

STANDARD OPERATING PROCEDURE

Created: 03/29/2021

Process: Pharmacy Hazardous Waste Storage & Disposal Process

SOP Number: WAG.SOP.RX.062



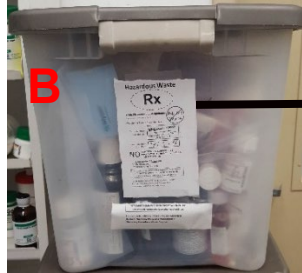
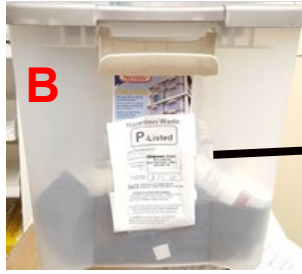

DEPARTMENT: Labor and Capacity, Pharmacy and Retail Process Optimization

PROCESS DESCRIPTION	This document provides the process for handling, storing, and disposing of pharmacy hazardous waste generated by a Walgreens pharmacy.
DEPARTMENT	Pharmacy
AUDIENCE	Pharmacy Team Members

STEP #	INSTRUCTIONS	KEY POINTS / ILLUSTRATIONS
1. Pharmacy Hazardous Waste Storage & Disposal Process Overview	<p>A) All pharmacy hazardous waste must always be stored in the pharmacy using the procedures outlined in this document, and following the Hazardous Waste Management Policy.</p> <p>B) Pharmacy hazardous waste must never be discarded in the trash, poured down the sink/drain or placed in the Discarded Protected Health Information (DPI) bins.</p> <p>C) Pharmacy hazardous waste must be stored in the pharmacy in separate containers in an area of the pharmacy designated for storing hazardous waste, and clearly labeled to identify the type of waste (i.e., General Rx Waste, P-Listed waste, or Controlled [CII-CV] substance waste). Controlled Substance (CII-CV) Waste must be stored in a container that is securely locked in the controlled substance safe.</p> <ul style="list-style-type: none"> o Prescription labels do not need to be removed from pharmacy products (e.g., return to stock medication) prior to being placed in a Hazardous Waste container. However, PHI must be blacked out completely. o The General Rx Waste Container is for pharmaceutical waste that is neither identified as P-Listed nor controlled substance. o The P-Listed Waste Container is for pharmaceutical waste that has been identified as being acutely toxic and must be quarantined separately from all other pharmacy waste. <ul style="list-style-type: none"> ▪ P-Listed Product List ▪ Connecticut P-Listed Product List – Connecticut Stores Only 	<p>Detailed information on what products must be discarded as hazardous waste can be found in the:</p> <ul style="list-style-type: none"> • Pharmacy Hazardous Waste Definitions • Hazardous Waste Generator Reference Guide • Expense Item Disposition List & Specialty Rx Expense Item Disposition List • Hazardous Waste Storage/Handling Job Aid for Specialty Pharmacies <p>NOTE: Pharmacy hazardous waste supplies can be ordered with the expense order. WIC numbers are available on <i>StoreNet > Rx Ops > Equipment > Pharmacy Expense List</i></p>

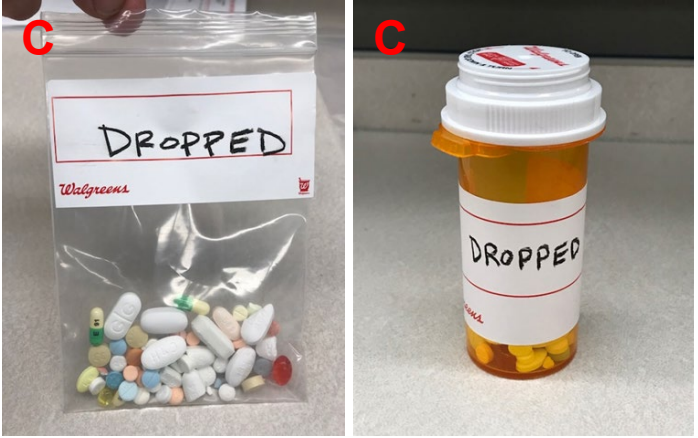
Failure to follow the processes/procedures in Standard Operating Procedures will result in disciplinary action, up to and including termination.

