



# Home Generated Pharmaceuticals and the Medical Waste Management Act

Environmental Management Branch  
Medical Waste Management Program



# Presentation Overview

- Classifications of Pharmaceutical Waste in California
- California Health and Safety Code Sections governing “Pharmaceutical Waste”
- Mixed Wastes
- Pharmaceutical Consolidation Issues



# Different Types of Pharmaceutical Wastes in California

- RCRA = waste pharmaceuticals that are classified as a **hazardous waste**, not a medical waste.
- California Hazardous Waste = **California regulated medical waste** or “pharmaceutical waste” H&SC 117774
- **Controlled Substances** – Schedule 1-5
- **Solid Waste**



# Pharmaceutical Waste (continued)

- HSC Section 117635(g) - *Biohazardous Waste*  
“Biohazardous waste”: Waste that is hazardous only because it is comprised of **pharmaceuticals, as defined in Section 117747**. Notwithstanding subdivision (a) of Section 117690, medical waste includes biohazardous waste that meets the conditions of this subdivision.



# Pharmaceutical Waste (continued)

- HSC 117747(a) - *Pharmaceutical*  
“Pharmaceutical” means a prescription or over-the-counter human or veterinary drug, including, but not limited to, a drug as defined in Section 109925 or the Federal Food, Drug, and Cosmetic Act, as amended, (21 U.S.C.A. Sec. 321(g)(1)).



# Mixed Wastes

- Medical Waste and Hazardous Waste is regulated as **Hazardous Waste**
- Medical Waste and Radioactive Waste is regulated as **Radioactive Waste**
- Medical, hazardous waste, and radioactive waste is **mixed radioactive waste**



# Pharmaceutical Waste (continued)

- Examples of Pharmaceutical Wastes:
  - Loose pills
  - Sample medications
  - Expired medications
  - Medications no longer fit for usage (ex. contaminated or rejected by patient)
  - Partially utilized bottles/containers from the manufacturer



# Pharmaceutical Waste (continued)

- Examples of Non-Pharmaceutical Wastes:
  - Sodium Chloride solutions
  - D5W
  - Lactated ringers
  - Vitamin solutions

To ensure that the local sewer district will accept the above items or any other materials, contact your sewer district noted on your facility's sewer bill for confirmation.



# Pharmaceutical Consolidation Issues

- Home Generated Pharmaceuticals - Who regulates this MESS!
- Consolidation of the home generated pharmaceutical waste would be classified as a medical waste
- Consolidation at pharmacies: could be a source of abuse by unscrupulous pharmacists
- Some home generated pharmaceuticals, specifically, controlled substances must be collected in compliance with the Drug Enforcement Agency (DEA)
- Who regulates pharmaceutical consolidation points? CDPH, Board of Pharmacy, IWMB, DTSC, ALL?