

**Case Study**  
**Eaton Apothecary**  
**Wellesley, Massachusetts**  
**Saturday, June 7, 2008**

**Host:** Eaton Apothecary

**Management Contact:** Director of Clinical Services

**Collection Site:** Eaton Apothecary, Wellesley, Massachusetts

**Collection Hours:** 10 – 2

**Participation**

**Total number participants:** 41

**Total volume collected:** 31.5 gallons

- Volume of controlled substances: 3.5 gallons (10%)
- Volume of non-controlled substances: 31 gallons (90%)
- Mercury thermometers: 5

**Average volume per participant:** 0.84 gallons

- Average volume per participant controlled substances: 0.09 gallons
- Average volume per participant non-controlled substances: 0.76 gallons

**Total number of items<sup>1</sup> collected:** 685

- Number of controlled items: 102 (15%)
- Number of non-controlled items: 583 (85%)

**Average number of items per participant:** 17

- Average number of controlled items per participant: 2.5
- Average number of non-controlled items per participant: 14.2

**Percent prescription:** 72%

**Percentage Eaton Pharmacy Customers:** 51%

**Costs:** \$2,565 (average per participant \$62.55)

- Hazardous waste disposal: \$909.65
- Controlled substance destruction (with police): \$1,270
- Police on-site: \$385

**Overview**

This collection came about as a result of a two-year effort by Eaton Apothecary (Eaton) to find a way to hold an unwanted medication collection. After learning of a grant from the Community Pharmacy Foundation to the Northeast Recycling Council, Inc. (NERC) to work with pharmacies to organize such events, Eaton contacted NERC and requested its assistance.

Eaton Apothecary is a community pharmacy chain operating in Massachusetts. Currently, there are 20 stores in the greater Boston region.

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<sup>1</sup> An item is one container of medication.

NERC's role in developing and implementing the event was organizational. Eaton provided staffing, as well as covering all out-of-pocket expenses.

**Background**

NERC, through a Community Pharmacy Foundation grant, worked closely with the Eaton Clinical Director and the head pharmacist from the Eaton Newton store to develop and implement a one-day unwanted medication collection. NERC's role was to provide organizational and administrative support. This assistance was provided through the Community Pharmacy Foundation grant. No direct financial support for the collection was provided. All expenses were the responsibility of Eaton.

For a general overview about how to set up and operate an unwanted medication collection, and for detail than is provided in this case study, see the guidance document [Operating Unwanted Medication Collections - A Legal & Safe Approach](#).

**Planning**

Timeline	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9
Decision/commitment to hold collection									
Site visits and date selection									
Secure agreement of law enforcement to participate									
Secure pricing from hazardous waste hauler, negotiate terms, sign contract									
Arrangements for witnessed destruction of controlled substances									
Permission from State DPH and Board of Pharmacy									
Develop marketing plan									
Implement marketing plan									
Collection event									

**Site Visits, Date Selection, & Agreement of Law Enforcement to Participate**

Eaton had originally intended to hold the collection event in its Newton store. The head pharmacist from that store had been the catalyst for Eaton's interest in such an event, and she was very committed to the opportunity. A site visit was held at that store, which was attended by NERC, the Newton head pharmacist, and Eaton's Director of Clinical Services. A plan for how the collection would take place, including traffic flow and signage, was agreed to and tentative dates selected.

NERC then contacted the Newton Police Department (Department) to secure its willingness to participate in the event. A memo (Appendix A) detailing what was being asked of them was written and emailed to them following the initial phone contact. In

brief, the role of law enforcement is to provide security during the event, take possession and responsibility for controlled substances received, and ensure witnessed incineration of the controlled substances.

Although the Department expressed support for the event and a general willingness to participate, it ultimately was not able to provide the necessary support. Internal Department reporting requirements would have required that the controlled substance inventory be repeated in-house by police department staff, and then logged into its database. Due to budget and staffing constraints, the Department did not believe it had the capacity to provide this service.