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	<ul style="list-style-type: none"> o The Controlled Substance (CII–CV) Waste container is for controlled substance pharmaceutical waste only. <ul style="list-style-type: none"> ▪ Because hazardous waste expense containers are too large to fit in the CII safe/cabinet, use professional judgment and obtain the appropriate size container/box in order to store controlled substance waste in their CII safe/cabinet. <p>D) California Locations Only: Follow the Hazardous Waste Management for Containers with Residual Liquid/Material Standard Operating Procedure (SOP).</p>	
<p>2. Set Up Pharmacy Hazardous Waste Containers</p>	<p>A) Print the General Rx Hazardous Waste category label for general pharmacy waste and the P-Listed Hazardous Waste category label for P-Listed waste. Fill out the labels completely.</p> <ul style="list-style-type: none"> o Use the store stamp to complete the store address field. o The store number, store address, and accumulation start date must be completed on the label. <p>NOTE: The accumulation start date is the date the first item is placed into the container.</p> <p>B) Place the completed label on the outside of each respective waste container.</p> <p>C) The Controlled Substance (CII-CV) waste container does not require a category label but should be clearly identified as the “Controlled Substance (CII-CV) Waste” container.</p> <p>D) California and Ohio Stores Only: Print a copy of the Hazardous Waste Log for non-controlled substances and write the store number and hazardous waste accumulation start date on the log. Place the log inside each non-controlled substance hazardous waste container.</p>	   <div style="display: flex; justify-content: space-around;"> <div data-bbox="1795 451 2026 747"> <p>HAZARDOUS WASTE Rx <input type="checkbox"/> TOTE FULL</p> <p>STORE PHARMACEUTICAL/CONTROLLED Physical Store: <input type="text"/> <input type="text"/></p> <p>Wegmans Family # (Company): <input type="text"/></p> <p>Store number and address: <input type="text"/></p> <p>Accumulation Start Date: <input type="text"/> / <input type="text"/> / <input type="text"/></p> <p>NO • CONTROLLED SUBSTANCES PRODUCT THAT HAS CREDIT VALUE P-LISTED WASTE</p> <p><small>Controlled Substances: ☑ In Medication ☑ Compendium Chemical ☑ PII Products</small></p> <p><small>This label must be used for the Environmental Hazardous Waste Program. TOTE LID MUST REMAIN CLOSED UNLESS WHEN ADDRESS DETAILS. Remove all used labels after each pick up. Apply new label when starting when first item is placed in tote.</small></p> </div> <div data-bbox="1795 771 2026 1063"> <p>HAZARDOUS WASTE P-LISTED <input type="checkbox"/> TOTE FULL</p> <p>STORE PHARMACEUTICAL Physical Store: <input type="text"/> <input type="text"/></p> <p>Wegmans Family # (Company): <input type="text"/></p> <p>Store number and address: <input type="text"/></p> <p>Accumulation Start Date: <input type="text"/> / <input type="text"/> / <input type="text"/></p> <p>NO • CONTROLLED SUBSTANCES PRODUCT THAT HAS CREDIT VALUE</p> <p><small>Controlled Substances: ☑ Prescription Controlled Substances, Coughs, Salts ☑ Prescription Steroids (Steroid) ☑ Drugs (Controlled Substance) (Controlled Substance) (Controlled Substance) ☑ PII Products</small></p> <p><small>This label must be used for the Environmental Hazardous Waste Program. TOTE LID MUST REMAIN CLOSED UNLESS WHEN ADDRESS DETAILS. Remove all used labels after each pick up. Apply new label when starting when first item is placed in tote.</small></p> </div> </div>
<p>3. Identify P-Listed Pharmacy Hazardous Waste in Inventory</p>	<p>A) Ensure all P-Listed products have a yellow mylar (including USP800 products). If a P-Listed product has a white mylar, print and replace the existing mylar with a yellow mylar.</p> <ul style="list-style-type: none"> o Check the P-Listed product list for updates on a quarterly basis. 	<p>NOTE: Yellow mylars and yellow stickers can be ordered with the expense order. WIC numbers are available on StoreNet> Rx Ops> Equipment > Pharmacy Expense List</p>

