

Vermont Psychiatric Care Hospital Policy and Procedure		
Hazardous Medications – EPA – RCRA		
Effective: September 2014	Revised: September 2024	Due for Review: September 2026

POLICY

The Vermont Psychiatric Care Hospital (VPCH) safely manages Hazardous Medications classified by the Environmental Protection Agency. These medications as dangerous to the environment under the Resource Conservation and Recovery Act, Federal laws, and regulations (RCRA) mandated by Congress, 1976. RCRA creates a framework for proper management of hazardous and non-hazardous solid waste.

PROCEDURE

The Environmental Protection Agency has classified medications. There are 3 categories of medications deemed to be hazardous potentially stored at Vermont Psychiatric Care Hospital.

- D-Listed: Medications with toxicity characteristics at specific regulatory levels
- P-Listed: Medications that are acutely hazardous.
- U-Listed: Medications considered hazardous.

Listings	Medications stored at VPCH	Additional comments
D- Listed	m-cresol	Not applicable for VPCH
D-Listed	Silver (Silvadene Cream)	Not applicable for VPCH Concentration needs to be greater than 5mg/L
P-listed	No Prescription Nicotine products are available on the market	Not applicable for VPCH
U-Listed	NONE	

The VPCH Pharmacist in Charge will evaluate which medications meet one or more of the criteria for definition of a Hazardous drug. The Director will be the Hazardous medication and waste point of contact. This hospitalized individual will be the medication expert in all the aspects of keeping the employees and environment safe from hazardous medications.

All current medications listed in the VPCH formulary that have been identified as Hazardous will require special handling, education, storage, training, labeling, administration, and disposal.

VPCH will keep an up-to-date list and post it on all Nursing Units and in Pharmacy. The list will be reviewed as needed and yearly at the minimum. Currently there are no hazardous medications classified as EPA- RCRA within VPCH.

All Pharmacy, Nursing and Environmental service personnel will be trained in Hazardous medication- RCRA- Hazardous medications to the environment in the event a medication of this class is added into the formulary.

References

Joint Commission M.M.01.01.03, MM03.01.01, MM05.01.07, MM 05.01.11

Hazardous drugs: any pharmaceuticals that fall under the American Society of Health-System Pharmacists (ASHP) 1990 definition of hazardous drugs
(http://www.ashp.org/s_ashp/docs/files/BP07/Prep_Gdl_HazDrugs.pdf)


USP <800>

<http://www.usp.org/compounding/general-chapter-hazardous-drugs-handling-healthcare>

Title 40 CFR 261.

<https://www.epa.gov/rcra/resource-conservation-and-recovery-act-rcra-regulations>

<https://www.govinfo.gov/content/pkg/CFR-2017-title40-vol28/xml/CFR-2017-title40-vol28-part261.xml>
<https://dec.vermont.gov/sites/dec/files/wmp/HazWaste/Documents/VHWMR%20Effective%20Feb%2001%2C%202022520Subchapter%2010.pdf>

Approved by	Signature	Date
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