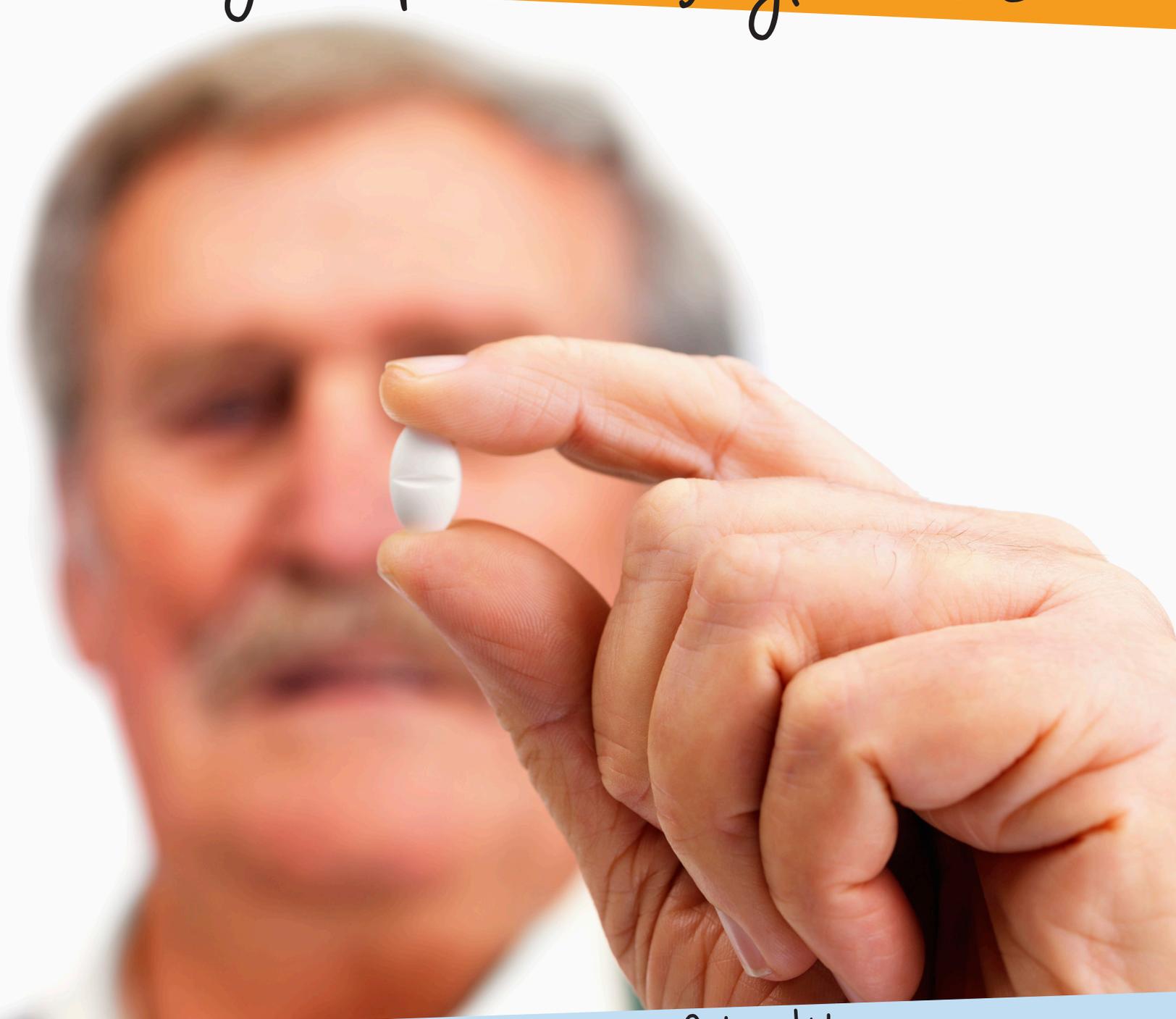


drug disposal day guidelines:



ohio department of health  
injury prevention program, office of healthy ohio



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# acknowledgements

## **Guidelines Developed by:**

- Amy Kuhn, Intern  
Injury Prevention Program, Ohio Department of Health  
Phone: 614-644-0204  
E-mail: amy.kuhn@odh.ohio.gov

