

A Guide on
Hazardous Waste Management
for Florida's

Pharmacies

Hazardous Waste (RCRA) Compliance Assistance Program



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Thank you for the assistance and expertise you provided toward the preparation of this brochure. Your materials were extremely valuable and helped to produce an "easy to read" guidance brochure.

Florida Pharmacy Association and Capital Returns, Inc.

We would like to express our gratitude for your assistance and enthusiasm in the preparation of this brochure. We greatly appreciate the use of your materials as a guideline for the production of this brochure and for letting us use your best management practices within this publication.

Other RCRA publications produced by the Center for the Florida Department of Environmental Protection (DEP) include:

Guides on Hazardous Waste Management for Florida's

Agricultural Pesticide Users
Automotive Repair Shops
Dry Cleaners
Fiber-Reinforced Plastic Manufacturers
Furniture Finishers
Laboratories
Paint and Body Shops
Photo Shops
Printed Wiring Board Manufacturers
Printers
Managing Mercury: Best Management

These publications are available from your County Environmental Protection Department, the DEP, or the Center. These publications can also be downloaded from the Center's web site.

Practices for Florida's Medical Facilities

Visit the Center's web site at http://www.floridacenter.org

This document was printed at a cost of \$0.47 per copy on recycled paper. November 1999.

This document was published to assist businesses with hazardous waste management issues and regulatory compliance. The suggested best management practices (BMPs) may help businesses to operate in an environmentally appropriate manner. Some of the BMPs may go beyond what is required to remain in compliance with regulations. This information is offered only as guidance. Specific requirements may vary with individual processes and/or businesses. Business owners are responsible for obtaining complete information about applicable regulations. The Florida Department of Environmental Protection and Florida Center for Solid and Hazardous Waste Management are not authorized to relieve any person from any requirement of federal regulations or Florida law.

WHY SHOULD I CARE ABOUT HAZARDOUS WASTES?

Some of the materials produced in everyday pharmacy operations may be harmful to people or the environment.

This booklet suggests a five-step management plan with tips on how to:

- Comply with federal and state hazardous waste regulations.
- Avoid penalties by properly managing pharmaceuticals.
- Save money on disposal costs by reducing pharmaceutical wastes.

Health and the Environment

Hazardous pharmaceutical wastes disposed of improperly may contaminate soil or seep into the groundwater and contaminate drinking water supplies.

Hazardous pharmaceutical wastes disposed of improperly may run off into the nearest body of water where they may poison or kill fish and other wildlife.

Hazardous pharmaceutical wastes pose a health risk to you, your employees and your community.

Cost Savings

State and county environmental compliance inspectors may visit your pharmacy to ensure that pharmaceutical wastes are being managed properly. State penalties may involve fines from \$100 to \$25,000 **per violation per day**.

Implementing an effective pharmaceutical waste control plan can reduce production and disposal costs and reduce your liability risk.

Public Image

Your customers will appreciate your efforts to prevent pollution. Your community will recognize your pharmacy as a good neighbor.



WHAT STEPS SHOULD I FOLLOW TO MANAGE MY PHARMACEUTICAL WASTES?

Some of the following practices may not be required for your pharmacy to remain in compliance with regulations. Even if they are not required, they are good waste management practices. Additional information is available from the Florida Department of Environmental Protection (DEP).



ESTABLISH A PHARMACY MANAGEMENT PLAN

General Pharmaceutical Management

- Conduct random expired pharmaceutical audits and remove outdated products from inventory.
- Be sure to inspect all medication storage areas for outdated products.
- Remember that pharmaceuticals include the samples provided by pharmaceutical representatives or your suppliers.
- Designate a clearly marked outdated pharmaceutical quarantine area to accumulate outdated pharmaceuticals or pharmaceutical products that cannot be sold.
- All pharmaceuticals discarded by the facility must be reviewed for hazardous waste status and a determination must be made as to whether or not the discarded pharmaceuticals are hazardous waste.
- Never discharge hazardous waste to a drain that is connected to a publicly owned treatment works facility (POTW) without written permission from the POTW.
- Never discharge hazardous waste to a septic tank.
- Never mix hazardous pharmaceutical waste with biomedical waste for disposal.
- Train all employees according to your outdate management program and ensure that employees can identify, reduce and properly handle wastes.



