

# Evaluating Pharmaceutical Wastes

*Pharmaceutical waste* in Minnesota includes any prescription drugs, over-the-counter (OTC) drugs, homeopathic drugs, dietary supplements, vaping liquids, inhalers, medicated patches, medicated gums and lozenges, and equipment and containers contaminated with these wastes when any of these items is unusable for its intended purpose, discarded, disposed, destroyed, managed through reverse distribution, or accumulated prior to these actions. Pharmaceutical waste generated by businesses and government agencies in Minnesota is regulated by the Minnesota Pollution Control Agency (MPCA) and the Metropolitan Counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington (Metro Counties).

Pharmaceutical wastes may also be regulated by the Minnesota Board of Pharmacy (Board) and the U.S. Drug Enforcement Administration (DEA). For questions about Board or DEA requirements, contact these agencies.

**Unless evaluated by the generator as non-hazardous, pharmaceutical wastes must be assumed to be hazardous waste in Minnesota and managed accordingly.** This fact sheet offers guidance only for evaluating pharmaceutical wastes; for all other wastes, see MPCA fact sheet #w-hw1-01, Evaluate wastes, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf>.

You may use the [flowchart tool](#) on the next page to help evaluate whether your pharmaceutical waste is hazardous or non-hazardous. Keep all documentation used to evaluate your waste regardless of the results.

## More information

Information on many pharmaceutical waste topics may be found in MPCA fact sheet #w-hw3-35, Regulatory consensus on health care waste issues, at <https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf>.

Guidance and requirements in this fact sheet were compiled from Minnesota Rules, Chapter 7045, and incorporate regulatory interpretation decisions made by the MPCA on the dates referenced in MPCA fact sheet #w-hw3-35. Visit the Office of the Revisor of Statutes at <https://www.revisor.mn.gov/pubs> to review applicable Minnesota Statutes and Rules.

For more information, contact your Metro County hazardous waste office or the MPCA.

### Metro County Hazardous Waste Offices

Anoka .....	763-324-4260
.....	<a href="https://www.anokacounty.us/">https://www.anokacounty.us/</a>
Carver .....	952-361-1800
.....	<a href="http://www.co.carver.mn.us/">http://www.co.carver.mn.us/</a>
Dakota .....	952-891-7557
.....	<a href="https://www.co.dakota.mn.us/">https://www.co.dakota.mn.us/</a>
Hennepin .....	612-348-3777
.....	<a href="http://www.hennepin.us/">http://www.hennepin.us/</a>
Ramsey .....	651-266-1199
.....	<a href="https://www.ramseycounty.us/">https://www.ramseycounty.us/</a>
Scott .....	952-496-8177
.....	<a href="http://www.scottcountymn.gov/">http://www.scottcountymn.gov/</a>
Washington .....	651-430-6655
.....	<a href="https://www.co.washington.mn.us/">https://www.co.washington.mn.us/</a>

### Minnesota Pollution Control Agency

Toll free (all offices) .....	1-800-657-3864
All offices .....	651-296-6300
.....	<a href="https://www.pca.state.mn.us/">https://www.pca.state.mn.us/</a>

### Minnesota Board of Pharmacy

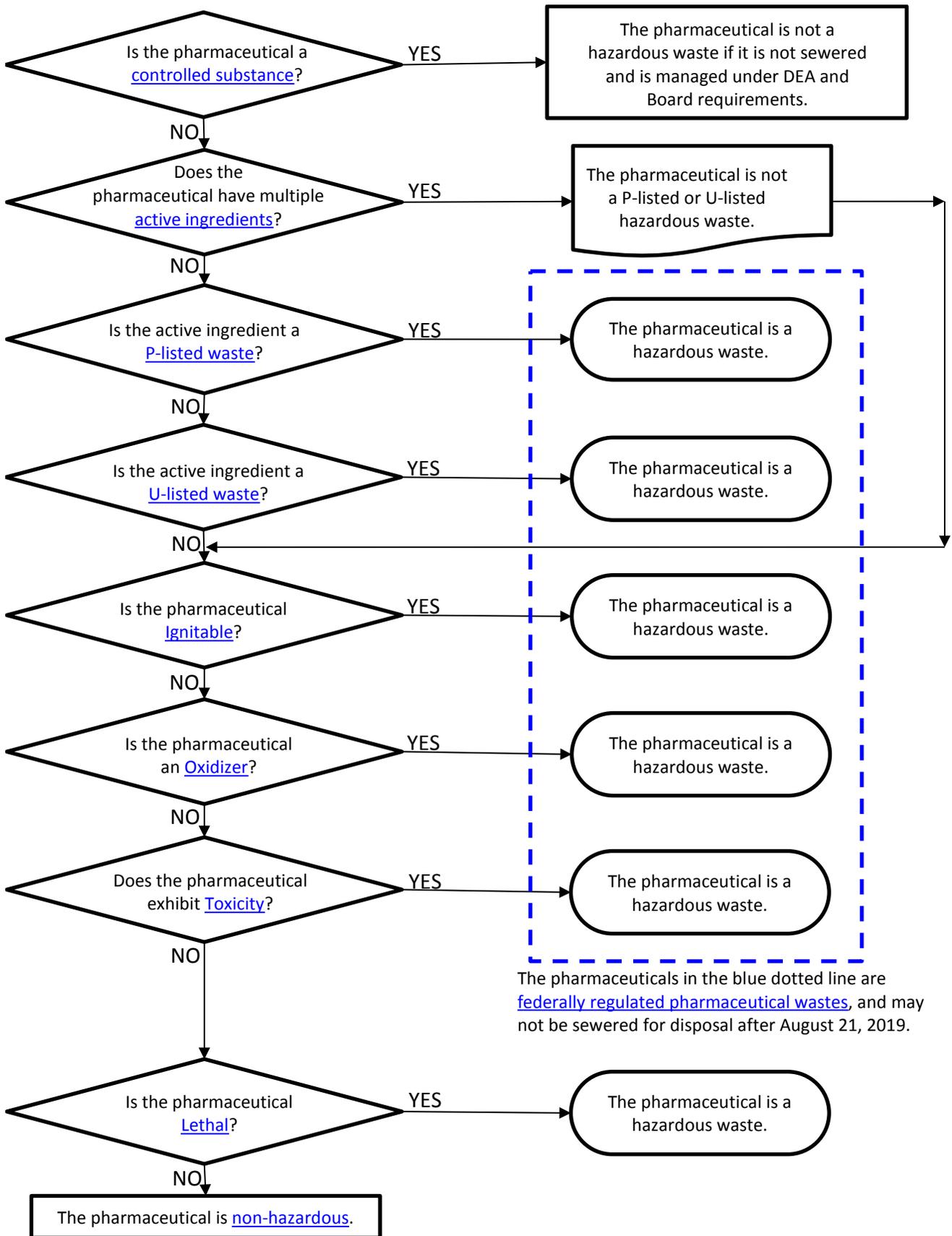
Statewide .....	651-201-2825
.....	<a href="https://mn.gov/boards/pharmacy/">https://mn.gov/boards/pharmacy/</a>

