



Business Name	
Contact	
Phone Number	

MONTEREY BAY AREA GREEN BUSINESS PROGRAM

Supplemental Checklist: Pharmacies

The following measures are intended to supplement those in the Minimum Measures and Office/Retail checklist. In addition to completing the Minimum Measures and Office/Retail checklist, this checklist must also be completed prior to certification.

Remember, the program offers free, non-enforcement, technical assistance to help meet the criteria. We will send out professional technical staff to assist you in meeting the energy, water, resource conservation, and pollution prevention requirements.

- Online applications are now being accepted for businesses located in Santa Cruz, Monterey and San Benito Counties. Please visit: <http://www.montereybaygreenbusiness.org/HowToBecomeGr.html> to fill out an application.
- For businesses located in the unincorporated areas of Santa Cruz County, Scotts Valley, and Capitola, or Watsonville call (831) 477-3976 or email: greenbusiness@co.santa-cruz.ca.us
- For businesses located in Monterey County, call Monterey County Environmental Health at (831) 755-4579 or email: recycle@co.monterey.ca.us
- For businesses located in the City of Santa Cruz, call (831) 420-5160 or email: shealy@ci.santa-cruz.ca.us
- For businesses located in San Benito County, call (831) 636-4110 or email: sbcium@iwm.co.san-benito.ca.us

Green Business Checklist

Business must be compliant with regulatory requirements as well as all of the criteria outlined below to obtain Green Business status, except where a choice is given. If a certain section does not apply to your business, mark it with N/A for Not Applicable. For instance, if there are no company owned vehicles mark that section N/A.

A. Pollution Prevention

A. Mercury

(Before GB program)(After GB program)

1. All mercury containing instruments are no longer used. Including:
 - Patient thermometers.
 - Blood pressure monitoring devices.

B. PVC Plastic Waste

(Before GB program)(After GB program)

1. Substitute PVC-containing products for these PVC-free products
 - Polyethylene containers/reusable containers for sharps containers.

C. Reductions of Universal Wastes

Reduce the use of products that qualify as universal waste (fluorescent lamps, mercury thermometers, batteries, blood pressure gauges etc.). This will lessen the amount of hazardous universal waste that must be disposed of later.

D. Medical Waste; Sharps Biohazardous Wastes; Pathological, Infectious, Pharmaceutical, Sharps, and Chemotherapy.

(Before GB program)(After GB program)

1. All Medical Waste Generators must have required permits.

E. Pharmacies

(Before GB program)(After GB program)

1. When possible, recommend over the counter medications that contain less toxic substitutes (i.e. avoid products like selenium including dandruff shampoo and zinc ointments).
2. Inform patients/customers of the proper methods of prescription drug disposal when filling prescriptions (i.e. not down the sewer).
3. Implement a sharps and pharmaceutical waste collection program for used sharps and expired or unused pharmaceuticals from all patients. An example of such a program is SharpMed Solutions (www.sharpmedsolutions.org). *Obtain approval from Environmental Health to implement a sharps and pharmaceutical waste collection program.*
4. Perform annual assessments to review containment and disposal requirements for RCRA-based pharmaceuticals and hazardous wastes.

Green Note: Pharmaceutical Waste Take-Back Programs.

Although approval is needed from County Health Departments to become a consolidation point for sharps and pharmaceutical waste take-back programs, the process is simplified with approval. Ask your Green Business Program Coordinator or County Environmental Health Department to see if you are eligible.

F. Employee Awareness and Training

1. Designate at least one employee to be responsible for developing and implementing environmental programs.

2. Demonstrate that a waste segregation training program is in place. Improved procedures and increased education can dramatically reduce the amount and the toxicity of waste being generated.
3. Review Appendix A and Appendix B (attached to this checklist) with employees at regular intervals and at least twice per year. Ensure employees understand the definitions of the different classes of medical wastes with an emphasis on “infectious wastes.” Local environmental regulators and/or medical facility regulators may be able to assist you.
4. Internal environmental audits are conducted regularly by facility staff or consultants.
5. Personnel in all departments are trained for awareness for their roles in pollution prevention and waste minimization.
6. Poster, fliers, and signs are used to remind employees of pollution prevention strategies. For example, label instruments and processes that use problem substances so the user is aware of his/her responsibility.
7. An employee will be asked if they know what Green Business and/or Best Environmental Practices are. They will be asked to list an example of a Green Business or Best Environmental Practice.

