

STATE OF COLORADO

John W. Hickenlooper, Governor
Christopher E. Urbina, MD, MPH
Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

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<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

Via Certified Mail #7011 2000 0000 7611 6321
Return Receipt Requested

December 19, 2011

Mr. Alan Scheere, District Manager
Waste Management of Colorado, Inc. / Conservation Services, Inc.
41800 East 88th Avenue
Bennett, Colorado 80102

Mr. Bruce Clabaugh, Environmental Protection Manager
Waste Management of Colorado, Inc.
5500 South Quebec Street
Suite 250
Greenwood Village, Colorado 80111

RE: Approval
Revised Handling and Disposal Plan for Pharmaceuticals
Conservation Services, Inc. Landfill
Adams County, Colorado

Dear Mr. Scheere and Mr. Clabaugh:

Via electronic mail on October 26, 2011, the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (Division), received from Waste Management of Colorado, Inc. (WMC) and Construction Services, Inc. a *Handling and Disposal Plan for Pharmaceuticals (Plan)* (WMC 2011a) for the handling and disposal of pharmaceuticals at the CSI Landfill, and prepared by WMC. On October 31, 2011, the Division received a hard copy of the *Plan* (WMC 2011a).

The Division completed its review of the *Plan* (WMC 2011) pursuant to the appropriate provisions of the Regulations Pertaining to Solid Waste Sites and Facilities, 6 CCR 1007-2, Part 1 (Solid Waste Regulations), and with the facility's approved Design and Operations Plan (D&O Plan), and issued comments via electronic mail on December 19, 2011. WMC revised the *Plan* (WMC 2011a) based on

December 19, 2011

Mr. Alan Scheere and Mr. Bruce Clabaugh

Approval: *Revised Handling and Disposal Plan for Pharmaceuticals*, Construction Services, Inc. Landfill,
Adams County, Colorado

Page 2

the Division's comments and, via electronic mail on December 19, 2011, submitted the *Revised Plan* (WMC 2011b) for the Division's review.

The Division has completed its review of the *Revised Plan* (WMC 2011b) pursuant to the appropriate provisions of the Solid Waste Regulations) and with the facility's approved D&O Plan. The Division hereby approves the *Revised Plan* (WMC 2011b).

The Division is authorized to bill for its review of technical submittals at \$125 per hour, pursuant to Section 1.7 of the Solid Waste Regulations. An invoice for the Division's review of the subject document will be sent under separate cover.

Should you have questions, please contact Doug Eagleton at (303) 691-4065, douglas.eagleton@state.co.us, or Roger Doak at (303) 692-3437, roger.doak@state.co.us.

Sincerely,



Doug Eagleton, P.E.
Environmental Protection Specialist
Solid Waste and Materials Management Program
Hazardous Materials and Waste
Management Division



Roger Doak, Unit Leader
Solid Waste Permitting Unit
Solid Waste and Materials Management Program
Hazardous Materials and Waste
Management Division

cc: Craig Tessmer – Adams County Planning & Development Department
Deanne Kelly – Tri-County Health Department
Tom Schweitzer, P.E. – WMC

ec: Darrell Dearborn – HMWMD
Kathy Hotovec – HMWMD

SW/ADM/CSI 2.2



December 19, 2011

Alan Scheere, Site Manager
Conservation Services, Inc.
41800 E 88th Avenue
Bennett, CO 80102

Mr. Bruce Clabaugh, Environmental Protection Manager
Waste Management of Colorado, Inc.
5500 South Quebec Street
Suite 250
Greenwood Village, CO 80111

RE: *Revised Handling and Disposal Plan for Pharmaceuticals* (the Plan)
Conservation Services, Inc. Landfill
Adams County, Colorado

Dear Mr. Scheere and Mr. Clabaugh:

On October 26, 2011, Tri-County Health Department (TCHD) received the *Handling and Disposal Plan for Pharmaceuticals* via electronic mail. On December 19, 2011, TCHD received via electronic mail a single comment regarding the document from Colorado Department of Public Health and Environment (CDPHE) and a revised copy of the Plan from Waste Management, Inc.