## **For More Information:**

- Christy Beeghly, MPH, Program Administrator  
Injury Prevention Program, Ohio Department of Health  
**Phone:** 614-728-4116  
**E-mail:** christy.beeghly@odh.ohio.gov
- Judi Moseley, Program Consultant  
Injury Prevention Program, Ohio Department of Health  
**Phone:** 614-728-8016  
**E-mail:** judi.moseley@odh.ohio.gov

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# introduction and overview

## Introduction

Drug Disposal Days are implemented to ensure that unwanted medications are collected and destroyed using methods that are both legal and environmentally friendly. According to the 2007 National Survey on Drug Use and Health (NSDUH), a majority of individuals who used pain relievers non-medically in the past 12 months obtained the medication from a friend or family member for free. In addition, the 2007 Ohio Youth Risk Behavior Survey found that 26.5 percent of high school students reported using a prescription drug without a doctor's prescription one or more times during their lifetime. Other studies show that teens most often obtain prescription drugs from friends and/or family members. Holding drug disposal events can help prevent medication diversion and raise public awareness. Pairing events with educational efforts is strongly encouraged. Keep in mind that events can range in size, from "two cops and a bucket" to a large scale community event. This document is a comprehensive guide, covering the logistical and legal matters involved in a large scale drug disposal event. Implementing a smaller scale event may not require covering all the steps outlined below.

## Overview

### 1. Contact Local Partners (see Attachment 1)

- Required:
  - Law enforcement must be present to take custody of the controlled medications.
    - Call or send a written request to your local law enforcement seeking their participation.
    - If controlled and non-controlled medications will not be segregated, then all must be treated as controlled substances. Law enforcement must have custody of controlled substances until destruction.
  - If it is determined that controlled and non-controlled medications will be segregated during the event, a pharmacist must be present to identify and segregate the medications.
    - USDEA permission is required if a pharmacist will be handling the collected medications.
    - It is not required that pharmacists participate. However, if pharmacists are not present to segregate controlled and non-controlled medications, all must be treated as controlled substances.
    - If it is determined that controlled and non-controlled medications will be segregated during the event, a hazardous waste company licensed with the Ohio State Board of Pharmacy as a Wholesale Distributor of Dangerous Drugs may be used to transport and destroy all non-controlled medication.
  - Identify an appropriate facility for proper destruction.
    - Event organizers or law enforcement may need assistance in locating an appropriate facility as listed in Ohio Environmental Protection Agency's (EPA) guidance document (see References above).
    - In some cases, a hazardous waste company can be allowed by the U.S. Drug Enforcement Agency (DEA)



# introduction and overview (con't)

to destroy the collected pharmaceuticals at the collection site and then transport them to another location for incineration.

- Recommended:
  - Local organizations and agencies for support, sponsorship, and volunteers
    - Hospitals, pharmacies, health departments, substance abuse treatment centers, county medical societies, etc.
  - Other staff
    - Site supervisor, greeters, data entry, pharmacy technicians, and interns

## **2. Obtain Permits and Approval**

- A letter to local/regional DEA agent-in-charge seeking written approval is required. It should be sent by the local police department involved and should include the following:
  - Date, time, and location
  - Description of participating law enforcement
  - Detailed description of the event, including the disposal method
  - Whether controlled and non-controlled medications will be segregated by a pharmacist
- It is not required to notify the Ohio EPA.
- It is not required to notify the Ohio State Board of Pharmacy; however, notification may be helpful so they can refer consumers.

## **3. Preparation before the Event (see Attachment 2)**

- Identify the date, time, and location.
- Determine whether controlled and non-controlled substances will be segregated.
- Determine what materials will be collected.
- Determine responsibilities for each partner.
- Prepare and distribute publicity and educational materials.
- Prepare and distribute a participant survey (optional, but recommended).
- Provide necessary supplies.

## **4. Considerations (see Attachment 3)**

- Patient privacy
- Safety
- Avoiding medication diversion

## **5. The Collection (see Attachment 4)**

- Legal strategy for medication collection
- Medication inventory
- Packing medications
- Destruction

## **6. After the Event (see Attachment 5)**

- Analyze the participant surveys and the medication inventory.
- Report the results to the community and event partners.



