

Proper Management of Non-Dispensable Pharmaceuticals

County of San Diego, Department of Environmental
Health, Hazardous Materials Division
January 20, 2010

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Management Non-Dispensable Pharmaceuticals

* Reverse Distributor

* Waste Companies

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In the “Pharmacy World”, There are 3 Sure Things in Life...


1) Death

2) Taxes

3) **OUTDATES!**

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**Reverse Distribution Services is for
only potentially returnable
(value, useful) products**

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Categories of Most Frequently Received Products

- * Outdates
- * Shortdates
- * Overstock/Obsolete Products
- * Recalls

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Pharmaceutical Returns Process Procedure

- * Sort Product by Manufacturer
- * Sort Product by NDC Number
- * Sort Product by Lot Number
- * Inventory Product by Manufacturer, NDC Number, Lot Number and Expiration Date
- * Verify Return Policy of Product



Pharmaceutical Returns Process Procedure

Returnable Product

- Package Returnable Product for Each Manufacturer
- Secure Return Authorization
- Ship Returnable Product to Each Manufacturer

Complete Documentation

- ✓ Return Schedule Drug Report
- ✓ Return Non-Schedule Drug Report
- ✓ Processed Recall Report
- ✓ Processed Indates Report
- ✓ Returned Drug Summary
- ✓ Indate Report

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Pharmaceutical Returns Process Procedure

Non-Returnable Product (Waste)

- Separated by Non-Hazardous
- Separated by Hazardous
 1. Federal RCRA “P” Acute Hazardous
 2. Federal RCRA “U” Toxic Hazardous
 3. Federal RCRA “D” Characteristics Hazardous