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	<p>B) All P-Listed stock bottles must have yellow stickers on the bottle cap. When a P-Listed product is received (e.g., from ABC), affix a yellow sticker to the bottle cap prior to placing it into the pharmacy inventory to ensure separated caps are properly disposed of in the P-Listed Waste Container.</p> <ul style="list-style-type: none"> o Affix a yellow sticker to all P-Listed return to stock amber vial caps prior to placing them back into the pharmacy inventory. 	
<p>4. Adjust Inventory Counts for Any Product Placed in Hazardous Waste Container</p>	<p>A) For all waste products except for patient/customer returns or abandonment, adjust pharmacy inventory using the "Subtract from Inventory Balance" procedures prior to placing the hazardous waste product into the appropriate hazardous waste container.</p> <ul style="list-style-type: none"> o <i>StoreNet > Rx > SIMS > Resources > Inventory Management > Inventory Adjustments > Subtract from Balance</i> 	
<p>5. Label and Store General Pharmacy Hazardous Waste in the General Rx Waste Container</p>	<p>A) Place all general pharmacy hazardous waste into the General Rx Waste Container.</p> <p>B) Any non-P-Listed and non-controlled substance dropped, or loose solid oral dosage forms (e.g., tablets, capsules) must be placed into the General Rx waste container within one amber vial or a hazardous zip seal bag. The amber vial or zip seal bag must be stored in the General Rx waste container at all times, do not keep hazardous waste amber vial/zip seal bag on the fill counter throughout the day.</p> <ul style="list-style-type: none"> o NOTE: The vial or zip seal bag can contain multiple different non-P-Listed and non-controlled substance loose/dropped solid oral dosage forms. <p>C) Write "Dropped" on a blank thermal label and attach it to the amber vial or hazardous zip seal bag.</p> <p>D) Place the amber vial or hazardous zip seal bag into the General Rx Waste Container and securely close the container.</p> <p>California and Ohio Stores Only: Record the NDC, drug name, drug strength, dosage type, and quantity of each medication placed into the hazardous waste container on the Hazardous Waste Log.</p>	

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6. Label and Store P-Listed Hazardous Waste in the P-Listed Waste Container

A) Place any waste identified as P-Listed hazardous waste (Step 3) into the P-Listed Waste Container (including any empty, securely closed P-Listed stock bottles and amber vials).

- o P-Listed stock or return to stock bottles with missing lids must be placed into a zip seal bag prior to disposal in the P-Listed Waste Container. This will ensure acutely hazardous dust is contained and properly disposed.

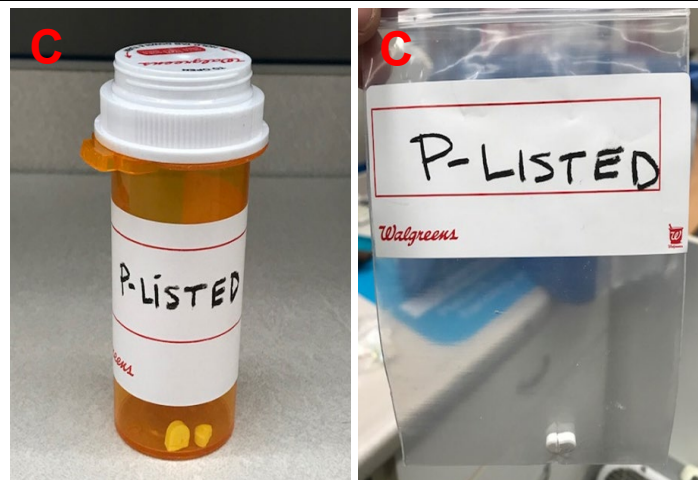
B) Any P-Listed dropped or loose solid oral dosage forms (e.g., tablets, capsules) must be placed into one amber vial or hazardous zip seal bag.