Upon learning of the barrier to a collection in Newton, Eaton considered other store locations. It was determined that the Wellesley store was a suitable candidate. The Newton pharmacist conferred with Wellesley store staff and secured its agreement to host the event at that location. A site visit was held at that store with NERC staff and the Newton pharmacist. The suggestion was that the collections take place in the basement medical supplies section of the store. A back set of stairs would provide access for the hazardous waste hauler to deliver and remove containers, while the public would enter and exit through the main stairs at the front of the store. It would be necessary to clear out the basement in order to have work areas and unencumbered access for the public and hazardous waste hauler. The manager of the medical supplies department was on-hand during the site visit and she expressed hesitation about the need to relocate product and the ability to have the materials available for sale during the event. It was also unknown at the time if the hazardous waste hauler would be willing to move containers up and down stairs. Ultimately, the medical supplies manager agreed to allow the collection to take place in that area of the store as long as everything was put back in its original location and sales could continue during the event. The hazardous waste hauler, after being emailed a photo of the stairs in question, also agreed to the downstairs location.



NERC then contacted the Wellesley Police Department and provided it with a document modeled on the one provided to the Newton police. After deliberation, the Wellesley Police Department agreed to participate in the event. Its primary concern was the several week period during which it would be responsible for the secure storage of the controlled substances while the waste-

to-energy facility determined if the materials were acceptable. See discussion below

about Witnessed Destruction. There was also concern that perhaps the incinerator would not approve all of the materials. NERC assured them that there would be no problem in this regard since none of the materials could be considered hazardous waste under Massachusetts law.

Eaton's responsibilities would include paying the Police Department for an officer to be on site during the collection<sup>2</sup>, as well as for the cost of destruction and the two police officers' time to transport and witness the destruction. A verbal agreement to this effect was negotiated by NERC with Eaton's approval.



One week before the collection, NERC confirmed with the Wellesley Police Department that a police officer would be on site. On the day of the event, the officer was not from the Wellesley Police Department but rather the Norfolk Sheriff's Department. At the last minute, Wellesley could not provide overtime staffing and arranged for the Norfolk Sheriff's Department to provide the staffing. The financial arrangements remained with the Wellesley Police Department. The Sheriff, at the end of the collection event, took the controlled substances to the Wellesley Police Department for storage pending the witnessed destruction.

### **Arrangements for Witnessed Destruction**

In Massachusetts controlled substances that come into the custody of law enforcement due to criminal investigations are destroyed under the supervision (and budget) of the State Department of Public Health (DPH). The Board of Pharmacy is also within the DPH. Discussions several years ago with the DPH and Board of Pharmacy about how to hold unwanted medication collection events made explicit that controlled substances received must be kept separate from criminal evidence materials and destroyed outside the criminal evidence system. The practical result is that controlled substances received at an unwanted medication collection event would have to be destroyed through arrangements made specifically for this purpose; and not under the authority or budget of the DPH. Witnessed incineration by law enforcement is the method of required destruction.

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<sup>2</sup> The hourly rate was \$48.13/hour, billed in 4-hour blocks.

Several waste-to-energy facilities (WTE) in Massachusetts are licensed to incinerate controlled substances. The nearest such facility to Wellesley is owned and operated by Covanta Energy in Haverhill, MA. Covanta was contacted to learn of the steps and costs involved in arranging for a witnessed incineration of controlled substances. A simplified overview of the steps is as follows:

1. Waste Disposal Agreement provided by Covanta submitted by Eaton in advance of the collection event.
2. Credit application provided by Covanta submitted by Eaton at least two weeks in advance of the collection event.
3. Material Characterization Form completed by NERC and submitted along with detailed inventory of controlled substances immediately following collection event to Covanta. This documentation is used by Covanta to determine if the materials are acceptable for destruction. This determination could take up to three weeks. During this time, the Wellesley Police Department is responsible for secured custody of the materials. Once the approval was received, scheduling of the witnessed incineration could take place within 24 hours. NERC would coordinate with the Wellesley Police Department to make these arrangements.