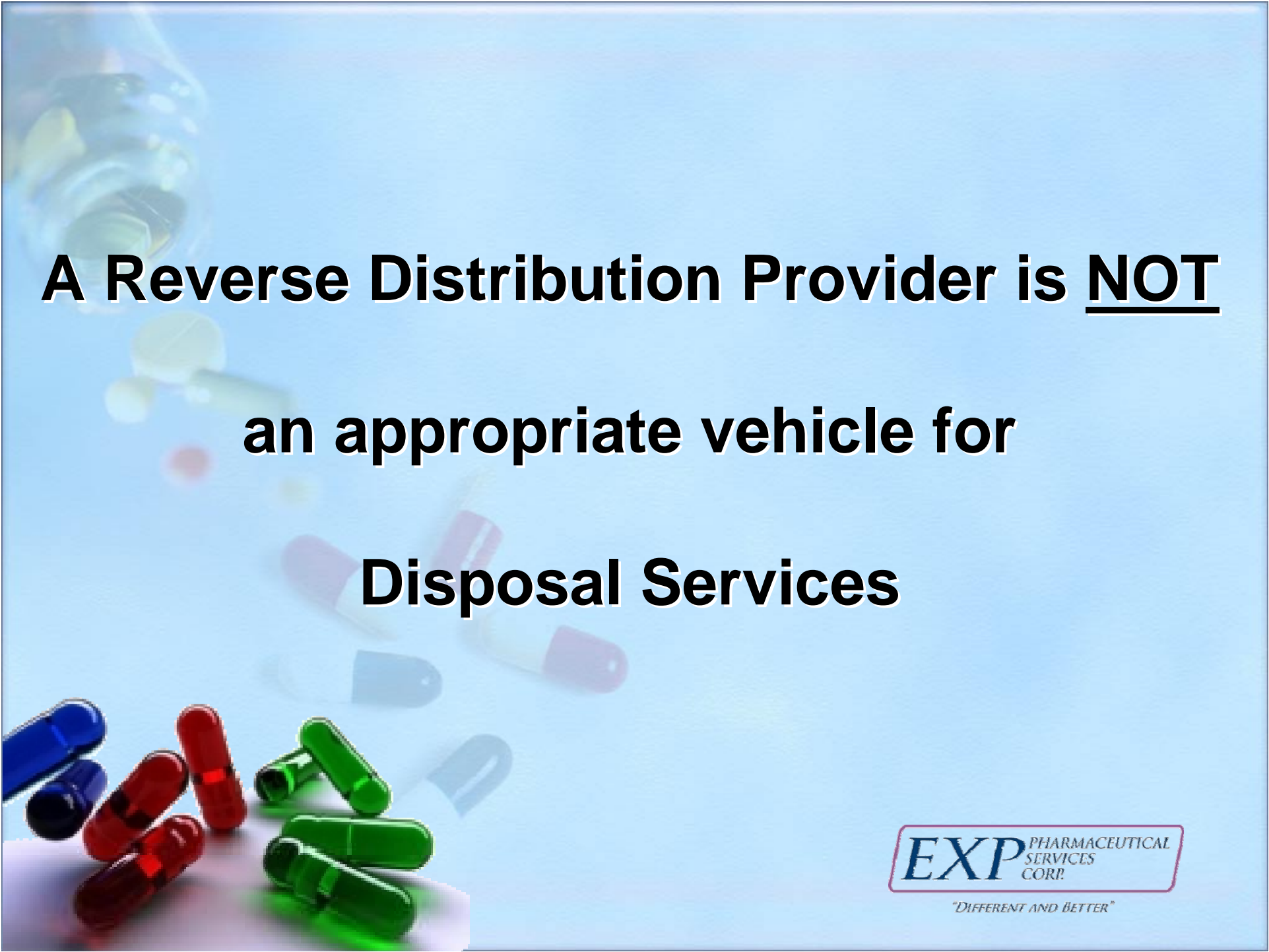
Complete Documentation

- ✓ Schedule Drug Waste Report
- ✓ Non-Schedule Drug Waste Report
- ✓ Hazardous Waste Report

Professional Transportation/Incineration

- All Waste Items are Transported and Incinerated Compliant with all Applicable Regulatory Agencies



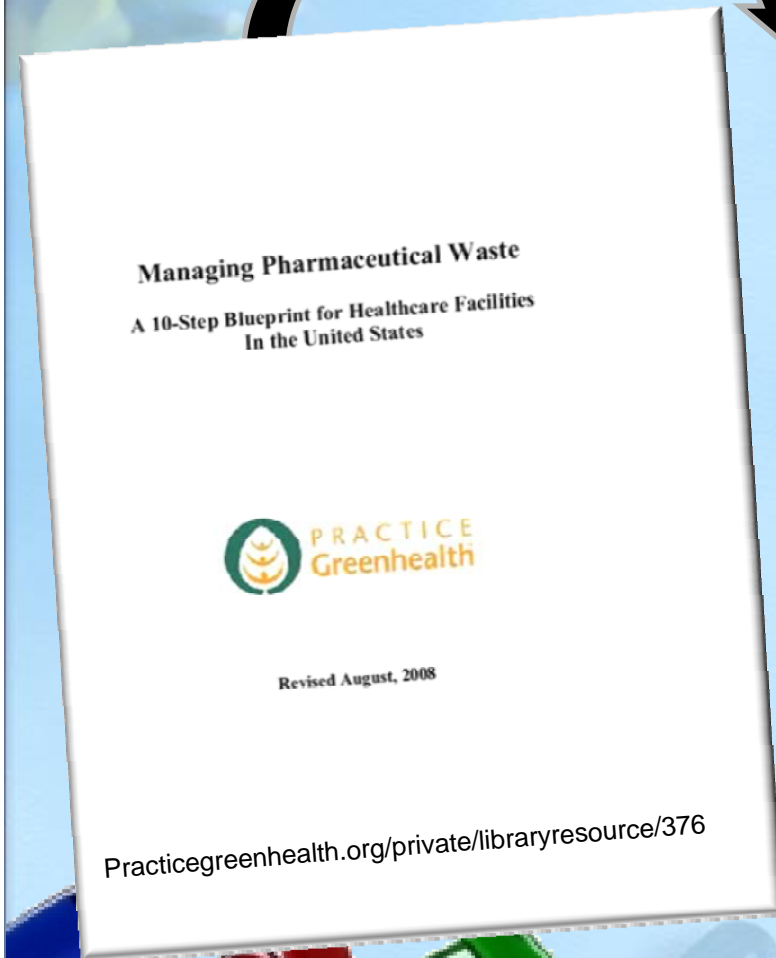


**A Reverse Distribution Provider is NOT
an appropriate vehicle for
Disposal Services**

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The following items should never be returned to a reverse distributor since they are never creditable:



- * Unused compounded IVs
- * Partial or empty vials
- * Used ointments
- * Bulk chemicals or materials
- * Outdated Samples
- * Outdated Pharmacy re-packs
- * Patient's owned medications

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Proper Disposition of these items

Waste Disposal Companies

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