G. Compliance Checks

1. Business is permitted by or registered with Environmental Health and has not had any SIGNIFICANT health violations that have not been corrected (confirm with Environmental Health Services/Consumer Protection Agency).

All criteria have been met as of the following date: _____

Signature of authorized Green Business Program Coordinator:

Printed Name: _

Compliance Notes

Compliance with environmental regulatory laws is required to be certified as a Green Business. The following are some typical compliance issues that businesses find challenging:

- All expired, unused, or partially filled vials, bottles, bags, and tubing for P-listed drugs under the Resource Conservation and Recovery Act of 1976 **AND** all empty containers for P-listed waste must be disposed of as **hazardous waste**.

- **RCRA Hazardous Waste**

Examples of U-listed drugs are:

- ✓ U015 - Azaserine
- ✓ U035 - Chlorambucil (Leukeran)
- ✓ U034 - Chloral hydrate
- ✓ U026 - Chlornaphazin
- ✓ U158 - 2-Chloroaniline
- ✓ U059 - Daunomycin
- ✓ U089 - Diethylstilbestrol
- ✓ U116 - Ethylene thiourea
- ✓ U181 - 5-Nitro-0-Toluidine
- ✓ U109 - Benzene hexachloride shampoo
- ✓ U010 - Mitomycin C
- ✓ U150 - Mephalan (Alkeran)
- ✓ U206 - Streptozotocin
- ✓ U237 - Uracil mustard
- ✓ U248 - Warfarin <0.3% (Coumadin)

Examples of P-Listed substances are:

- ✓ P012 - Arsenic trioxide (Trisenox)
- ✓ P042 - Epinephrine (Adrenalin)***
- ✓ P075 - Nicotine (Nicoderm)
- ✓ P081 - Nitroglycerine
- ✓ U129- Lindane (Kwell lotion)
- ✓ P046 - Phenteramine
- ✓ P188 - Physostigmine salicylate (Antilirium)
- ✓ P001 - Warfarin >0.3% (Coumadin)

*** Does **NOT** include epinephrine salts as part of the federal hazardous waste program.

- * Pharmaceutical Waste must be placed in a container labeled "INCINERATION ONLY". Both sharps non-sharps approved pharmaceutical waste containers are available through your medical waste hauler.
- Containers with less than 3% of original total volume are considered as either holding trace amounts or empty. These containers can be placed in the regular trash (please note, this does not apply to RCRA hazardous wastes)
- Small amounts of liquid pharmaceutical wastes may be dumped on a special absorbent pad placed inside a pharmaceutical waste container -- the empty syringe may then be disposed of in sharps container or empty vial disposed of in the regular trash. If the needle is removed (must be placed in a sharps container) from the empty syringe the latter may be discarded in the trash. Contact your Medical Waste Hauler to obtain absorbent pads.
- Dispose of full containers within 90 days, and remove at least once a year.

Hazardous Wastes (RCRA)

- Certain pharmaceuticals (i.e. expired crash cart meds and unused chemotherapy) meet guidelines for ignitability, corrosivity, toxicity, or flammability and are hazardous wastes under the Federal Resource Recovery and Conservation Act (RCRA). These wastes **and empty containers** MUST be segregated from pharmaceutical waste. Large quantity generators (100 kg or more per month) must obtain a Federal EPA ID number and have the waste picked up by a Federally approved Hazardous Waste hauler. Small quantity generators must obtain a Cal EPA ID from the California Department of Toxic Substance Control (DTSC) and may drop their hazardous waste off at their local Household Hazardous Waste Collection Sites for a fee.