Eaton would be responsible for the cost of the witnessed destruction (minimum charge of \$500 for up to one ton of material), as well as the associated police time. Per Massachusetts requirements, two law enforcement officers must transport at and witness the destruction.

### **Permission for the Department of Public Health & Board of Pharmacy**

In Massachusetts, obtaining the permission from the Department of Public Health (DPH) and Board of Pharmacy is essential in advance of holding a collection event. A written description of how the event will proceed is required and these entities may require modifications to that plan. Permission from both entities can be sought from the same individual as he serves as the key staff person to both relevant entities.

Appendix B presents the written request made of the DPH. Permission to proceed was received via a phone conversation with NERC. In addition, the week before the event, the Eaton Director of Clinical Services emailed the director of the Board of Pharmacy to remind him of the upcoming event. She received an enthusiastic response to this contact.

### **Hazardous Waste Hauler**

Due to NERC's previous experience with Clean Harbors Environmental as the hazardous waste hauler providing services to unwanted medication collections in New England, Eaton determined to hire this company. NERC requested pricing on behalf of Eaton, negotiated the terms of the contract, and facilitated the signing of a contract between Eaton and Clean Harbors.

The pricing agreement was as follows:



Wellesley, MA

Medicine Collection Quote

5/31/08 – 6/7/08

2008 SERVICE AND TREATMENT COSTS:

- ◆ SET-UP FEE: \$0.00
- ◆ CREW SIZE: 1 DRIVER
- ◆ COST PER DRUM OF PRESCRIPTION MEDS (D92K): \$365.00/55DM  
\$325.00/30DM  
\$225.00/15DM  
\$115.00/05DM

NOTES:

- ◆ There will be a \$250 Transportation fee per pickup.
- ◆ A variable energy and security fee currently at 13.0% will be applied to the total of the invoice.
- ◆ Per pound surcharge will apply to this waste Classification Codes as follows:  
D92K – Base price up to 500 lbs., \$1.68/lb. thereafter

Eaton Apothecary signed the contract with Clean Harbors with a price cap of \$3,000 unless authorization received to exceed that amount. It was agreed that should the public response to the collection warrant exceeding that limit that on the day of the event Eaton would authorize such a cost overrun.

It was also agreed that Clean Harbors would deliver empty containers to the store the day before the event, and remove any unused containers after the event. No charges were incurred for the containers themselves. NERC contacted Clean Harbors approximately two weeks before the event to indicate how many containers, and of what size, should be delivered. They were:

- 8 – 55 gallon (fiberboard)
- 6 – 30 gallon (fiberboard)
- 5 – 16 gallon (fiberboard)
- 5 – 5 gallon (plastic)

The hazardous waste company was scheduled to come to pick-up the medications at 3 p.m. (one hour after the close of the event). Because of the size of the truck (an 18-wheeler), they were not able to use the back entrance as had been planned. Instead,

they carried the containers, by hand<sup>3</sup>, up the front stairs and out to the truck waiting on the street. The Sheriff assisted with traffic control while the truck turned around on the relatively narrow street. Thus, once the hazardous waste hauler had removed the container with the unwanted medication and placed it in their truck (escorted by the police officer), there was no need for additional staff time or supervision.

The turnout for the event was slightly above the average for retail pharmacy collection events to date; 41 individuals. The total amount shipped as hazardous waste (non-controlled substances) was 31.5 gallons. Thus, the actual cost for the hazardous waste hauler was \$909.65. This averages to approximately \$62.55 per participant, which is much higher than the average; which are \$27 per participant. The above average costs can be attributed to a few factors:

- Fuel surcharge cost of 13%
- Receipt of medications in syringes (Lovenex) requiring separate packing (\$115 additional cost)
- The cost of the 30-gallon container as full. The cost of a 55-gallon container is nominally more (\$40), and so the per gallon cost is higher for a 30-gallon container is \$5/gallon higher than for a 55-gallon container.

