

**Pharmaceutical Waste Working Group
September 9, 2013, 1 to 3 PM
Jefferson County Courthouse**

Present: Amber Meyer Smith, Clean Wisconsin; Jennifer Semrau, Winnebago County; Roy Irving, DHS; John Knard, Jefferson County; Anne LeMere, Unity Hospice; Barb Bickford, DNR; Steve Brachman, UW-Milwaukee Solid & Hazardous Waste Education Center (SHWEC); Gail Tanner, MedReturn; Donna Lotzer, UW Health; Mark Heal, Veolia Environmental Services; Paul Milbrath, Jefferson County Sheriff; Sharon Ehrhardt, Jefferson County Solid Waste; Jane Larson, DATCP Clean Sweep program

On Phone: Nancy Eggleston, Wood County; Janet Kline, Walworth County; Chris Blan, Brown County; Camille Turcotte, DNR water program; Rene Gabriel, REM Wisconsin; Stefanie Wnuck and Julia Jonas-Day, Product Stewardship Institute; John Waffenschmidt, Covanta; Rene Gabriel, the Mentor Network; Andy Stewart and Kristen Hart, DNR Air program.

Minutes by Barb Bickford, DNR

Wisconsin Updates:

- UWEX and its partners are wrapping up tasks for the GLRI grant that ends 9/30/2013.
- There are not many new collection programs being added to the SHWEC list of Wisconsin collections.
- A bill is still being drafted by the Legislative Reference Bureau.
- The June pharmaceutical waste summit in Milwaukee was well attended.

Regional work groups and PSI work

Stefanie reported that PSI:

- Has drafted a “Myths and Realities” fact sheet about drug collection programs and a couple other fact sheets highlighting successful take back programs in the Great Lakes Region.
- Has drafted upgrades to their Drug Take Back Network website, which will be renamed the “Go-to-Guide for Safe Drug Take-Back”. There will be resources for consumers, collectors and policy makers. Resources will be arranged by state. The URL is:
<http://www.productstewardship.us/drugtakeback>

Transition to post-grant period (Regional & Wisconsin)—Steve Brachman

Leadership – Steve will likely be retiring in 2014. Barb is willing to continue as co-chair. If interested in co-chairing, contact Barb.

Frequency --The group agreed that quarterly meetings seem best.

Brainstorming for the future

What might the PWWG do?

- Support legislation
- Reply to DEA on their final rules
- Provide public education through pharmacies and community partners and waste haulers (perhaps through tax bill fliers, utility bills and phone bills)
- Host webinars for local governments and pharmacies after DEA's rules change
- Adapt the PSW flier for other uses

Who else needs to be at the table?

- Pharmacies
- Healthcare providers: nurses, doctors, Physicians for Social Responsibility
- WI Environmental Health Network
- County departments of health
- Sanitarians
- Wisconsin Public Health Association
- Assisted living and skilled care providers
- Hospice
- Government relations staff for major healthcare providers such as Gunderson, Marshfield Clinic, Aurora, Affinity, Mayo, etc)
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What ideas do we have for removing barriers to disposal?

- Create a central place to store drugs in WI that are bound for destruction elsewhere (or in-state) Problem is 80% of drugs are solid waste, 20% are controlled substances, ointments and liquids
- Provide more money for collections through the Clean Sweep Grants (Jane noted that of the \$100,000 allocated each year, about \$25,000 has been returned because DEA has been funding disposal)
- Allow pharmacies to collect medications
- Fund drug boxes
- Fund public education
- Require pharmacies and healthcare providers to inform consumers about drug disposal
- Be clear about whether to take pills out of containers or not

Discussion on destruction

John Waffenschmidt of Covanta explained that Covanta in Indiana is a Waste-To-Energy (WTE) facility subject to MACT (EPA Air) rules. This and other Covanta facilities offer free disposal of household medications to any community in the US, as long as state regulations allow household waste to be taken to their facilities. (In Wisconsin, under an enforcement discretion document, household pharmaceutical waste may be incinerated in an approved solid waste incinerator; they do not have to be taken to a hazardous waste incinerator.)

John suggests the following:

1. EPA and the states should declare by definition that household pharmaceutical wastes would be “non-hazardous waste”.
2. Because law enforcement escorts to the incinerator are costly, DEA should allow others (e.g., National Guard, DEA registrants) to move drugs to destruction facilities.
3. DEA should also allow under their forthcoming rules, DEA registrants to take drugs to a WTE facility.

Covanta’s facility in Indiana is a WTE facility that can accept 2200 Tons/day of waste. Veolia’s incinerator in Sauget, IL, is a hazardous waste incinerator that can accept 100 tons/day. Veolia’s incinerator in Port Arthur, TX, can accept 300 tons/day (200 T liquid plus 100 T solids). For hazardous waste incinerators, all wastes cost the same. For WTE facilities, pharmaceuticals are charged more than other solid wastes.

Andy Stewart (Deputy Director of the DNR Bureau of Air Management) and Kristen Hart (Section chief for Stationary Sources) explained that DNR wants to support cost effective destruction.

Depending on the quantities, DNR has determined that it can be done. DNR has approved a limited number of stationary sources: the Pulliam power plant in Brown County in Green Bay, and another power plant. A third facility, the Barron County Municipal Solid Waste Incinerator, has applied with DNR to take pharmaceuticals. Barron County is currently approved to take 100 tons/day of municipal solid waste. Pulliam, while approved, decided not to continue accepting drugs as of August 2012.

To increase capacity for incinerating pharmaceuticals within Wisconsin, the Air program is considering streamlining approvals by exempting those who want to burn pharmaceuticals from having to apply for a state air “construction permit” (this is costly).

Federal air pollution rules for incinerators appear to be a stumbling block for power plants and boilers who might otherwise consider incinerating drugs. Burning drugs would mean the facilities would be subject to the “Commercial and Industrial Waste Incinerator Unit” (CISWI) rules, which require record keeping, testing, and reporting. Andy contacted EPA several months ago, and EPA said CISWI would apply to anyone burning pharmaceutical waste, no matter how incidental the amount of waste was. States could comment to EPA on the CISWI rules during an EPA Rule Making process, but there is no rule making going on now.

In the meantime, the Air Program has begun to streamline the air permit process. It will take about 3 years for revisions of Wisconsin rules to become final. If the Wisconsin legislature decided to act on its own to change the rules, any changes they made would still have to be cleared through EPA before being implemented.

Questions from the PWWG:

- Can local law enforcement use mobile destruction units? Answer: the DNR Air program would need to do a technical review of each mobile unit. They may need air permits.

- Can crematories be used to burn pharmaceuticals? Answer: burning waste of any sort would disqualify a crematory from the exemption from air management rules that they now operate under.
- Who regulates crematories? Answer: General air pollution codes apply to any source of air pollution. John W. noted that the emissions from drugs burned in crematories could be harmful to the local community. While DNR general exempts them from permits, there may be local regulations on crematories.

Tour of the Jefferson County drug collection area

Sheriff Paul Milbrath showed us their drug disposal box and described how the county manages drugs collected. The dropbox is in the lower level of the Courthouse, and undersurveillance of law enforcement. They empty it about once a week. After sorting the controlled substances out, they store the controlled substances in their evidence room. Once a year, Jefferson County arranges for Veolia to pick up waste for hauling to its Sauget, IL, incinerator. The County invites other counties and municipalities to bring their drugs to Jefferson county the same day, to share the cost of transportation and the witnessed burn. The program is funded by DATCP Clean Sweep grants.



Next meeting: to be determined, probably will be in late 2013