

## Training Requirements

62.730.186(9) Florida Administrative Code: “A handler shall ensure that all employees handling or managing universal pharmaceutical waste successfully complete a program of classroom instruction or on-the-job training.”

Training must be completed within three months of employment or assignment to duties. No employee shall manage or handle UPW unsupervised until they have met the training requirements.

Employees shall take part in an annual refresher of the original training.

Records of the training shall be kept on file at the employers facility for a period of 3 years and shall include: the employee’s name, signature, date of hire or assignment, date of training, and type of training.

## Definitions

**“Pharmaceutical”** means a manufactured chemical product that is intended to be inhaled, ingested, injected, or topically applied for use in the diagnosis, cure, mitigation, treatment, therapy, or prevention of disease or injury in humans or other animals.

**“Non-viable”** means a **pharmaceutical** that cannot be sold, for credit, or donated to a charitable organization. Pharmaceuticals that are obviously “waste-like”, such as partial intravenous formulations; partial vials used in the preparation of IV formulations; outdated samples; other outdated items repackaged at the pharmacy; partial vials or vials used on the unit and not emptied (such as insulin and epinephrine dispensing devices); partial ointments, creams and lotions; partial inhalants; partial containers that are not empty; patient’s personal medications that have been left at the hospital; filled finished products that are rejected during the manufacturing process, so long as they are in their consumer package (such as bottle, jar, tube, or ampule), are non-viable pharmaceuticals.

Non-Viable Pharmaceuticals may be managed as Universal Waste in the State of Florida. If not managed as Universal, it **MUST** then be managed under full EPA RCRA regulations for hazardous waste. UPW regulations provide less stringent regulatory and compliance burdens than that of RCRA regulations.

**“Biomedical waste”** – Any solid or liquid waste which may present a threat of infection to humans, including non liquid tissue, body parts, blood, blood products, and body fluids from humans and other primates; laboratory and veterinary wastes which contain human disease-causing agents; and discarded sharps. The following are also included:

- (a) Used, absorbent materials saturated with blood, blood products, body fluids, or excretions or secretions contaminated with visible blood; and absorbent materials saturated with blood or blood products that have dried.

(b) Non-absorbent, disposable devices that have been contaminated with blood, body fluids or, secretions or excretions visibly contaminated with blood, but have not been treated by an approved method.

**IMPORTANT:** Biomedical Waste is **NOT** UPW *unless* it is mixed with pharmaceutical waste (also known as “Dual Waste”).

### **DO NOT dispose of UPW in the following manner:**

In the “Red Bag”

Down the drain (sewering)

In the regular trash

These practices are not only bad for the environment and human health, they violate state and federal regulations. There are both civil and criminal penalty provisions for those who violate the regulations, even if they do so unknowingly.

### **Containers**

Black 12 or 18 gallon containers

Obtain containers from **Deb Warren at 974-2552 in MDC**

Containers **MUST REMAIN CLOSED** except when adding or removing UPW.

Must not show evidence of leakage under reasonably foreseeable conditions.

### **Labeling**

Accumulation containers must be labeled.

Obtain labels from **Deb Warren at 974-2552 in MDC** if not pre-labeled

Date label upon initial UPW disposal

Must be legible and in English

### **Location**

Satellite accumulation area must be in a secure location (not readily accessible to the public)

### **Spills**

Contain and clean up spilled material immediately

Contact Environmental Health & Safety

Spilled material and cleanup media cannot be managed as UPW

Do not place spill cleanup material in the UPW container

### **Controlled Substances**

Must **NOT** be placed in the UPW container. If you are unsure how to handle controlled substances please contact Deb Warren for proper protocol. 974-2552

***For questions regarding the proper management of UPW containers contact Environmental Health & Safety at (813) 974-4036***