



Complying with Subpart P

Adopted in Wisconsin on September 1, 2020

VSQG

- Opt into Subpart P
- To opt in fill out form 8700-12 on RCRAinfo.epa.gov
<https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>
 - In section D, question number 1 fill in "Yes". Select "A" as a healthcare facility
- Make sure you keep a copy of the completed form on file
- You will receive an EPA Id number from the EPA, please reach out to MERI with this number so we include this on the manifests and labels.

VSQG: What's going to change when you opt in

- You will receive an EPA Id number from the EPA, please reach out to MERI with this number so we can update the system
- The EPA Id number will be included on the manifests and labels
- You will go from using a BOL to an EPA Manifest for hazardous waste pickups
- You will no longer have to count your hazardous waste pharmaceuticals towards your monthly hazardous waste totals
- Acutely hazardous pharmaceutical waste (Such as Warfarin) will no longer need to be segregated
- Drums and black bins containing hazardous pharmaceuticals must be labeled "Hazardous Waste Pharmaceuticals"
- You can no longer store hazardous waste for more than a year

SQG/LQG

- Notify the EPA you are a healthcare facility using site form 8700-12 during your next annual report. Facilities are encouraged to use RCRAinfo.epa.gov to do this ○
<https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login> ○
 - The hazardous waste annual report is due March 1, 2021
- A Healthcare facility is not required to fill out box 10.B "Waste codes for federally regulated hazardous wastes" with respects to hazardous waste pharmaceuticals.
- You do need to fill out this box for other hazardous waste generated onsite. In section D, question number 1 fill in "Yes". Select "A" as a healthcare facility
- Keep a copy of this notification on file for as long as you are subject to this subchapter
- Manifest after September 1st must use the "PHRM" waste code for non-creditable hazardous waste pharmaceuticals. If this code was not used the manifest must be revised.
- The revisions can be made by the generators in the EPA E manifest system, go to the DNR manifest page below for instructions.
 - <https://dnr.wisconsin.gov/topic/Waste/Manifest.html>

SQG/LQG: What's going to change when you opt in

- You will no longer have to count your hazardous waste pharmaceuticals towards your monthly hazardous waste totals
- Acutely hazardous pharmaceutical waste (Such as Warfarin) will no longer need to be segregated
- In the waste code section of the manifest "PHRM" will be used.
- Drums and black bins containing hazardous pharmaceuticals must be labeled "Hazardous Waste Pharmaceuticals"

Complying with the nicotine amendment – All Generators

- Adopted in Wisconsin on September 1, 2020.
- These items can now be disposed of as non-hazardous waste:
 - Nicotine gum
 - Patches
 - Wrappers
 - Lozenges
- At MERI, we recommend to healthcare providers to continue to dispose of nicotine patches and wrappers as hazardous waste, for the health and safety of others.
- Nicotine, in its purest form, is still considered acutely hazardous (P075) waste, this includes:
 - e-cigarettes
 - cartridges
 - vials

Empty Container Law – All generators

The new laws clarify what is considered RCRA empty in the healthcare setting.

- RCRA Empty Guidelines
- Fully remove medicine from dispensing bottles.
- syringes, need to be fully depressed
- IV bags, contents must be fully administer to the best of the user's ability using commonly employed methods such as pouring, pumping and aspirating
- Residues remaining inside of a container will no longer be regulated as hazardous waste pharmaceuticals.
- Triple rinsing of RCRA pharmaceutical empty containers with acute hazardous pharmaceutical waste is not required/allowed.

Sewer Prohibition – All Generators – Implemented in all states

- All Hazardous Waste pharmaceuticals can no longer be put in the sewer
 - No disposal down the drain or flushing
- The following EPA hazardous wastes are also DEA Controlled substances. They must be made non-retrievable, in compliance with DEA regulations, or handled by a DEA registrant, before being thermally destroyed at a permitted treatment facility.
 - Chloral/Chloral Hydrate
 - Fentanyl Sublingual Spray
 - Phenobarbital
 - Testosterone Gels/Solutions
 - Valium Injectable/Gel
- If any of these drugs are wasted into the container make sure to notify MERI so its sent off for incineration.

Reverse Distribution Standards

- Reverse Distributors must inventory and evaluate each pharmaceutical onsite as either “potential creditable” or “Non Credible”
 - Potential creditable gets sent back to the reverse distributor
 - Non-Credible must be sent for incineration.