, others persist and are discharged into

waterways. In the Duluth region, residual medicines can enter the St. Louis River and Lake Superior. Pharmaceutical substances can adversely affect fish and other aquatic life.

Temple-Rhodes recommends that residents attending the event:

- Bring prescription or over-the-counter medication in its original container with all information about the medication visible to assist with sorting. Names and addresses may be covered or scratched out.
- Keep medications out of reach of children while waiting for and transporting material to the event.
- Keep needles or other medical sharps separate and properly packaged for safe disposal.

WLSSD can only accept medication during special events due to US drug laws. The special events will employ pharmacists and law enforcement officers to ensure safe and proper sorting and disposal of all medications. Residents who are unable to attend a disposal event may dispose of unwanted medications in the garbage after properly preparing the medication per Minnesota Pollution Control Agency recommendations. These recommendations can be found at <http://www.pca.state.mn.us/oea/hhw/pharmaceuticals.cfm>.

This event and two more collection events this year are funded in part by the Coastal Zone Management Act, by NOAA's Office of Ocean and Coastal Resource Management, in conjunction with Minnesota's Lake Superior Coastal Program. More information is available at http://www.wlssd.com/pollution_pharmaceutical.php.

Western Lake Superior Sanitary District provides award-winning wastewater and solid waste services to residents, businesses and industries within its 530 square mile legislative boundaries in Southern St. Louis and northern Carlton counties, and is a nationally recognized leader in pollution prevention.

EXAMPLE Event Publicity Materials

MEDICINE CABINET CLEAN-OUT DAY!

One Day Only! **April 26, 2008**
10:00 am to 4:00 pm

Do you have expired or unwanted medications in your home?
Don't flush them down the drain!
Bring them to this collection event for safe, proper disposal.

Follow these 3 easy steps...

1. Leave medication in original container
2. Keep out of reach of children before event
3. Bring to WLSSD's drive-thru event April 26


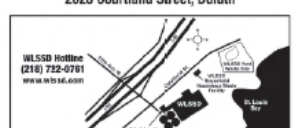

Can't make it on April 26? Watch for the next events or destroy, seal and dispose of medications in the garbage. Medications can ONLY be accepted by WLSSD during special collection events.

Western Lake Superior Sanitary District
Household Hazardous Waste Facility
2626 Courtland Street, Duluth

Help protect our local waters from contamination by medication; *it's a no drainer!*

WLSDD Hotline (218) 722-0761
www.wlssd.com

For more information, contact WLSDD at 722-0761 or visit www.wlssd.com/pollution_pharmaceutical.php

Clear Answers for Clear Water™

11 by 17 inch Poster



MEDICINE CABINET CLEAN-OUT DAY!

One Day Only! **APRIL 26, 2008**
10:00 am to 4:00 pm

Do you have expired or unwanted medications in your home?
Don't flush them down the drain!
Bring them to this collection event for safe, proper disposal.

Western Lake Superior Sanitary District
Household Hazardous Waste Facility

WLSDD Hotline (218) 722-0761
www.wlssd.com

Flyer Double-Sided 3.3 by 8.5 inches

Follow these 3 easy steps:

1. Leave medication in original container
2. Keep out of reach of children before event
3. Bring to WLSSD's drive-thru event April 26th

One Day Only! **APRIL 26, 2008**
10:00 am to 4:00 pm

If medications are flushed, they may not be removed from wastewater and could end up in the St. Louis River and Lake Superior. Help protect the water from contamination by medication; *it's a no drainer!*

Can't make it on April 26th? Watch for the next events or dispose of medications in the garbage. Before medication is put in the garbage, it should be destroyed, tightly sealed and hidden in a non-transparent container. Medications can ONLY be accepted by WLSSD during special collection events.


For more information, contact WLSDD at 722-0761 or visit www.wlssd.com/pollution_pharmaceutical.php

WLSDD Hotline (218) 722-0761
www.wlssd.com

This project was funded in part by the Coastal Zone Management Act, by NOAA's Office of Ocean and Coastal Resource Management, in conjunction with Minnesota's Lake Superior Coastal Program.