# attachment 1: partners and responsibilities

## **Suggested Organizations and Agencies**

- Below are the suggested organizations and agencies to contact for financial and logistical support of the event.
- Ideally, all partners should assist with planning, publicity, and providing volunteers for the event. Prepare publicity materials and supply to partners for distribution.
  - Local health departments
  - Nursing associations
  - County medical society
  - County fire departments
  - County sheriff's offices
  - Solid Waste Management Districts (SWMDs)
  - County/city departments on aging
  - Centers for Medicare & Medicaid Services
  - Drug-free community coalitions
  - Hospitals
  - Hospices
  - Pharmacies
  - Public and private universities
  - Poison control centers
  - Religious groups
  - Ohio State Board of Pharmacy
  - Ohio Dental Association
  - Ohio Environmental Protection Agency
  - Ohio Department of Health
  - Ohio Public Works Commission
  - Local office of US Drug Enforcement Agency
  - State TRIAD agencies
  - Substance abuse treatment centers
  - Alcohol and substance abuse boards
  - Veterans administration hospitals
  - Veterinary organizations/hospitals
  - Wastewater treatment plants
  - Soil and water conservation districts

## **Responsibilities for Key Partners at the Event**

### **Law Enforcement**

- Send a letter to the local DEA agent-in-charge requesting approval for the event.
- Take custody of controlled substances; by law, law enforcement are the only people who can be in possession of the collected medications.
  - Note: If pharmacists are not present at the event to segregate controlled and non-controlled medications, all medications are treated as controlled substances.
- Determine what containers the controlled substances will be deposited in.
  - Most likely, your local law enforcement will have a disposal



# attachment 1: partners and responsibilities (con't)

method already in place. Therefore, they may provide the disposal containers for controlled substances. However, prior to the event be sure to establish who is responsible for supplying the containers.

- Transport the medication directly to the site of destruction or transport controlled substances to the agency's evidence locker and maintain secured locked possession.
- Take responsibility for disposal of controlled substances.
- Prevent medication diversion by carefully witnessing all stages of the collection process.

## **Pharmacist**

- Segregate controlled and non-controlled substances.
- Identify unlabeled medications using reference materials as necessary.
- Inventory the medications (optional).
- Instruct law enforcement to take possession of controlled substances.
- Provide counting materials and reference materials for identifying medications.

## **Hazardous Waste Company (HWC)**

- Transport and destroy all non-controlled medications.
  - Law enforcement may have the resources and opt to handle the non-controlled medications along with the controlled substances. Consult with the local law enforcement involved to determine if this is a possibility for your event.
  - In some instances, a hazardous waste company may be authorized by US DEA to destroy medications on-site.
- Provide disposal containers for non-controlled substances.
- Seal the filled containers and transport the non-controlled substances to point of destruction.
- Properly destroy the collected medications.
- Provide a certificate of destruction.
- **Tips on choosing a HWC:**
  - Check with Ohio EPA Division of Hazardous Waste Management. A list of companies can be found at: [epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=29](http://epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=29)
  - Seek recommendations of a company used in past events.
  - Verify that the company is properly permitted to accept and transport pharmaceuticals.
  - A contract, pricing, and the delivery of containers should be negotiated by the event organizer.
  - Know if the company has requirements for segregating medications, such as separating items under pressure, needle delivery medications, nitrogen based medications, and mercury containing medications.

## **Other Staff/ Volunteers**

Prior to the event, recruit staff/volunteers and assign them to serve in the following roles:

- **Site Supervisor**
  - Coordinate site set up.



# attachment 1: partners (con't)

- Direct staff and volunteers.
- Oversee the collection process to ensure proper procedure is followed.
- Maintain copies of the medication inventory (inventory is optional).
- Verify that the medication has been properly disposed of by the HWC.
- **Data Entry**
  - Record inventory of medications (inventory is optional).
- **Greeter**
  - Give direction to participants and answer questions.
  - Provide pens/markers to obscure personal information.
  - Distribute educational materials.
  - Survey participants.
- **Pharmacy Interns and Technicians**
  - Assist the pharmacist(s) in identifying and counting medications
  - Be sure that permission has been granted by the USDEA for these individuals to handle medications.



