

Comments to CalRecycle Background Paper

Page 24 – III. Challenges and Barriers, Item Number 5.

Change to “~~Unclear~~ **Current** Requirements, Policies and Authorities **Authority**”

Page 25 – REGISTERED WASTE HAULERS & DISPOSAL FACILITY OPTIONS, 1st Paragraph

The Medical Waste Management Program (MWMP) requires medical waste to be hauled by a registered medical waste hauler. One exception is the mail-back sharps container program which requires businesses to go through an approval process to operate in California (US Postal Service approves packaging for transportation). MWMP would need legislation to address the mail-back of consolidated home-generated pharmaceuticals.

Page 25 – REGISTERED WASTE HAULERS & DISPOSAL FACILITY OPTIONS, 2nd Paragraph

Remove sentence: “It also appears that HHW collection programs that mix medications and poisons.....hazardous waste landfills.” The preference is incineration because land filled waste has continual generator liability, environmental issues, leachate, etc.

Remove sentence: “CalRecycle has requested information from CDPH and other agencies.....pharmaceuticals.”

How does the Department of Toxic Substances Control regulate home-generated pharmaceutical waste that is collected at a Household Hazardous Waste Collection Facility/Event? (Are pharmaceuticals required to be incinerated or can it be disposed of at a hazardous waste landfill; what is the proper hazardous waste classification for the collected home-generated pharmaceutical waste?).

Under the MWMP, medical waste pharmaceuticals are required to be incinerated at a permitted medical waste incinerator.

Page 25 – TWO-KEY LOCKING COLLECTION BINS

MWMP storage time limits for pharmaceutical waste containers that are ready for disposal is 90 days. Statutory language for home-generated pharmaceutical consolidation storage time limits can address the need to have these containers removed quickly from these consolidation locations.

Page 25 – USE OF SECURE CONTAINERS AT HHW SITES

What is the proper waste characterization and treatment standard for home-generated pharmaceutical waste?

Page 26 – RECORD KEEPING AND DATA COLLECTION

MWMP wants to make sure that appropriate medical waste tracking documents are kept (e.g. waste tracking documents, invoicing)

Page 27 – Item Number 5. Unclear Requirements, Policies & Authority

Change to: “~~Unclear~~ **Current** Requirements, Policies & Authority”

Page 28 – The sentence at the top of the page.

Change to: “While these practices are legal, they ~~may not be~~ **are not** the environmentally preferred ways.....pharmaceuticals.”

Page 28 – CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

MWMP regulates home-generated pharmaceutical waste at the point of consolidation. While the language for this waste is not in current statute, the MWMP applies a best waste management policy consistent with current, existing waste collection models (i.e. Consolidated Home-Generated Sharps) for home-generated pharmaceutical waste. The MWMP’s current policy is to monitor consolidated, home-generated pharmaceutical waste at registered consolidation points to ensure proper containment, storage and treatment. Legislation is needed to establish clear requirements for managing consolidated home-generated pharmaceutical waste.

MWMP does not support being less stringent regarding the labeling, waste tracking, and medical waste hauling requirements for pharmaceutical waste.

An Option/Recommendation that includes funding for an effective take back program is needed. Under the current economic environment, counties will not want to implement a program that requires the local agency to fund the program.