## **Marketing**

NERC prepared several marketing pieces for Eaton. The marketing pieces that were prepared by NERC in draft were:

- Press release
- Display advertisement (paid newspaper advertisement)
- Sign for store
- Counter-top sign
- Flier/bag stuffer
- Question and answers fact sheet

The question and answers fact sheet was for use by pharmacy staff in responding to questions about the upcoming event.

Based on previous experience, NERC proposed the following marketing strategy:

- 1) A press release distributed to media outlets at least two weeks before the event.
- 2) Place a newspaper advertisement in local papers, at least three times in the week preceding the event (Sunday, Wednesday, and Saturday – the day of the event).
- 3) Post a large color sign made at the entrance to the store for two weeks in advance of the collection.
- 4) Distribute bag stuffers for all purchases, including the pharmacy, in the Wellesley store as well as other Eaton stores in the area, for at least one week before the event.
- 5) Post an 8.5 x 11 black and white desktop sign at the pharmacy counter publicizing the event.

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<sup>3</sup> Clean Harbors estimated that the 30-gallon container weighed in excess of 100 pounds. It was very tightly packed and full.

Eaton did a very thorough job of promoting the event. Their marketing plan, as implemented follows.

## **Promotion of June 7, 2008 Medication Collection Wellesley**

### Signs:

- ❖ Preliminary signs and fliers at store by 5/5/08
- ❖ Preliminary signs and fliers at senior center by 5/5/08
- ❖ New, bigger signs and bag stuffers delivered to Wellesley, Newton, Weston, and Waltham locations 1 week prior to event
- ❖ Other locations include Whole Foods Newton, Trader Joes Newton & Needham, Wellesley Dump, & library 7-10 days prior to event
- ❖ All Eaton locations notified of event 5/8/08 and reminded on 6/6/08 in weekly newsletter/ updates

### Press Release<sup>4</sup>, dates of issue:

- ❖ Wellesley Townsman: May 7 & May 22 (for June 5)
- ❖ Newton Tab: May 28
- ❖ Weston Paper: May 28
- ❖ Metrowest Daily News: May 28

### Paid Ads:

- ❖ Metrowest Daily News: June 6

### On air promotion:

- ❖ Wellesley Community Access Channel community newscast 6/5/08

### Media Outreach: (to cover event)

- ❖ Channel 5 WCVB
- ❖ Channel 7 WHDH
- ❖ Boston Globe
- ❖ Wellesley Community Access Channel

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<sup>4</sup> A sample press release is in Appendix C.



**Let us help you clean out your medicine cabinet the safe way!**

We are proud to be hosting a free unwanted medication collection allowing you to dispose expired, unwanted, or unneeded medications without harming the environment, pets, or people!

When: Saturday June 7, 2008, 10AM – 2PM

Where: Eaton Apothecary, 266 Washington Street, Wellesley

Please note: This is the ONLY date and location

What to bring:



- Prescription medications
- Over-the-counter medications
- Vitamins
- Veterinary medications
- Mercury thermometers
- Sharps will not be collected

Medications from any pharmacy will be accepted.

Please bring the medications in their original containers with the name of the medicine visible, and cross out any personal information.

**THERE WILL BE ABSOLUTELY NO REFUNDS OR EXCHANGES**

Medications will *not* be reused or resold.

Medications will be accepted only from the public – no businesses or doctor's offices please.

For more information, please call 781-235-1464

**Sample Flier**

**Eaton**

**Apothecary**

## **Unwanted Medication Collection**

Saturday June 7, 2008 10AM-2PM

266 Washington St, Wellesley

781-235-1464



**Let us help you clean out your medicine cabinet the safe way!**

We are proud to be hosting a free unwanted medication collection allowing you to dispose expired, unwanted, or unneeded medications without harming the environment, pets, or people!