General Pharmaceutical Management (continued)

- The Pharmacy has **two options** for managing outdated pharmaceuticals for credit through the return process:
 - 1. Use a Reverse Distributor. or
 - 2. Process all returns and waste **Internally**.

Procedures for Managing Outdated Pharmaceuticals for Reverse Distribution

- Implement the **outdate management procedures** provided by your reverse distributor or create a written outdate management program and initiate it as standard operating procedure. It is important to ensure that your reverse distributor is properly **permitted and** insured. Check with the Florida Department of Health at (850) 487-1257 for a list of permitted reverse distributors in Florida. For a list of National Reverse Distributors, check with your Regional DEA Office or the Returns Industry Association (See page 20 for contact information).
- Your outdate management plan should include container, storage, labeling, shipping, and recordkeeping guidelines.

Procedures for Managing Outdated Pharmaceuticals Internally

- Separate and store outdated pharmaceuticals by manufacturer and by the manufacturer's return policy for possible return to the manufacturer.
- Using the manufacturer's return policy, distinguish between products eligible for credit and products that are not returnable for credit. Store and segregate these products according to the container and storage guidelines on page 10.
- Waste management procedures should include container, storage, labeling, shipping, and recordkeeping guidelines. Follow the hazardous waste and non-hazardous waste guidelines included in steps 2-5 of this brochure.



Management Scenarios:

- Internal Management: A pharmacy *separates* returnable from non-returnable pharmaceuticals and *inventories* all pharmaceuticals. The pharmacy *ships* only the returnable pharmaceuticals to a manufacturer, wholesaler or reverse distributor and retains the non-returnable pharmaceuticals for disposal. The *pharmacy* is the hazardous waste generator upon determining that the non-returnable pharmaceuticals are hazardous waste.
- Reverse Distribution: A pharmacy does not separate returnable from non-returnable pharmaceuticals, inventories all pharmaceuticals, and ships the pharmaceuticals as a product to a manufacturer or a reverse distributor. The manufacturer or reverse distributor is the hazardous waste generator upon determining that the non-returnable pharmaceuticals are hazardous waste.
- Reverse Distribution: A pharmacy contracts with a reverse distributor to work onsite. The reverse distributor does not separate returnable from non-returnable pharmaceuticals onsite, but inventories all pharmaceuticals, and ships the product to the reverse distribution facility. The reverse distribution facility is the hazardous waste generator upon determining that non-returnable pharmaceuticals are hazardous waste.



WHEN ARE PHARMACEUTICALS CONSIDERED WASTE?

Be aware of the **Federal and State** interpretation.

- An outdated product is generally considered waste at the **time** and **place** the decision is made to discard it.
- According to the EPA, unsorted, outdated pharmaceuticals may be shipped as a product (rather than as a waste) if the outdated pharmaceuticals are being shipped to a reverse distributor or a manufacturer with the intent to return the outdated pharmaceuticals to the manufacturer for credit.

Waste pharmaceuticals include all pharmaceuticals that have been identified as:

- Outdated but **not returnable** for credit,
- Used in compounding or IV preparation,
- Spilled or Broken Product no longer useable for intended purpose, and
- Any items used in cleaning up a spill (vermiculite, paper towels, etc.) must be treated as a waste pharmaceutical, either hazardous or non-hazardous.

WHAT IS A HAZARDOUS WASTE?

A waste is defined as being HAZARDOUS if:

- It has any of the **characteristics** described on page 8.
- It is **listed** as a hazardous waste in the Code of Federal Regulations, 40 CFR Part 261.