County of Santa Cruz Household Hazardous Waste Drop-off center

<http://www.dpw.co.santa-cruz.ca.us/www.santacruzcountyrecycles/PDF/FeeSchedule.pdf#page=5>

California Department of Toxic Substance Control

Appendix A

**Medical Waste Management Act, Health and Safety Code
Pharmaceutical Waste**

- **Section 118275 (g)** Pharmaceutical Waste must be placed in a container labeled “INCINERATION ONLY”. Both sharps and non-sharps approved pharmaceutical waste containers are available through your medical waste hauler.
- Containers with less than 3% of original total volume are considered as either holding trace amounts or empty. These containers can be placed in the regular trash (please note, this does not apply to RCRA hazardous wastes)
- Small amounts of liquid pharmaceutical wastes may be dumped on a special absorbent pad placed inside a pharmaceutical waste container -- the empty syringe may then be disposed of in a sharps container or empty vial disposed of in the regular trash. If the needle is removed (must be placed in a sharps container) from the empty syringe the latter may be discarded in the trash.

Contact your Medical Waste Hauler to obtain absorbent pads.

- 118280(e) Dispose of full containers within 90 days, and remove at least once a year.

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Useful web links:

County of Santa Cruz Household Hazardous Waste Drop-off center

<http://www.dpw.co.santa-cruz.ca.us/www.santacruzcountyrecycles/PDF/FeeSchedule.pdf#page=5>

California Department of Toxic Substance Control:

<http://dtsc.ca.gov/IDManifest/index.cfm>

Appendix B – Medical Waste Definitions

CA Health and Safety Code

Section 117700 NOT Medical Waste:

- (c) Urine, feces, saliva, sputum, nasal secretions, sweat, tears, or vomitus, unless it contains fluid blood, as provided in subdivision (d) of Section 117635.
- (d) Waste which is not biohazardous, such as paper towels, paper products, articles containing non-fluid blood, and other medical solid waste products commonly found in the facilities of medical waste generators.
- (d) Hazardous waste, radioactive waste, or household waste, including, but not limited to, home-generated sharps waste, as defined in Section 117671

Section 117635 Biohazardous Wastes Defined:

- (d) Waste...containing recognizable fluid blood, fluid blood products, containers or equipment containing blood that is fluid, or blood from animals known to be infected with diseases which are highly communicable to humans
- (e) Waste containing discarded materials contaminated with excretion, exudates, or secretions from humans or animals that are required to be isolated by the infection control staff, the attending physician, and surgeon...veterinarian, or the local health officer, to protect others from highly communicable diseases....
 - (f) (2)...chemotherapeutic agent means an agent that kills or prevents the reproduction of malignant cells.
 - (3)...a container, or inner liner, removed from a container, which previously contained a chemotherapeutic agent, is empty if the container or inner liner removed from the container has been emptied by the generator as much as possible, using methods commonly employed to remove waste or material from containers or liners, so that the following conditions are met:
 - (A) If the material which the container or inner liner held is pourable, no material can be poured or drained from the container or inner liner when held in any orientation, including, but not limited to, when tilted or inverted.
 - (B) If the material which the container or inner liner held is not pourable, no material or waste remains in the container or inner liner that can feasibly be removed by scraping.
- (g) Waste that is hazardous only because it is comprised of pharmaceuticals, as defined in Section 11747. Notwithstanding subdivision (a) of Section 117690, medical waste includes biohazardous waste that meets the conditions of this subdivision. Biohazardous waste that meets the conditions of this subdivision is not subject to Chapter 6.5 (commencing with Section 25100) of Division 20

Section 117690 - Medical Waste:

- (a) “Medical waste” means waste which meets both of the following requirements:
 - (1) The waste is composed of waste which is generated or produced as a result of any of the following actions:
 - (A) Diagnosis, treatment, or immunization of human beings or animals.

(B) Research pertaining to (A) above.

C) Production or testing of biologicals.

(D) The accumulation of properly contained home-generated sharps waste that is brought by a patient, a member of the patient's family, or by a person authorized by the enforcement agency, to a point of consolidation approved by the enforcement agency pursuant to Section 117904 or authorized pursuant to Section 11847.

(2) The waste is either of the following:
Biohazardous Waste.
Sharps Waste.

Section 118275 (g) Pharmaceutical Waste must be placed in a container labeled "INCINERATION ONLY". Both sharps non-sharps approved pharmaceutical waste containers are available through your medical waste hauler.