Sample Poster

### Site Set-up

Eaton staff cleared out the basement space several days in advance of the event, including bringing in the folding tables and chairs that would be necessary for the event. On the day of the event, NERC staff arrived by 8:30 to set up tables and arrange equipment and supplies. The Eaton store manager assisted with ensuring that necessary equipment and supplies were in place in a timely fashion. At the end of the event, Eaton collection event staff ensured that the area was clean and back in order.



### Staffing

There were two primary staffing components:

- NERC staff time in organizing and holding the event, and
- Eaton staff in organizing, implementing, and promoting the event.



Eaton staff included:

- Director of Clinical Services
- Newton Head Pharmacist
- Pharmacy Technicians (3)
- Pharmacist (served as Greeter, directing people downstairs to the collection, answering questions).

In addition to providing its own staff on the day of the event, Eaton arranged for two pharmacy students to assist.

NERC staff provided site supervision and data collection on the day of the event,

and also served as a greeter/survey taker.

<b>Staff</b>	<b>On-Site Responsibilities</b>	<b>Time On-Site</b>
Pharmacists - 2	Identifying controlled substances, counting medications, site set-up	8:30 – 3
Sheriff	Took possession of controlled substance, security	9:30 – 3:30
Pharmacy students (2)	Identifying unknown medications, assisting with inventory of non-controlled substances	9 – 2
Pharmacy technicians (3)	Identifying unknown medications, assisting with inventory of non-controlled substances	9 – 2
Data entry/site supervisor	Ensure legal and safety protocols practiced, answered questions/problem-solving, entering medication inventory into spreadsheet	8:30 – 3
Greeters/survey takers (2)	Welcome, answer questions, conduct survey, take medications and deliver to processing tables, site set-up	8:30 – 3

### **Personal Information/Prescription Labels**

In planning for the event, Eaton determined that personal information on the unwanted medication containers would be crossed out. The pharmacist or student/tech processing the medication used an indelible marker to cross the information out. Any empty containers with prescription labels or cardboard that was removed from a medication that had a prescription label on it would be put in a separate container for secured destruction. Approximately 4 gallons of this material was collected.



### **Sharps & Thermometers**

Sharps are often an issue at collection events. While certain medications brought for destruction will include sharps – such as Epi-Pens – the majority of sharps the public wants to get rid of are used. Eaton advertising stated that sharps would not be accepted, yet preparations were necessary because there is always the chance that some would “sneak in.” Eaton was equipped with sharps collection containers but no sharps were received.

The public was invited to bring mercury thermometers to the event and non-mercury thermometers were being distributed. As a cost savings measure, arrangements were made with the Wellesley municipal recycling program for Eaton to bring thermometers to them for recycling. There would be a minimum charge of \$30. The hazardous waste hauler had originally quoted a minimum price of \$160. Five mercury thermometers were collected and taken to the municipal recycling center by Eaton staff on the Monday following the event.

## Supplies

The following supplies were used during the event:

- Counting tools – Electronic counters (2) and manual counting trays (5)
- Reference materials for researching unknown tablets.
- Tables – 8 6' folding tables - 1 table for every two staff, additional for displays and “in take”
- Chairs – enough for each staff person, including greeters and law enforcement
- Hazardous waste containers
- Container for controlled substances – 5- gallon pail provided by hazardous waste hauler
- Containers for trash and recycling –
  - 1 30-gallon pail with plastic liner for trash
  - Cardboard boxes for recycling thin cardboard (30 gallons recycled)
  - Cardboard box or bag for secure disposal of thin cardboard with prescription labels and empty prescription containers (4 gallons recycled)
  - Empty plastic bag stuffed with other plastic bags for recycling (3 stuffed grocery bags recycled)
- Gloves - non-latex disposable (medium and large)
- Ziploc® bags - lunch bag sized with external slides.
- Laptops (2) - with power and extension cords
- Back-up memory - flash card
- Printer (with paper and ink)
- Pens (for surveys)
- Indelible markers (marking plastic bags of unknowns, available for crossing out personal information)
- Surveys
- Clipboards for surveys
- Drinking water
- Toilet and sink
- Instant hand cleaner/sanitizer
- Phone
- Sharps containers (small and large)

**Survey:** A draft survey was developed for Eaton by NERC, and then finalized by Eaton to address its specific needs. A greeter asked each participant the following questions and completed the survey for them.



