

PROPER DISPOSAL OF CONTROLLED SUBSTANCES FOR YALE UNIVERSITY CLINICAL SITES

Controlled substances must be disposed of in a manner that complies with state and federal law. This document provides guidance on the steps for proper disposal of controlled substances at Yale University clinical sites.

Option 1: Reverse Distributor

1. Reverse distributors are companies that receive pharmaceuticals for the purpose of returning unwanted, unusable, or expired pharmaceuticals to the manufacturer. Reverse distribution is well-established and regulated by the DEA and CT Drug Control Division. If you need assistance in finding a DEA-registered reverse distributor, contact your [Local Diversion Field Office](#) for a current list.
2. Ensure that your inventory records reflect the new quantity of drugs on hand.

Option 2: Joint Disposal

1. Alternatively, at outpatient surgical facilities, **two or more of the following individuals may jointly dispose of controlled substances without the presence of an agent: an administrator, a clinical director or chief of staff, or a nursing supervisor.**
2. Contact your [EHS safety advisor](#) prior to the disposal of any [controlled substances](#). Your safety advisor will provide you with a label and quart-sized container(s) containing absorbent material for the disposal.
3. Complete the record log of surrender or disposal.
4. Controlled substance stocks may then be carefully emptied into the quart-sized container.
5. Complete the label and add to the container. Add lid, seal tightly, and place in soiled utility room.
6. Ensure that your inventory records reflect the new quantity of drugs on hand.

Option 3: Disposal with CT Drug Control Agent

1. Contact the [CT Drug Control Division](#) to schedule a disposal with an agent. The agent acts as a witness for the drug disposal.
2. Contact your [EHS safety advisor](#) prior to the disposal of any [controlled substances](#). Your safety advisor will provide you with a label and quart-sized container(s) containing absorbent material for the disposal.
3. Complete the record log of surrender or disposal.
4. With the agent present, carefully empty controlled substance stocks into the quart-sized container.
5. Complete the label and add to the container. Add lid, seal tightly, and place in soiled utility room.
6. Ensure that your inventory records reflect the new quantity of drugs on hand.

Controlled Substance Pickup and Record-Keeping for Investigational Studies Only (for Options 2 and 3)

1. Email [RCRA Compliance Officer and Environmental Operations Manager](#) with an inventory of the drugs disposed.
2. An EAS technician will go to the clinic, package the container for disposal, and arrange its removal. The drugs shall be shipped to a chemical waste incinerator on their own manifest. After the waste is received and burned, a signed copy of the manifest and the associated certificate of disposal will be provided to the clinic for their records* and to provide to study sponsors, as necessary.



Yale University EXAMPLE ONLY
Non-Hazardous Waste

Principal Investigator: Dr. John Smith

Department: Yale Environmental Health and Safety

Building/Room #: 135 College Street, LL15

Telephone #: 203-785-3550

This waste contains Clay Absorbent, Bleach and one or more of the following:
(Circle all applicable and write in others)

Ketamine Buprenorphine Diazepam Euthasol
Midazolam Pentobarbital

Other: Fentanyl

Date of Destruction: 07/01/2023

Controlled Substance Pickup and Record-Keeping for All Others (for Options 2 and 3)

1. Submit an online [Chemical Waste Pickup Request](#) in EHS Integrator for “Denatured Controlled Substances.”
2. An EAS technician will go to the clinic, package the container for disposal, and arrange its removal.
3. Contact your safety advisor for waste pickup documentation to keep with your records.

**Records include registrations, inventory, invoices, inspection reports, and protocols. For questions or assistance with maintaining these records, please contact controlledsubstances@yale.edu or 203-737-2120. If you have any additional questions, please contact your [EHS safety advisor](#).*