



POLICY AND PROCEDURE

NO.418

Med Return™ Drug Collection Unit

Date Issued September 1, 2014	Date Effective September 1, 2014	Revision No.	No. of pages 2
----------------------------------	-------------------------------------	--------------	-------------------

PURPOSE:

It is the purpose of this policy and procedure to establish and maintain a method of assisting citizens with an easily accessible, environmentally friendly, safe and secure method of disposing of unwanted or expired household medications including prescriptions, over-the-counter drugs and unused pharmaceuticals.

POLICY:

The presence of unwanted or expired household medications, prescriptions, over-the-counter drugs and unused pharmaceuticals in the household is problematic in that these items can be the subject of theft, misuse, abuse or come into the hands of children. As ordinary methods of disposal such as discarding these items in the trash or flushing them down the toilet are detrimental to the environment, our citizens are left without a safe and secure means of disposing of these items.

So as to offer our citizens a safe and accessible means of disposal for these medications, drugs and pharmaceuticals, the Worcester Police Department will provide a secured drop-off receptacle located at police headquarters. This receptacle will enable citizens to anonymously drop off these items quickly and easily.

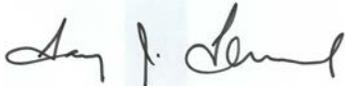
Police personnel, consistent with established procedure, will periodically empty this receptacle of the items deposited and transport them to a secure location for immediate destruction.

PROCEDURE:

- A. A receptacle shall be permanently installed in an area accessible by the public at Worcester Police Headquarters for the purposes of the collection of unwanted or expired household medications including prescriptions, over-the-counter drugs and unused pharmaceuticals. Persons are encouraged to come to police headquarters and deposit these unwanted items for safe and effective disposal.
- B. It is not necessary that any person using this deposit receptacle do not identify themselves nor should any member of this department require that any person using the receptacle identify themselves either.
- C. The storage portion of the receptacle shall be locked at all times and the key for the device shall be secured in the office of the Commanding Officer of the Vice-Squad.
- D. Vice-Squad personnel shall periodically inspect the contents and of the receptacle box and when necessary, remove the contents thereof and immediately transport them to the Wheelabrator incinerator plant situated on the Southwest Cutoff in Millbury MA for immediate disposal. Procedures for this inspection, removal, transport and disposal shall be as follows:

- a. Any opening of the storage portion of this receptacle device may only come after notification of the Vice-Squad Commanding Officer and upon his authorization. This request and authorization if granted, must be memorialized in the unit journal.
- b. After access authorization is granted by the Vice-Squad Commanding Officer, the key shall be issued to an official of the rank of sergeant or higher. That official along with another sworn member of this department designated by the Vice Squad Commander shall then proceed directly to the collection receptacle for opening and inspection.
- c. If removal and disposal is warranted, that official and the accompanying officer or official shall collect the contents of the receptacle and immediately proceed to the disposal site located at Wheelabrator incinerator plant situated on the Southwest Cutoff in Millbury MA. To facilitate undeterred disposal, the Wheelabrator plant shall be called and notified informing them the officers' impending arrival.
- d. At the disposal site, the items deposited into the receptacle shall be conveyed to Wheelabrator in such a way to insure its immediate disposal. The delivering official/officer shall remain there until disposal is insured.
- e. Record of disposal or record of the fact that disposal was not required (i.e. the receptacle was not full or had too few items therein to warrant transport) should be recorded in the vice-Squad unit journal.
- f. The key to the receptacle shall then be returned to the Vice-Squad Unit Commander at the conclusion of this inspection and disposal.

Per:



Gary J. Gemme
Chief of Police



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

DEVAL L. PATRICK
Governor

RICHARD K. SULLIVAN JR.
Secretary

DAVID W. CASH
Commissioner

November 7, 2014

Worcester Police
Sergeant Matthew Early
9-11 Lincoln Square
Worcester, MA 01608

RE: Response to Application for Waiver of Household Hazardous Waste Center
Requirements for a Permanent Residential Waste Medication Collection Kiosk

Dear Sergeant Early,

The following is in response to the waiver application you submitted on behalf of the City of Worcester, on November 7, 2014 to the Massachusetts Department of Environmental Protection ("MassDEP"). In this application you requested a waiver of the requirement to manage collected household hazardous waste pharmaceuticals in compliance with the regulations for Centers for the Accumulation of Hazardous Waste Generated by Households, in accordance with 310 CMR 30.1102.

MassDEP reviewed your application and has determined that it meets the criteria in 310 CMR 30.1102. Specifically, MassDEP has determined the activity for which you are seeking a waiver is insignificant as a potential hazard to public health, safety and welfare. In addition, the waiver being sought is for a Massachusetts requirement that is more stringent than the minimum federal requirements for household hazardous waste, which is excluded by US EPA at 40 CFR 261.4(b)(1). As such, MassDEP has determined that the waiver requirements are not less stringent than those required by US EPA.

