



Environmental Health and Safety

TITLE:

Disposal of Controlled Substances

Effective Date:

04/26/2018

Instruction Number:

EHS_SOP350_INST003

Revision:

0

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Approved by

Date:

1. APPLICABILITY

Access to controlled substances (CS) must be kept to an absolute minimum number of specifically authorized users who are under the supervision of the registrant. CS must have at minimum two levels of security.

2. PROCEDURE STATEMENT

The Drug Enforcement Agency (DEA) Office of Diversion Control regulates the disposal of DEA controlled substances. The following information provides an overview of the requirements for DEA controlled substances disposal from a research laboratory or animal care facility at UCF.

3. DEFINITIONS

CS: Controlled Substances.

4. RESPONSIBILITY

Principal Investigators (PI) are required to dispose of their own controlled substances. The following document provides information on updated procedures.

5. ASSOCIATED DOCUMENTS

DEA Registered Reverse Distributors List

6. INSTRUCTION

General Requirements:

- Proper use and disposal of DEA controlled substances is the responsibility of the individual holding the DEA registration used to obtain them.

- When the registrant no longer needs prescription drugs or controlled substances due to change in protocol or expired and otherwise unwanted materials, he or she must dispose the materials.
- Disposal must be completed prior to the expiration of the DEA registration and Florida Exemption Letter.
 - The registrant is responsible for a timely renewal of both DEA registration and Florida exemption letter for research use of pharmaceuticals.
- Disposal methods must ensure complete destruction of the controlled substances. Absorbing controlled substances on loose sorbents or pads is no longer an approved method of destruction. Instead, controlled substances must be disposed through an authorized Reverse Distributor for destruction.
 - Reverse distributors are companies licensed and permitted to recycle and/or destroy controlled substances.
- Environmental Health and Safety (EHS) is NOT registered with the DEA and therefore cannot collect, hold, or dispose of controlled substances.
- PIs who “orphan” controlled substances by abandoning or losing control of them are in violation of federal law.
 - In the case of a lab shutdown, the PI is responsible for disposal of controlled substances, along with the close-out of the laboratories that will be vacated, prior leaving the institution.
- Do not create orphan drugs. If drugs are found, or if you have questions about disposal methods, contact EHS for assistance at (407) 823-6300.

Reverse Distribution Process

All reverse distributors have their own methods and requirements. The process typically involves most, if not all, of the following:

- Contacting a Reverse Distribution Vendor to register*.
- Completing the vendor's requirements for approval to ship material – either in paper form and sent by mail / fax or in electronic form.
 - Note: you will need to provide a current DEA registration and State of Florida Exemption number.
- After receiving shipping materials (if provided), forms, and labels from the Reverse Distributor, follow all directions for packaging and shipping.
- Additional Forms may be needed – Complete DEA Form 222 if necessary (for Schedule I & II controlled substances).
- Payment – payment or payment information is required with application.

- Shipping – once authorized, items are packaged and shipped by you via an approved shipper (Fed-Ex or UPS).
- Always request documentation of return/disposal/destruction and keep on file for two years. The Reverse Distributor will send a completed DEA 41 Form (for controlled substances only) to you after destruction is complete.

DEA Forms and Contacts

- DEA Website: [DEA Office of Diversion Control](#)
- Information on Identifying Your Material: [DEA Briefs & Background, Drug Policy, Drug Scheduling](#)
- Definition of reverse distribution: [Reverse Distribution](#)
- DEA Forms: [DEA Applications and Tools](#)
- Local DEA Contact:

ORLANDO DISTRICT OFFICE

DIVISION: MIAMI

Heathrow Business Center
300 International Parkway, Suite #424
Heathrow, FL 32746
Diversion Number: (407) 333-7046
Diversion Fax: (407) 333-7056
GS Linda A. Stocum, (407) 333-7006

** The DEA provides a list of approved vendors. EHS does not endorse any reverse distribution vendor. Contact EHS for assistance with general questions.*

7. RECORD KEEPING

All destruction related paperwork return to the registrant must be kept in the CS manual for a minimum of two years.

8. DISTRIBUTION

This document is shared through:

<input type="checkbox"/> EH&S only	<input type="checkbox"/> Facility and Safety	<input checked="" type="checkbox"/> UCF community
<input type="checkbox"/> Secured Document	<input type="checkbox"/> Contractor	<input checked="" type="checkbox"/> EH&S Web site
<input type="checkbox"/> Other: _____		

9. REVIEW

	Name	Signature	Date
Coordinator			

10. DOCUMENT HISTORY

Date	Revision number	Author	Modifications
04/26/2018	0	Casey Brock	Format based on EHS_SOP001