Characteristic Wastes

A characteristic hazardous waste is a solid waste that exhibits any of the properties included in the definitions of ignitability, corrosivity, reactivity, and toxicity according to the Code of Federal Regulations, 40 CFR Part 261.

Listed Wastes

In addition to characteristic hazardous wastes, a waste is hazardous if it is identified as a **Listed Waste** in the Code of Federal Regulations, 40 CFR Part 261. There are numerous listed wastes, a partial list is provided on page 9. For details on listed wastes and waste code numbers, contact the DEP (See page 21 for DEP phone numbers). The Code of Federal Regulations is available online at http://www.access.gpo.gov/nara/cfr/, or you can obtain information by calling the U.S. Environmental Protection Agency's RCRA hotline at (800) 424-9346.

Acutely Hazardous Wastes

Acutely hazardous wastes are extremely dangerous wastes. Small amounts of these wastes, such as arsenic and cyanide compounds, are regulated in the same way as large amounts of other wastes. A pharmacy that generates 2.2 pounds (1 kilogram) or more of these acutely toxic wastes per month is subject to full regulation under the hazardous waste rules. Contact the DEP for more information on the proper management of acutely Hazardous Wastes.

Identifying Your Hazardous Wastes

Once it has been determined that an outdated pharmaceutical cannot be returned to the manufacturer, that pharmaceutical is classified as a waste. If this determination has been made at the pharmacy, it is very important to determine whether the waste is hazardous or non-hazardous. There are several ways to identify hazardous wastes.

Identifying Your Hazardous Wastes (continued)

- Obtain and read Material Safety Data Sheets (MSDS).
- Talk to product suppliers and manufacturers.
- Read product labels.
- Compare product to hazardous waste characteristics and to wastes listed in federal regulations.
- If product information is not available or is inconclusive, have a commercial lab sample and test the waste using the Toxicity Characteristic Leaching Procedure (TCLP).
- A non-hazardous material or product may become a hazardous waste due to contaminants added during use. Lab testing may be necessary to determine whether or not the waste is hazardous. This is called a "waste determination."

Additional Resources for Identifying Hazardous Wastes

American Hospital Formulary Service (AHFS Drug Information)

Remington's Pharmaceutical Sciences

Merck Manual

The Pill Book – OTC Medications

The Pill Book – Most Prescribed Drugs

Red Book - Pharmacy Fundamental Reference

CRC Handbook of Chemistry and Physics

Drug Facts and Comparisons

Information on the Internet

http://www.RX@RXLIST.COM



CHARACTERISTIC WASTES

Ignitable (A majority of the hazardous wastes that pharmacies handle are hazardous because they are ignitable. These wastes often pose the greatest management problems for pharmacies.)



Ignitable wastes are easily combustible or flammable. If they have a flashpoint of 140° F or less or an alcohol content of 24% or more, they are hazardous wastes. Examples include: alcohol (denatured ethyl, ethyl, isopropyl alcohol, and etc.), ammonia inhalants, amyl nitrite, Anbesol®, AquaNet®

aerosol spray, benoxyl peroxide, Benzoin Tincture, Collodion Based Preparations, Bronchial Dilators (Tornalate), Compound W®, Cleocin T Topical Solution®, Erythromycin Topical Solution, Merthiolate Tincture, mouthwash (alcohol content >24%), Peppermint Spirit, Retin A Gel®, Right Guard® aerosol spray, Silver Nitrate (oxidizer), Solarcaine® aerosol spray, and some cough medicines (Nyquil®).

Corrosive



Corrosive wastes corrode metals or other materials or burn the skin. These liquids have a pH of 2 or lower or 12.5 or higher. Examples of acids that exhibit a pH of 2 or lower include glacial acetic acid and Liquid Phenol (Carbolic Acid). Examples of bases that exhibit a pH of 12.5 or higher include

Potassium Hydroxide and Sodium Hydroxide.