MassDEP hereby approves your waiver application for the requirements for Centers for the Accumulation of Hazardous Waste Generated by Households described at 310 CMR 30.393. This

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TDD# 1-866-539-7622 or 1-617-574-6868
MassDEP Website: www.mass.gov/dep

Printed on Recycled Paper

approval is dependent upon the veracity of the statements in the application, and is effective on this date and for as long as the following conditions are met:

- All collected household hazardous waste pharmaceuticals shall be placed into a kiosk that shall be a heavy metal container, the approximate size of a mailbox, with a top one-way opening drop slot, and a lock.
- The kiosk shall be located inside or in the vestibule of a police station, mounted to the ground or wall, and under 24-hour direct or video surveillance.
- Signs shall be posted at the kiosk instructing residents to drop off waste medications only; the sign shall also clearly state that residents cannot place prohibited items, such as sharps, thermometers and other non-pharmaceutical wastes, into the kiosk.
- Access to kiosk contents shall be limited to a police officer who shall have sole access to the key for the kiosk.
- Only residents can drop off waste medications; businesses are prohibited from dropping off waste medications.
- The container in the kiosk shall be emptied immediately after it becomes full.
- Waste medications removed from the kiosk shall be removed directly to the Police Department's evidence room, where they will be kept while awaiting disposal.
- Waste medications shall be disposed within 180 days of the date on which they are removed from the kiosk.
- Waste medications shall be disposed of in the presence of a police officer at the solid disposal facility referenced in Section C of your application.
- Waste medications shall otherwise be disposed of in accordance with the policies and procedures described in the police department's program for drug destruction.

Failure to comply with the conditions and statements in this approval letter will result in immediate revocation of this waiver approval, requiring the municipality to manage any hazardous pharmaceuticals it collects as hazardous wastes under 310 CMR 30.000, and may result in enforcement action pursuant to M.G.L. Chapter 21C and 310 CMR 30.000.

Please contact James Paterson from my staff at 617.556.1096 if you have any questions.

Sincerely,



Greg Cooper, Director
Business Compliance Division
Bureau of Waste Prevention



Massachusetts Department of Environmental Protection
Bureau of Waste Prevention

Application for Waiver of Household Hazardous Waste Collection Requirements
For a Permanent Residential Waste Medication Collection Kiosk

A. Purpose of Waiver & Rationale

Residential waste medications collected through the program identified below will be diverted from disposal in wastewater (via flushing) and will be destroyed/disposed at the permitted Massachusetts solid waste facility identified below. Destruction/disposal at a permitted solid waste management facility is more environmentally protective than disposal in wastewater. This program will also protect public safety by making waste medications unavailable to people who should not take them.

By submitting this form, your organization is applying for a waiver of the Massachusetts requirement to classify residential waste medications collected at the location described below as "hazardous waste" and the associated requirements for managing "household hazardous wastes" in accordance with 310 CMR 30.1100:

- This waiver would apply to a state requirement that is more stringent than the federal hazardous waste requirement for this waste stream. Under 40 CFR 261.4(b)(1), wastes generated by households are exempt from the requirements of Subtitle C of the U.S. Resource Conservation and Recovery Act.
- Data from similar collections indicates that only 10 to 15 percent of the waste medications collected are classified as "hazardous waste." When properly contained, managed and directed to a permitted Massachusetts solid waste facility, this quantity of waste medication is insignificant as a potential hazard to public health, safety, welfare and the environment.
- Waste medications to be collected at this location will be managed in accordance with U.S. Drug Enforcement Administration (DEA) requirements (21 CFR 1307.21) and would therefore be considered to be "adequately regulated" by another government agency.

B. Applicant Information

WORCESTER POLICE
 Name of Sponsoring Organization

SGT MATTHEW EARLY
 Contact Person Name

508 799 8657
 Contact Person Telephone Number

9-11 LINCOLN SQ
 Mailing Address Line 1

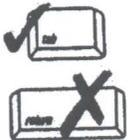
WORCESTER
 Mailing Address Line 2

MA 01608
 State ZIP Code

SERGEANT
 Contact Person Title

EARLYMC@WORCESTERMA.GOV
 Contact Person Email Address

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



Instructions & Notes:

• Provide contact information for the person responsible for on-site supervision of the collection, packaging & disposal of waste medications.

• No other household hazardous wastes - e.g., waste oil, oil-based paints, paint thinner, mercury products, etc. - are covered by this waiver.

• Medications discarded by businesses may not be accepted under this waiver & must be managed in compliance with the Massachusetts Hazardous Waste Regulation (310 CMR 30.000).

C. Kiosk, Security & Disposal Information

WORCESTER POLICE DEPT
 Building or Facility Where Kiosk Will Be Located

9-11 LINCOLN SQ
 Address

WORCESTER
 City/Town

MA 01608
 State ZIP Code

SGT. M. EARLY
 On-Site Supervisor Name

SERGEANT - VICE SQUAD
 On-Site Supervisor Title

508 799 8657
 On-Site Supervisor Office Telephone Number

774 242 4005
 On-Site Supervisor Mobile Telephone Number

EARLYMC@WORCESTERMA.GOV
 On-Site Supervisor Email Address

- 24 HOURS - 7 days a week
 Days & Hours of Operation

Waste materials to be collected at this kiosk:

Discarded Medications Only

Waste materials to be collected from:

Private Residences Only