TCHD has reviewed the Plan and has no additional comments. The *Revised Handling and Disposal Plan for Pharmaceuticals* is approved by TCHD for inclusion in the facility Revised Design and Operations Plan.

Should you have any questions, please call me at 303-439-5909.

Sincerely,

A handwritten signature in cursive script that reads "Deanne Kelly".

Deanne Kelly, R.E.H.S.
Solid Waste Specialist

Cc: Brian Hlavacek, TCHD
TCHD File
Darrell Dearborn, CDPHE
Craig Tessmer, Adams County
Tom Schweitzer, P.E. WMC
Doug Eagleton, CDPHE



CONSERVATION SERVICES INC.

41800 East 88th Avenue
Bennett, CO 80102
(303) 644-4335
(303) 644-4306 Fax

October 26, 2011

Darrell Dearborn
Colorado Department of Public Health and Environment
HMWMD-SWIM-B2
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

**RE: Disposal of Pharmaceuticals
Conservation Services, Inc. (CSI)
41800 E. 88th Avenue
Bennet, CO 80102**

Dear Mr. Dearborn:

Pursuant Section 13 Medical Waste of the Regulations Pertaining to Solid Waste Sites and Facilities Subsection 13.9.3 Trace chemotherapy waste and waste pharmaceuticals, CSI is submitting the attached supplement to their revised Design & Operations Plan (D&O Plan). The enclosed "Handling and Disposal of Pharmaceuticals Plan" meets the requirements prescribed under Section 13.9.3 (B) (3) and (5) and (D) and further supports the waste acceptance criteria contained in the revised D&O Plan. This plan is designed to be a stand alone document that can be easily updated to meet the changing regulatory requirements pertaining to pharmaceuticals, illicit and over the counter drugs.

Adams County issued a Certificate of Designation (CD) for CSI in 1989; the CD was amended in 1996 as a non-hazardous liquid waste solidification and solid waste disposal facility. CSI believes pharmaceuticals constitute waste streams that are approved under their existing CD. The CD allows CSI to accept non-hazardous wastes. The approved D&O Plan, dated February 5, 1996, does not specifically list wastes approved for management at CSI. The D&O Plan does state "...CSI will consider accepting any waste for treatment and disposal that is not a hazardous waste as defined in the Resource Conservation Recovery Act (RCRA) (40 CFR Part 261) or the Colorado Hazardous Regulations (6 CCR 107-3 Section 261, et seq.)." Accordingly, CSI has previously received substances from various generators including pharmaceutical manufacturers, local law enforcement agencies and the DEA as part of their Nation Wide Prescription Take-Back Program. The DEA selected CSI, from within their four state area of jurisdiction in partnership with the Colorado Department of Public Health and Environment, for environmentally sound and appropriate disposal/destruction of drugs collected as part of their take-back program.

CSI has prepared the enclosed Handling and Disposal Plan for Pharmaceuticals that provides for enhanced waste acceptance protocol for safely managing these materials. The procedures ensure that substances managed under this protocol will render the material non-useable and non-recoverable.

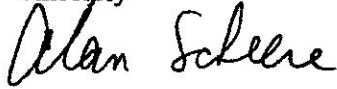
CSI Handling
Plan for Pharmaceuticals

October 2011

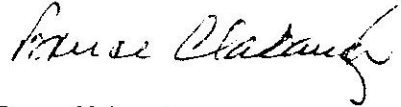
From everyday collection to environmental protection, Think Green® Think Waste Management.

Should you have any questions regarding this request, please call me at 303.644.4335 ext.1 or Bruce Clabaugh, Environmental Protection Manager, at 303.486.6034.

