



Management of P-Listed Pharmaceutical Containers

FACT SHEET 37-059-0913

1. BACKGROUND: The United States Environmental Protection Agency issued a memorandum on 4 November 2011 regarding the regulatory status for containers that once held pharmaceuticals that are on the acute hazardous waste (P-list) list in 40 CFR 261.33 (e).

This includes pill bottles that have held pharmaceuticals such as warfarin (brand names Coumadin and Jantoven) at concentrations greater than 0.3%; nitroprusside; blister packs and wrappers that held nicotine gum; nicotine patches and lozenges, and containers such as paper/plastic dispensing cups (soufflé cups) that were used to administer an acute P-listed pharmaceutical to a patient in a healthcare facility (HCF).

2. APPLICABLE REGULATIONS: The regulatory status of P-listed residues remaining in a container are specifically addressed under the Resource Conservation and Recovery Act (RCRA) regulations found in 40 CFR 261.33 (Identification and Listing of Hazardous Waste):

The following materials or items are considered to be an acute P-listed hazardous waste if and when they are discarded or intended to be discarded:

Any residue remaining in a container or in an inner liner removed from a container that has held any commercial chemical product unless the container is RCRA empty as defined in 40 CFR 261.7 (b).

RCRA provides several regulatory mechanisms for containers that held an acute P-listed hazardous waste to be classified as "RCRA empty," which would allow the residues to fall out of hazardous waste regulation. However, none of these options are feasible for HCFs.

As these containers are not considered RCRA-empty, the container residues are regulated even when the pharmaceuticals are fully dispensed and the container appears to be empty.

The memorandum can be found at:

[http://yosemite.epa.gov/osw/rcra.nsf/0/57B21F2FE33735128525795F00610F0F/\\$file/14827.pdf](http://yosemite.epa.gov/osw/rcra.nsf/0/57B21F2FE33735128525795F00610F0F/$file/14827.pdf)

3. APPLICABILITY TO MEDCOM HEALTHCARE FACILITIES: Satellite accumulation sites/points must be established in wards/pharmacies/community clinics/wellness centers in which these pharmaceuticals are dispensed in order to collect containers (including medication bottles, blister packs and wrappers). The Environmental Science and Engineering Officer (ESEO) should contact the installation environmental office to inform them of the waste stream and to determine the requirements for managing an acute P-listed hazardous waste at an accumulation site.

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It should be noted that while the residue in these containers is a hazardous waste, the container itself is not. However, the container must be collected at the satellite site because the residues cannot be removed from the container.

When determining the volume of hazardous waste for an accumulation site, only the residue in the containers needs to be counted. This is important because federal regulations allow only one quart of an acute P-listed hazardous waste to be accumulated at a satellite site.

4. EXAMPLES OF P-LISTED HAZARDOUS WASTES

EPA Waste Code	Constituent of Concern	Brand Names	Remarks
P001	Warfarin & salts (Concentration > 0.3%)	Coumadin	Blood Thinner
P012	Arsenic Trioxide	Trisenox	Antineoplastic
P030	Cyanides	Nitroprusside	High Blood Pressure
P046	Phentermine	Phentermine	Controlled Substance
P075	Nicotine & Salts	Nicotine patches, gum, lozenges (Habitrol, Nicoderm, Nicorette, Nicotrol, etc)	Smoking Cessation
P188	Physostigmine Salicylate	Eserine Salicylate	Treatment for glaucoma (ophthalmic solution) and Alzheimers
P204	Physostigmine	Eserine	Treatment for glaucoma (ophthalmic solution) and Alzheimers

5. ASSISTANCE: HCFs may contact USAPHC, Hazardous and Medical Waste Program at 1-800-276-MIDI (6434) or DSN 584-3651 for additional assistance.