



Terry Tamminen  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

1001 "I" Street, 25<sup>th</sup> Floor  
P.O. Box 806  
Sacramento, California 95812-0806



Arnold Schwarzenegger  
Governor

November 30, 2004

Ms. Karin Didriksen North  
PARWQP - Environmental Compliance  
2501 Embarcadero Way  
Palo Alto, California 94303

### PHARMACEUTICAL MANAGEMENT LETTER

Dear Ms. North:

Thank you for asking the Department of Toxic Substances Control (DTSC) to be a party to the Bay Area Pollution Prevention Group's (BAPPG) open letter regarding appropriate disposal of waste pharmaceuticals. While Health and Safety Code section 117635 effectively excludes pharmaceutical wastes from hazardous waste law, there is emerging evidence that current, and past, pharmaceutical disposal practices have contributed to low level contamination of both aquatic environments and domestic water sources. DTSC is, therefore, agreeable with the idea of adding DTSC's logo to such a letter.

As a matter of process, please provide a final draft of the proposed letter for review by DTSC. If the letter is found to be in line with DTSC goals and policies, DTSC will provide a digital copy of the logo and written authorization to apply the logo to the reviewed letter.

If you have any questions concerning this matter, please contact Ms. Sonia Low of my staff at (916) 323-9757.

Sincerely,

  
Karl Palmer, Chief  
Regulatory and Program Development Branch  
Hazardous Waste Management Program

cc: See next page

Ms. Didriksen North  
November 30, 2004  
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cc: Ms. Sonia Low, Chief  
Onsite Hazardous Waste Treatment Section  
Department of Toxic Substances Control  
1001 "I" Street, 11<sup>th</sup> Floor  
P.O. Box 806  
Sacramento, California 95812-0806

Mr. William Beckman  
Household Hazardous Waste Unit  
Department of Toxic Substances Control  
1001 "I" Street, 11<sup>th</sup> Floor  
P. O. Box 806  
Sacramento, California 95812-0806

DRAFT

Shirley  
Jim

7/28/2004

To Whom It May Concern:

Multiple agencies within the Bay Area need your assistance in disseminating information to the public regarding the proper disposal of pharmaceuticals. Traditionally, residents were told to dispose of unused or expired medications down the drain. The problem is that wastewater treatment plants are designed to remove conventional pollutants such as suspended solids and biodegradable organic material, not low concentrations of synthetic pollutants such as pharmaceuticals. Therefore, if a resident asks how to dispose of medications please pass along the following information:

**Residents should not dispose of unused or expired medications down the drain; instead they should contact their local household hazardous waste program for proper disposal options.**

Pharmaceutical residuals from humans and animals, personal care products, and their metabolites are continually introduced to the aquatic environment via a number of routes including wastewater treatment plants and are found in waterways nationwide<sup>1,2</sup>. As studies are conducted to assess the impact of pharmaceuticals on the aquatic environment, it is recommended that federal, state and local governments, and agencies adopt a uniform policy in regards to the disposal of unused or expired medications. The first step is to ensure that agencies are disseminating one disposal recommendation when they receive phone calls from residents. We appreciate you informing residents of how to properly dispose of their unused or expired medications. The bottom line is that residents should not dispose of unused or expired medications down household drains or toilets.

Since many household hazardous waste programs have expressed concern about budgets, please do not advertise the programs without first checking with your local program. Feel free to contact Karin North at [Karin.north@cityofpaloalto.org](mailto:Karin.north@cityofpaloalto.org) or 650-494-7629 if you require further information. Ms. North is leading the Pharmaceutical Disposal Project for the Bay Area Pollution Prevention Group, a consortium of Bay Area wastewater treatment facilities.

Regards,

<sup>1</sup> Daughton, C.G. and Ternes, T.A. (1999) Pharmaceuticals and Personal Care Products in the Environment: Agents of Subtle Change. *Environmental Health Perspectives*, Vol 107, Supplement 6: 907-938 [available: <http://epa.gov/nerlesd1/chemistry/ppcp/images/errata.pdf>]

<sup>2</sup> Kolpin, Dana et al. (2002) Pharmaceuticals, hormones and other organic wastewater contaminants in U.S. Streams, 1999-2000: A National Reconnaissance, *Environmental Science and Technology* v. 36: 1202-1211.

DRAFT

**From:** "North, Karin" <Karin.North@cityofpaloalto.org>  
**To:** <WBeckman@dtsc.ca.gov>  
**Date:** 8/10/2004 1:14:01 PM  
**Subject:** Logo request on a letter

Bill-

As discussed last week. We were hoping that we could get DTSC's logo on top of the attached letter. We believe that more people will read the letter if we have DTSC, DHS and EPA's logo on top of the letter. EPA is currently on the second level and feels like it should be approved by the end of next week. Feel free to contact me if you require more information.

We are still trying to decide who will sign the letter.

Regards,

Karin Didriksen North  
Environmental Compliance Group  
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650-494-7629  
Fax 650-494-3531  
email: [karin.north@cityofpaloalto.org](mailto:karin.north@cityofpaloalto.org)  
[www.cityofpaloalto.org/cleanbay](http://www.cityofpaloalto.org/cleanbay)  
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