Sincerely



Alan Scheere
District Manager



Bruce Clabaugh
Environmental Protection Manager

Attachments

**Cc: Craig Tessmer, Adams County
Deanne Kelly, TCHD
Roger Doak, CDPH&E
Brad Pollock WM
Tom Schweitzer WM**



CONSERVATION SERVICES, INC.

Handling and Disposal Plan for Pharmaceuticals

**41800 East 88th Avenue
Bennett, Colorado 80102**

Prepared by Waste Management of Colorado, Inc.

Dated October 2011
Revised December 2011

CONSERVATION SERVICES, INC.

Handling and Disposal Plan for Pharmaceuticals

ERRATA - FOR INTERIM UPDATES

DATE	DESCRIPTION OF CHANGE
12/2011	Revised section 5.0 to reflect Section 2.0 statement regarding suitable solidification agent per CDHP&E

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CONSERVATION SERVICES, INC.

Handling and Disposal Plan for Pharmaceuticals

1.0 PURPOSE

This Handling and Disposal Plan for Pharmaceuticals (Plan) supplements the waste acceptance criteria contained in the Revised Design and Operations Plan, dated February 5, 1996, for Conservation Services, Inc. (CSI). The procedures described in this Plan provide enhanced waste acceptance protocol for safely managing controlled and uncontrolled substances and over the counter drugs, hereafter referred to as Substances. Substances specified in this Plan are considered non-hazardous solid waste and regulated under the Regulations Pertaining to Solid Waste Disposal Sites and Facilities, (6 CCR 1007-2) and United States Drug Enforcement Agency (DEA).

The primary purpose of this Plan is to establish special protocol that protects employees, public health and the environment when managing pharmaceuticals at CSI. This Plan provides for special procedures for screening, receipt, surveys, handling/placement, training, and record keeping.

2.0 WASTE ACCEPTANCE PROCEDURE

The waste streams accepted at CSI are non-hazardous solid and liquid industrial wastes and non-regulated PCB containing wastes. Industrial solid wastes accepted at CSI are managed through direct burial, or may be applied to the facility's Prepared-Bed Biological Treatment (PBBT) units as appropriate. **Suitable industrial solid wastes includes, but not limited to, fly ash, kiln dust etc., received at the facility may also be used in the site mixing basin(s) as a supplemental solidification agent and approved liquids that are present in the basin.** Liquid industrial wastes are solidified prior to land disposal, or, if appropriate, are applied on the PBBT units. CSI also accepts asbestos waste for disposal, with friable asbestos managed exclusively in the facility's asbestos monofill. This Plan provides for waste acceptance procedures for the receipt of controlled and uncontrolled substances and pharmaceuticals including but not limited to household medicines, outdated, off-spec pharmaceuticals and illicit drugs etc. The primary sources of these substances are pharmacies, pharmaceutical manufacturers, law enforcement agencies, medical facilities and collection events conducted by regulatory agencies.

2.1 Pre-acceptance Screening for Industrial Wastes

Although it is the Generator's responsibility to accurately characterize its waste, CSI's technical staff reviews each waste stream for which disposal has been requested to ensure the material is appropriate for management at CSI.

The pre-acceptance screening process begins when CSI receives a completed Generator's Waste Profile Sheet from the Generator or its Authorized Representative. A sample profile is included in Appendix A. The completed profile provides information about the waste, including the waste name and the process generating the waste. The Generator must also provide specific information regarding the chemical and physical waste properties and regulatory status of the waste material and must answer specific questions to ensure all necessary information has been provided. As part of this process, the Generator may also

provide laboratory analysis and/or other information about the waste¹ to assist in the accurate characterization of the waste proposed for management.

2.2 Pre-acceptance Screening for controlled and uncontrolled substances

The pre-acceptance screening process for controlled and uncontrolled substances uses the same procedures for industrial waste as described in 2.1 above with the addition of the DEA Form 41 (Appendix B) for disposal of controlled substances as appropriate. The information received in the DEA Form 41, in conjunction with the Generator Waste Profile Sheet and supporting technical information, is used to evaluate the waste for acceptance. Any incorrect or missing information may delay the review and approval process. CSI's technical staff will review the analysis and supporting information and a determination of acceptability will be made. Once the waste is determined acceptable, the generator will be notified and informed of limitations and conditions of acceptance.

