

## Standard Operating Procedure for Disposal of Controlled Substances and other Pharmaceuticals

**The preferred method of disposal of controlled substances is complete use of the substance such that there is none left to dispose of.** Registrants should only purchase and securely store those quantities of controlled substances needed for current research or instructional activities. Controlled substances that are expired, surplus, or contaminated must be disposed of in accordance with applicable state and federal regulations. Controlled substances and other pharmaceuticals must **never** be drain disposed or discarded in the regular garbage.

Disposal of a controlled substance must render it non-retrievable. According to the DEA, “the process utilized to render a substance ‘non-retrievable’ shall permanently alter the substance’s physical or chemical condition or state through irreversible means and thereby render the substance unavailable and unusable for all practical purposes. A substance is considered ‘non-retrievable’ when it cannot be transformed to a physical or chemical condition or state as a controlled substance analogue.” At this time, UND’s approved method of disposal is Rx Destroyer or a reverse distributor. The DEA registrant must have a valid DEA registration to dispose of these products. A copy of the disposal information must be kept on file for a minimum of three years. The DEA registrant will be responsible for any and all costs of disposal of DEA controlled substances.

If the lab is closing or the PI is retiring, the PI must dispose of those controlled substances prior to closing the lab or before allowing the DEA registration to expire. Abandoning controlled substances is a violation of the DEA regulations and the PI who owns them may be subject to fines or imprisonment. If abandoned controlled substances have been discovered, contact the Office of Safety at (701) 777-3341 immediately to initiate disposal.

### Disposal of dilutions and mixtures

When a controlled substance is consumed in a reaction or converted into a hazardous waste mixture, the quantity of controlled substance used is removed from the controlled substances inventory. Excess dilutions or mixtures must be labeled, separated, and stored in the designated controlled substance secure storage cabinet until ready for disposal. Maintaining these substances separately within the same cabinet where inventory is stored is acceptable. Solutions created using hazardous chemicals (e.g. methanol), must be disposed of as a hazardous waste mixture. **No amount of controlled substance is to be poured down a drain for disposal.**

### Disposal of non-recoverable substance, e.g. residual amount left in used syringe

If waste is unable to be collected via syringe or other means and the usage log is balanced to zero, disposal may proceed by depositing syringe in a sharps container.

### Disposal of broken or damaged containers

If a container of a controlled substance is inadvertently broken or damaged, the incident must be documented in the controlled substances inventory as “unintentional destruction” with the amount of controlled substance lost recorded. If applicable, a witness must sign and date this entry. All spill cleanup residues and materials used in the cleanup must be disposed of appropriately by retaining all material and disposing as hazardous waste. Contact the Office of Safety for assistance.

**Disposal of empty stock bottles**

Disposal of the empty vial must be logged among the DEA registrants' records. Empty stock bottles of controlled substances must have the label removed or rendered unreadable prior to disposal. The empty bottle can then be disposed of with non-regulated waste.

**Disposal of medical materials and supplies**

Needles, syringes, catheters and other medical devices used in the administration of controlled substances must be disposed appropriately according to University policy along with city, state, and federal regulations. Unused drugs must not be left behind in syringes or catheters for disposal. Drugs must be emptied as much as reasonably possible into an appropriate waste disposal container.

**Disposal of other pharmaceuticals**

All pharmaceutical substances, including those that are not considered controlled substances, must be properly disposed in accordance with city, state, and federal regulations. Some are considered a regulated hazardous waste by the Environmental Protection Agency (EPA). However, even materials that are not regulated as a hazardous waste can pose hazards when released into the environment. For this reason, the city of Grand Forks landfill is highly restrictive as to the accepted waste from UND. Drain disposal of waste pharmaceuticals is illegal and is a violation of the campus wastewater discharge permit. To ensure your lab is in compliance with regulations and to avoid polluting the environment and your drinking water, arrange for disposal of unwanted (Non-DEA Controlled Substance) pharmaceuticals by submitting a Waste Disposal Manifest Form to the Office of Safety.

**CONTACT INFORMATION**

<b>Office of Safety</b>	<b>701-777-3341</b>
<b>Director for Safety</b>	<b>701-777-3759</b>
<b>Biological Safety Officer</b>	<b>701-777-2444</b>
<b>Environmental Health &amp; Safety Manager</b>	<b>701-777-5931</b>
<b>UND Police Department</b>	<b>701-777-3491</b>

### Disposal of Controlled Substances Standard Operating Procedure

#### Procedure to dispose of waste considered to be recoverable, e.g. unused doses, spillage, expired material

1. Contact Julie Magnus at the Center for Biomedical Research to request a bottle of Rx Destroyer.
2. To discard DEA controlled substances, a witness must be present.
3. Add material to bottle and tightly replace the cap. Label the bottle with the following: "Open date\_\_\_\_", "Waste",  
Do not label the bottle with the identity of the disposed drug or terms such as "DEA", "Controlled Substance", or "Drugs"

Note: Any hazardous material such as (but not limited to): toxins, flammable, radioactive isotopes, etc. must be disposed of following federal and state regulations. Contact the Office of Safety to process as hazardous material waste.

4. Record the waste amount on the usage log in addition to DEA Form 41 (see link below under "Resources"). The witness will need to initial the log and sign the DEA Form 41. This record must be kept for 3 years along with the associated controlled substance records.
5. Gently shake bottle to mix
6. Store disposal container securely in the same registered location dictated by the license holder until ready for disposal.
7. Additional controlled substance waste may be added to this same container but must meet the following criteria:
  - Water soluble
  - Compatible with all contents
  - NO effervescent or antacid or gassing medications
  - NO syringes, glass, or vials
8. Continue to add waste as necessary until contents are within 2 inches from the cap OR at one year from initial opening of the Rx Destroyer. **The expiration date for an opened bottle of Rx Destroyer is one year from the open date.**
9. For disposal, complete a UND chemical waste disposal form and contact the Office of Safety. The container will be returned to the manufacturer for disposal. **\*\*The city of Grand Forks does not allow disposal of this product in its landfill.\*\***

## Resources

DEA Form 41: [https://www.deadiversion.usdoj.gov/21cfr\\_reports/surrend/41\\_form.pdf](https://www.deadiversion.usdoj.gov/21cfr_reports/surrend/41_form.pdf)

Registrant record of controlled substances destroyed instructions:

[https://www.deadiversion.usdoj.gov/21cfr\\_reports/surrend/](https://www.deadiversion.usdoj.gov/21cfr_reports/surrend/)

Rx Destroyer:

<https://www.rxdestroyer.com/>

<https://www.rxdestroyer.com/faq-page/>

<https://www.rxdestroyer.com/dea-compliant-pharmaceutical-disposal-regulations/>

UND Chemical Waste Form: <https://campus.und.edu/safety/files/docs/waste-disposal-manifest-form-chem.pdf>

UND DEA Controlled Substance Forms and Information: <https://campus.und.edu/safety/public-safety/biological.html#d34e100--3>