RECOMMENDATION:
Medications Should Stay in their Original Containers for Disposal

Primarily due to the wasted space that medication containers take-up in disposal drums, the question has arisen "why not dump the medications out and dispose of the containers separately?" The Advisory Committee for this project has concluded that the medications should stay in their original containers for disposal. There are many reasons for this decision, but they include:

1. If there is a loose bunch of unlabeled pills in a container and they are diverted or someone chooses to help themselves, you have no idea what they are and no way to treat a potential poisoning. Some folks are stupid enough to scoop up a bunch and try to sell them on the street. It is not good medication management policy under any circumstances.

2. Encouraging consumers to combine them at home and then bring them in is even more fraught with risk. You only need one case of accidental poisoning to give the program a black eye.

3. Some states, like Maine, regulate household generated waste as hazardous (if it meets RCRA criteria) if returned to a facility. The drum would need to be manifested with waste codes, such as P, U, and D. If the medications were co-mingled it would be very hard to verify that if the barrel is inspected at the incinerator which could cause the load to be rejected.

4. Some medications are hazardous waste and even those that aren't can have hazardous properties. Handling of loose pills, especially broken pills, present a risk to individuals handling them. In addition, the dust and fumes that can be released through the "dropping" of loose pills into a container may present additional worker exposure concerns.
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5. Anytime you remove drugs from the identifying labels there are worker exposure and public safety risks. Part of the decision whether to consolidate the medications should be a risk benefit analysis of what are the inherent risks with a bucket full of unmarked drugs vs. the cost savings of co-mingling the materials.