2.3 Screening at the Site

All substances delivered to the facility are accompanied with a non-hazardous waste manifest and DEA Form 41 as appropriate. Upon arrival at CSI, these forms are reviewed for accuracy and completeness to ensure the waste being received matches the waste previously approved by CSI on the Waste Profile. Any discrepancies will be noted on the manifest. If the manifest does not have correct information and signatures, the waste will not be accepted into the facility. Additionally, radioactivity screening for levels above background is conducted using a fixed detector on every load that passes the gate.

3.0 ANALYSIS OF WASTES

CSI will evaluate the waste profile and related analytical information to ensure it is not accepting prohibited wastes. If analytical data is provided with the waste profile to aid in accurate characterization, the data must meet CDPHE protocols. Sampling and analysis should be conducted by the generator following Subpart C Part 261, CCR 1007-3 or equivalent method approved by the CDPHE under Section 260.21.

4.0 CONTINGENCY PLAN: LOAD REJECTION PROCEDURES

If prohibited wastes are identified at the facility during the on-site screening process described in Section 2.2, the waste load will be rejected and the Generator notified. Documentation of the rejection will be noted in the operating record.

In the event that prohibited waste materials are identified after a load has been accepted, but before it has been managed at the site, the waste will be secured away from the active portion of the facility until removed by the Generator or their Authorized Representative. An incident report will be completed and all required notifications made pursuant to regulatory, permit, and operational guidelines. All documentation will be maintained with the associated profile and in the site Operating Record. An example Incident Report is included in Appendix D.

¹ Sampling and analysis of a waste must be conducted in accordance with Subpart C of Part 261, CCR 1007-3 or equivalent method approved by the CDPHE under Section 260.21. CSI's technical personnel evaluate the waste profile using analytical data provided by the Generator and/or equivalent information (i.e. Subpart B of Part 261.10(ii) allowing the Generator to apply his or her knowledge of the hazard characteristic of the waste in light of the materials or processes used) to ensure that CSI is not accepting prohibited wastes.

5.0 OPERATIONAL REQUIREMENTS

Incoming Substances that have passed the entrance screening, document review process, and testing, as appropriate, are directed to the facility's mixing basin. CSI office personnel will notify site operators regarding incoming material and special handling conditions associated with the waste. The wastes are off loaded either on the concrete apron surrounding the mixing basin or directly into the mixing basin. The waste containers and contents are crushed using the bucket of the excavator, wheel loader or tracts on the excavator or dozer to ensure destruction of the packaging containers and contents, therein. Wastes, when crushed on the apron, are placed in the mixing basin. Wastes crushed inside the mixing basin remain in the basin. The liquid/substances are mixed with the bucket of the excavator until there is uniform consistency and solidification of the mix has occurred. **(See Section 2.0 for solidification agents)** The solidified wastes are considered to be chemically encapsulated at this point in the process. The encapsulated wastes are removed from the basin using the excavator and placed in to the facility haul truck. The wastes are transferred and off loaded into a specially prepared and designated location in the disposal cell that is of sufficient size to place the entire mixture. The solidified wastes are immediately covered with at least 1 foot of other solidified waste. The disposed wastes are considered non-recoverable at this point. The disposal location is documented using a hand held GPS and coordinates noted on the manifest. During the course of the day, several feet of additional solidified waste may be placed over the top of the covered solidified substances.

6.0 TRAINING

All employees responsible for approving waste streams for disposal at CSI will receive training in applicable regulations (Federal, State, and local), company requirements, and specifications of the Design and Operations Plan and this Plan.

Employees responsible for handling and disposal of substances will receive training in the CSI screening process, manifesting requirements, ensuring handling conditions and limitations are met, load rejection procedures, and operational requirements.