### U.S. Drug Enforcement Administration

Toll free .....	1-800-882-9539
Minneapolis Field Office .....	612-344-4143
.....	<a href="https://www.deadiversion.usdoj.gov/">https://www.deadiversion.usdoj.gov/</a>

# Pharmaceutical waste evaluation flow chart tool

Blue underlined terms are hyperlinked to the notes on the following page.



## Pharmaceutical waste evaluation flow chart tool notes

Active ingredients	Active ingredients are the components that perform the function of the product. Excipients, fillers, solvents, carriers, propellants, and preservatives are not active pharmaceutical ingredients.
Controlled substance	Schedule I through Schedule V controlled substances listed by the DEA or Board. Find more information in the <i>Controlled substances</i> entry in MPCA fact sheet #w-hw3-35, Regulatory consensus on health care waste issues, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf</a> .
Federally-regulated pharmaceutical waste	Pharmaceutical wastes that have not been evaluated must be assumed to be federally regulated pharmaceutical waste. Find more information in the <i>Federally regulated pharmaceutical waste</i> entry in MPCA fact sheet #w-hw3-35, Regulatory consensus on health care waste issues, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf</a> .
Ignitable	Find the complete description of the Ignitability Characteristic in MPCA fact sheet #w-hw2-04, Characteristic hazardous wastes, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw2-04.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw2-04.pdf</a> .
Lethal	Lethality is an additional Minnesota hazardous waste characteristic. Pharmaceutical wastes that have not been evaluated as non-lethal must also be assumed to be Lethal pharmaceutical wastes. Find more information in the <i>Lethality</i> entry in MPCA fact sheet #w-hw3-35, Regulatory consensus on health care waste issues, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf</a> . Find Lethality evaluation criteria for pharmaceuticals in MPCA fact sheet #w-hw4-45b, Alternate method to evaluate pharmaceutical waste for the Lethality characteristic, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw4-45b.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw4-45b.pdf</a> .
Non-hazardous	Because pharmaceutical wastes only extremely rarely exhibit the hazardous waste characteristics of Corrosivity or Reactivity, they were not included in this flow chart. Pharmaceutical wastes evaluated as non-hazardous may still be subject to sewerage restrictions, DEA or Board conditions, or other regulatory standards. See <a href="#">More information</a> on page 1. Wastes that are not pharmaceuticals must be evaluated under the full hazardous waste requirements discussed in MPCA fact sheet #w-hw1-01, Evaluate waste, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf</a> .
Oxidizer	Find the complete description of the Oxidizer Characteristic in MPCA fact sheet #w-hw2-04, Characteristic hazardous wastes, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw2-04.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw2-04.pdf</a> .
P-listed waste	Find the complete P-list in MPCA fact sheet #w-hw2-02, P list of acute hazardous wastes, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw2-02.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw2-02.pdf</a> . Pharmaceutical epinephrine, nitroglycerin, phentermine, and some approved nicotine replacement therapy products are not P-listed wastes. See the entries for these pharmaceuticals in MPCA fact sheet #w-hw3-35, Regulatory consensus on health care waste issues, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw3-35.pdf</a> .
Toxicity	Find the complete description of the Toxicity Characteristic in MPCA fact sheet #w-hw2-04, Characteristic hazardous wastes, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw2-04.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw2-04.pdf</a> .
U-listed waste	Find the complete U-list in MPCA fact sheet #w-hw2-03, U list of hazardous wastes, at <a href="https://www.pca.state.mn.us/sites/default/files/w-hw2-03.pdf">https://www.pca.state.mn.us/sites/default/files/w-hw2-03.pdf</a> .