Reactive



Reactive wastes are unstable and may explode or react rapidly or violently with water or other materials. Examples include Clinatest (a test tablet to determine sugar in urine) and some nitroglycerin formulations.

Toxic



Wastes are toxic if they contain toxic organic chemicals or certain heavy metals, such as chromium, lead, mercury, or cadmium. Examples of potential toxic pharmaceuticals include: Arsenic, Barium, Barium Enemas, Cadmium, Chloroform, Chromium, Fluogen, Fluzone, Insulin with

Cresol, Lindane, Merbromin, Mercury, Mercurochrome, Mixture of Trace Elements, Selenium, Silver, Silver Nitrate, Thimerosal (contains Mercury), and vaccines containing mercury as a preservative. Approximately 40 chemicals meet specific leaching concentrations which classify them as toxic.

LISTED WASTES

There are two types of listed pharmaceutical hazardous wastes. These are known as acutely hazardous (**P-listed**) and toxic (**U-listed**).

P-listed Pharmaceutical Wastes – These wastes are known as acutely hazardous.

U-listed Pharmaceutical
Wastes - These wastes are
known as toxic .

NAME	HW#
Epinephrine (Adrenaline)	P042
Nicotine	P075
Nitroglycerine	P081
Physostigmine	P204
Physostigmine salicylate	P188
Sodium Azide	P105
Strychnine	P108
Warfarin >.3%	P001



NAME	HW#
Acetone	U002
Chlorambucil	U035
Chloroform	U044
Cyclophosphamide	U058
Daunomycin	U059
Dichlorodifluromethane	U075
Diethylstilbestrol	U089
Formaldehyde	U122
Hexachlorophene	U132
Lindane	U129
Melphalan	U150
Mercury	U151
Mitomycin C	U010
Paraldehyde	U182
Phenacetin	U187
Phenol	U188
Reserpine	U200
Resorcinol	U201
Saccharin	U202
Selenium sulfide	U205
Streptozotocin	U206
Trichloromonofluromethane	U121
Uracil mustard	U237
Warfarin <.3%, (Coumadin)	U248

NOTE: These are not comprehensive lists of "P" and "U" listed chemicals. For a complete list, refer to: 40CFR§261.33. The Code of Federal Regulations is available online at http://www.access.gpo.gov/nara/cfr/, or you can obtain information by calling the U.S. Environmental Protection Agency's RCRA hotline at (800) 424-9346.



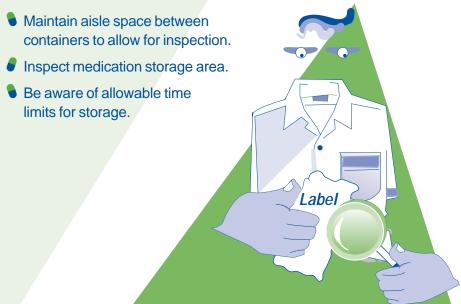
IMPLEMENT BEST MANAGEMENT PRACTICES (BMPS) FOR:

Container Maintenance

- Maintain containers in good condition.
- Never place incompatible wastes, such as wastes that react with each other, in the same container. (e.g. Do not store acids and bases in the same container.)
- Wastes must be compatible with the container that they are being stored in (plastic or metal). (e.g. Do not store strong acids or bases in metal containers.)

Storage

- Separate waste by hazardous waste classification: P- or U-Listed, Toxicity, Ignitability, Corrosivity, and Reactivity.
- Don't combine hazardous waste with non-hazardous waste.