Site operators responsible for working with the substances will be trained, at a minimum, to recognize and properly respond to all prohibited wastes, and how to segregate a waste that requires removal from the site.

7.0 PLAN REVIEW AND RECORDKEEPING

This Plan will be reviewed periodically and amended as necessary. Any major changes made to the Plan will be submitted to CDPHE and copied to Adams County and Tri-county Health Department. An Errata Page, located at the front of this Plan, will be used for tracking minor changes.

Generator Waste Profiles will be reviewed on a periodic basis, at the time of profile expiration, or if the process generating the waste changes. Any changes made to the profile will be initialed and dated by the person authorizing the changes. All changes will be communicated to the Generator in writing. Facsimile changes are acceptable.

Records will be maintained in accordance with applicable regulations. Select records, i.e. waste manifests, laboratory/load/rejection/inspection forms, and profile approval reports will be maintained at the facility. All other waste information, including generator waste profiles, laboratory analytical results, related

technical information and any other supporting documentation are kept at Waste Management's Industrial Waste Office located at 7780 E. 96th Avenue, Henderson Colorado 80640. The information is kept electronically.

8.0 HEALTH AND SAFETY

CSI has implemented health, safety and transportation programs to meet regulatory requirements as well as company health and safety policies. The safety and health programs are designed to prevent accidents, to provide information for emergency situations and unsafe conditions. These programs are available for review in the operating record.

These programs are supported by periodic safety training meetings to ensure employees have an understanding of health and safety requirements. Furthermore, there are certain health and safety concerns when dealing with substances. Training will be completed to ensure employees have an understanding of issues, PPE and proper procedures for management of substances. Training of employees is documented and maintained at the facility.

APPENDIX A
GENERATOR'S WASTE PROFILE SHEET



Generator's Non-hazardous Waste Profile Sheet

Requested Disposal Facility: Profile Number:
Renewal for Profile Number: Waste Approval Expiration Date:
Check here if there are multiple generating locations for this waste. Attach additional locations.

A. Waste Generator Facility Information (must reflect location of waste generation/origin)

1. Generator Name:
2. Site Address: 7. Email Address:
3. City/ZIP: 8. Phone: 9. FAX:
4. State: 10. NAICS Code:
5. County: 11. Generator USEPA ID #:
6. Contact Name/Title: 12. State ID# (if applicable):

B. Customer Information same as above P. O. Number:

1. Customer Name: 6. Phone: FAX:
2. Billing Address: 7. Transporter Name:
3. City, State and ZIP: 8. Transporter ID # (if appl.):
4. Contact Name: 9. Transporter Address:
5. Contact Email: 10. City, State and ZIP:

C. Waste Stream Information

1. DESCRIPTION
a. Common Waste Name: State Waste Code(s):
b. Describe Process Generating Waste or Source of Contamination:
c. Typical Color(s):
d. Strong Odor? Yes No Describe:
e. Physical State at 70°F: Solid Liquid Powder Semi-Solid or Sludge Other:
f. Layers? Single layer Multi-layer NA
g. Water Reactive? Yes No If Yes, Describe:
h. Free Liquid Range (%): to NA(solid)
i. pH Range: to NA(solid)
j. Liquid Flash Point: < 140°F 140°- 199°F ≥ 200°F NA(solid)
k. Flammable Solid: Yes No

1. Physical Constituents: List all constituents of waste stream - (e.g. Soil 0-80%, Wood 0-20%): (See Attached)

Table with 5 columns: Constituents (Total Composition Must be ≥ 100%), Lower Range, Unit of Measure, Upper Range, Unit of Measure. Rows 1-6.