# attachment 2: preparation before the event

## Identify the Date, Time, and Location

- For a large scale event with multiple locations, preparations should begin at least 90 days before the event. Smaller events or one location events may need less preparation time.
- The day and time should be convenient for participants. Hold the event on the weekend beginning in the morning and ending in late afternoon (e.g., 9 a.m.-3 p.m.).
- Choose a neutral, easily accessible location with free parking.
- The logistics of the site should include barriers/protection around the drug handling area.
- If an outdoor site is chosen, consider shelter from inclement weather (such as tents or canopies).
- Make sure event volunteers and officers will have easy access to restrooms.

## Determine if Controlled and Non-controlled Substances will be Segregated

*There are two options for the collection and disposal of the medications:\*

1. No segregation of controlled and non-controlled medication.
  - If medications will not be segregated then ALL medications must be treated as controlled substances.
  - Pharmacists are not required for this method.
  - Law enforcement officers take possession of ALL medications and assume responsibility for their destruction.
2. Segregation of controlled and non-controlled medication (must be approved by USDEA)
  - Pharmacists determine whether medication is controlled or non-controlled.
  - Controlled substances are taken into custody by law enforcement.
  - Non-controlled substances are deposited into the hazardous waste containers for removal by the HWC.
  - Medications that cannot be identified are treated as controlled substances.

## Accepted Items

- It is important to determine what items will and will not be accepted at the event.
- The following items should be considered: Over-the-counter (OTC) medications, veterinary medications, vitamins, supplements, thermometers, and sharps (needles).
- A note on sharps and thermometers:
  - Have sharps containers and thermometer containers available.
  - Even if it is determined that sharps and/or thermometers will not be collected, it is inevitable that participants will bring them. Be prepared to collect these items either way.
  - Contact your local hospital or solid waste management district for assistance with disposal of sharps.
  - Contact a local mercury recycling service or your local solid waste management district for disposal of thermometers. Additionally, you might want to contact Ohio EPA for assistance.

## Logistical Supplies for a Successful Event

### Site Set-up

- Tables and chairs
- Tents/canopies (if outdoor site is chosen)
- Traffic cones



# attachment 2: preparation before the event (con't)

- Caution tape (to define restricted areas)

## Signage

- Signage specifying the work stations
- Signage to direct participants
- Educational displays
- Display boards and easels

## Collection Supplies

- Recycling bins for excess medication packaging, pill containers, etc. Contact your local solid waste management district to learn more about recycling options.
- Plastic containers to secure medications for destruction (containers for non-controlled medications may be provided by the HWC).
- Sealable plastic bags
- Containers specified for sharps (obtain from a local nursing home, hospital, or fire department)
- Containers specified for thermometers
- Pill counters for the pharmacist (if conducting an inventory)
- Packing tape
- Permanent markers to blackout information on prescription bottles
- Inventory sheets
- Copies of participant survey
- Educational handouts
- Scissors
- Pencils and pens
- Clipboards
- Note pads/paper

## Supplies for Staff/Volunteers

- Name tags
- Safety vests for those directing traffic
- Protective gloves and masks for law enforcement and pharmacists
- Hand sanitizer
- Snacks and refreshments

## Equipment

- Computer with a spreadsheet template to record inventory
- Printer to print the inventory

## How to Publicize your Event

- Create a press release to be distributed to local media and posted on internet websites.
- Create flyers (electronic and printed) and send to organizations for display and/or distribution.
- Send event information via email lists to hospitals, medical and nursing associations, nursing homes, local law enforcement agencies, prosecutors' offices, pharmacies, etc.
- Supply area pharmacies with fliers to distribute to customers.
- Create simple and visible signs to direct participants the day of the event.