Labels

- Label every container with the contents (type of pharmaceutical or waste).
- Label every container with whether it is a hazardous waste or a non-hazardous waste.
- Include any **federal waste code numbers** that apply.
- Include the **accumulation start date** (the date when waste pharmaceuticals were first stored in the container).
- Include your pharmacy name and address.
- Use the following words on labels for **hazardous** wastes:

HAZARDOUS WASTE FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

If found, please contact the nearest police or public safety authority or the U.S. EPA

(Your business's name, address and manifest document number)

Use the following words on labels for **non-hazardous** wastes:



Recordkeeping

- Inspect containers at least once a week and keep a written log of container inspections.
- Total weight of P-listed waste generated monthly must be documented on a monthly basis (Weight of the Container/ Solvent Included).
- Total weights of U-listed and characteristic waste generated monthly must be documented on a monthly basis.
- Keep training and inspection records for 3 years.
- Keep manifests and shipping receipts for 3 years.
- Keep records of completed inventories/audits regarding the distribution or shipment of prescription drugs for 2 years.
- Keep records of lab tests for 3 years.
- Keep completed land disposal restriction forms for 3 years.

Spills

- ▶ **Keep** spill cleanup materials readily accessible including: fire extinguishers; safety equipment such as rubber or latex gloves and safety glasses; spill cleanup products such as absorbents, rags, towels, brooms, shovels and dust pans to pick up materials; and containers to hold spill waste.
- Observe the safety precautions associated with the material spilled.
- Stop the source of the spill immediately and cleanup the spill right away.
- Recover the spilled substance while observing safety precautions.
- Contain the spilled material.
- Call your local fire and/or police departments if fire or public safety hazards are created.



DETERMINE YOUR WASTE GENERATOR STATUS

You must determine how much hazardous waste you generate each month. The set of rules you must follow depends on how much waste you generate, how much you store, and how long you store it.

- If you generate less than 220 pounds of hazardous waste (100 kilograms or about half a drum) per month or you generate less than 1 kilogram of an acute hazardous waste per month: you are a "Conditionally Exempt Small Quantity Generator."
- If you generate 220 2,200 pounds of hazardous waste (100 − 1,000 kilograms or about half a drum to 5 drums) per month: you are a "Small Quantity Generator."
- If you generate more than 2,200 pounds of hazardous waste (1000 kilograms or more than about 5 drums) per month or you generate 1 kilogram or more of an acute hazardous waste per month: you are a "Large Quantity Generator."





TRANSPORT GUIDELINES FOR MANAGING OUTDATED PHARMACEUTICALS INTERNALLY

Shipping Guidelines for Waste Transport & Disposal

- Conduct a complete inventory/audit of all pharmaceuticals or wastes being shipped offsite. Keep records of completed inventories/audits for 2 years.
- Make sure your transporter is properly permitted and has an EPA identification number.
- Make sure that the treatment, storage and disposal facility receiving your shipment has an EPA identification number and is properly permitted to dispose of the waste you are shipping.
- Use manifests for all hazardous wastes shipped offsite.
- Follow container, storage and label guidelines described on pages 10-11.

Federal Drug Enforcement Administration (DEA) Regulations

- If you are shipping Controlled Substances for disposal/destruction, be sure to follow DEA Regulations. For more information on shipping controlled substances for disposal/destruction, contact your Regional DEA office (see page 20).
- If any of your controlled substances are hazardous waste and are destined for disposal/destruction, contact the DEP (see page 21).

TRANSPORT GUIDELINES FOR MANAGING OUTDATED PHARMACEUTICALS FOR REVERSE DISTRIBUTION

Shipping Guidelines for Waste Transport & Disposal

- Wrap glass/vials/ampules carefully.
- Segregate Controlled Substances in tamper-proof pouches with no external indication of what is being shipped.
- Apply DOT Hazardous Materials Label:
 - ORM-D Consumer Commodity, and
 - Up arrows if over 1 liter.

Federal Drug Enforcement Administration (DEA) Regulations

(For contact information see page 20.)

- If you are shipping Controlled Substances, be sure that all DEA regulations are followed.
- Be sure your reverse distributor is registered to accept the products being shipped. The DEA requires that all transfers be made between registrants.
- Inventory all Controlled Substances in Schedules III V:
 - Include one copy in the shipment.
 - Retain one copy for your records at the pharmacy.
- If you are shipping Schedule II products, the reverse distributor must provide you with a Form 222 for the products being shipped prior to the shipment. Follow the procedures of your reverse distributor.
- DO NOT indicate that the contents of the shipment contain controlled substances.
- DO NOT request or accept a Form 41.