Clear Answers for Clear Water™

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Medicine Cabinet Clean-Out Day

One Day Only! **April 26, 2008**
10:00 am to 4:00 pm

DON'T FLUSH unwanted or expired medication down the drain. Bring it to this special collection event!

Western Lake Superior Sanitary District
Household Hazardous Waste Facility
2626 Courtland Street • Duluth, MN 55806 • www.wlssd.com
Questions? Call the WLSDD Hotline: 722-0761




Newspaper Advertisement

MEDICINE CABINET CLEAN-OUT DAY!

One Day Only! **October 6, 2007**
10:00 am to 4:00 pm

Don't Flush! unwanted or expired medication down the drain. Bring it to this special collection event!

Follow these 3 easy steps...

Western Lake Superior Sanitary District
Household Hazardous Waste Facility
2626 Courtland Street • Duluth, MN 55806 • www.wlssd.com
Questions? Call the WLSDD Hotline: 722-0761




Flyers as distributed at pharmacies and health care offices

EXAMPLE

WLSSD Medicine Cabinet Clean-Out Survey (reduce to fit 2 on a page when reproducing)

___ Do you also have Household Hazardous Waste Material?

1: Do you have any sharps? (Must be separated from drugs; provide container, if needed)

2: What is your zip code? _____ (zip code)

3. How many household's worth of medication did you bring in today?

(i.e. just yours, or materials from a parent's house, neighbor, etc?)

___ Just their own household

___ Other households (fill in number _____)

4: How did you hear about the event?

___ Newspaper ad or story

___ TV or ___ Website

___ Flyer (list location if mentioned: _____)

___ Don't know

5: Why are you disposing of most of these medications?

___ Old/Beyond expiration date

___ Discontinued use - didn't like it/doctor's orders

___ Patient moved/died; (this is a relative's/friend's medication)

6: Before we started having these collection events, how would have disposed of unwanted medication? ✓