**Unwanted Medications Collection – Wellesley, MA  
June 7, 2008**

City or Town you live in: \_\_\_\_\_

Have you been to an Eaton Apothecary before? Yes \_\_\_\_\_ No \_\_\_\_\_

What pharmacy do you usually use to fill your prescriptions?

How did you find out about this event? (Check all that apply)

\_\_\_\_\_ Store signs: Which store? \_\_\_\_\_

\_\_\_\_\_ Advertisement: Which paper? \_\_\_\_\_

\_\_\_\_\_ Press release: Which paper? \_\_\_\_\_

\_\_\_\_\_ Friend

\_\_\_\_\_ Other (please specify) \_\_\_\_\_

Whose medication was this?

Mine \_\_\_\_\_

Household member \_\_\_\_\_

Friend \_\_\_\_\_

Pet \_\_\_\_\_

Do you have any comments? \_\_\_\_\_

**Thank You!**

The survey responses were as follows:

**City or Town you live in**

Wellesley	70%
Weston	8%
Newton	8%
Natick	5%
Needham	3%
Dedham	3%

**Have you been to an Eaton Apothecary before?**

Yes	87%
No	13%

**What pharmacy do you usually use to fill your prescriptions?**

Eaton	51%
CVS	21%
Professional pharmacy	8%
Newton-Wellesley Hospital	8%
Rite Aid	5%
Harvard Pilgrim	3%
Online	3%
Variety	3%

**How did you find out about this event?**

Store signs	32%
Advertisement	20%
Stuffer	18%
Press release	14%
Other	11%
Friend	5%

**Whose medication was this?**

Household member	50%
Mine	37%
Friend	9%
Pet	4%

**Conclusion**

This was a very successful event. Eaton did an outstanding job of publicizing the event, and secured excellent media coverage as a result. This was the first unwanted medication collection held anywhere in the Boston metropolitan area, and as a “first” had the burden of both promoting the specific event and providing public awareness of the issue and the opportunity.

This event enjoyed the participation of a higher than average number of individuals, and also a higher than average percentage of controlled substances. In general, collections receive an average of 8% controlled substances. In this case, it was 15%; demonstrating the great public health and safety impact of this single event.

Appendix A  
**NERC**

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***Northeast Recycling Council, Inc.***

139 Main Street, Suite 401 • Brattleboro, Vermont 05301-2800  
802.254.3636 • 802.254.5870 fax • [www.nerc.org](http://www.nerc.org) • [info@nerc.org](mailto:info@nerc.org)

December 13, 2007

Captain Mintz  
Community Resources Unit  
Newton Police Department

**RE: Request for participation of Newton Police Department in unwanted medication collection to take place at the Eaton Apothecary, April 12, 2008**

Dear Captain Mintz,

Lieutenant Dangelo requested that I write to you and explain the request being made of the Newton Police Department relative to participating in an unwanted medication collection that Eaton Apothecary would like to hold on April 12, 2008.

First, some background: the Northeast Recycling Council, Inc. (NERC) has a grant from the Community Pharmacy Foundation to work with retail pharmacies to organize and hold unwanted medication collections. Such events are opportunities for the public (not businesses, doctors offices, or nursing homes, for example) to get rid of unwanted medications from their homes. All medications received are incinerated – the non-controlled as hazardous waste, the controlled substances per U.S. DEA and Massachusetts Department of Public Health required witnessed burning.

Attached is an overview of the role of law enforcement at an unwanted medication collection event. NERC has organized and participated in eleven unwanted medication collection events, several of which have been in pharmacies. The collection event at Eaton Apothecary will last for four hours (10 – 2).