HOW CAN I REDUCE PHARMACEUTICAL WASTE GENERATION?

Make a **commitment to reducing waste** in every area of your pharmacy's operations.

Evaluate your pharmacy's waste and identify areas where changes can be made.

Facilitate and encourage the participation of all pharmacy personnel through **education**, **training**, and **incentives**.

Apply Inventory Management Techniques.

- Dispense older pharmaceuticals first.
- Create an effective inventory system to reduce outdate accumulation.
- After inventory is reduced, prevent the accumulation of new inventory.
- Save money by ordering smaller quantities of pharmaceuticals and reducing the need to dispose of outdated pharmaceuticals.
- Purchase pharmaceuticals from suppliers who will accept returns of unopened pharmaceuticals.
- Purchase pharmaceuticals from vendors who promote small quantity purchases and who will accept returns of unopened bottles.
- If a constant stock is required, perform an inventory review at least once a year to evaluate ordering trends and pharmacy inventory needs.



Reverse Distribution

- If you inventory and ship all unsorted outdated pharmaceuticals as products to a qualified and properly permitted reverse distributor;
 OR
- If you contract a reverse distributor to inventory and ship all unsorted, outdated pharmaceuticals as products to the reverse distribution facility; THEN
- The reverse distribution facility becomes the Hazardous Waste Generator upon determining that the non-returnable pharmaceuticals are hazardous waste.
- Your reverse distributor should:
 - Inventory and review all items for return eligibility at the reverse distribution facility, and
 - Properly manage all non-returnable items as either hazardous or non-hazardous waste.
- It is your RESPONSIBILITY to ensure that the reverse distributor is properly handling your outdated pharmaceuticals.

WHAT ARE THE END RESULTS?

These steps will help to ensure that your pharmacy is able to effectively:

Develop a consistent outdate reduction and management program,

Develop and implement a waste reduction program,

Understand and apply RCRA and State environmental regulations, and

Assure compliance in all departments to successfully avoid regulatory fines.

Reducing wastes in your pharmacy **makes sense.** Benefits include:

Maximizing profits,

Saving money on waste management costs,

Earning a greater return on investments,

Reducing concerns about penalties and liability,

Creating a safer and healthier workplace, and

Promoting positive public relations with clients, customers and the local community.

CHECKLIST

This checklist will help you to prevent the most common hazardous waste violations. For more detailed information on hazardous waste management requirements, contact the DEP.

Identify types and quantities of hazardous wastes.
Notify the Florida DEP of your monthly hazardous waste generation, and obtain an EPA identification number from the DEP.
Use proper containers to collect and store wastes.
Separate waste by classification: Toxicity, Ignitibility, Corrosivity, and Reactivity.
On't combine hazardous waste with non-hazardous waste.
Label all containers as hazardous or non-hazardous waste.
Include the accumulation start dates on labels.
Maintain aisle space between containers for inspection.
Inspect containers weekly for rust, leaks or damage and keep inspection records for three years.
Total weight of P-Listed waste must be documented monthly.
Total weights of U-Listed and characteristic waste must be documented monthly.
Never discharge hazardous wastes to a drain or a septic tank unless you have an DEP permit that allows you to do so.
Train employees to properly handle hazardous wastes.
Make sure your transporter and disposal facility have EPA identification numbers.
Make sure your reverse distributor is properly licensed and registered.
○ Use Manifests for all waste transported for disposal.
Keep all records for at least three years.

WHERE CAN I GET MORE INFORMATION?

Additional information on hazardous waste reduction and regulations is available from many sources.

Florida Department of Environmental Protection

District offices and the Tallahassee office offer technical assistance, fact sheets and other publications on hazardous waste regulations.