- o The amber vial or zip seal bag can contain multiple different P-Listed loose/dropped solid oral dosage forms.

C) Write "**P-Listed**" on a blank thermal label and attach it to the amber vial or hazardous zip seal bag.

D) Place the amber vial or hazardous zip seal bag in the P-Listed Waste Container and securely close the container.

California and Ohio Stores Only: Record the NDC, drug name, drug strength, dosage type, and quantity of each medication placed into the hazardous waste container on the [Hazardous Waste Log](#).



7. Label and Store Controlled Substance (CII-CV) Hazardous Waste in the Controlled Substance (CII-CV) Waste Container

A) Place any controlled substance hazardous waste bottles or vials into the Controlled Substance (CII-CV) Waste Container.

B) Ensure the following information is legible on the bottle or label for all controlled substance hazardous waste products. If any of the below information is missing, write it on the [Control Waste Label](#) or on the package to ensure all information is present for each controlled substance waste product in the container.

- o NDC number
- o Drug name
- o Manufacturer name
- o Quantity

C) Any controlled substance dropped or loose solid oral dosage forms (e.g., tablets, capsules) must be identified and quarantined by medication, strength, and manufacturer. Place each medication with the same NDC into an amber vial or



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hazardous zip seal bag in accordance to the [Handling Controlled Substance Breakage, Spillage or Damage Procedures](#).

- o The vial or zip seal bag may contain only **one product/NDC**.

D) Fill out the [Controlled Substance Breakage/Spillage/Damage Log](#).

E) Place the controlled substance hazardous waste in the properly marked hazardous zip seal bag or vial. Write the information identified in step 7B on the [Label for Controlled Waste](#) and attach to each hazardous zip seal bag or vial.

F) Place the item in the controlled substance waste container located in the CII safe/cabinet until the annual pick-up occurs.

NOTE: All controlled substance hazardous waste must be placed in a properly marked hazardous zip seal bag or vial prior to being placed in the CII safe/cabinet.

8. Pharmacy Hazardous Waste Pick Ups for General Rx Waste and P-Listed Waste

A) Walgreens has contracted with environmental waste haulers to handle/transport hazardous waste and to pick up waste on a routine basis. **NOTE:** Stores must not transfer hazardous waste between locations.

B) To confirm there are no controlled substances co-mingled with items in the P-Listed Waste Container and General Rx Waste Container, the environmental waste hauler will review the items in the waste containers.

C) The environmental waste hauler will create an **electronic copy** of the Hazardous Waste Manifest for the store and will make the documents electronically available for review. The [Hazardous Waste Transporter E-Document Guide](#) provides additional details, along with instructions for logging into the [Hazardous Waste Transporter E-Document Portal](#).

D) After each pick-up, re-label the pharmacy waste containers with a new [category label](#), following Step 2. Fill in the "accumulation date" when the first item is placed into the container.

E) **California and Ohio Stores Only:** Write the hazardous waste pick-up date on the [Hazardous Waste Log](#) and file it in the [Pharmacy Record Keeping System](#). Prepare a new copy of the log following step 2D.