Eaton Apothecary will be responsible for compensating the Newton Police Department for duty time for its participation in the event, as well as for the cost of destroying all controlled substances.

**So, what are we asking of the Department?**

1. A commitment that a Newton Police Officer will participate in the event; providing security and taking possession of controlled substances.
2. That the Newton Police Department will take permanent physical possession and

custody of any controlled substances.

3. That the Newton Police Department will transport the controlled substances for witnessed incineration and provide documentation to Eaton Apothecary that such witnessed destruction took place. This must be *apart* from the evidence destruction system implemented by the Massachusetts Department of Health.

We will be happy to assist in making the arrangements for the witnessed destruction, including with scheduling.

4. Specific instructions from the Police Department about how it wants to manage the controlled substances. For example, the Police Officer will take the controlled substances back to the station on April 12 and then would like to have the witnessed destruction take place that week. Or, that arrangements must be made for the immediate transport of the medications to the witnessed destruction. I would be happy to discuss the particulars and your requirements in this regard.

If you have any questions, please do not hesitate to contact me. Thank you.

Case studies about two recent unwanted medication collections held in pharmacies are available on the NERC Web site at [http://www.nerc.org/documents/case\\_study\\_big\\_y.pdf](http://www.nerc.org/documents/case_study_big_y.pdf) for a recent collection in Connecticut, and [http://www.nerc.org/documents/case\\_study\\_ukrop.pdf](http://www.nerc.org/documents/case_study_ukrop.pdf) for an event in Virginia.

Sincerely,



Lynn Rubinstein  
Executive Director

Cc: Sophie McIntyre, Director of Clinical Services, Eaton Apothecary  
Lieutenant Dangelo, Newton Police Department

Attachments

Appendix B  
**NERC**

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***Northeast Recycling Council, Inc.***

139 Main Street, Suite 401 • Brattleboro, Vermont 05301-2800  
802.254.3636 • 802.254.5870 fax • [www.nerc.org](http://www.nerc.org) • info@nerc.org

March 21, 2008

Grant M. Carrow, Ph.D., Deputy Director  
Bureau of Quality Assurance and Control  
Department of Public Health  
99 Chauncy Street  
Boston, MA 02111

**RE: Proposal by Eaton Apothecary to conduct an unwanted medication collection, June 7, 2008 - Wellesley**

Hello Grant. I hope that you are well. I continue to work with entities interested in holding unwanted medication collections, but have not done so in Massachusetts since you and I were last in touch in 2006. The proposed event will follow the protocol that was agreed to during our meeting in the fall of 2005.

NERC currently has a grant from the Community Pharmacy Foundation to work with community pharmacies to set up and hold unwanted medication collections. Through that effort, I was approached by Eaton Apothecary and they have decided that they would like to hold an event at their store in Wellesley on June 7, 2008. The Wellesley Police Department has agreed to participate per the terms and conditions that you require. I am doing the organizing on their behalf and will be on-site supervising and coordinating activities.

I would like to outline for you the details of how the event will operate and to seek your express approval of the process (or to learn of desired changes). As you can imagine, Eaton Apothecary wants to be sure that they will be in full compliance with all Massachusetts legal and licensing requirements.

1. It will take place inside the Eaton Apothecary retail establishment located at 266 Washington St., Wellesley, Massachusetts.
  - a. The event will take place in the basement retail space of the store. The pharmacy is located on the street level.
  - b. The event will be open to the public from 10 – 2.
2. Materials will be accepted only from the public – no businesses, nursing homes, or other institutions.
3. The collection will be staffed by at least the following individuals:

- a. Maria Cognilia, RPh, Eaton Apothecary Pharmacist
- b. Sophie McIntyre, Pharm.D., Eaton Apothecary
- c. Myself
- d. Another member of the NERC staff who has participated in a number of collection events.
- e. A Wellesley Police Officer, in uniform
- f. A “greeter”

There is the intention of securing the assistance of two or more pharmacy students or interns to assist with identifying any unlabeled or unknown medications that come in.