2. ESTIMATED QUANTITY OF WASTE AND SHIPPING INFORMATION

a. One Time Event Base Repeat Event
b. Estimated Annual Quantity: Tons Cubic Yards Drums Gallons Other (specify):
c. Shipping Frequency: Units per Month Quarter Year One Time Other
d. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (if yes, answer e.) Yes No
e. USDOT Shipping Description (if applicable):

3. SAFETY REQUIREMENTS (Handling, PPE, etc.):



D. Regulatory Status (Please check appropriate responses)

.. Waste Identification:

- a. Does the waste meet the definition of a USEPA listed or characteristic hazardous waste as defined by 40 CFR Part 261? Yes No
 - 1. If yes, please complete a hazardous waste profile.
- b. Does the waste meet the definition of a state hazardous waste other than identified in D.1.a? Yes No
 - 1. If yes, please complete a hazardous waste profile.
- 2. Is this waste included in one or more of categories below (Check all that apply)? If yes, attach supporting documentation. Yes No
 - Delisted Hazardous Waste Excluded Wastes Under 40CFR 261.4
 - Treated Hazardous Waste Debris Treated Characteristic Hazardous Waste
- 3. Is the waste from a Federal (40 CFR 300, Appendix B) or state mandated clean-up? If yes, see instructions. Yes No
- 4. Does the waste represented by this waste profile sheet contain radioactive material? Yes No
 - a. If yes, is disposal regulated by the Nuclear Regulatory Commission? Yes No
 - b. If yes, is disposal regulated by a State Agency for radioactive waste/NORM? Yes No
- 5. Does the waste represented by this waste profile sheet contain Polychlorinated Biphenyls (PCBs)? Yes No
(If yes, list in Chemical Composition - C.1.1.)
 - a. If yes, are the PCBs regulated by 40 CFR 761? Yes No
 - b. If yes, is it remediation waste from a project being performed under the Self-Implementing option provided in 40 CFR 761.61(a)? Yes No
 - c. If yes, were the PCBs imported into the US? Yes No
- 6. Does the waste contain untreated, regulated medical or infectious waste? Yes No
- 7. Does the waste contain asbestos? Yes No
 - a. If Yes, Friable Non Friable
- 8. Is this profile for remediation waste from a facility that is a major source of Hazardous Air Pollutants (Site Remediation NESHAP, 40 CFR 63 subpart GGGGG)? Yes No
 - a. If yes, does the waste contain <500 ppmw VOHAPs at the point of determination? Yes No

E. Generator Certification (Please read and certify by signature below)

By signing this Generator's Waste Profile Sheet, I hereby certify that all:

- 1. Information submitted in this profile and all attached documents contain true and accurate descriptions of the waste material;
- 2. Relevant information within the possession of the Generator regarding known or suspected hazards pertaining to this waste has been disclosed to WM/the Contractor;
- 3. Analytical data attached pertaining to the profiled waste was derived from testing a representative sample in accordance with 40 CFR 261.20(c) or equivalent rules; and
- 4. Changes that occur in the character of the waste (i.e. changes in the process or new analytical) will be identified by the Generator and disclosed to WM (and the Contractor if applicable) prior to providing the waste to WM (and the contractor if applicable).
- 5. Check all that apply:
 - a. Attached analytical pertains to the waste. Identify laboratory & sample ID #'s and parameters tested: _____ # Pages: _____
 - b. Only the analysis identified on the attachment pertain to the waste (identify by laboratory & sample ID #'s and parameters tested). Attachment #: _____
 - c. Additional information necessary to characterize the profiled waste has been attached (other than analytical, such as MSDS). Indicate the number of attached pages: _____
 - d. I am an agent signing on behalf of the Generator, and the delegation of authority to me from the Generator for this signature is available upon request.

Certification Signature: _____ Title: _____

Company Name: _____ Name (Print): _____

Date: _____

APPENDIX B

DEA FORM 41

The following schedule is an inventory of controlled substances which is hereby surrendered to you for proper disposition.

FROM: (Include Name, Street, City, State and ZIP Code in space provided below.)