___ Flush down drain/toilet ___ Save it – I don't discard ___ Throw in garbage ___
Don't know

7. If we didn't have any more of these events, how would you dispose of medication? (✓)

___ Flush down drain/toilet ___ Save it – I don't discard ___ Throw in garbage ___
Don't know

8. (optional) Are you over 60? YES_____ NO_____

~~~~~**Thank You!**~~~~~

## EXAMPLE

### Script for Greeters:

Safety Gear Required: Vests, Hardhats, safety glasses

“**Welcome!**” (If really busy; thanks for waiting!)

**1. Are you bringing in waste from a business or from a home today**

**2.**

- **If from a Business:** OK, we'll have to have you talk to Ryan Cunningham up at the door there. Thanks!

**END TRANSACTION** (We are only accepting medications and materials from residents, not businesses like pharmacies or nursing homes today. Ryan will explain and give them a letter detailing alternative disposal options.)

- **If from a Home or private residents: proceed to next questions.**

**2. Do you have any medications to dispose of today?**

- **NO:** OK. If you are just dropping off hazardous waste material, drive ahead to the door and the technicians will help you. If you want to look at the product exchange, just park and go on in.

- **YES: medicine:**

Thanks for bringing that in today. Do you have just medicine, or any medical sharps today?

- **YES Sharps:** Are they properly packaged? Do you need a container/sticker?

(If they express confusion about what is proper packaging, give them a sharps brochure for future reference. Sharps must be contained in rigid containers with a secured top and labeled with an orange “SHARPS” sticker.)

- **NO, just Medication:** Ok, great. You'll be giving them to the technician at the door up there (politely decline if they try to hand it to you).

- **IF TIME:** Would you like to mark out your name? Please leave the medication information visible. (give marker, wait, or assist).

**3. Would you mind answering a few anonymous survey questions to help us with our grant report?**

- **YES survey:** Give survey.
- **NO survey:** Are you sure? It's really simple!

**4. Is this your first time visiting HHW?** Would you a flyer listing our facilities' hours? (Give Think Before you Throw Brochure). If thermometers are available, give a thermometer if they'd like one. **Thanks for waiting... they'll be with you shortly.**

## **EXAMPLE**

### **Medication Handling/ Traffic Flow Procedures WLSSD Medicine Cabinet Clean-Out Day (print out)**

1. Residents/customers drive cars into the HHW facility driveway. They do not get out of their cars. The only people parking and getting out of vehicles will be those interested in picking up materials at the materials exchange area.
2. Customers are met by a Greeter, who determines what sort of waste they are bringing; medications, sharps or regular HHW. Customers are directed to drive up to the drop-off location under the awning. Greeters DO NOT accept or touch waste from customers.
3. HHW Technicians accept all waste from customers on their wheeled carts. Carts are brought into the HHW processing area.
4. Medication (in boxes or bags) is immediately placed on the pharmacy sorting table. Other HHW waste (like paint, etc) is processed by HHW technicians in other areas.
5. Pharmacists sort the medication, looking for controlled substances. If some are found, the law enforcement officer is alerted. The medication is poured out for counting on the counting trays, then returned to the bottle and handed to the law enforcement officers.
6. The other pharmacist or data entry staff enters the controlled substance medication name, dosage and pill quantity into the inventory list for WLSSD record-keeping purposes.
7. The law enforcement officers place controlled substance medication in evidence kits per their own methods, recording precise amounts on the property intake forms. Controlled substances stay in the possession of law enforcement officers from that point onward. Witnessed destruction will follow later. Copies of intake forms will be left with WLSSD at end of day.
8. Uncontrolled substances will be inventoried by data entry staff or HHW Technician before sorting by the HHW technician into disposal barrels for pickup by Veolia Environmental Services.

## **EXAMPLE**

### INSTRUCTIONS FOR PHARMACISTS

#### **Medication Sorting/Disposal Procedures**

1. Medication will be placed on sorting table by HHW Technicians
2. Begin sorting medications, looking for controlled substances
3. If a controlled substance is found, alert law enforcement officer.  
\*\*Follow advice of Law Enforcement Officer here, if different\*\*
  - a. Empty bottle onto sorting tray for counting. Count items.
  - b. Communicate number and dosage to Law Enforcement Officer for evidence recording.

**OPTIONAL IF STAFFING ALLOWS:** record information in spreadsheet yourself or by student volunteer.

- c. Return medication to bottle and hand to Officer.
4. If substance is uncontrolled, hand medication to WLSSD HHW technician for sorting and recording.

\*\*If time allows, remove outer box or bag for recycling; leave medication in original bottles for disposal.

## **Final Approval Communication from The US Drug Enforcement Administration**

**From:** Cavendish, John J. [John.J.Cavendish@usdoj.gov]  
**Sent:** Tuesday, August 14, 2007 4:09 PM  
**To:** Gina Temple-Rhodes  
**Subject:** RE: Approval for MN Collection  
Ms. Temple-Rhodes,

In conducting your collection event, you will not be violating federal law and regulations as long as you and/or agency adhere to the following procedures:

A law enforcement officer must be present at all times during the actual collection of controlled substances. A pharmacist can coordinate the collection, but a law enforcement officer must be present at all times.

At the end of the collection of controlled substances, the law enforcement agency must take possession of all controlled substances. Upon receipt of the controlled substances, the law enforcement agency must maintain continuous, unbroken custody of them until they are destroyed. The law enforcement agency should handle the controlled substances just like it handles "contraband" such as cocaine or heroin. Law enforcement officers should witness the destruction of the collected controlled substances to ensure that they are successfully destroyed. It is not necessary for the law enforcement agency to maintain records to account for the destruction of the collected controlled substances. The physical custody and witnessing of the destruction by the law enforcement officers is all that DEA is looking for.

Sincerely,

John Cavendish  
Staff Coordinator  
DEA HQ  
(202) 353-7093