## attachment 2: preparation before the event (con't)

- Create educational displays for day of the event (e.g., on foam board and easels).
- Include the following important information in promotional materials (see Attachment 6 for examples):
  - Date, time, and location
  - No cost to participate
  - Person or website to contact for more information
  - Total anonymity, no questions asked
  - Do not remove medication labels; cross out personal information but keep medication information legible
  - List of accepted and unaccepted items: OTC, pet medications, vitamins, supplements, thermometers, sharps, medical waste, aerosol cans, etc.
  - Medications will not be returned and refunds will not be given.
  - Medications will be destroyed, not resold or reused.

### **Types of Educational Materials to Distribute**

- Prescription drug use fact sheets
- Talking points for parents
- Information about proper disposal and safe usage of medication, including:
  - Flushing unwanted or left over medications down the drain/toilet can adversely affect the environment.
  - If a drug take back event is not available in your area, follow these steps to dispose of medications:
    1. Take the medications out of their original containers.
    2. Mix the medication with an undesirable substance.
    3. Put the mixture into a container, seal it, and put it in the trash.
    4. Mark out or remove any personal information, including the Rx number, from the empty medication container and discard it.
- Never give your medications to someone else to take.
- Never take a prescription that is not prescribed to you.
- Keeping unwanted, left over, or expired medication in the home presents a danger to children, pets, and visitors who could ingest them.

### **How to Develop and Distribute a Participant Survey**

- DO NOT ask for names
- Hand out a printed survey or conduct a verbal survey
- Possible questions:
  - City the participants live in
  - How the participants heard about the program
  - Newspaper, television, internet, e-mail, friend, pharmacy, radio, work, etc.
  - What types of medication the participants discarded
  - Pain, heart/blood pressure, antibiotic, asthma, antidepressant, cholesterol, veterinary, OTC, anti-nausea, cancer, allergy, etc.



# attachment 3: considerations

## **What to Remember During the Event:**

- Comply with federal and state laws.
- Privacy: Instruct participants to mark out all personal information on medications, but keep medication information (type, dosage) legible.
- Safety:
  - Use universal precautions; all those who handle medications or come into contact with the disposal containers should wear gloves. Facemasks are encouraged, especially for those conducting a physical inventory.
  - It is not required by law that medications be kept in their original containers. However, doing so can help to minimize worker exposure and ensure public safety.
    - If it is decided that medications will be dumped out of their original containers, consider recycling the medication bottles.
- Avoid illegal diversion of medications by strategically setting up the site and placing law enforcement appropriately.
  - Law enforcement should have visual contact with the people dropping off the medications and the point of drop-off.
  - Law enforcement should watch all movement of medication. For example, if event workers move medications from consumers' cars to the sorting area, law enforcement should witness this process.
  - Protective barriers should be placed around the drug handling area. Individuals, including event volunteers, not authorized to handle the medications should not enter the drug handling area. Use caution tape to indicate restricted areas.
    - A law enforcement officer should be assigned the sole duty of monitoring the drug handling area to enforce restricted access.
    - When a medication is classified as a controlled substance, law enforcement must continue to monitor the medication.
- The law enforcement agency involved should be given the full responsibility for the final say on the handling of the event. If questions or conflicting opinions arise during the planning stages or the actual event, it is better to lean toward more documentation and more safety.



# attachment 4: the collection

## **Legal Strategy for Medication Collection:**

Note: The content below is based on information from the Ohio EPA, individuals who have experience implementing drug disposal events in Ohio, and publications from the Northeast Recycling Council.

There are two options for the collection and disposal of medications:

1. No segregation of controlled and non-controlled medication
  - If medications will not be segregated then ALL medications must be treated as controlled substances.
  - Pharmacists are not required for this method.
  - Law enforcement officers take possession of all medications and are responsible for their destruction.
  - This is often the preferred method because the medications are only handled by law enforcement. In general, the fewer individuals who handle the medications, the better.
2. Segregation of controlled and non-controlled medication
  - Pharmacists determine whether medications are controlled or not.
  - Controlled substances are taken into custody by law enforcement.
  - Non-controlled substances are deposited into the hazardous waste containers for removal by the HWC.
  - Medications that cannot be identified are treated as controlled substances.

