

## Reducing Pharmaceutical Waste for Retail Stores

The retail industry, while more familiar with the sale of consumer products, can generate a variety of hazardous wastes. Many pharmaceutical products sold at retail stores can become a hazardous waste when disposed. Retailers must manage their pharmaceutical waste properly and ensure proper disposal. This informational fact provides tips and material to assist the retail industry to reduce waste at the source and understand EPA's upcoming activities to address this topic.



### Can the retail industry reduce pharmaceutical waste?

Yes! The retail industry has many opportunities to reduce pharmaceutical waste. By reducing pharmaceutical waste, you are in turn reducing expenses, the potential generation of hazardous waste and providing mutual benefits to the environment. The success of retail facilities is determined by the commitment of the facility and employees. This informational fact sheet provides useful information focused on pollution prevention for the retail industry.

## Reducing Pharmaceutical Waste in Retail



**Important!** Generators must perform proper waste determinations to determine if their wastes are hazardous. For more information on waste determinations, hazardous waste management, and proper shipment and disposal, refer to Title 40 of the Code of Federal Regulations (CFR) Parts 260 through 273 and Arizona Department of Environmental Quality's (ADEQ) [Managing Hazardous Waste for a Small Business Handbook](#)<sup>1</sup>.

### Reducing Pharmaceutical Waste

Many retail stores dispense medication through an onsite pharmacy. This causes retailers to manage various types of pharmaceutical waste in accordance with the hazardous waste regulations set forth by the Resource Conservation and Recovery Act (RCRA). While pharmaceutical waste may not be completely eliminated, there are many steps that can be taken to reduce the volumes of pharmaceutical waste at the source. The following are some examples of how you can reduce the generation of pharmaceutical waste—some of which can become a hazardous waste.

- Verify if the pharmaceutical waste generated is a hazardous waste per 40 CFR Part 261.
- See [The Managing Pharmaceutical Waste – A 10 Step Blueprint for Healthcare Facilities In the United States](#)<sup>2</sup> which is a document written for healthcare facilities but contains many tips that can be incorporated at retail pharmacies such as:

- ⇒ Understanding the RCRA regulations
- ⇒ Performing a drug inventory review
- ⇒ Minimizing pharmaceutical waste by considering lifecycle impacts
- ⇒ Accessing the current retail store practices



- Conduct an inventory analysis and waste audit to prevent surplus and expiration of prescribed pharmaceuticals.
- Participate in a take back program with your pharmaceutical supplier for prescription medication.
- Ensure that extra care is taken when storing and stocking pharmaceuticals to avoid damaging product.
- Meticulously count the residue in warfarin containers when counting waste amounts and disposing of waste. For more information, see [EPA's 11/4/2011 Memorandum – Containers that Once Held P-listed Pharmaceuticals](#)<sup>3</sup>.

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- Design a program to effectively contact consumers when their prescription medications are ready to avoid 'forgotten medication' that goes to waste.
- Develop a procedure or goal to prevent spills when filling prescription medication.
- Inventory over-the-counter medication and assess the most and least selling items.
- Stock over-the-counter medication (vitamins, pills and ointment and medication) according to consumer demand and avoid ordering a surplus of materials.
- Train store employees to continually check aisles to ensure over-the-counter medication is placed in shelves based on expiration dates.
- Determine the root cause of nicotine waste and create a standard operating procedure (SOP) to reduce

## Tailoring the Rules for Pharmaceutical Waste

[Proposed Rule: Management Standards for Hazardous Waste Pharmaceuticals](#)<sup>4</sup>

This rule proposes a tailored, sector-specific set of regulations for the management of hazardous waste pharmaceuticals by healthcare facilities (including pharmacies) and reverse distributors.

To read more on the rule visit [EPA's Hazardous Waste Page](#)<sup>5</sup>.

You can also read about EPA's [Strategy for Addressing the Retail Sector under RCRA's Regulatory Framework](#)<sup>6</sup> to learn more about a proposed rule. This document discusses EPA's upcoming activities to address retail RCRA issues on the policy of reverse distribution by the retail sector.



## References

The following is a list of resources to assist you in learning more about reducing pharmaceutical waste.

<sup>1</sup> Arizona Department of Environmental Quality - *Managing Hazardous Waste: ADEQ Handbook for Small Business*: <http://legacy.azdeq.gov/environ/waste/hazwaste/download/managehw.pdf>

<sup>2</sup> Managing Pharmaceutical Waste – A 10 step Blueprint for Healthcare Facilities in the United States: <http://www.hercenter.org/hazmat/tenstepblueprint.pdf>

<sup>3</sup> EPA's Memorandum on Containers that Once Held P-Listed Pharmaceuticals [https://yosemite.epa.gov/osw/rcra.nsf/0/57B21F2FE33735128525795F00610F0F/\\$file/14827.pdf](https://yosemite.epa.gov/osw/rcra.nsf/0/57B21F2FE33735128525795F00610F0F/$file/14827.pdf)

<sup>4</sup> EPA's *Proposed Rule: Management Standards for Hazardous Waste Pharmaceuticals*: <https://www.epa.gov/hwgenerators/proposed-rule-management-standards-hazardous-waste-pharmaceuticals>

<sup>5</sup> EPA's Hazardous Waste Page: <https://www.epa.gov/hw>

<sup>6</sup> Strategy for Addressing the Retail Sector under RCRA's Regulatory Framework: [https://www.epa.gov/sites/production/files/2016-09/documents/strategy\\_for\\_addressing\\_the\\_retail\\_sector508.pdf](https://www.epa.gov/sites/production/files/2016-09/documents/strategy_for_addressing_the_retail_sector508.pdf)

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