4. The Wellesley Police Department will take possession and custody of all federally controlled substances (Schedule 2 - 5) and any medications that are not identified. They will be provided with a printed and signed copy of the inventory of controlled substances. They have agreed to ensure witnessed destruction of the controlled substances and *not* to use the evidence destruction system for this. Two Wellesley officers will transport the controlled substances to a Waste-to-Energy facility that is permitted to destroy pharmaceuticals, and will watch the destruction. They will provide documentation to Eaton Apothecary of the witnessed destruction. Eaton Apothecary will be responsible for the associated costs.
5. The non-federally controlled substances will be incinerated as hazardous waste. Clean Harbors Environmental will be the hazardous waste company. It will pick-up and remove these materials at the end of the event, so there will be no on-site storage of any medications collected.
6. The pharmacy will not be the holder or generator of the inventory of medications. The Northeast Recycling Council, Inc. will assume this responsibility.
7. The medications collected or received will in no way become part of the inventory of materials of the pharmacy for the purposes of accountability.

Sincerely,



Lynn Rubinstein  
Executive Director

Attachment – copy of this document (Appendix A)

## Appendix C

### **PRESS RELEASE**

For immediate release

CONTACT: Sophie McIntyre

Date: May 7, 2008

Eaton Apothecary

(508) 429-8506 ext 13

### **DON'T FLUSH THAT LEFTOVER MEDICINE!**

## **Eaton Apothecary to hold Free Collection and Safe Disposal of Unwanted Medication**

**Saturday June 7, 10 a.m. to 2 p.m.**

**Eaton Apothecary**

**266 Washington Street**

**Wellesley, MA**

### **BACKGROUND:**

Everyday, unwanted or expired medicine is disposed of via indoor drains—down the sink or in the toilet. Antibiotics, antidepressants, and hormone medications are now found in waterways nationwide because they slip through septic systems and sewage plants untreated. Trace amounts of pharmaceuticals have also been identified in some drinking water supplies. Although using the toilet or sink prevents someone from accidentally taking the medications, disposing of them in this way causes water pollution and has adverse effects on aquatic species, including fish. There may be human effects because the release of antibiotics in the environment fosters the spread of antibiotic resistance among microbes.

Eaton Apothecary has partnered with the Northeast Recycling Council to hold Massachusetts' first-ever unwanted medication collection in a pharmacy. Northeast Recycling Council has held similar events in neighboring states, collecting and safely incinerating hundreds of gallons of unwanted and expired medicine that may otherwise have ended up contaminating our waters.

## **COLLECTION:**

The Unwanted Medication Collection will be held on Saturday, June 7, from 10 a.m. until 2 p.m. at Eaton Apothecary, 266 Washington Street, Wellesley MA. Items that will be collected are:

- **Expired or unwanted prescription medicine**
- **Over the counter medicines**
- **Vitamins and nutritional supplements**
- **Veterinary Medications**

Medications must be in their original containers. To prepare for the collection, participants should cross out the patient's name on prescription drug labels, but leave the name of the medication visible. This event is open to the public, regardless of where the medications were purchased. However, medications cannot be accepted from businesses such as nursing homes and doctor's offices. In addition, sharps will not be accepted. The Wellesley Police Department will supervise the collection. All medicine will be sent to a waste facility for secure incineration. No medicine will be re-sold or re-used.

Outdated and unused medications pose a danger in the home, and when improperly discarded, contaminate our environment with a dangerous blend of chemicals. This is an opportunity for Massachusetts residents to clean out their medicine cabinets and bring all unwanted medications to the collection for proper disposal, and in so doing safeguard the home, and preserve our environment for future generations.

Eaton Apothecary organizes this event in conjunction with the Northeast Recycling Council, with support from the Community Pharmacy Foundation, the Department of Public Health, and the Wellesley Police Department.

For more information please contact Eaton Apothecary at 266 Washington Street, Wellesley MA, (781) 235-1464.

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