## **Inventory**

- It is not required by law to inventory the collected medications. However, it may be required by the hazardous waste hauler.
  - Know what type of inventory is required by the company (i.e., only the weight of the containers or specific content).
  - Even though inventory of medications is not required, keeping track of at least the volume of materials shipped can help plan for future events.
- For an item by item inventory, data entry staff should record the name, dosage, amount, and form of the medication.
- Recording the weight and volume of collected medications is recommended, especially if medication is not individually inventoried.

## **Packing the Medications**

- Non-controlled
  - Non-controlled medications go into the hazardous waste containers.
    - If required by the HWC, segregate medications into specified hazardous waste containers, such as separating items under pressure, needle delivery medications, nitrogen based medications, mercury containing medications.
  - If required by the HWC, place medication that comes without its original container in its own container (e.g., sealable plastic bag) and label it with name and dosage.
  - Unnecessary packaging may be removed to save space.



# attachment 4: the collection (con't)

- Place liquids and solids in separate containers if directed by the HWC.
- Place sharps and thermometers in appropriate disposal containers.
- Controlled
  - Place the medications in the containers reserved for controlled substances. The type of container used for controlled substances is up to the law enforcement disposing of the materials (e.g., sealable plastic bags, covered plastic pails, paper bags).
  - Medication that comes without its original container should be placed with controlled substances.
  - Place liquids and solids in separate containers.

## **Destruction**

- If this method is selected, at the end of the event, the HWC removes the non-controlled medication and transports it to the point of destruction. In some cases, hazardous waste companies have been permitted to destroy controlled pharmaceuticals at the collection site, by dissolution or another similar process. This requires US DEA permission.
- The site supervisor should follow up with the hazardous waste company to verify that the non-controlled medications have been properly destroyed.
- Law enforcement transports the collected medications either directly to the destruction site or to the station's property/evidence room and stores it until the time of destruction.
- All the controlled substances are eventually transported by the law enforcement to the site of destruction. See Ohio EPA guidance document for more information.



# attachment 5: after the event

## **Data Analysis**

- Data analysis can help plan and budget future events.
- **Medication inventory**
  - If an inventory of individual medications was conducted, categorize it to see what the types of medication were collected.
    - Pain, heart/blood pressure, antibiotic, asthma, antidepressant, cholesterol, veterinary, OTC, anti-nausea, cancer, diabetes, allergy, etc.
  - Collect data on the weight and volume of material shipped for both controlled and non-controlled substances.
    - Determine the average amount of material brought in per person.
- **Participant surveys**
  - Determine what advertising strategies worked.
  - Track the number of people who bring medication.
  - Learn what types of medication were more commonly collected from participants.
  - Learn if there is a need for events in surrounding communities.

## **Report the Results**

- Inform event partners and the community about the success of the event.
- Send a letter to event partners and volunteers.
- Develop a press release for local media.



# attachment 6: examples of event advertisement

## **Do you have a medicine cabinet full of old medications? Get rid of them safely at the Prescription Drug Drop Off June 19th**

**Where: Senior Safety Symposium 2010  
Bethesda Medical Center at Arrow Springs  
100 Arrow Springs Boulevard Lebanon, OH 45036**

**When: Saturday, June 19, from 9:00am to 12:30pm**

**What: Free & Open to the Public, Just Drop Off:**

- Expired, unwanted and unused prescription medications - Please remove labels
- Over the counter medications and samples
- Medicated ointments and lotions
- Inhalers & Patches
- Liquid medicines in leak proof containers

**There are some items we cannot accept:**

- **NO** Needles, Syringes, Lancets
- **NO** Thermometers
- **NO** IV Bags
- **NO** aerosol cans
- **NO** hydrogen peroxide
- **NO** empty containers
- **NO** personal care products

The Senior Safety Symposium will also have **educational sessions** on scams and fraud, elder abuse, home modification for safety and falls prevention.

Over 25 **vendor tables** will provide information on aspects of senior safety.