Web site: http://www.dep.state.fl.us/

Hazardous Waste Compliance Assistance Program

Phone: (800) 741-4337

(850) 488-0300

Fax: (850) 921-8018

Publications available:

Summary of Hazardous Waste Regulations

Requirements for Conditionally Exempt Small Quantity Generators

Requirements for Small Quantity Generators

Handbook for Small Quantity Generators of Hazardous Waste

Florida Board of Pharmacy

Web site: http://www.doh.state.fl.us/mqa/pharmacy/pshome.htm

Address: Board of Pharmacy

2020 Capital Circle SE, Bin #C04 Tallahassee, FL 32399-3254

Phone: (850) 414-2969

Email: bobbie sawner@doh.state.fl.us

Florida Small Business Assistance Program

The Small Business Assistance Program helps businesses with environmental concerns. Assistance is confidential and staff experts have business experience.

Phone: (800) 722-7457

U.S. Environmental Protection Agency

The EPA has published a series of industry-specific guidelines and handbooks on preventing pollution and complying with hazardous waste regulations. The RCRA Hotline will provide answers to your hazardous waste management questions. Calls and questions will be kept anonymous at your request.

RCRA Hotline

Phone: (800) 424-9346

DEA CONTACTS IN FLORIDA

MIAMI DIVISION

8400 Northwest 53rd Street Miami, Florida 33166 (305) 590-4870

ORLANDO DIVISION

300 International Parkway, Suite 424 Heathrow, Florida 32746 (407) 333-7046

TAMPA DIVISION

4950 West Kennedy Boulevard, Suite 400 Tampa, Florida 33609 (813) 288-1290

YOUR TRADE & PROFESSIONAL ASSOCIATIONS

Many trade and professional associations have published guides to help you find solutions to your hazardous waste management problems.

AMERICAN PHARMACEUTICAL ASSOCIATION

2215 Constitution Avenue, Northwest Washington, DC 20037-2985 (202) 628-4410

AMERICAN ACADEMY OF PHARMACEUTICAL PHYSICIANS

1135 Kildare Farm Road Suite 200-8 Cary, North Carolina 25711 (919) 469-9906

AMERICAN ASSOCIATION OF PHARMACEUTICAL SCIENTISTS

1650 King Street, Suite 200 Alexandria, Virginia 22314-2747 (703) 548-3000

FLORIDA PHARMACY ASSOCIATION

610, North Adams Street Tallahassee, Florida 32301 (850) 222-2400

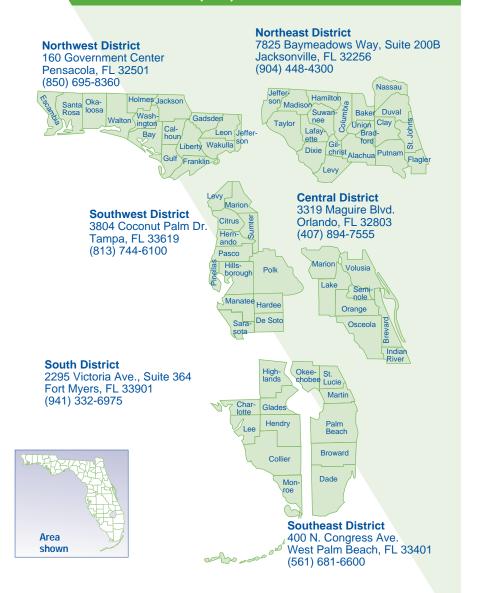
RETURNS INDUSTRY ASSOCIATION

8000 Towers Crescent Drive Suite 1350 Vienna, VA 22182 (703) 847-3696 Email: riawash@aol.com

OFFICES OF THE FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Hazardous Waste Regulation Section

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University of Florida

Florida Center for Solid and Hazardous Waste Management

2207-D NW 13th Street

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Organization Non-Profit

Gainesville, FL Permit No. 94

Gainesville, FL 32609
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Email: floridacenter@floridacenter.org

For additional information contact:

Janet Ashwood

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