Signature of applicant or authorized agent
Registrant's DEA Number
Registrant's Telephone Number

NOTE: CERTIFIED MAIL (Return Receipt Requested) IS REQUIRED FOR SHIPMENTS OF DRUGS VIA U.S. POSTAL SERVICE. See instructions on reverse (page 2) of form.

NAME OF DRUG OR PREPARATION	Number of Containers	CONTENTS (Number of grams, tablets, ounces or other units per container)	Controlled Substance Content, (Each Unit)	FOR DEA USE ONLY		
				DISPOSITION	QUANTITY	
					GMS.	MGS.
Registrants will fill in Columns 1,2,3, and 4 ONLY. 1	2	3	4	5	6	7
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
5						
16						

NAME OF DRUG OR PREPARATION Registrants will fill in Columns 1,2,3, and 4 ONLY.	Number of Containers	CONTENTS (Number of grams, tablets, ounces or other units per container)	Controlled Substance Content, (Each Unit)	FOR DEA USE ONLY		
				DISPOSITION	QUANTITY	
					GMS.	MGS.
1	2	3	4	5	6	7
17						
18						
19						
20						
21						
22						
23						
24						

The controlled substances surrendered in accordance with Title 21 of the Code of Federal Regulations, Section 1307.21, have been received in _____ packages purporting to contain the drugs listed on this inventory and have been: ** (1) Forwarded tape-sealed without opening; (2) Destroyed as indicated and the remainder forwarded tape-sealed after verifying contents; (3) Forwarded tape-sealed after verifying contents.

DATE _____ DESTROYED BY: _____

** Strike out lines not applicable.

WITNESSED BY: _____

INSTRUCTIONS

- List the name of the drug in column 1, the number of containers in column 2, the size of each container in column 3, and in column 4 the controlled substance content of each unit described in column 3; e.g., morphine sulfate tabs., 3 pkgs., 100 tabs., 1/4 gr. (16 mg.) or morphine sulfate tabs., 1 pkg., 83 tabs., 1/2 gr. (32mg.), etc.
- All packages included on a single line should be identical in name, content and controlled substance strength.
- Prepare this form in quadruplicate. Mail two (2) copies of this form to the Special Agent in Charge, under separate cover. Enclose one additional copy in the shipment with the drugs. Retain one copy for your records. One copy will be returned to you as a receipt. No further receipt will be furnished to you unless specifically requested. Any further inquiries concerning these drugs should be addressed to the DEA District Office which serves your area.
- There is no provision for payment for drugs surrendered. This is merely a service rendered to registrants enabling them to clear their stocks and records of unwanted items.
- Drugs should be shipped tape-sealed via prepaid express or certified mail (return receipt requested) to Special Agent in Charge, Drug Enforcement Administration, of the DEA District Office which serves your area.

PRIVACY ACT INFORMATION

AUTHORITY: Section 307 of the Controlled Substances Act of 1970 (PL 91-513).
PURPOSE: To document the surrender of controlled substances which have been forwarded by registrants to DEA for disposal.
ROUTINE USES: This form is required by Federal Regulations for the surrender of unwanted Controlled Substances. Disclosures of information from this system are made to the following categories of users for the purposes stated.
 A. Other Federal law enforcement and regulatory agencies for law enforcement and regulatory purposes.
 B. State and local law enforcement and regulatory agencies for law enforcement and regulatory purposes.
EFFECT: Failure to document the surrender of unwanted Controlled Substances may result in prosecution for violation of the Controlled Substances Act.

Under the Paperwork Reduction Act, a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. Public reporting burden for this collection of information is estimated to average 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Drug Enforcement Administration, FOI and Records Management Section, Washington, D.C. 20537; and to the Office of Management and Budget, Paperwork Reduction Project no. 1117-0007, Washington, D.C. 20503.

APPENDIX C

INCIDENT REPORT FORM

INCIDENT REPORT, Continued

Names and title/position of witnesses

Causes of incident

Identify steps taken to prevent recurrence

Summarize media coverage and attach copies

List regulatory and government agencies contacted. Attach copies of reports.