**Door prizes and refreshments! Open to all!**

Brought to you by the Safe Aging Coalition, Lebanon Police Department  
The Warren County Drug Task Force & Warren County Sheriff's Department



For more information call 513-695-2288 or email [safeaging@wccsinc.org](mailto:safeaging@wccsinc.org)



# attachment 6: examples of event advertisement (con't)

## OPERATION: MEDICINE CABINET



Saturday - May 8, 2010

The Cuyahoga County Sheriff's Office, in cooperation with local law enforcement, Home Instead Senior Care, and Drug Awareness and Prevention Inc., and the Cuyahoga County Board of Health would like to help you to safely dispose of any outdated or unwanted prescription medications. Nationally, teenage prescription drug

Help to protect the environment from overdosing on improperly disposed of medications. Collection programs greatly lessen the chance of prescription medications entering our water supply, or the food we eat.

This is a completely confidential program. No personal information will be asked! Please remove all prescription labels before arriving. All medications will be collected between 9:00am to 2:00pm, and held only by law enforcement officers until they can be disposed of safely. For more information call 1-800-473-6467

### Medication Drop Off Locations

For a complete list of drop off sites, visit: [www.DrugAwarenessAndPrevention.com](http://www.DrugAwarenessAndPrevention.com).

#### Berea

Fairgrounds

164 Eastland Road.

#### Cleveland Heights

The Community Center

One Monticello

#### Independence

The Civic Center

6354 Selig Drive.

#### Mayfield Village

The Civic Center

6622 Wilson Mills

#### Parma

Donna Smallwood Center

7001 West Edgewood

#### Solon

Senior Center

35000 Portz Parkway

#### Westlake

Clague Cabin

1500 Clague Road

#### Police Stations

Bay Village

Bedford

Fairview Park

Garfield Heights

Lakewood

North Olmsted

Rocky River

#### Cleveland

Public Safety Central

2001 Payne Avenue

#### Cleveland Police Stations

1st District-3885 W. 130th Street

2nd District-3481 Fulton Road

3rd District-10700 Chester Avenue

4th District-6333 Kinsman Road

5th District-881 E. 152nd Street

\*\*\*Various locations will also be held in Holmes, Lorain, Medina, Summit, and Wayne Counties.



*Collaborators*



# Safe Kids News



## **Medicine Drop: medication disposal event**

Prevent accidental death and drug overdose: drop off your unwanted over-the-counter and prescription medicines for environmentally safe disposal.

**Event:** Medicine Drop  
Saturday, May 22  
10 a.m. – 2 p.m.

**Where:** The METRO Transit Center  
631 S. Broadway St. Akron 44311

**\*Medications accepted:** Pills, capsules, patches, gels, powders, ointments, syrups and liquids in sealed, leak-proof containers. Medication samples, medications for pets, vitamins and inhalers. Keep drugs in their original containers or in sealed plastic bags. To ensure privacy, peel off or black out prescription labels.

Items that **cannot** be accepted include needles, syringes, lancets, thermometers, IV bags, aerosol cans, bloody or infectious waste, hydrogen peroxide, empty containers, personal care products and illegal (street) drugs.

*Safe Kids Summit County: 330-543-8942*



# MEDICATION DISPOSAL DAY

*Dispose of your expired or unused prescriptions before you leave for the summer*

**Saturday, April 24**



Coalition for Healthy Community-Oxford  
will host a medication disposal day

**Bring your:**

- Expired or unwanted prescription drugs
- Unneeded over-the-counter medications
- Drugs you are no longer taking
- Drugs that did not work for you
- Leftover drugs from roommates or friends

**When:** Saturday, April 24, 2010  
10:00 am – 3:00 pm

**Where:** Kroger's Parking Lot  
South Locust Street  
Oxford

Law Enforcement officers will dispose of the contents in a safe, legal and environmentally conscious manner. Medications should be brought in their original container if at all possible. Medication containers will be destroyed and disposed of in a green way.

- Medication thrown out in the trash or flushed down the toilet can find their way into the water table. In 2008 an AP investigation found traces of prescription drugs in the drinking water of 41 million Americans.
- Medications thrown out or left in your medicine chest can fall into the wrong hands, and can be abused, sold or traded.
- 96% of unintentional poisoning deaths in Ohio are due to drugs and medications.
- In Ohio, more people die from unintentional medication poisoning than from motor vehicle crashes and suicide.

**Medication Amnesty Day – No questions asked!**

*Partners to making a safer, greener community.*