WASTE MANIFEST		10/11/2011 09:11:00		U13990911 FLE																																					
Walgreen #11243 11508 Studebaker Road Norwalk, CA 90650-7548		Walgreen#11243 11508 Studebaker Road Norwalk, CA 90650-7548																																							
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Receiver Name and Address Rho Chem, LLC 425 Issa Avenue Ingleswood, CA 90301		U.S. EPA ID Number CAD000364432																																							
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Quantity	Container	Code	Priority	U.S. EPA ID	U.S. EPA ID																																				
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1. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this manifest are true and accurately describe the waste being shipped. I warrant that the contents of this manifest are true and accurately describe the waste being shipped. I warrant that the contents of this manifest are true and accurately describe the waste being shipped. I warrant that the contents of this manifest are true and accurately describe the waste being shipped.																																									
Signature of Generator		Signature of Receiver		Date																																					
Luisa Davis		Luisa Davis		10/11/2011																																					
Signature of Transporter		Signature of Transporter		Date																																					
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9. Pharmacy Controlled Substance Hazardous

A) On a yearly basis, the environmental waste hauler will pick up any controlled substance hazardous waste stored in your CII safe/cabinet at the same time as your general pharmacy waste and P-Listed waste.



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<p>Waste Pick Ups</p>	<p>NOTE: If adequate storage space is not available for the controlled substance waste in the CII safe/cabinet, the Store and Pharmacy Managers will need to determine if additional pick-ups are needed.</p> <ul style="list-style-type: none"> o Additional pickups or increased service frequency can be requested via <i>StoreNet > Rx Ops > Pharmacy Policy and Procedures > Pharmacy Hazardous Waste Disposal > Service Request Forms > Safe Medication Disposal Kiosk Service Request and Frequency Adjustment.</i> <p>B) An approved environmental waste hauler technician, under the supervision of a licensed pharmacist on duty, will inventory, package and secure all controlled substance waste within a lab-packer provided by the waste hauler using tamper evident tape. This process must be completed in the pharmacy.</p> <p>C) The approved environmental waste hauler technician will then generate the appropriate documents. The licensed pharmacist on duty must review each document for accuracy and provide signatures where required. Documents must then be filed in accordance with the Pharmacy Record Keeping System.</p> <ul style="list-style-type: none"> o If there is CII pharmacy waste, a DEA 222 form will be generated by the environmental waste hauler. The pharmacist must follow the steps outlined in the Hazardous Waste Transporter DEA Form 222 Job Aid or the Clean Harbors DEA Form 222 Job Aid when filling out the DEA 222 form. o The pharmacy must keep a copy and file it in the Pharmacy Record Keeping System. A copy must also be mailed to the store's local DEA office immediately. <p>Puerto Rico Locations: If there is CII pharmacy waste, in addition to the DEA 222 form, the ASSMCA-60 form will be generated by the environmental waste hauler. The ASSMCA-60 form must be verified for accuracy and signed by the licensed pharmacist on duty. The environmental waste hauler will leave a copy to be filed in the Pharmacy Record Keeping System.</p>	
<p>10. Cleaning Liquid Medication Spills</p>	<p>A) Every store must have a spill kit available to absorb any incidents of damaged/broken liquid medications. Ensure all team members are aware of its location.</p>	

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B) Spills must be cleaned up quickly to reduce the risk of customer or team member injury as well as to maintain a neat and safe pharmacy.

C) When cleaning a spill:

- o Use proper personal protective equipment (PPE) (e.g., goggles, gloves, etc.)
- o Use enough absorbent to clean the entire spill.
- o Sweep all excess absorbent material from the area, then wipe the area with an isopropyl alcohol wipe.
NOTE: Glass pieces (e.g., from a broken bottle) can be included with the absorbent.
- o Pour any remaining liquid from a broken bottle into an amber bottle.
- o Place the contents of the spill in a plastic zip seal bag, seal it tightly, and place it inside a second zip seal bag.
- o Write the NDC number and drug name on a blank thermal label and attach to each hazardous zip seal bag used and place in the proper container according to the appropriate pharmacy hazardous waste procedures in this document.



NOTE: Pharmacy hazardous waste supplies, including the spill kit, can be ordered with the expense order. WIC numbers are available on *StoreNet*> *Rx Ops*> *Equipment* > [Pharmacy Expense List](#)

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